

From: Planning and Sustainability Commission
Sent: Wednesday, November 12, 2014 11:59 AM
To: Kovacs, Madeline
Subject: FW: PSC Comprehensive Plan Testimony

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

From: PDX Comp Plan
Sent: Wednesday, November 12, 2014 10:03 AM
To: Planning and Sustainability Commission
Subject: FW: PSC Comprehensive Plan Testimony

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

From: David Bernard [mailto:elemonators@me.com]
Sent: Tuesday, November 11, 2014 3:05 PM
To: PDX Comp Plan
Subject: PSC Comprehensive Plan Testimony

RE: Re-zoning residential land on the Linnton Hillside.
November 11th, 2014

David Bernard
Linnton resident
8420 NW Whitney St.
Portland Or. 97231
503-788-6310

Purpose:

To convey alternative solutions to counterintuitive rezoning for those interested in preventing problems that can arise and or currently exist on a limited infrastructure within residential areas on the Linnton Hillside.

I have a concern about rezoning on the Linnton Hillside. Rezoning R7 lots to R20 is not at all an answer to improving or limiting overuse on the hillside. In fact, it could make things more unmanageable. The

Linnton Neighborhood Association (LNA) is concerned about the limited road and sewage infrastructure on the Linnton Hillside. My personal concern is exactly the same. Currently, the primary problem lies in what is happening on more than one existing R20 lot on the Linnton Hillside that has a direct negative impact on livability in the area.

According to the latest LNA newsletter, it was interpreted that changes in zoning were in response to residents concerns about hilly terrain and inadequate road and sewer infrastructure. Whitwood Court in particular, over the last several years has been impacted by over use of existing infrastructure by at least one R20 property owner. For those that are serious about curtailing negative impact on that infrastructure, it would be more beneficial to work toward finding solutions that would end the misuse of R20 lots, or up zone them so that it best suites the way in which some are currently being used.

Questions to be asked at the LNA land use meeting on Nov.12th:

- 1) What precise criteria went into the decision by LNA to advocate property rezoning on the Linnton Hillside and do any of these concerned residents live in Whitwood Court?
- 2) Was the decision to advocate zone changes for Linnton residents a collaboration within the LNA or was this a request from the City? Did anyone involved in these decisions live in Whitwood Court?
- 3) How and or why was LNA involved years ago, in having the Linnton Hillside designated as a "Forest Park exemption" from city mandated installation of city sewage and road upgrades?

I am not opposed to that decision, however general rules regarding usage of limited infrastructure should have been clearly spelled out to Hillside residents at that time to prevent the misuse of the larger R20 lots that we are now seeing.

- 4) Has anyone in Whitwood Court complained to LNA about heavy traffic and a couple of accidents on the NW Mills Street between Bridge Road and Whitney Street as a result of too much activity going on at the top of the hill?

To whom it may concern,

The Linnton Hillside which includes Whitwood Court, is one of the most unique groups of neighborhoods in Portland. This is because of its proximity to Forest Park, and the beautiful, natural surroundings facilitated by lack of infrastructure. In many ways, it is a blessing that this area was excluded from vast infrastructure improvements. For other reasons however, it would have been helpful to have a better functioning infrastructure. This very peaceful environment is a special area within city limits of Portland. This endeared environment unfortunately has been violated by some, that have little regard for how there actions affect others within close proximity to them, let alone the Linnton community as a whole.

Rezoning of any privately owned property on the Linnton Hillside is refutable and counterintuitive. This transition does not work to balance environmental impact on the Linnton Hillside. In fact, it will work directly against safety and environmental concerns because of the misuse of larger properties that are currently zoned R20. The re-zoning of R7 property to R20 on the hill will actually make matters worse.

Currently zoned R20 lots are not working in favor of the environment in whitwood court as I will make very clear in this presentation.

There are three neighbors within one block of my home that rent auxiliary housing structures. Only one of them is an approved unit. I have confirmed that one home owner directly across from my residence has no designated auxiliary housing units but can apparently rent rooms in the main home. This land owner has at one time, and or is currently renting a poorly converted garage, a basement in their home,

an extra bedroom in their home, a yurt on the property and even an old converted chicken coupe. They are on an R20 lot which also happens to be an environmental zone. Since they can only have one septic system on their R20 lot, all of these rentals use the same septic system. I know this to be a problem because I have witnessed 3 times in the last 6 months, a septic pumping truck empty their tank. I also hear a warning buzzer that frequently goes off when the there septic system is overfilled. The over use of this system can cause raw sewage to drain onto the gravel road at the bottom of their property and into my front yard during heavy rains. There is also a gray water system for the converted garage that does not work well and also leaks when it rains or is over used. Had they been allowed to build a legal auxiliary structure with its own septic system, there would not be such a problem. Sewage management in this case would be better facilitated by R7 zoning. A newer system was installed a few years ago by the owner, but it obviously can't handle the volume of people using it. These violations had been reported to the city by another concerned neighbor a few years ago, but the problem still exists.

Renters may not know what type of sewage system they are using nor are they likely understand about how a septic system works, or the outcome of its misuse. Obviously this is true about some unknowing homeowners as well. With concern about invasive species and negative environmental impact from overuse in the area, homeowners share a responsibility to protect it. Renters are often not as concerned about the environment in which they reside since their stay is generally temporary. Inhabitants in areas with limited infrastructure should understand the use of private sewage disposal systems and prevent there overuse. Education along these lines would be much more helpful than re-zoning. Keeping large group functions and summer camps out of the area would also help tremendously.

Primary violations of common sense rules with regard to limited infrastructure in Whitwood Court and near my home are many. They include past and present multiple rentals, large scale and unapproved child day care, a lack of respect for inadequate road and sewage infrastructure which include over usage by 2 week long 4H camps every summer. Functions that should be held on a large open farm or ranch, not in a city neighborhood, let alone one with limited infrastructure. These camps consist of several dozen attendees, faculty and counselors for 2 weeks on private land on the hillside. This activity greatly impacts the area by bringing heavy traffic and overuse of limited facilities to the neighborhood. The hillside can not handle this. Only after I complained about the situation, did the land owner provide one portable toilet facility for these large functions.

I was told by this same land owner that the LNA was behind her organizing the 4H events. With circumstances that exists about rezoning concerns, this seems hypocritical. Certainly a single land owner in violation of common sense rules, has no room to request changes to zoning in the area. To avoid extreme impact on our limited infrastructure and to insure the health and safety of residents, it would be helpful if the the LNA no longer condone such activity on the Linnton Hillside.

Over usage from rentals and high attendance activities on R20 lots creates negative environmental concerns far beyond that which rezoning can correct. R20 zoning of existing R7 lots could create environmental concerns much greater than if things were left as is. Rental units in general on R20 property, do not have proper avenues to take with regard to constructing adequate sanitary conditions. R7 zoned lots would not be as vulnerable to this problem because adequate additional systems could be built.

Rezoning in Whitwood Court is not the answer. Any re-zoning would need to include statutes preventing rentals of any auxiliary structure within the boundaries of any individually owned R20 property. It should also limit use of properties for large functions that crate environmental issues as well as congestion on underdeveloped, single lane, switchback laden roads.

I personally am the only one that maintains the gravel road in front of my home. I also am the one homeowner that causes the least amount of impact on the condition of that road. This maintenance needs to be done annually because of runoff that is not properly diverted coming off of the hill across the street from my residence. I have offered to help this neighbor correct the situation without luck.

Properly constructed septic systems on R20 or R7 property have little or no environmental impact unless they too fall victim to improper or over usage. I plan to be more active with the LNA so that problems that I am aware of can be better resolved.

Thank you for your concern,

David Bernard
8420 NW Whitney St.
Portland OR 97231

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COMPREHENSIVE PLAN TESTIMONY

Thank you for attending the Mixed Use Zones Public Workshop. The scope of the Mixed Use Zones Project is limited. Some of your comments related to these new zones may refer to underlying Comprehensive Plan policy. This sheet will be submitted as legal testimony for the Comprehensive Plan Update. Please turn this in at your table.

Name: Michael Roth

Address: 5126 NE Mistaria Dr

Legal Testimony We don't want taller buildings

We live north of Sandy Blvd - about
2 blocks on Mistaria. We have unanimous
support from neighbors on Mistaria and
on 51st Ave between Mistaria and Sandy
to limit building heights to 45' and preferably
to 38' if a concept zone is implemented. We
have a property owner who owns the Rose
City Food Court who has repeatedly broke City
law and lied about his intentions in development
of his property. He is uncooperative and not
wanted as a neighbor. Please mandating and
reduce building heights
on Sandy Blvd between
NE 47th and NE 57th



From: Planning and Sustainability Commission
Sent: Wednesday, November 12, 2014 11:54 AM
To: Kovacs, Madeline
Subject: FW: Comp Plan TSP Comment

Julie Ocken
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From: Garlynn Woodsong [mailto:garlynn@gmail.com]
Sent: Monday, November 10, 2014 9:46 PM
To: Transportation System Plan
Cc: Planning and Sustainability Commission
Subject: Comp Plan TSP Comment

To whom it may concern,

Project number 40013 is a step in the right direction, but what 82nd Avenue really needs is to be transformed from a strip into a series of centers and corridors. it's broken, both in terms of land use and transportation. To fix it, one must address both issues. Right now, it's an endless strip of nothing attractive, from the Portland Airport all the way down into Clackamas County.

In order to transform 82nd from a strip into a series of corridors and centers, it will need to see large-scale redevelopment. Where there is room, generally on the east side of the street, it should become a one-way couplet, with two through traffic lanes, one to two two parking lanes and a bicycle lane in each direction. Call it 82nd and 83rd avenues acting as a couplet. This would happen only in some places: such as from just north of Division (the split could happen at Sherman St) to just south of Foster (split/re-merge at SE Reedway Street), then again around Johnson Creek Blvd (split at SE Gray St) to south of SE Sunnyside Rd (split just south of SE Sunnybrook Blvd).

In each of these areas, the major east-west arterials would also need to split into a couplet on either side of 82nd Ave. So, Division would split into two sections at 81st Ave, then merge at 84th Ave. This would allow four individual intersections with timed signals to handle all the turn movements and throughput, rather than a single, large, dysfunctional intersection. With shorter crossing distances and slower speeds, this arrangement will be safer for all users, and yet will be able to move a higher volume of traffic. Powell, Holgate, Foster, Johnson Creek Blvd, King Rd, Monterey Ave, Sunnyside Rd, and Sunnybrook Blvd would thus all need to become couplets for

the few blocks on either side of 82nd. (For those streets outside of the current city limits... is annexation a possibility?)

For the interim areas, where the couplet does not exist, 82nd should slim down to ideally just one traffic lane and a bicycle lane in each direction, with the bicycle lane adjacent to the sidewalk and buffered from traffic by a landscaped planter strip. Driveways should be removed from 82nd between intersections completely, with auto access to businesses provided from side streets and using alleys. Left turn lanes should only occur at intersections, with either landscaping in the median between intersections, or the lanes of traffic separated by a double yellow line and the extra ROW dedicated to the pedestrian space.

For the areas within a couplet, the amount of real estate fronting an arterial would thus double in terms of linear feet of street frontage. At especially prominent intersections, the block in the middle of the two halves of each arterial could even become a public plaza, creating public space and a neighborhood center where currently only asphalt for traffic exists. The transformative potential to improve the surrounding neighborhoods cannot be overstated.

This sort of massive reconfiguration of 82nd is exactly the sort of project that redevelopment was invented to tackle. Large amounts of real estate will need to change hands and have lines re-configured to make this happen. All current property owners who wish to remain on 82nd should be entitled to a land swap (though the parcel they receive may have a reduced depth) so they can have a stake in the newly revitalized 82nd ave if they prefer to not just get cashed out. This would allow for places like the Jade District to remain and be improved, while many low-margin used car lots might instead choose to seek grayer pastures elsewhere.

This project will require bold leadership to be brought to fruition, but the benefits could be enormous. Portland has the urban design talent to pull this off. It just needs to be carefully thought out and coordinated, with comprehensive plan designations, transportation system plan projects, zoning, and property conveyances all occurring in ways that support this grand vision.

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To whom it may concern,

Project number 40102, a Candidate project currently estimated to cost \$14.86 million, is to widen Columbia Blvd to a five-lane cross-section. This is inconsistent with Vision Zero goals, and with previous proposals and project which would put Columbia Blvd on a road diet east of MLKJr Blvd, where North Portland Highway already provides a five-lane highway literally one block to the south of Columbia Blvd. Columbia should thus become a true boulevard, with protected bicycle facilities, sidewalks, one lane of through traffic in each direction, left turn lanes, and clear painted lane markings to guide the interactions of truck, bicycle, transit, pedestrian, and vehicle traffic in this multi-use corridor. There are schools, the Humane Society, retail centers, and a wide variety of employers on this corridor that the City needs to provide for multi-modal access to and from.

This project, Columbia Blvd widening, thus must be removed from the TSP and replaced by a project with a focus on enhancing access to the corridor by multiple modes, rather than a project that will only lead to increased VMT, increased GHG, and decreased safety.

Sincerely yours,
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The Comp Plan's TSP should actively seek to repair the damage inflicted on this City by the freeway system, which has carved up neighborhoods with a series of polluting barriers that reduce public health and reduce access to destinations from neighborhoods. Specific projects to implement this vision include:

- Removal of I-5 from the east bank of the Willamette, from I-84 south to the west end of the Marquam Bridge
- Removal or repurposing of the Marquam Bridge structure
- Covering the freeway trench for I-405 through downtown Portland
- Covering the freeway trench for I-5 through north Portland
- Partially covering the freeway trench for I-84 through Sullivan's Gulch, and adding multiple additional crossings where a full lid is not feasible
- Covering I-5 south of downtown Portland, and adding additional crossings where a full lid is not possible
- Adding additional crossings over I-205 through East Portland
- Adding additional crossings over I-84 east of I-205

While these projects will not come cheaply, they should be added as study items to the TSP so that eventually, they will become part of the more sustainable future fabric of this city that subsequent generations will be able to enjoy.

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Lewis & Clark College

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To: Mayor Charlie Hales
Commissioner Steve Novick
Jamie Waltz, PBOT
Mark Lear, PBOT

From: Lewis & Clark College

✓ Cc: Collins View Neighborhood Association

Date: 11/10/2014

Re: Our Streets Funding Conversation and Project List

For the past few months, the City of Portland has engaged residents and businesses in the *Our Streets* conversation about new sources of funding for transportation as well as potential projects. While the City continues to lead discussions about the precise nature of a supplemental funding mechanism for transportation spending, Lewis & Clark would like to take this opportunity to present potential projects for the southwest Portland area.

Many of those who live, work, and study in the area surrounding Lewis & Clark use sustainable modes of transportation. Currently, **well over 1,000 people** – 11% of Lewis & Clark's employees and 27% of students – ride bicycles and walk to campus. Approximately 1,200 students, including 560 freshmen without vehicles, live on campus and walk, bike or use Tri-Met to connect to other parts of the metro area.

The City of Portland has taken modest steps to accommodate and encourage non-automobile transportation in SW Portland. Specifically, SW Primrose is a dedicated 2030 Greenway and is currently marked as a bike route on most maps as well as a SW Walking Trail. Unfortunately, despite a few existing efforts to encourage and accommodate a high volume of pedestrian and cyclist traffic, the area surrounding Lewis & Clark and the Collins View neighborhood remains difficult and inconvenient to access. Pedestrian and cyclist access becomes increasingly difficult and dangerous at night and during wet weather.

In light of these challenges, the Collins View Neighborhood Association (CVNA) and Lewis & Clark have collaborated to develop a list of concrete projects to increase safety for all forms of transportation as well as increase cycling and walking. We request that the City of Portland add the following projects to its priority transportation projects that the proposed street fee may make

possible or alternatively add these projects to the City's longer range Transportation System Plan (TSP) update:

Crossing and Pedestrian Improvements:

- 1) Crosswalk and flashing light at the intersection of SW Primrose and Terwilliger Blvd.
Adding a crosswalk at this intersection should be done in connection with extending the sidewalk on the east side of Terwilliger two blocks south from the retail district on Terwilliger / Taylor's Ferry to Primrose, consistent with ADA requirements. SW Primrose is heavily used by pedestrians and cyclists, and is also a bus route/stop. Currently, it is both difficult and dangerous for pedestrians and cyclists to cross Terwilliger at this intersection. .
- 2) Sidewalk and lighting along the east side of Terwilliger from Boone's Ferry's eastern intersection with Terwilliger to the Law School. This roadway currently has no shoulder and is the main route to the Lewis & Clark campus for pedestrians who live in the neighborhood and/or commute to campus using the #38 bus.

Protected Bike Route:

We recommend development of a neighborhood greenway between Lewis & Clark and the Burlingame retail area at Terwilliger and Taylor's Ferry. Primrose and Palatine Hill Road provide the main access route for cyclists between Lewis & Clark and central Portland. For cross-town cyclists, this route also provides the main access from SW Portland to the Cemetery Route and the Sellwood Bridge. Dangerous intersections at Terwilliger/Primrose and Boones' Ferry/Primrose pose significant barriers to bike access to this critical route, and have contributed to several bike crashes. Development of a neighborhood greenway along this route would significantly improve safety for pedestrians and cyclists and would lessen conflicts between these users and automotive traffic.


Thank you for considering our requests. We look forward to working with the City to continue to improve safety and convenience for all of those who travel to and from the Collins View neighborhood and Lewis & Clark.

If you have any questions or concerns, please contact Amy Dvorak, Sustainability Manager, at 503-768-7794.

Sincerely,


David Ellis
VP, Secretary & General Counsel

Sincerely,


Amy Dvorak
Sustainability Manager



November 10, 2014

Dear Chair Baugh and Members of the Planning and Sustainability Commission,

Please accept the following comments from the Audubon Society of Portland regarding the Comprehensive Plan Update. These comments supplement our prior comments submitted on 9-23-14. These comments reflect our testimony at the November 4 PSC Hearing.

Process Issues:

- 1) **Please Consider Adding Additional Hearings:** We would urge the PSC to add additional hearings to allow for additional general comments on the Comprehensive Plan. The development of the Comprehensive Plan has been years in the making. The two volume document and supplemental materials are very dense and complex and the drafts have changed tremendously since the prior review drafts to the point where some sections are virtually unrecognizable. In addition it is important to also have time to cross reference the plan with the equally complicated Portland Plan We are hearing from numerous organizations that have only recently become aware of the draft plan and are still formulating positions. Under ordinary circumstances a three month review and hearing period would be reasonable, but for a document of this significance and complexity, three months seems truncated, especially when compared with more deliberate pace of prior portions of this process.
- 2) **The Economic Opportunities Analysis (EOA) should have been released for comment prior to the release of the draft Comprehensive Plan:** The EOA provides the basis for some of the most difficult and controversial decisions included in the comprehensive plan. It provides an analysis of economic trends, supply and demand of buildable lands and policy alternatives. By releasing the draft Comp Plan prior to the EOA, the City has functionally denied the public the opportunity to evaluate or understand the basis for many of the policies included in the Comp Plan or to explore other strategies for meeting Goal 9 not included in the draft Comp Plan. It is important to note that all other background reports were released for public review and adoption far in advance of the draft Comprehensive Plan. The EOA should serve as a starting point for policy discussion development, not a post hoc rationalization.

Substantive Issues:

1) The City Should Seek a Goal 9 Exception

The focus of the Goal 9 discussion to date has been West Hayden Island. However, West Hayden Island is only one example among many of how the City's efforts to remedy the 670 acre industrial land deficit are undermining its ability to protect natural areas, openspace and natural resources in the City. The July 2014 draft Comprehensive Plan includes not only the conversion of 300 acres of wildlife habitat on West Hayden Island, but also includes the conversion of significant portions of two golf courses along the Columbia Slough and strict limitations on regulations to protect natural resources on industrial sites along the Willamette and Columbia Rivers and Columbia Slough. In addition, the Industrial Development Chapter includes numerous policies which mandate that the City continue to find new industrial lands above and beyond the existing deficit if 5 and 20 year growth forecasts indicate an increased demand. In recent years the PSC has approved and forwarded several natural resource plans to council including North Reach River Plan, Portland Tree Code Update, and Airport Futures, only to have elements of the plans that applied to industrial lands abandoned due to Goal 9 conflicts. All of the above is indicative of the fact that Portland has run out of capacity to meet goal 9 mandates unless it is willing to compromise the health of our environment. Our rivers are already seriously degraded and the policies contained in this plan ensure that they will continue to degrade over the life of this plan.

The City of Portland has reached a major decision point that will define whether it retains its reputation as a "green" city in the coming decades.

First, it is critical to understand that the land use system does allow the city to inform the state that it has run out of land and is unable to meet industrial land targets. State land use planning goals do not require the city to sacrifice our environment or our neighborhoods in order to meet industrial land goals. In fact Goal 9 explicitly states that industrial land objectives "should consider as a major determinant, the carrying capacity of the air, land and water resources of the planning area." Instead, Portland should inform the state that it will meet job targets through strategies other than creation of new industrial lands.

Second, the City has over 900 acres of brownfields--contaminated industrial sites that have either limited or no productive use. In short there are more than enough brownfield sites to meet the industrial land deficit. The problem has been that owners of these sites have been reticent to invest the capital to clean them up and put them back into productive use. It is absolutely critical that the city to develop an aggressive strategy to hold polluters accountable for these sites through a combination of enforcement actions and incentives.

Finally, to the degree an industrial land crisis exists at all, it is a self-inflicted crisis. Although city forecasts predict a surplus of commercial and residential property, the city and industrial stakeholders have spent the last 15 years rapidly converting industrial lands to residential and commercial uses. Today the city brags about the transformation of the Pearl District and South Waterfront from "industrial wasteland" to high end development. The Port of Portland, one of the loudest advocates for more industrial land, sold its property at Terminal One to make way for low rise condos and it converted industrial land next to Portland International Airport for a big box shopping center. Whether intentional or not, the strategy pursued by both industrial interests and the city over the past 15 years has been one of allowing industrial land owners to cash out by

upzoning their industrial land to more profitable use and then backfilling the industrial land deficit through conversion of greenspace.

It is time for a new strategy, one that does not necessitate destruction of our natural resources, open spaces and undermine the health and livability of neighborhoods. We urge the City to take the following approach to addressing the industrial lands deficit:

- The City should inform the state that it has run out of adequate undeveloped land to meet industrial land forecasts and therefore will develop other strategies to meet jobs supply objectives. This does not mean that the city will never add new industrial land to the inventory, but it does mean that the city will not be held hostage to an artificial target that would necessitate destruction of natural areas, openspace and neighborhoods.
- The City should develop an aggressive strategy to force industrial polluters to clean-up brownfields. This should include a combination of enforcement actions as well as non-subsidy based incentives. The City should set a target of 80% clean-up of Portland's brownfields over the next 20 years. **(The current draft lowers the goal from 80% to 60%)**
- The City should put in place regulatory and non-regulatory programs to increase use intensification on the existing industrial land base, something that is already occurring in cities in Europe and Asia with limited land supply. Far too much of Portland's existing industrial land base is used inefficiently. We need a real consolidation and intensification strategy for industrial lands in Portland. **(The draft does this but is not clear about what portion of the deficit it hopes to meet with this strategy)**
- The City should put in place strong protections to prevent the upzoning of existing industrial lands except in extraordinary cases. **(The Draft does effectively incorporate this policy)**
- The City should ensure that whenever land is rezoned for industrial development that strong mechanisms are in place to ensure the significant numbers of jobs are actually delivered. Public investments in public infrastructure should be tied to job creation targets. **(The Draft does not address this issue)**
- The City should avoid policies in the Comprehensive Plan which limit the City's ability to protect natural resources on industrial lands through both regulatory and non-regulatory mechanisms. It is critical that the city retain the ability to protect natural resource values which often overlap with prime industrial land, especially along our urban waterways. **(The Draft does the opposite)**
- The City should reject proposals to rezone 300-acres on West Hayden Island for industrial development. This irreplaceable resource should be permanently protected as openspace. **(The Draft does the opposite)**
- The City should reject proposals to rezone Columbia Corridor golf courses for industrial use. If it does move forward, it should simultaneously put in place zoning and other mechanisms to implement a landscape scale Columbia Slough Restoration Strategy including expanded P-Zones along the entire Slough within Portland, implementation of the new tree code on industrial lands, and permanent protection and restoration strategies on golf course areas that will be retained as openspace. **(The draft proposes to rezone the golf courses without committing to any of the other objectives)**
- The City and State should take a hard look at strategies to promote real collaboration and cooperation and potentially unification of the Columbia River Ports in order to maximize efficient use

of land, promote a sustainable regional Port economy and stabilize our Port system which is on the brink of system failure. This is something which has been in the Port of Portland's Marine Terminal Masterplan since 1991 but which has never been seriously pursued. **(The draft does not address this issue)**

2) Environment and Watershed Health (chapter 7)

In general the language in the Environment and Watershed Health Chapter has become significantly less detailed, weaker, and more difficult to track and understand than the January 2013 draft. Many reasonable and important policies have simply been eliminated without explanation. This stands in stark contrast to the Industrial Development Chapter (discussed below) which has been expanded, strengthened and been infused with far more detail since the January 2013 draft. We will provide additional specific details to staff and the PSC in the coming weeks, but for now we would like to highlight the following issues as a sample of our concerns:

- a) **Goals:** The goals of this chapter have been entirely rewritten since the 2013 draft. While we agree with the new goals we would note that two very significant goals have been removed from this chapter since the 2013 draft: 1) Sustain the quality of Portland's environment by preserving natural resources and focusing development in already built areas" and 2) "consider cumulative effects of decisions on the environment." Both of these goals should be restored. In addition Goal 7.B should be strengthened from "watershed conditions have improved over time" to "Healthy watershed conditions are achieved." In addition the goals should explicitly reference protecting and restoring biodiversity.
- b) **The action verbs throughout the section have been substantially weakened from the 2013 draft and in many instances now indicate the goal is simply to maintain the status quo rather than enhance and restore ecosystem health:** The 2013 draft clearly and explicitly stated that the goal was to "protect, enhance and restore" Watershed quality and function (4.1) groundwater systems (4.2), vegetation (4.3), Fish and Wildlife Habitat (4.4), At-risk habitats (4.5), biodiversity (4.6) and prevent and minimize the effects of invasive species. These policies have been replaced with a new section "Improving environmental quality and preventing degradation" which is far weaker placing an emphasis on preventing degradation, "considering impacts" "improving" "addressing" "encourage" and inserting qualifiers such as "where practicable." We would urge the city to restore the "protect, enhance and restore" verbiage and make it explicitly clear that the goal is not just improvement but achieving ecological health in each of the target areas.
- c) **The draft inserts the following new language at the start of many policies: "ensure that plans and investments are consistent with and advance programs..."** This is nothing more than bureaucratic gobbledeygook that confuses the reader. No other section has this type of obscuring language and it should be removed.
- d) **Cumulative Effects:** Goals and policies requiring the city to consider cumulative effects of decisions on the environment found in the 1-2013 draft have been removed entirely from the current draft. These should be restored.
- e) **Mitigation:** The requirement to "fully mitigate" impacts on natural resources (policy 4.12) in the 1-2013 draft has been weakened to simply require "mitigation: (policy 7.11) The city should restore the requirement to "fully" mitigate for unavoidable impacts to natural resources and that it should also

add language requiring that mitigation result in “net increase in ecological function.” The goal should be improvement in ecological health over time.

- f) **Carrying Capacity:** Policy 4.11 b from the 2013 draft, “Strive to maintain and sustain the carrying capacity of air land and water resources by enhancing natural resource quality and function” has been removed in the current draft. It should be restored. Notably Goal 9 has very similar language about economic development being done such that it does not exceed the carrying capacity of the land, air and water.
- g) **Goals and Policies encouraging the efficient use of already developed land before encroaching on natural resources found in the 2013 draft have been completely removed.** The current draft appears to have completely abandoned the commitments of the 2013 draft to focus on already developed land before destroying natural resource land. In fact the 2014 draft appears go entirely the opposite direction by including several policies on the Economic Development Chapter which promote encroachment onto non industrial lands. The priority on already developed lands should be restored.
- h) **Johnson Creek:** Policy 42.2 in the 1-2-13 draft “to protect and enhance connectivity of natural resources in the East Buttes that provide habitat and natural stormwater management...” has been removed. It should be restored. This is a critical part of the JC Watershed Strategy.
- i) **Goal 7.D Environmental Equity** should be changed to: "All Portlanders have access to clean air and water, can benefit from development designed to lessen the impact of natural hazards and environmental contamination and development designed to protect, enhance, and restore nature in all neighborhoods."
- j) **Policy 7.3** should mention recovering threatened, endangered sensitive species; it only a reference to "including at-risk" species. More could be in here to continue support for the species recovery planning the City committed to over a decade ago.
- a) **Policy 7.9 Impact Evaluation**" could be stronger: Analyze the potential direct and cumulative impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide.
- b) **Policy 7.10** Add: "Adopt regulations, plans and programs that address cumulative environmental impacts of development on environmental quality."
- c) **Policy 7.11** - "Require" instead of encourage "mitigation approaches..."
- d) **Policy 7.12** –This policy should be changed. Local policies do not have to be consistent with State and Federal Policies. While we agree that the City should coordinate with state and federal regulators, the city should also be free to develop its own policies and priorities.
- e) **Policy 7.14 and 7.16:** We would suggest "with an emphasis on underserved and underrepresented communities most vulnerable to health impacts." The reason to prioritize these communities is because they lag behind in many human health indicators so this policy should be more specific in this respect.
- f) **Policy 7.24.** "Limit and remove impervious surfaces to reduce impacts on hydrological function air and water quality, habitat connectivity, and tree canopy.
- g) **Policy 7.22** - "Require and encourage low impact development, habitat-friendly development, bird-friendly design, and green infrastructure into all new and existing development including but not limited to City-owned, managed, and funded facilities.

- h) **Policy 7.23** - Access to Nature. This policy is focused on access to nature in the macro-landscape and in balancing access and conservation in protected natural areas. In reference to the environmental equity goal, it should also address equitable neighborhood access to nature where people access "nature in their daily lives" there by promoting the interstitial green; we need anyway for biodiversity and air and water quality. I would add the following bullets:
 - i) Prioritize park investments to toward the goal of ensuring 100% Portlanders are within 1/4 mile of a public park or natural area.
 - ii) Prioritize green infrastructure investments in neighborhoods with poor access to parks, nature and with limited tree canopy.
 - iii) Consider increasing housing densities near to active recreation parks to increase the percentage of Portlanders living within ¼ of a mile of a park.
- i) **Policy 7.32** - Re-write this policy to be both more explicit and broader: "Integrate stormwater management and planning: Develop programs, regulations, and design standards to more fully integrate stormwater management and transportation planning and infrastructure in order to improve water quality, safety, access to nature and overall neighborhood livability. Prioritize improvements for unimproved or substandard rights-of-way, accident-prone locations, and neighborhoods with less access to nature or active transportation."

2) **Economic Development (Chapter 6)**

In contrast to the weakening of the Watershed Chapter, the Economic Development Chapter appears to have been put on steroids relative to the 2013 draft, especially with regards to industrial lands. For example the Industrial Districts Section has ballooned from half a page to three pages. More importantly, the draft includes numerous new and modified policies that undermine the ability of the city to protect natural resources on industrial sites, which require that the city find new industrial lands regardless of impact on other city goals, and which weaken the city's commitment to focusing development in already built areas before impacting natural resource areas. Again, in contrast with the severe streamlining of the policies in the Watershed Chapter, the policies in the industrial lands section are often repeated several times over. We believe that the Land Development and Industrial Employment District Sections will significantly reduce the city's ability protect and restore natural resources along the Willamette and Columbia River and Columbia Slough below what is possible under the existing Comprehensive Plan. It appears that the City has simply acquiesced to industrial interests who have long advocated for minimal environmental protection on industrial lands. If the city adopts these sections as written, it will ensure that our already degraded waterways will continue to degrade in the coming decades.

There is absolutely no evidence that environmental regulations cost industrial jobs, especially given the non-existent link between industrial land supply and recent industrial job growth in Portland. The City's most recent "Economic Opportunities Analysis" documents the widely recognized trend that "Industrial employment has been dropping at the same time the city is experiencing increases in industrial land development." The study provided no analysis to indicate environment regulations hurt job growth, only a comment in focus group. The argument that environmental regulations hurt job growth or even significantly impact land supply comes directly from industry lobbyists not from any credible evidence or analysis." Meanwhile there continues to be evidence and analysis that environmental quality- especially in our region- attracts a skilled and educated workforce and increases work productivity.

The following are a sample of out specific concerns:

- a. **Brownfield Redevelopment:** The City has reduced the brownfield redevelopment target from the 80% goal which was discussed throughout the PEG process and which was include in the 2013 draft to 60%. This will increase pressure to develop greenfield sites and decrease pressure to clean-up contaminated sites. The City should restore the more ambitious 80% target.
- b. **Policies that require the City to maintain a supply of industrial land without any consideration of how this might impact other city goals:** The Land Development and Industrial and Employment Sections are now replete with redundant policies that require the city to find an ongoing supply or new industrial land regardless of conflicts with other city goals. This includes policies 6.12, 6.15, 6.18, 6.36.d, 6.47. It is important to note that the action verb used in these sections (“provide”) is not discretionary. Given the fact that the city is already converting openspace and natural areas to find new industrial land, these policies can only result in additional losses for the environment.
- c. **Policies which appear to restrict the City’s ability to require natural resource protection or restoration on industrial lands:** Several policies appear to limit or prohibit the city from instituting new protections for natural resources on industrial lands. These include 6.35, 6.36.b, and 6.37. The draft ignores the fact that our industrial lands often overlap with some of our most high value natural resource areas. These policies should be rewritten to ensure that it is clear that the city can implement and update environmental policies on industrial lands.
- d. **Emphasis on incentives to achieve industrial land objectives:** Throughout the industrial land sections, many of the policies now explicitly rely upon an incentive based strategy. While incentives are fine, they are not the only way to achieve city objectives. Policies should clearly allow for a range of mechanisms including regulation to achieve its objectives.
- e. **Policy 6.17 Regulatory Climate:** This policy appears to severely limit the city’s ability to put new regulations on industrial lands by requiring that the city prioritize economic development over all other goals (6.17), requiring that the city’s regulations be competitive with other cities (a “middle of the pack” mentality rather than maintaining Portland as an environmental leader) (6.17a), and potentially eliminating city jurisdiction over areas where the state of federal government have regulatory programs (6.17e) even though the City has long recognized the importance of local regulatory authority over our urban natural resources.
- f. **Policy 6.36 Prime Industrial Land Retention:** This policy appears to prevent the city from updating environmental or community protections on industrial lands if those protections in anyway diminish the capacity of those industrial lands. Policy 6.36b explicitly limits conversion of industrial lands though land use plans, regulations, or non-industrial uses. This policy appears to completely ignore the need to also protect health of the community and the environment. Policy 6.36c requires the city to minimize the impacts of regulations on industrial lands without consideration of any other goals. Policy 6.36d requires the city to strive to offset any loss of industrial land with replacement lands---given the existing deficit, this policy could effectively prevent any new regulations on along the river that protect natural resources. Taken together, these policies appear to us to make it practically impossible to establish new natural programs on these lands and negate the responsibility of industrial landowners to protect and restore the natural environment.

Taken together, these policies appear to move us into an era in which other public values such as protection of natural resources, protection of human health, Goal 15 objectives, etc. appear to have been abandoned on industrial lands. This is inconsistent with our land use planning system, community values, the city's past planning practices, and Policy 10.2b in the draft comp plan. It places the interests of industrial developers above all other city goals.

3) Green Infrastructure needs to be more robust in the urban design, housing and transportation chapters:

In order to achieve the city's watershed health objectives, it is critical that all elements of the plan explicitly adopt green infrastructure policies. We would urge the city to make the design with nature/ green infrastructure policies in the housing, transportation and urban design sections much more robust and explicit. For example in the transportation chapter, the design with nature policy (9.16) simply states that the city should "promote street alignments and designs that respond to topography and natural features and, when feasible" protect, streams, habitat and native trees." This says virtually nothing other than avoid harming natural resources when possible. Each of these sections should contain strong proactive policies requiring the city to actively incorporate green infrastructure into their projects. The City's Watershed Management Plan calls for the city to consider green infrastructure opportunities on all public projects and this should be written large throughout the Comp Plan.

4) We support the proposal to reduce residential density in specific areas with natural hazards and drainage constraints, and where the current Comp Plan and zoning designations would allow significant additional residential development.

The intent of the proposed "down-designations" in locations such as the West Hills and near Powell Butte is to reduce future risks to public health and safety by reducing future development potential and associated cumulative impacts in these areas. This part of the Comp Plan proposal is notable, and represents the integral "flip-side" of the proposal focus most of the new development in urban centers and along corridors. These proposed down-designation areas are generally characterized by steep slopes with poorly draining soils, and limited stormwater pipes so runoff from new development, roads, etc. must be routed to local streams. These areas have a mix of landslide, wildfire, and earthquake hazards, and can be difficult to access or evacuate during emergencies. We view this as a common sense proposal to protect natural resources and public safety.

Thank you for your consideration of these comments.



Bob Sallinger
Conservation Director
Audubon Society of Portland

November 10, 2014

Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Subject: City of Portland Proposed Draft 2035 Comprehensive Plan

Dear Commissioners:

Following are comments and recommendations from the City of Portland's Public Involvement Advisory Council (PIAC) on the Proposed Draft 2035 Comprehensive Plan. PIAC is a City commission charged with advising elected officials on public involvement in government citywide, and with helping City bureaus improve their community outreach and engagement practices. Established by City Council in 2008, PIAC is comprised of both community members and bureau staff.

Members of PIAC have worked closely with Bureau of Planning and Sustainability (BPS) staff, through both PIAC and the Policy Expert Group (PEG) for the Comprehensive Plan community involvement chapter. We have greatly appreciated the opportunity for sustained input on earlier drafts of the Comp Plan, and for a productive, collaborative relationship with BPS staff over the past two years, particularly Marty Stockton through PIAC and the PEG and Deborah Stein through the PEG. PIAC's comments are intended to offer the collective expertise and experience of PIAC members to strengthen an already strong document, and we limit our remarks to Chapter 2, the goals and policies regarding community involvement.

Our overarching comment is that the community involvement chapter is **clear, comprehensive and exceptionally relevant** to an evolving Portland. It is responsive to the mandates of State planning law, and consistent with the vision of the Portland Plan. PIAC strongly **supports the intention to develop a manual** to guide the implementation of the Plan's policies, and we believe this approach has the potential to become a model for other jurisdictions.

Where PIAC recommends revisions to the proposed draft, it is generally to restore elements that were removed from the previous draft we reviewed in March.

Recommendations

1. **Make a clear distinction between policies that require ongoing action by bureaus and their staff and policies that are project-specific.** This distinction was made and explained throughout earlier drafts on which PIAC members had input. It is an important distinction because it clarifies (a) who is responsible for carrying out the policy (the bureau as a whole or an individual staff member), (b) when the policy applies (as part of an ongoing program or when staff begin to work on a project), and (c) how to evaluate a policy (as part of an ongoing program or as it was implemented for specific projects). The previous draft of the Plan achieved this by categorizing policies 2.1-2.16 as “ongoing” and policies 2.17-2.33 as “project-specific.”
2. **Restore policy language on adequate funding for the community involvement program.** In order to carry out the policies of the Comp Plan, bureaus must devote sufficient financial and staff resources to the community involvement program itself, and must provide staff with training and support. Indeed, the commitment of adequate resources marks the difference between a policy that makes a meaningful difference in the City’s work and one that looks good on paper.

PIAC understands the recommendations from the City Attorney and OMF to remove funding questions from Comp Plan policy on the grounds that “The budget is not a land use decision” (Editing Change List note). However, the intent of this policy is not to compel elected officials to increase bureau budgets, but to direct bureaus to allocate a sufficient portion of their budgets (whatever those budgets might be) to implement the requirements of the Comp Plan.

3. **Appoint an independent body, rather than the Planning and Sustainability Commission (PSC), to oversee the Community Involvement Program.** Throughout the process of community input on earlier drafts of the chapter (including the Community Involvement PEG), the composition of the Community Involvement Committee (CIC) was left unspecified. In the proposed draft, a subcommittee of the PSC serves as the CIC. The reason for this decision is not discussed in the Editing Change List. We understand that there are resource constraints in establishing new committees. However, PIAC believes there are advantages to appointing a separate body apart from the PSC.

First, the CIC must have the capacity to evaluate community involvement programs for multiple bureaus, review community involvement plans for numerous individual projects, and create and maintain a community involvement manual to implement the Comp Plan goals and policies. It seems unrealistic to expect the PSC, a body already charged with significant responsibilities and workload, to take on this additional role.

Second, we concur with the State’s Citizen Involvement Advisory Committee (CIAC), the body that advises Oregon’s Land Conservation and Development Commission (LCDC) on public involvement in land use planning, that the multiple responsibilities of the PSC can detract from, or even conflict with, the role of the Committee on Citizen Involvement (CCI):

“Having a CCI – a committee with citizen involvement as its *only* responsibility – ensures that citizens are not forgotten in the planning process.... An independent CCI is the best choice to ensure widespread public involvement. The hybrid planning commission/CCI is an acceptable but less desirable choice. Finally, the least desirable option is having the governing body or the planning commission act as the CCI. It’s likely to work against citizen involvement and should be done only as a last resort” (CIAC, *Putting the People in Planning*, May 2008, pp. 8-9).

The City of Portland should strive to be a leader within Oregon, demonstrating best practices in the institutional design of its community involvement program.

- 4. Restore previous language applying the Comp Plan to “plans, policy, investment and development decisions” where it was replaced by “land use decisions” in the proposed draft.** PIAC is concerned about the nearly blanket change in "plans, policy, investment and development decisions" to "land use" because it seems to restrict the application of the Comprehensive Plan unnecessarily. The Comprehensive Plan applies to infrastructure projects, capital investment and development decisions, in addition to land use planning.

PIAC recommends that the previous language be restored throughout, or that the language be restored selectively to those policies that apply to “plans, policy, investment and development decisions” beyond land use alone. It is important to avoid the implication that the Comp Plan only applies narrowly to land use decisions and the work of the Bureau of Planning and Sustainability.

PIAC is tasked with recommending policies and practices to expand public involvement in city government. Even if the term is defined broadly, we are concerned that the use of “land use” alone could limit public involvement by creating the perception that the Comprehensive Plan does not apply to other kinds of government decisions. The issue of community perception, and its potential effect on community participation, is critical as you reexamine this language.

5. Add language to the chapter introduction referencing the celebrated history of Portland's neighborhood system. Our city's early commitment to community involvement in government is recognized internationally, and the neighborhood system has been central to that history. The January 2013 draft of Chapter 2 summarizes the evolution of the system and the continuing challenge to become even more inclusive. As we chart a course forward, PIAC believes it is appropriate to reference where we have been, and to reassure the community that the intent of the Comprehensive Plan is not to dismantle the neighborhood system.

Specifically, we recommend the following revisions to the proposed chapter introduction on page GP2-1 (new language in **bold**, most of which is taken from the previous draft of the Plan):

"The results are better — more durable, equitable and accountable — when a wide and diverse range of Portlanders are involved in the scoping, development and implementation of plans and investment projects. **No one person, agency, organization, or business can provide all the things Portland's diverse communities need.** Collaborative partnerships and inclusive community participation in land use decision making are essential to creating and sustaining a prosperous, healthy, equitable and resilient Portland.

Portland has a long history of community involvement that gained strength and power in the 1970s and forms the foundation of today's neighborhood system. As the city grows, diversifies, and works to advance equity, it is essential that all community members' needs and concerns are considered. Particular efforts must be made to improve services **and participation** for people of color, immigrants and refugee communities, people with disabilities, renters, low-income Portlanders, older adults, youth, and the lesbian, gay, bisexual, transgender and queer (LGBTQ) community. **A new paradigm of community involvement and engagement that supports intercultural organizing, recognizes that diversity is an advantage, and works to achieve equitable outcomes must be embraced and paired with Portland's neighborhood organizations to create a robust and inclusive community involvement system.**

It is the City's responsibility to promote deep and inclusive community involvement in land use decisions."

6. Additional Recommendations

- Remove “as appropriate” in policies 2.7, 2.25, 2.28 and 2.31.
- Direct bureaus to collect data regularly as an ongoing activity. This is implied by the policies on evaluating, sharing and using data (policies 2.7, 2.8, 2.19), but it is not stated explicitly. We recommend changing the first phrase in policy 2.8 to “Collect and evaluate data...” We also recommend changing the order of policies 2.7 and 2.8, and changing the title of policy 2.7 to “Community participation in data collection.”
- Revise policy 2.16 to emphasize two-way sharing of engagement methods. Add the phrase in **bold** to the proposed policy: “Coordinate and share methods, tools, and technologies that lead to successful engagement practices with both government and community partners, **and solicit engagement methods from the community.**”
- Define key terms from this chapter in the glossary: “accountability,” “engagement,” “accessible” and “community verified data.”

PIAC members thank you for your important work for the future of Portland, and we appreciate your consideration of our comments.

Sincerely,

Public Involvement Advisory Council
City of Portland

Attachment: List of PIAC Members

PIAC Members

Community Members

Claire Adamsick – NE neighborhood coordinator
Mohamed Ali – Immigrant & refugee service provider
Glenn Bridger – SW neighborhood activist
Baher Butti – Refugee case manager
Donita Fry – Native American Youth and Family Center
Greg Greenway – Public engagement consultant
Maryhelen Kincaid – North/NE neighborhood activist
Julio Maldonado – SE neighborhood and EPAP
Linda Nettekoven – SE neighborhood activist
Jessica Wade – Educator
Christine White – Port of Portland communications
Mark Wubbold – Policy analyst, Portland State University

City Staff Members

Kelly Ball – Office of Management & Finance
William Beamer – Bureau of Planning & Sustainability
Ross Caron – Bureau of Development Services
Michael Crebs – Police Bureau
Rhetta Drennan – Bureau of Environmental Services
Tim Hall – Water Bureau
Brian Hoop – Office of Neighborhood Involvement
Denver Igarta – Bureau of Transportation
Aaron Johnson – Fire & Rescue Bureau
Paul Leistner – Office of Neighborhood Involvement
Steve Pixley – Parks & Recreation Bureau
Jeff Selby – Office of Equity and Human Rights
Marty Stockton – Bureau of Planning & Sustainability

From: Planning and Sustainability Commission
Sent: Monday, November 10, 2014 9:57 AM
To: Kovacs, Madeline
Subject: Fw: Comprehensive Plan Testimony

From: Wendy Chung <wcrossiter@yahoo.com>
Sent: Sunday, November 9, 2014 8:38 PM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan Testimony

I tried to provide these comments via the map app but it wouldn't let me do it without choosing a feature, which I tried to do but couldn't.

I live at 1729 NW Irving St. The houses around me and many on the block south of me on Hoyt are all individually listed landmarks on the National Register of Historic Places. They are zoned RH. The Campbell Townhouses at the end of my block on 17th and Irving are zoned R1. All the individually listed single-family homes on the blocks from Irving to Burnside between 17th and 19th should all be rezoned R1 to be consistent with the historic overlay.

Thank you.
Wendy Chung
(503)222-2236

From: Planning and Sustainability Commission
Sent: Monday, November 10, 2014 9:58 AM
To: Kovacs, Madeline
Subject: Fw: zoning problem

From: laurawozniak1@gmail.com <laurawozniak1@gmail.com> on behalf of Laura Wozniak <lawoz@comcast.net>
Sent: Sunday, November 9, 2014 3:35 PM
To: Planning and Sustainability Commission; Hales, Mayor; Commissioner Fritz; Commissioner Fish; Commissioner Novick; Commissioner Saltzman; City Auditor Griffin-Valade; Anderson, Susan; mnaLandUseCommittee@gmail.com; Amy Burslem; Andy Fisher; Angie Tanyi; Anne Hudson; Carol Staropoli; Carole Glauber; Carolyn Fisher; David Withers; Dennis Frengle; Doreen Welsh; Elizabeth Draper; Holly Matthews; hufftcpa@aol.com; James Peterson; Jan Hurst; jean keertan; Joan Wray; John Hunter; Joren Bass; Karen Jackson; Karen Mallov; Kelly Peterson; Liz Safram; nicole wilson; Scott Pakel; Shoshana Petrushkin; Simon; Steven Meacham; Stuart Oken; Tamara Bakewell; Wendy Talbot
Subject: zoning problem

To: Planning and Sustainability Commission
psc@portlandoregon.gov

1900 SW Fourth Ave
Portland, Oregon 97201-5380

To: Planning and Sustainability Commission
psc@portlandoregon.gov

1900 SW Fourth Ave
Portland, Oregon 97201-5380

Re: Preservation of Multnomah Village and other historic affordable communities with significant trees and natural character

I am requesting that the Planning and Sustainability Commission consider zoning changes that would maintain and encourage the retention of affordable housing that supports wildlife and the urban forest by assuring that lot coverage does not exceed certain maximums for single family residential housing (35%) in Multnomah Village residential neighborhoods. Multnomah Village is historically rural in character, with the exception of housing which is already mixed single-family and multifamily along major corridors (Beaverton Hillsdale Highway, Barbur and Capitol Highway for examples). I derive my suggested standards from sample urban code provisions. I believe that driveways which are non-permeable and required sidewalks (if the city continues to insist on those in the narrow residential barely improved side streets of the Village) should be considered for a maximum of 35% coverage. The current zoning requirement is 37.5% by the way I read the statute overall for our neighborhood, but this is not providing protection for our heritage sized trees and wildlife habitat. There seems to be some confusion since new exceptions are now being sought (for example the corner of SW Nevada Court and SW 29th Ave) based on lot divisions requests to consider corner lots effectively as zone R2.5 which allows even greater coverage. So as part of this request, I would be asking for no part of the current neighborhoods

zoned R-7 and R-5

to be able to have effective rezoning to R2.5 based on the corner lot provision.

Limitation in lot coverage would prevent the degradation of the environment by leaving room for significant trees to be preserved

(instead of rigid setbacks which might require the removal of significant trees) as well as to allow ground water infiltration. It would

also remove the incentive for developers to stalk smaller older affordable homes and buy them before they go on the market with the

goal of replacing a 200,000 smaller home with a large yard and Douglas Firs with a new house filling over 50% of the lot (I think now

porches and driveways and walkways may be excluded from being counted even though they are impermeable cover) that costs

500,000 to buy and is set directly next to and looming over other homes. In some cases, the open character of the neighborhood has

been replaced with giant walls with dark passages between the houses. A provision such as this would level the playing field for

developers who would all have to adhere to these guidelines in older neighborhoods like Multnomah Village and stop the competition

that drives land prices so high that prices seem to justify trying to cram in the maximum development for resale without regard for

wildlife, affordability or neighborhood character.

Trees are not only a benefit to the environment in all of the ways well known to the commission, but our neighborhood is part of a

general wildlife corridor connecting the Coast Range to the Willamette via Tryon State Park and encompasses the Headwaters of

Stephens Creek. A less known fact is that healing from surgery or any illness including mental illness is significantly aided by the view of

trees even a small view from a hospital window. This is empirically validated by research and one reason Hazelden Springbrook

Residential Treatment Center for Drug and Alcohol is located in a rural setting.

There would remain plenty of room for affordable housing within the urban growth boundary if there were limits on the numbers of

strip malls, large grocery/pharmacy complexes with huge asphalt footprints being installed on mixed use corridors like Beaverton

Hillsdale Highway, which has some really nice truly affordable housing on it. The sidewalk requirements could be dropped where they

do not support walkability and safety (floating sidewalks on low traffic streets) and the fees collected could be used to place sidewalks

where they are needed along busy stress like SW 30th which connects the bus lines on Capitol Highway and Beaverton Hillsdale

Highway in Multnomah/Hillsdale.

Please add this to the record. I am a homeowner and the owner of a small business in Multnomah Village. I also work as a health care

professional at Northwest Permanente Medical Group. I appreciate the difficult work of the commission and, like many stakeholders,

appreciate your attention.

Thank you,

Laura Wozniak LCSW
7409 SW Capitol Highway
Portland OR 97219
503-312-6176

From: Planning and Sustainability Commission
Sent: Monday, November 10, 2014 9:58 AM
To: Kovacs, Madeline
Subject: Fw: Portland planning

From: macmaddie@juno.com <macmaddie@juno.com>
Sent: Sunday, November 9, 2014 8:20 AM
To: Planning and Sustainability Commission
Subject: Portland planning

Enough already!! Step back, pause, take a deep breath and re-evaluate!

I realize Portland is a desirable place to live but what makes it so, our great neighborhoods, is slowly being demolished. I live in the Richmond neighborhood and have watched lovely old PDX houses being demolished and multiple 3 story condos replacing them. A good example is the corner of 50th and Tibbetts St. There was a hill with an old Bungalow surrounded by huge old trees. The trees were cut down much to my horror, the house demolished and the hill removed to street level. Now there are 8 condos in that space. Recently 3 or 4 (I couldn't really tell) nice old PDX houses were demolished off of 50th between Division and Hawthorne. Right now there are 4 skeletons of condos and looks like there will be many more added to that spot. A developer recently approached the owner of the duplex across the street from me to ask him if he wanted to sell. Fortunately the owner said no. As this developer currently owns the house on the corner next to the duplex, it doesn't take a rocket scientist to see what the plans were.

I don't even know where to start when it comes to the horror that is Division between Cesar Chavez and about 20th. I think it is naive to presume that people moving into those condos and apartments (with no parking available) are going to exclusively use public transport. Or even those not in the immediate area. I would have to pay TriMet \$5 for a round trip ticket just to go have a meal in one of the restaurants in that area, plus pay for my meal. I feel sorry for the residents in that immediate area with people coming and going parking in front of their houses.

I see the condos marching up Division and am afraid that my end of Division will end up like the above.

Thanks
Marsha A. Campbell
5109 SE Tibbetts St

Mike Faden

33 NE San Rafael St, Portland, OR 97212
Office: (503) 284 6315

November 9, 2014

To: City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

Subject: Comments re 2035 Comprehensive Plan

I am commenting as an Eliot resident and member of the Eliot Neighborhood Association Land Use and Transportation Committee.

The zoning proposed for Eliot in the Draft 2035 Comprehensive Plan is an important step toward preserving the historic character of the neighborhood and its housing. I believe that the R2.5 zoning within the historic conservation district, in particular, will help preserve its character and livability.

To protect Eliot's historic character, it is essential that the rezoning to R2.5 be applied to ALL residential properties within the conservation district. If exceptions are made for specific demands or property owners, the effect will be to undermine this goal and enable development that destroys the historic character of the neighborhood.

In the Draft, any loss of density from the zone change to R.25 is more than offset by the MU zoning along commercial corridors and in the Williams/Fremont neighborhood center. The areas currently designated for MU zoning are adequate to accommodate current mixed use development patterns and allow step-downs to adjacent residential areas. Expansion of those zones/properties at the request of individual property owners is unnecessary and undermines the residential preservation objective in the Draft.

Sincerely,

Mike Faden



From: Planning and Sustainability Commission
Sent: Monday, November 10, 2014 9:58 AM
To: Kovacs, Madeline
Subject: Fw: opposition to paving over of natural areas

From: Dani Dennenberg <danihydennenberg@gmail.com>
Sent: Saturday, November 8, 2014 7:53 PM
To: Planning and Sustainability Commission; Hales, Mayor; Commissioner Novick; Commissioner Fritz;
Commissioner Saltzman; Commissioner Fish
Subject: opposition to paving over of natural areas

Dear City Commissioners:

I am writing to express support for the Audubon Strategy for Addressing Industrial Land Demand and link to the plan.

2) It is unacceptable to destroy critical natural areas and openspace on West Hayden Island and along the Columbia Slough in the name of finding more industrial land. The city should focus on cleaning up brownfields and intensification of existing industrial lands, not destruction of openspace and natural areas.

3) It is unacceptable to restrict the city's ability to place environmental regulations on riverside industrial lands – some of our most important and degraded fish and wildlife habitat;

4) The city should focus on cleaning up its more than 900 acres of contaminated brownfields, intensifying use of its existing industrial landbase, and preventing industrial landowners from converting their land to other uses.

5) I am asking the Planning and Sustainability commission to review and restore natural resource policies that were removed or weakened from the January 2013 Draft.

Sincerely, Dani Dennenberg
1100 SE 12 th Ave
#430
Portland, OR 97214

--

“Love comes in at the eye.”

? W.B. Yeats

From: Planning and Sustainability Commission
Sent: Saturday, November 08, 2014 3:18 PM
To: Kovacs, Madeline
Subject: Fw: Comprehensive Plan Testimony

Follow Up Flag: Follow up
Flag Status: Completed

From: D. Ben Henzel <dbh@henzelpc.com>
Sent: Friday, November 7, 2014 2:13 PM
To: Planning and Sustainability Commission
Cc: Jaon.Fredericksen@portlandoregon.gov
Subject: Comprehensive Plan Testimony

To Whom This May Concern:

My name is D. Ben Henzel and I am the owner of the real property located at 4606 SW Corbett Avenue, Portland, OR 97239.

I have reviewed the proposed comprehensive plan generally and looked at my property and how it may be affected. I am surprised to find that the zoning on this property remains residential and I would like to formally request a change on the zoning of this property. The property sits immediately adjacent to I-5 and is not well suited to residential use, though that is the current use. Adjacent properties are zoned mixed use commercial which seems to me to be a logical use of this property.

I think this is a great opportunity to address the zoning on this property and request that you consider making a change during this process.

You can contact me at the address below may name, or may call me at your convenience.

Thanks for your consideration.

D. Ben Henzel
Henzel Law Offices
0224 SW Hamilton Street, Ste 300
Portland, OR 97239
Telephone: (503) 546-1588
Facsimile: (503) 546-1589
Email: DBH@Henzelpc.com
www.Henzelpc.com

CIRCULAR 230 DISCLOSURE: IRS Regulations require us to notify you that this communication is not intended to be used, and cannot be used, by you as the taxpayer, for the purpose of avoiding penalties that the IRS might impose on you.

From: Planning and Sustainability Commission
Sent: Thursday, November 06, 2014 12:06 PM
To: Kovacs, Madeline
Subject: FW: 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

To help ensure equal access to City programs, services and activities, the City of Portland will provide translation, 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.

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

From: Jean-Claude Jospon [mailto:jcjospin@yahoo.com]
Sent: Thursday, November 06, 2014 9:58 AM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan

I oppose change #345 regarding my propriety located at 1405 NE 78th Ave because it will decrease the value of my propriety. I have been counting on developing 5 townhomes on this propriety, which will offer more housing choice. With all due respect, change #345 will not be a good fit for my propriety at 1405 NE 78th Ave. I hope you keep the current Plan Map designation (Medium Density Multi-Dwelling) for this propriety.

Sincerely,

Jean-Claude Jospin
Owner: 1405 NE 78th Ave
Mailing address :
10202 N Leonard St
Portland, OR 97203
Tel: 503-805-2982

From: Planning and Sustainability Commission
Sent: Thursday, November 06, 2014 12:25 PM
To: Kovacs, Madeline
Subject: FW: Maintain Natural Areas such as the West Hayden Island & Columbia Slough

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 translation, 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: Hall, Stacie [mailto:stacie.hall@intel.com]
Sent: Thursday, November 06, 2014 12:09 PM
To: Planning and Sustainability Commission; Hall, Stacie
Cc: Hales, Mayor; Commissioner Novick; Commissioner Fritz; Commissioner Saltzman; Commissioner Fish
Subject: Maintain Natural Areas such as the West Hayden Island & Columbia Slough

Planning and Sustainability Commission Members:

I am very concerned that strategies and direction is being put in place that jeopardizes our area's wildlife and natural areas. Portland is a leader in environmental considerations, and that must not change. Industrial developers will always push to weaken environmental efforts for short term gain. They will utilize employment as the justification. However, long term it is the livability of a city through its natural areas and access to wildlife that brings companies that hire to an area.

I recommend that you perform the following:

- 1) I support the Audubon Strategy for Addressing Industrial Land Demand found: audubonportland.org/files/urban/11-point-plan/
- 2) It is unacceptable to destroy critical natural areas and openspace on West Hayden Island and along the Columbia Slough in the name of finding more industrial land. The city should focus on cleaning up brownfields and intensification of existing industrial lands, not destruction of openspace and natural areas.
- 3) It is unacceptable to restrict the city's ability to place environmental

regulations on riverside industrial lands – some of our most important and degraded fish and wildlife habitat;

4) The city should focus on cleaning up its more than 900 acres of contaminated brownfields, intensifying use of its existing industrial landbase, and preventing industrial landowners from converting their land to other uses.

5) Review and restore natural resource policies that were removed or weakened from the January 2013 Draft.

Sincerely,
Stacie Hall
927 Clearbrook Dr.
Oregon City, OR 97045
stacie.hall@intel.com
Phone: 503-557-1697

Notice on Record Required by November 4th 2014

Sent to Planning and Sustainability Commission

1900 S.W. 4th Avenue Portland Oregon 97201

Dear Sirs:

I am the owner of record of the following properties:

6805 SE 82nd Avenue

6819 SE 82nd Avenue

6829 SE 82nd Avenue

8132 SE Cooper Avenue

My Name is:

Kathleen Walsh Penn Kathleen Walsh Penn
321 West 55th
New York City, New York 10019

This is to notify you, on the record, and as you require, that I object to the proposed change in zoning of my above properties from Urban Commercial to mixed use civic corridor.

Accordingly legal council will contact you on my behalf about this matter in the future.

yours Sincerely

Kathleen Walsh Penn

Kathleen Walsh Penn
321 West 55th St
NY, NY 10019

Kathleen Walsh Penn
212 581-0608

Christe C. White
cwhite@radlerwhite.com
971-634-0204

November 6, 2014

John Cole
Bureau of Planning and Sustainability
1900 SW Fourth Avenue
Portland, Oregon 97201

Re: University of Portland Comments on Proposed Campus Institution
Development Review Procedures

Dear John,

Thank you for taking the time to brief me on the Proposed Campus Institution Development Review Procedures put forth by your Bureau. This letter contains our comments on the proposal. But before we offer those comments, we would like to share some important institutional history with you; a history that shapes how we view the proposed changes to the institutional planning process.

As you know, the University recently received an uncontested approval of its new Conditional Use Master Plan in May of 2013. We are barely one year into development under that new master plan. This latest master plan follows decades of previous master plans that have set the course for how the University will continue to develop its 113-year-old campus on the North Portland bluff.

The investment the University has made in the 2013 master plan and the previous master plans is staggering and measures in the hundreds of thousands of dollars in time and planning resources and hundreds of millions of dollars in facility development. The 2013 Conditional Use Master Plan is somewhat unique. The master plan does not identify specific buildings, building locations, or uses. Instead, it establishes development parameters that give the University the flexibility to evolve over time and the community the certainty that building density, height, parking supply and special events will be managed to reduce impacts on the surrounding neighborhood.

For example, the master establishes height zones with lower heights where the campus borders single family residential uses and greater heights internal to the campus. The master plan adopted design standards for the perimeter uses along N. Willamette Blvd. and a parking matrix that coordinates student enrollment growth with increases in parking supply. It is a living document that could, without artificial limitation, take the University into the next decade or several decades. When the 10-year time frame has expired, we will not have completed the level of development permitted under the plan. Instead, at the expiration of this 10-year time frame, we would simply ask for a continuation of the 2013 plan

John Cole
November 6, 2014
Page 2

into the future. In short, the 2013 master plan was a significant investment in the University's future and is based on long term projected growth, not on simply the next 10 years.

It is through this historical lens that we offer the following comments on the proposed institutional planning process.

Maintain the Option to Elect the Conditional Use Master Plan Process

We appreciate all of the work the institutional coalition, related task forces and the Bureau of Planning and Sustainability has completed to construct the current proposal. However, we strongly urge the City to maintain an institution's ability to elect the conditional use master plan process, even when their current master plans are amended or expire. In the case of the University of Portland, the historic and current master plans are building blocks that represent millions of dollars of investment. While the City may often invoke the 10-year term for conditional use master plans, universities, like the University of Portland do not plan in 10-year increments. We plan in several decade increments based on fundraising, student enrollment and program projections. That longer term planning investment is memorialized in the master plan. To terminate that investment prematurely after 10 years, or sooner depending on when one requires a change to their master plan, and replace it with another process that has no proven track record, no historical relevance to the institution and much more uncertainty is problematic. This is particularly true when the University of Portland's master plan could appropriately regulate its growth for the next 20 to 30 years.

Further, while the City often invokes the 10-year term, PCC 33.820.060 states that the master plan must include uses for at least the next 3 years and up to 10 years. However, the very next phrase of that code section states "an approved master plan remains in effect until development allowed by the plan has been completed or the plan is amended or superseded." (Emphasis added). The code seems to recognize that institutions may not plan or develop in 10 year increments. In the case of the University of Portland, we fully expected to work within the approved 2013 master plan for decades. The level of investment in the 2103 plan reflects that expectation.

We therefore urge the City to recognize these investments and maintain the option for institutions to amend, extend or request new master plans after any adoption of the proposed new Campus Institution Development Review Procedures.

Eliminate the 10-Year Timeframe

The master plan review is not without its flaws, some or all of which could be corrected in this or another planning process. The 10-year timeframe is one example. As mentioned above, PCC 33.820.060 states that the master plan must include uses for at least the next 3 years and up to 10 years. But when that same section addresses the effective timeline for the master plan it states "an approved master plan remains in effect until development allowed by the plan has been completed or the plan is amended or superseded." The City

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should confirm and restate in this planning process that master plans do not expire after 10 years. Instead, they expire when the approved development is complete or the plan has been amended or superseded.

Non-Conforming Uses and Development Features

The Bureau's concept paper states that once the CI zones are adopted some uses that were approved under the University's master plan can become nonconforming with the new standards and would be prohibited from expansion under PCC 33.258. In addition, another review would be required to establish what kind of changes could be made to the development under 33.258. The negative impact of this change cannot be understated.

As an example, the University of Portland has invested millions of dollars under an approved long term master plan to build the Chiles Center, Merlo Field and the like. If we are required to adopt the CI zone, the Chiles Center may exceed some new height limit based on its location on the perimeter of the campus or Merlo Field may have some element of its operation that would be prohibited. Under the new rules, these uses may become nonconforming and we may not be permitted to expand the Chiles Center or we may have to curtail operations at Merlo Field. This change in the rules would alone have significant detrimental effects on the University and the financial and program investments made in reliance on our approved master plans.

The University therefore strongly urges the Bureau to retain the conditional use master plan election and remove any provision from the CI zone that would render nonconforming any existing use that has been developed under an approved master plan.

Process Issues

The concept mentions that some uses under the new CI regulations will be listed as conditional uses because of their impact on the neighborhood and will be required to go through a Type II or Type III conditional use review. That is what we have now; a Type III conditional use review for master plans. Thus, one interpretation of the new concept is that we would have to abandon our existing conditional use master plan at expiration, apply for a zone change to CI demonstrating the availability of all required services and the capacity to serve, get mapped CI and then go through a conditional use review to permit our uses. Under this scenario, an institution would go through a lengthy rezoning process just to circle back to a similar review that applies now to all institutions outside of plan districts. Based on the approved University of Portland Master Plan, it also seems likely that the regulatory result could be the same or similar. For these additional reasons, the University urges the City to maintain the existing conditional use master plan process at least as an election if the new CI zone is imposed.

John Cole
November 6, 2014
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Conclusion

These comments reflect the University of Portland's position on the current concept. As the discussions evolve, we will offer additional comments where warranted.

Thank you for this opportunity to comment. While we have significant concerns with the current proposal, we understand and appreciate that you are still in the concept phase and hope that you consider these comments helpful in reaching a successful result.

Best regards,

RADLER WHITE PARKS & ALEXANDER LLP



Christe C. White

cc: Rev. Mark Poorman, President of the University of Portland
Jim Kuffner, Assistant Vice President of Community Relations



CITY OF PORTLAND
ENVIRONMENTAL SERVICES



1120 SW Fifth Avenue, Room 1000, Portland, Oregon 97204 ■ Nick Fish, Commissioner ■ Dean Marriott, Director

November 5, 2014

Dear Planning and Sustainability Commission:

Thank you for the opportunity to provide testimony on the Proposed Comprehensive Plan Goals and Policies, Comprehensive Plan Map, Urban Design Framework, and List of Significant Projects. Environmental Services is pleased to support this long-overdue overhaul to the Comprehensive Plan. While parts of the original Comprehensive Plan have been revised since it was first adopted over 33 years ago, it no longer holds together as a coherent document. More importantly, it lacks meaningful guidance on current and emerging issues that affect Portland's future development.

The proposed plan responds to a number of current and emerging opportunities and challenges that the 1981 Comprehensive Plan did not anticipate, including:

Opportunities:

- A cleaner Willamette River, due in large part to Portlanders' investment in the Big Pipes, and a growing interest in recreating on the river, as a result.
- Extensive expertise and increasing use of green infrastructure – including green streets, ecoroofs, and floodplain restoration – as a practical and cost-effective way to manage stormwater and improve sanitary sewer capacity, while also greening Portland neighborhoods.
- Public investment in protecting and restoring sensitive natural resources to protect water quality and natural hydrologic functions, preserve and enhance critical habitats, and provide Portlanders with better access to nature.
- An increase in Portland's urban tree canopy, thanks to public investments and the work of community organizations.

Challenges:

- The costs and complexities related to the cleanup of Portland Harbor, and the impact on Portland's industrial economy and environment.
- The listing of 15 fish species found in Portland as threatened under the Endangered Species Act.
- The impacts of climate change on ecological systems, infrastructure and public health.
- Aging public sewer and stormwater systems with increasing costs for replacement, upgrades, operations and maintenance.
- Evolving federal and state water quality regulations, which will likely result in more stringent water-quality and environmental requirements.

The Comprehensive Plan Update forwards the goals of 2005 Portland Watershed Management Plan, which guide much of Environmental Services' work related to stormwater management and environmental restoration. The Portland Watershed Management Plan calls for improving watershed health within an urban context, based on the following definition:

"A healthy urban watershed has hydrologic, habitat, and water quality conditions suitable to protect human health and maintain ecological functions and processes, including self-sustaining populations of native fish and wildlife species whose natural ranges include the Portland area."

When the City Council adopted the Portland Watershed Management Plan, they called for incorporating its goals and policy guidance into the Comprehensive Plan update. Environmental Services appreciates the work done by Bureau of Planning and Sustainability to include this direction into the Proposed Comprehensive Plan. The resulting documents will significantly improve how City of Portland plans, codes, and investments protect and enhance watershed health, Portlanders' quality of life and our community's long-term prosperity.

Attached please find a summary of comments from Environmental Services, which highlight the proposed plan's strengths that we hope to see carried forward into the Planning and Sustainability Commission's recommendations to City Council, as well as suggestions for further improvements.

As you deliberate about the Proposed Comprehensive Plan, we ask you to give particular attention to the relationship between the economic development and environmental policies. While some people are tempted to consider environmental and economic goals as being in conflict, our work has shown that the opposite is true. Portland's green ethic and urban landscapes (including ecoroofs, green streets and natural areas) attract tourists from all over the world, media-based entrepreneurs and green energy companies. Daimler Trucks North America is investing \$150 million in its new Portland headquarters, while also improving access to the Willamette River. Across town, floodplain restoration in Lents supports local investment and neighborhood revitalization.

Too often, conversations about economic prosperity ignore the fact that some of Portland's biggest economic challenges – like the Portland Harbor Superfund listing and our costs for preventing Combined Sewer Overflows – are the result of previous decisions that were made without consideration of the long-term environmental impacts.

The Comprehensive Plan Update sets important direction for the next 25 years to ensure a high quality of life for future generations. Its proposed policies should guide our plans and investments to make efficient use of existing industrial land, clean up past environmental problems, protect and restore critical habitats for sensitive species, *and* increase public access to the Willamette and Columbia Rivers. By forwarding an integrated approach to planning and implementation, the updated Comprehensive Plan will help avoid environmental problems and promote economic growth.

The Comprehensive Plan Update is guided by a high, yet attainable aspiration – that all Portlanders benefit from good jobs *and* good neighborhoods, access to urban amenities *and* to a healthy environment. With the new Comprehensive Plan guidance, Portland can continue to be a place where prosperity is built on an appreciation for of our key assets – our people, our environment and our commitment to innovation.

As you deliberate about the Proposed Comprehensive Plan update, we hope you find these comments useful. Please let me know if Environmental Services staff can provide any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'JH', with a long horizontal line extending to the right.

James Hagerman

Interim Director, Bureau of Environmental Services

Integrated Planning and Implementation

Environmental Services supports the emphasis placed on integration in the Goals and Policies Chapter 1: Integrated Planning Principles. It sets a strong direction for all Comprehensive Plan documents, recognizing that all of Portland's physical systems – built and natural – are interrelated and must work together to achieve beneficial outcomes. This represents a fundamental difference from the 1981 Comprehensive Plan and sets a solid foundation for many of the Proposed Comprehensive Plan elements. It also reflects current efforts by Environmental Services to work collaboratively with other City bureaus on issues where we share an interest. For example, we are working with Transportation to implement new, more affordable, Street by Street standards for improving unpaved roads. Parks & Recreation and Environmental Services are formalizing a partnership to manage natural areas to make efficient use of staff expertise and city resources. This kind of coordinated infrastructure planning, investment and implementation will be increasingly important in order to tackle future challenges.

Resiliency and Climate Change

Environmental Services supports the Bureau of Planning and Sustainability's continued leadership in mitigating and preparing for the impacts of Climate Change. The Proposed Comprehensive Plan policies provide much needed guidance aimed at reducing carbon emissions, heat island effects, and impacts of extreme weather. In addition, the policies support improvements to the resilience of natural systems and the ability of infrastructure and development to withstand climate impacts. Many of the plan's policies and actions also address related issues, such as water quality problems in local streams and lack of trees in low-income neighborhoods.

Watershed Health

Environmental Services supports the policies in Chapter 7: Environment and Watershed, with some suggested revisions. The chapter does an excellent job of incorporating the goals of the Portland Watershed Management Plan, which guides much of Environmental Services' work related to water quality, stormwater management and recovery of ESA-listed species. The policies also promote best management practices for green infrastructure, climate change and natural hazard resiliency.

The chapter could be stronger with some relatively minor modifications. The first environmental goal in the Working Draft Part 1 Comprehensive Plan (January 2013) was developed under the specific direction of the Watershed Health and Environment Policy Expert Group. It highlighted the Portland Watershed Management Plan's key goals and provided other underlying reasons for the chapter's policies that follow. Some of these reasons were practical and relevant to City of Portland operations. Others were more personal and were included in response to the strong recommendations of community members of the policy expert group.

Without them, users of the Comprehensive Plan do not have a clear sense of what the policies are intended to achieve.

Later in the chapter, the policies related to improving ecological conditions are difficult to read and their meaning is hard to discern because of the complexity of the language. Several policies unnecessarily restate the intention of *all* Comprehensive Plan policies: to guide City of Portland plans, regulations and investments.

Overall, the Proposed Goals and Policies do a good job of integrating work across policy topics, in order to make good use of public investments. The Working Draft included several “Designing with Nature” policies in a development-related chapter. This highlighted how development, even in urban areas, can (and often is required to) be designed to improve drainage, water quality and tree canopy. Many of these policies now are found in Chapter 7: Environment and Watershed. This misses an opportunity to provide direction about how urban-scale and neighborhood development can promote environmental improvements, even far from natural areas.

To respond to these issues above, we offer the following suggestions:

Suggested revisions:

1. Restore the original goal language from the Working Draft Part 1, January 2013, developed under the specific direction of the Watershed Health and Environment Policy Expert Group, to reflect the rationale they strongly recommended.

Goal 7.B: Healthy watersheds. ~~Ecological and ecosystem functions are maintained and watershed conditions have improved over time.~~ Watersheds in Portland have the hydrologic, water quality and habitat conditions suitable to protect human health, safety, and well-being; protect public and private property; protect ecological functions and ecosystem services; sustain native fish and wildlife; support cultural and spiritual fulfillment; and maintain nature for its intrinsic value.

2. Remove the introductory language from the following policies so their meaning is much clearer:

Policy 7.15 Hydrology. ~~Ensure that plans and investments are consistent with and advance efforts to improve watershed hydrology by achieving more natural flow and Enhanceing the conveyance and storage capacity in rivers, streams, floodplains, wetlands, and groundwater aquifers to restore a more natural watershed hydrology. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly infiltrating soils and limited public stormwater discharge points; and encourage restoration of degraded hydrologic functions, where practical.~~

Policy 7.16 Water quality. ~~Ensure that plans and investments are consistent with and advance efforts to improve water quality in rivers, streams, floodplains, groundwater, and wetlands, including reducing toxics, bacteria, temperature, metals, and sediment pollution. Consider Prevent water quality related health~~

impacts on all Portlanders, especially under-served and under-represented communities.

Remove the similar introductory language for:

- ***Policy 7.17 Habitat and biological communities.***
- ***Policy 7.18 Habitat connectivity.***
- ***Policy 7.19 Urban forest.***

3. Move the following development-related policies from Chapter 7 back into the “Designing with Nature” section of Chapter 4:

- ***Policy 7.23 Low impact development and best practices.*** *Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure, especially for City-owned, managed, or funded facilities.*
- ***Policy 7.24 Impervious surfaces.*** *Limit impervious surfaces to reduce impacts on hydrologic function, air and water quality, urban heat island, habitat connectivity, and tree canopy.*
- ***Policy 7.25 Hazards to wildlife.*** *Encourage building, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.*
- ***Policy 7.26 Access to nature.*** *Promote equitable, safe, and well-designed physical and visual access to nature for all Portlanders, while also protecting significant natural resources, fish, and wildlife. Provide access to major natural features, including:*
 - *Water bodies, such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.*
 - *Major topographic features, such as the West Hills, Mt. Tabor, and the East Buttes.*
 - *Natural areas, such as Forest Park and Oaks Bottom.*

Pattern Areas

Environmental Services supports the plan’s recognition that Portland neighborhoods have evolved into distinctive areas based on topography, culture, natural environment and development history. The concept of “Pattern Areas,” which roughly corresponds to the Portland watershed and stormwater system boundaries, emphasizes the need to tailor land use and infrastructure plans to local conditions. This useful concept moves the Comprehensive Plan past an outdated one-size-fits-all planning philosophy, which, in some cases, has proven to be costly and ineffective. These policies also provide a basis for proposed changes to the Comprehensive Plan Map in areas where steep slopes, poorly infiltrating soils, drainage problems, and/or risks of landslides or flooding make them difficult to develop and serve with infrastructure. We appreciate the careful analysis that Bureau of Planning and Sustainability used to develop these proposals and the intention to better match allowed development

patterns to the realities of local conditions and the feasibility of providing infrastructure services. Their work is consistent with analysis done by Environmental Services early in the Comprehensive Plan process to determine where additional development could potentially contribute to local problems with drainage, streams and/or infrastructure.

Growing and Greening Centers and Corridors

Environmental Services supports the Proposed Comprehensive Plan's emphasis on centers and corridors as places to focus growth, create connections between communities, and provide the greatest concentrations of private goods and public services.

Stormwater from rights of way is a major source of polluted runoff that the City of Portland is obligated to manage and mitigate. Unmanaged impervious areas associated with existing private development also contribute to stormwater challenges. New development or redevelopment in centers and corridors can improve water quality and reduce impacts of impervious areas on our piped systems and local streams by triggering requirements for improvements for stormwater management and tree canopy.

Thoughtful design of public rights of way and private development can also yield more attractive and functional places. Instructive examples include Mississippi Avenue's stormwater courtyards, the Hollywood District's rain gardens, and South Waterfront's ecoroofs, green streets, and parks. Green street curb extensions on Clay Street and Division Street add to the distinctiveness of these areas, while also making busy streets safer for bicyclists and pedestrians to cross. These kinds of multi-purpose improvements can reduce overall costs related to project design and construction, while maximizing public benefits.

In Chapter 3: Urban Form, the policies and Urban Form Diagram further support the greening of corridors by forwarding a key strategy of the Portland Plan – a network of Habitat Corridors, City Greenways and Civic Corridors that work together to connect people to neighborhood destinations and nature, while improving conditions for water and wildlife. The Portland Plan's Guiding Policies calls for Habitat Corridors, City Greenways and Civic Corridors to be the spine of Portland's civic, transportation and green infrastructure systems to enhance public safety, livability and watershed health, and catalyze private investment and support livability. The Comprehensive Plan Update provides an opportunity to create truly distinctive corridors in Portland, through intentional and coordinated planning and implementation.

Greening strategies are especially important for Civic Corridors. Today, many of these busy transit streets are noisy, hot, and difficult (if not dangerous) for pedestrians to cross. Air quality, water quality, and other factors are impacted by these high-traffic streets, affecting human and environmental health, and neighborhood livability.

While the Proposed Comprehensive Plan calls for Civic Corridors to incorporate green infrastructure and be models of ecologically-sensitive design, the policy language does not reflect the Portland Plan's strong emphasis on landscaping and trees to distinguish Civic

Corridors from other streets and to make them healthier, more attractive places for residents, businesses and active transportation.

Because future growth and public investments will be focused along corridors, we suggest the following revisions to ensure that Civic Corridors transform into special places where people want to live, work, shop and gather:

Suggested revisions:

1. Revise the Civic Corridors policy to be consistent with the Portland Plan's Guiding Policies:

Policy 3.38 Integrated land use and mobility. *Enhance Civic Corridors as distinctive places that are models of ecological urban design, with transit-supportive densities of housing and employment, extensive vegetation and tree canopy, and high-quality transit service and pedestrian and bicycle facilities ~~that are models of ecologically-sensitive urban design~~.*

2. As part of early implementation of the Comprehensive Plan, convene the relevant bureaus to ensure that the policies for Civic Corridors, City Greenways and Habitat Corridors are integrated into City plans and specific projects.

Economic Development and Watershed Health

Environmental Services supports the Proposed Comprehensive Plan Goals and Policies regarding the connection between Portland's economic and environmental health:

- ***Goal 6.A: Prosperity.*** *...A strong economy that is keeping up with population growth and attracting resources and talent can:*
 - *... Support a healthy environment...*
- ***Policy 6.45 Clean, safe, and green.*** *Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitation adoption of market feasible new technology and design.*
- ***Policy 6.46 Industrial growth and watershed health.*** *Facilitate concurrent strategies to protect and improve industrial capacity and watershed health in the Portland Harbor and Columbia Corridor areas.*

Environmental Services also supports Chapter 6: Economic Development policies related to brownfield redevelopment:

- ***Policy 6.14 Brownfield redevelopment.*** *Cleanup and redevelop 60 percent of brownfield acreage by 2035.*
- ***Policy 6.39 Industrial brownfield redevelopment.*** *Provide incentives, technical assistance and direct support to overcome financial-feasibility gaps to enable remediation and redevelopment of brownfields for industrial growth.*

During the development of the Proposed Comprehensive Plan, members of the Economic Development Policy Expert Group identified brownfield clean up and redevelopment as a key strategy for helping meet Portland's projected needs for industrial land. Brownfield cleanup provides additional public benefits by reducing the risk of pollution entering Portland's water bodies.

Green Infrastructure and Industrial Development

Chapter 6: Economic Development calls for strict protection of industrial land from potential conversion to other uses. Environmental Services agrees that it is important to prevent the conversion of industrial lands to commercial or residential uses. However, Sub-policy 6.36.b. Prime Industrial Land Retention, calls for limiting the conversion of industrial land through "public land acquisition for non-industrial uses..." This, and related policies, need to be simplified or clarified in order to ensure that these policies are not intended to apply to green infrastructure projects. The following example illustrates the confusion that can arise around Environmental Services' investments in industrial areas:

In the Columbia Corridor, stormwater is discharged into the Columbia Slough, which has significant water quality issues that the City of Portland is required to address. To help manage stormwater runoff and improve water quality in the slough, Environmental Services protects and restores wetlands and other natural areas. For example, the Mason Flats area treats stormwater from 600 acres of development and roadways, while also providing wildlife habitat and other benefits. This critical part of our municipal stormwater infrastructure looks and functions like a natural area or an Open Space use. Stormwater management approaches like this are necessary to address existing runoff and to facilitate new industrial development. Without clarifying the policies, confusion is likely to arise about whether or not a project like Mason Flats is appropriate on industrial land.

This problem could be addressed by simplifying the policies to remove repetition and provide more general direction, consistent with policies found in other chapters. For example, Policies 6.50: Public facilities and land acquisition, and 7.8: Land acquisition priorities and coordination, both relate to how the City of Portland manages its acquisition programs in industrial areas, yet there are already several policies and sub-policies about how to protect industrial lands through planning processes.

Suggested revisions:

1. Simplify the policies regarding retention of industrial land so they focus on the desired outcome – maximizing use of existing land and minimizing loss of land to other uses:

Policy 6.36 Prime industrial land retention. *Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1) that is prioritized for long-term retention.;*

~~6.36.a. Strictly limit quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.~~

~~6.36.b. 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.~~

~~6.36.d. Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics.~~

2. Add a policy to Chapter 8: Public Facilities that promotes coordination between bureaus regarding public land acquisition to ensure consistency with City goals and policies and to make effective use of public resources.

3. Delete overlapping policies 6.50 and 7.8.

~~**Policy 6.50 Public facilities and land acquisition.** Limit the use of prime industrial land for parks or other non-industrial public facilities.~~

~~**Policy 7.8 Land acquisition priorities and coordination.** Maintain a prioritized list of natural resource types, target areas, or properties desirable for public acquisition to support long-term natural resource protection, and establish a process for coordinating acquisition with other programs including strategies to maintain employment land capacity, programs to protect water quality, and programs to reduce exposure to flooding hazards.~~

4. As part of Bureau of Planning and Sustainability's implementation of the Comprehensive Plan Update, consider revisions to the Zoning Code that recognize the public utility function of stormwater management facilities, including green infrastructure facilities.
5. Because the Willamette and Columbia Rivers provide critical habitat for ESA-listed salmonids, migratory birds and other sensitive species, industrial land retention policies should work in tandem with environmental policies that call for protecting and enhancing habitat for native fish and wildlife.
6. Simplify Policy 6.17 regarding regulatory climate so that it focuses on how development review process should work, rather than prescribing specific actions. As worded, sub-policies "b" and "c" describe current development review processes and sub-policy "e" could give the incorrect impression that the City considers its regulatory obligations for clean water and the ESA to be less important than our economic development goals.

Policy 6.17 Regulatory climate. *Provide clear, fair, timely, cost-proportionate, and coordinated development review processes. Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:*

~~**6.17.a.** Assess and monitor cumulative regulatory costs to ensure that Portland is financially competitive with other comparable cities.~~

~~**6.17.b.** Promote certainty for new development through appropriate allowed uses and "clear and objective" standards to permit typical development types without a discretionary review.~~

~~**6.17.c.** Allow discretionary review as a way to facilitate flexible and innovative approaches to meet requirements.~~

~~**6.17.d.** Design and monitor development review processes to avoid unnecessary delays.~~

~~**6.17.e.** Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and avoid duplicative procedures when City policies can be achieved through other means.~~

Public Access to the Willamette River

Environmental Services supports policies that promote increased public access to the Willamette River. With the completion of the construction of the Combined Sewer Overflow Controls (the Big Pipes), a major source of pollution is reduced and Portlanders have a greater interest in boating, swimming and other water-based recreation. During the Portland Plan and Comprehensive Plan public outreach, Portlanders consistently asked for more river access. Environmental Services supports the policies cited below to provide access to the rivers. While we recognize the need to consider public safety, marine-dependent industry, and habitat restoration, public access within each of the Willamette River's main reaches should also be a priority of the Comprehensive Plan.

Suggested revision:

Policy 3.60 Recreation. *Improve conditions along and within the Willamette and Columbia rivers for a diverse mix of recreational users and activities. Designate and invest in strategically-located sites along the length of Portland's riverfronts for passive or active recreational activities that are compatible with nearby land uses, historically and culturally important sites, and significant habitat, fish, and wildlife.*

Retain:

Policy 7.26 Access to nature. *Promote equitable, safe, and well-designed physical and visual access to nature for all Portlanders, while also protecting significant natural resources, fish, and wildlife. Provide access to major natural features, including:*

- *Water bodies, such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.*
- *Major topographic features, such as the West Hills, Mt. Tabor, and the East Buttes.*
- *Natural areas, such as Forest Park and Oaks Bottom.*

Comment:

Economic Development Policy 6.37 supports the important role of the riverfront for economic purposes. However, it should not preclude some public access to the river – visual and physical access – at appropriate locations within the industrial waterfront.

Policy 6.37 Harbor access lands. *Limit use of harbor access lands to river- or rail dependent or related industrial land uses due to the unique and necessary infrastructure and site characteristics of harbor access lands for river dependent industrial uses.*

West Hayden Island

The Proposed Comprehensive Plan will guide the development of West Hayden Island, if it is annexed into the City of Portland. As such, it must set clear direction for improving both ecological and economic conditions. Considerable analysis and public deliberation informed the Planning and Sustainability Commission's recommendations to City Council in August 2013 about the area's potential annexation. Unfortunately, the proposed Comprehensive Plan Map and Policies do not reflect the intent of these recommendations.

Suggested revisions:

1. Add policy language to reflect that development of the island should result in improved ecological conditions compared to those that currently exist.

Policy 6.41 West Hayden Island. *Provide for the future annexation of West Hayden Island for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or other implementation agreement that ensures mitigation of impacts and provision of public benefits. The annexation ordinance, future zoning, plan districts, and intergovernmental agreements will be used to:*

- *Allow no more than 300 acres for future deep water marine terminal and infrastructure development.*

- *Permanently protect and enhance at least 500 acres as open space, to be managed primarily for the benefit of the regional ecosystem.*
 - *Achieve a net ecological improvement over 2012 conditions (as detailed in the “West Hayden Island Natural Resource Inventory” and the “West Hayden Island Forest Mitigation Framework”), including floodplain-associated habitats and habitats for conservation priority species.*
2. Revise the Proposed Comprehensive Plan Map to show the placement of the Employment and Open Space designations, consistent with the Planning and Sustainability Commission’s Recommended Draft West Hayden Island Plan (August 2013).
 3. Provide the following information in the Commentary for the 2035 Comprehensive Plan – Proposed Draft, to clarify the legislative intent behind these proposals:

Policy 6.41 provides direction intended to reflect the City Council Resolution 36805 on West Hayden Island (July 2010) and the Planning and Sustainability Commission Recommended Draft West Hayden Island Plan (August 2013).

The sub-policy specifies improvements to “floodplain-associated habitats and habitats for conservation priority species” to clarify that ecological improvements should enhance functions that the island currently provides, and that any potential alterations to the floodplain do not result in a loss of floodplain functions.

A net gain means full replacement of all lost floodplain acreage, associated and supported floodplain habitats, ecological functions, and habitats for conservation priority species. Emphasis should be on at least full replacement of acreages with additional consideration of temporal loss. Once full and complete replacement is achieved, any mitigation package would include additional efforts that produce a “net gain.”

For more information about the ecological conditions of the site and opportunities for mitigating and enhancing ecological functions on West Hayden Island, see the “West Hayden Island Natural Resource Inventory” and the “West Hayden Island Forest Mitigation Framework,” both completed in 2012.

From: Sarah Frumkin [mailto:sarah_frumkin@ddouglas.k12.or.us]
Sent: Wednesday, November 05, 2014 3:37 PM
To: Planning and Sustainability Commission
Subject: Re: Comprehensive Plan feedback

3228 SE 118th Ave, Portland, Or 97266



My neighborhood has great character with old unique homes on large lots filled with Douglas Firs. With the infill of the last 20+ years, that character is becoming scarcer in East Portland. Please consider including SE 118th between Division and Powell in the Portland Comprehensive plan as an area for reducing the density of the current zoning.

From: Planning and Sustainability Commission
Sent: Thursday, November 06, 2014 12:07 PM
To: Kovacs, Madeline
Subject: FW: Comments on Comp 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 translation, 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: James Gardner [mailto:jimdonnachamois@msn.com]
Sent: Wednesday, November 05, 2014 6:27 PM
To: Planning and Sustainability Commission
Subject: Comments on Comp Plan

November 4, 2014

Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Dear Portland Planning and Sustainability Commission:

Thank you for the opportunity to comment on Portland's Proposed Draft Comprehensive Plan. South Portland Neighborhood Association (SPNA) has reviewed and discussed the draft plan for several months. Our Land Use Committee on October 21 adopted the following comments regarding changes we request be incorporated into the plan.

* SPNA requests that the Bureau of Planning and Sustainability provide the details for the new mixed use zoning designations as soon as possible, and request the Planning and Sustainability Commission extend the official record and hold additional public hearings on the Comprehensive Plan for at least 90 days following the release of the provisions of the mixed use zones.

* SPNA believes it is essential that the Comprehensive Plan contain policy language directing that the city establish zoning code parking requirements for multi-unit residential at a base level of one space per unit. Code provisions can allow lower ratios (but never lower than one space per three units) only when there are permanent, effective programs encouraging

alternative modes. Examples of such programs could be to provide Tri-Met passes as part of rent payments, or institute Residential Permit Parking program rules that charge significantly high fees for renters' permits.

* SPNA supports retaining neighborhood associations' role as Portland's primary program for citizen involvement. Language in the draft plan seems to ignore nearly 50 years of effective citizen participation by NAs promoting the livability of distinct communities. The Comprehensive Plan must maintain the current standing of Neighborhood Associations in planning, land use, and development processes. We ask that the draft plan add a Glossary definition of "Neighborhood Associations" as defined by geographic boundaries as established by the Neighborhood Associations and accepted by the city per city codes.

* SPNA is concerned about language in Policy 1.15 that states the updated Comprehensive Plan supersedes any goals or policies of a community, area or neighborhood plan that conflicts with goals or policies of this plan.

* SPNA supports identifying Barbur Concept Plan "nodes" for future transit stations, but we emphasize that Barbur at Gibbs was deliberately not a node identified in the BCP – and that Naito at Gibbs was.

* SPNA requests that the plan recognize the possibility of extending the streetcar to the Sellwood Bridge, and for this reason, the new Comp Plan should identify potential stations along Macadam.

* SPNA requests that the draft Comp Plan identify short term rentals as an issue that needs development of parking and traffic policies.

Please let us know if you have any questions about these recommendations.

Sincerely,

Jim Gardner
Chair, SPNA Land Use Committee

2930 SW 2nd Ave
Portland OR 97201
503-227-2096



November 20, 2014

City of Portland
City Planner, West District

1200 NE Oregon Street, Suite 3100
Portland, Oregon 97232

November 5, 2014

Planning & Sustainability Commissioners/Comprehensive Plan

As you plan for the future, especially in Downtown and North Portland, please do as much as possible to retain and create safe and affordable housing. Also include in your plans, way to encourage the development (or retention) of affordable grocery stores, employment + training opportunities.

Thank You God Bless Us All, Peggy Hillpatrick
Justice Brings Peace

November 4, 2014

Marquam Terrace Apartments, LLC
Kahm N Song
2832 SW Sam Jackson Park Rd
Portland, Oregon 97201
503-706-1930

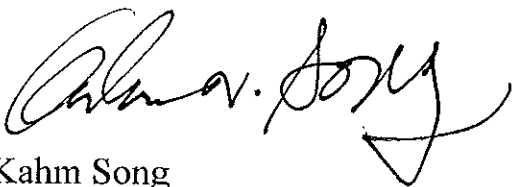
To Portland Planning and Sustainability Commission,

I own and manage the property at 2830-2846 SW Sam Jackson Park Rd, Portland OR 97201. My property is surrounded by all commercial areas and this is the only residential property in this area. It will be great benefit to OHSU to provide extra parking spaces as they are in a great need of it if the zone changes to commercial.

A brief and informal survey was done to three of my long-term current residents regarding upgrading their north side parking space from gravel to pavement if the zone changes to commercial. They strongly agreed to this commercial and mixed use zone changes.

Please see the two additional documents that are enclosed with this letter.

Best Regards,



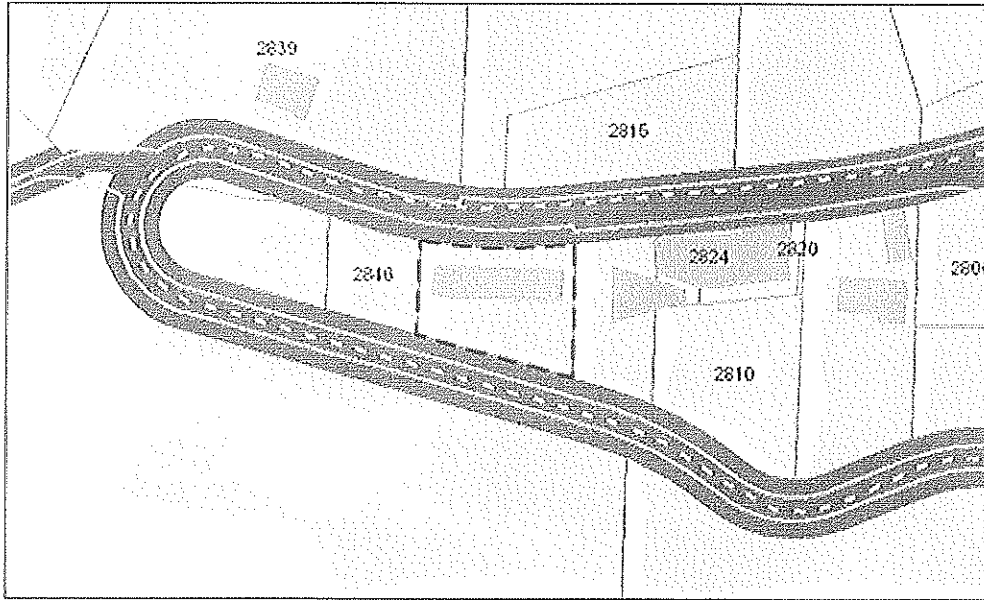
Kahm Song

2014 NOV - 4 P 3:37

RECEIVED
PLANNING DEPARTMENT

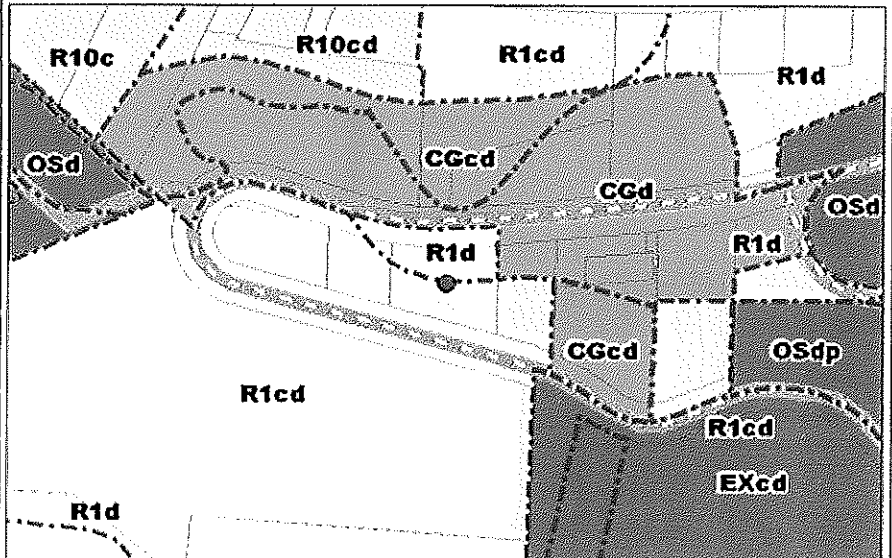
2830 SW SAM JACKSON PARK RD - HOMESTEAD - PORTLAND

Property & Location



Zoning

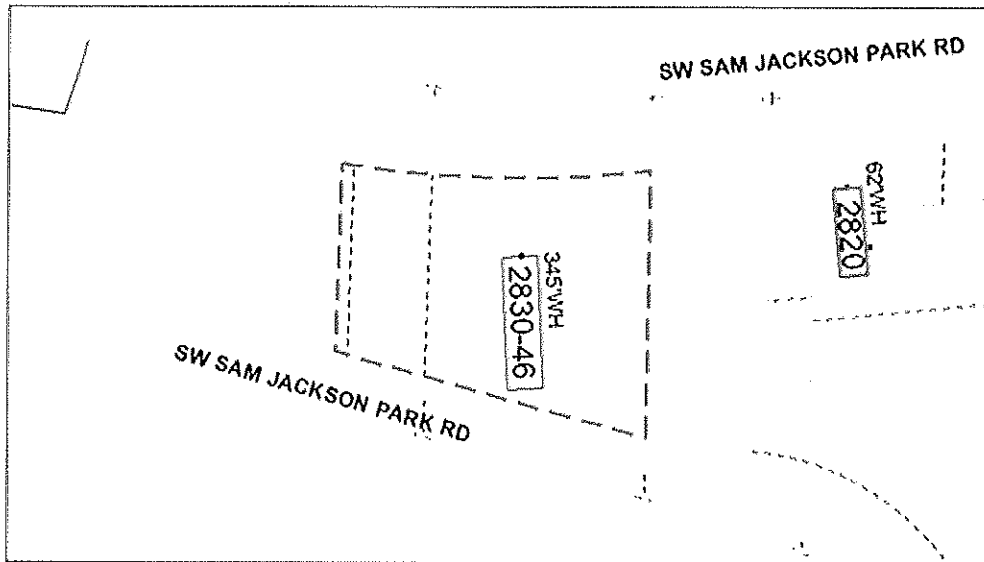
	Property
Zone	R1
Description	Medium Density Res. 1,000
Overlay	<u>C</u> , <u>d</u>
Comp Plan	R1
Comp Plan Overlay	
Historic District	
Conservation District	
Plan District	
NRMP District	
Urban Renewal District	n/a
Zoning Map	3328



MARQUAN Terrace Apts

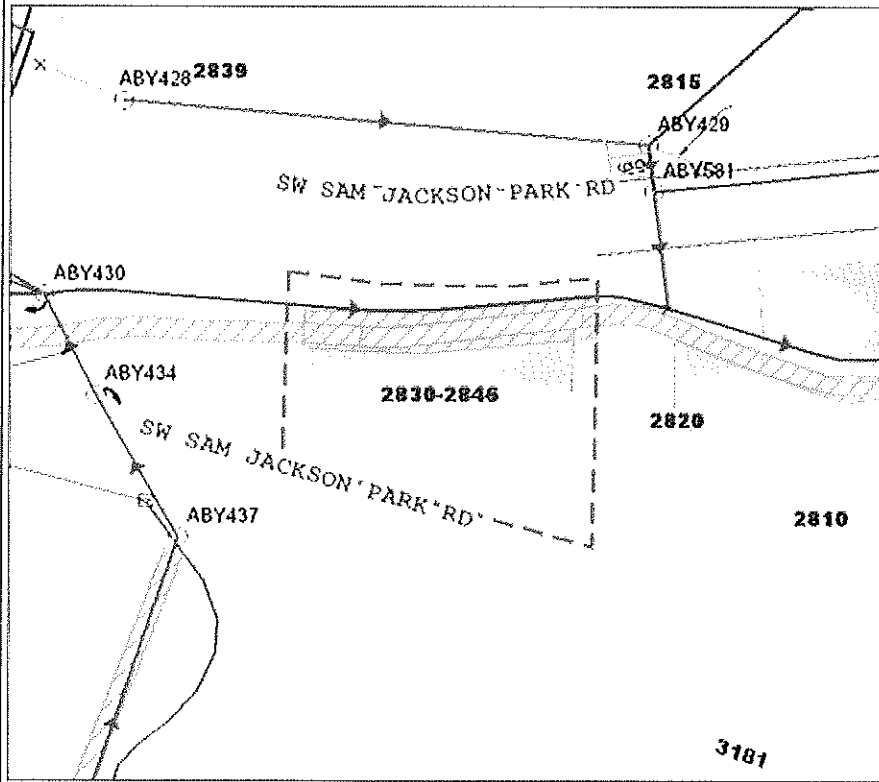
2830-2846 SW Sam Jackson Park Rd
 PORTLAND, OR 97201

Water Utilities



This map depicts the approximate location of water facilities located in the public right-of-way; the actual physical location can only be established by requesting a free utility locate. Call the Oregon Utility Notification Center by dialing 811. Location of water piping on privately owned property is unknown to the Portland Water Bureau, and is shown for illustrative purposes only.

Sewer System



- TREATMENT PLANTS
- PUMP STATIONS
- MANHOLES
- CLEANOUTS
- DIVERSIONS
- OUTFALL
- SEDIMENTATION MANHOLES
- SUMPS
- INLETS
- TRASH RACK
- DISCHARGE POINTS
- FLOW CONTROL
- STORAGE
- WATERWAY FEATURES
- NO ACCESS POINTS

*Marcellan Terrace apts
2830-2846 SW Sam Jackson Park Rd
Portland, OR 97201*

2 of 2



Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

November 4, 2014

Brentwood-Darlington Neighborhood Association
c/o Mr. Jacob Sherman
4326 SE Woodstock, PMB 494
Portland, OR 97206

RE: Comprehensive Plan Testimony for Green Thumb (6801 SE 60th Avenue)

Dear Planning and Sustainability Commission,

Thank you for listening to our testimony on October 22nd about the Brentwood-Darlington Neighborhood Association's request to the Planning and Sustainability Commission (PSC) to re-designate and re-zone the 12.8 acre urban agriculture and education site known as "Green Thumb" (6801 SE 60th Avenue) from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to a designation that best reflects its actual use: Open Space (OS).

We are pleased to know that the two property owners – Portland Parks and Recreation and Portland Public School – are supportive of this request, which reflects a strong desire from members of our community to preserve this important neighborhood asset.

Enclosed you will find the following documents supporting our request to re-designate and re-zone 6801 SE 60th Avenue as Open Space:

- BDNA request to PSC (dated September 22, 2014)
- Letter of support from Woodstock Neighborhood Association (dated Oct. 1, 2014)
- Letter of support from Friends of Portland Community Gardens (dated Oct. 6, 2014)
- Personal letter of support from Leslie Pohl-Kosbau (dated Oct. 6, 2014)
- Letter of support from ROSE Community Development (dated Oct. 9, 2014)
- Letter of support from faculty members in the Graduate School of Education at Portland State University (dated Oct. 10, 2014)



brentwood-darlington
neighborhood association

- Letter of support from Naomi's Organic Farm Supply (dated Oct. 15, 2014)
- Copy of BDNA Testimony from Oct. 28, 2014 PSC hearing at PSS Southeast
- Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from high-density residential to open space (49 pages, 467 signatures)

We hope you will seriously consider our request and this strong community support to re-designate and re-zone the Green Thumb site from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to Open Space (OS) as part of the 2035 Comprehensive Plan updates.

Thank you for taking the time to consider this request, and please do not hesitate to reach out if you have any questions.

Sincerely,

/s/

Jacob Sherman, Board Chair
Brentwood-Darlington Neighborhood Association
jdbsherman@gmail.com

CC:

Mike Abbaté, Director, Portland Parks and Recreation
Marty Stockton, Southeast District Liaison, Bureau of Planning and Sustainability
Anne Dufay, Executive Director, SE Uplift Neighborhood Coalition
Bob Kellet, Neighborhood Planning Program Manager, SE Uplift Neighborhood Coalition
Robert McCullough, Board Chair, SE Uplift Neighborhood Coalition

Enclosures



brentwood-darlington
neighborhood association

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

September 22, 2014

Brentwood-Darlington Neighborhood Association
c/o Mr. Jacob Sherman
4326 SE Woodstock, PMB 494
Portland, OR 97206

RE: Comprehensive Plan Testimony for Green Thumb (6801 SE 60th Avenue)

Dear Planning and Sustainability Commission,

On September 4, 2014, the Brentwood-Darlington Neighborhood Association (BDNA) unanimously voted in favor of strongly encouraging the Planning and Sustainability Commission (PSC) to change the zoning of the 12.8 acre urban agriculture and education site known as "Green Thumb" (6801 SE 60th Avenue) from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to a designation that best reflects its actual use: Open Space (OS).

The Green Thumb site is a unique 12.8-acre urban agriculture and educational garden facility that is managed by four partners: Oregon State University Extension Service's Community and Urban Horticulture Program, Portland State University's Leadership for Sustainability Education Program, Portland Public Schools, and City of Portland Parks and Recreation. For decades, this site has served as an important learning laboratory for Lane Middle School students, PSU students, OSU Master Gardener volunteers and Beginning Urban Farmer Apprenticeship (BUFA) students, Community Transition School students, S.U.N Program participants, the Portland Fruit Tree Project, community gardeners, a farmer-in-residence, local residents and more. Given the size and the scope of services offered, some community members believe there is no other place like the Green Thumb site in the Portland-metro area.

As a historically under-served East Portland neighborhood, BDNA has long-fought to protect, preserve, and invest in this deeply valued community asset. The site is referenced as a community resource in our adopted 1996 Brentwood-Darlington Neighborhood Plan. In the early 2000's, the neighborhood association organized and



intervened in the potential residential development of the site, successfully advocating for Portland Public Schools to sell a portion of the property to the City of Portland. As recently as last year, the neighborhood association has invested a significant portion of our savings in the development of a new project that seeks to increase civic engagement, promote social entrepreneurship, and provide affordable and nutritious organic produce to a neighborhood that faces significant food-access challenges.

Regarding the current zoning of the site, we do not want to see orchards, bird and pollinator habitat, community gardens, greenhouses, the fields of a market garden, and other community gathering spaces demolished and turned into several hundred town houses or apartments that we do not have the infrastructure and amenities to support. Rather, in our community's vision of 2035, the Green Thumb site remains a verdant and thriving place where, each year, hundreds of school-aged children, neighborhood families, university students, and other residents from around the city can access organic produce, build community, enhance their leadership skills, and learn about science, agriculture, and sustainability.

We hope you will seriously consider our request to re-zone the Green Thumb site from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to Open Space (OS) as part of the 2035 Comprehensive Plan updates. Thank you for taking the time to consider this request, and please do not hesitate to reach out if you have any questions.

Sincerely,

/s/

Jacob Sherman, Board Chair
Brentwood-Darlington Neighborhood Association
jdbsherman@gmail.com

CC:

Mike Abbaté, Director, Portland Parks and Recreation
Marty Stockton, Southeast District Liaison, Bureau of Planning and Sustainability
Anne Dufay, Executive Director, SE Uplift Neighborhood Coalition
Bob Kellet, Neighborhood Planning Program Manager, SE Uplift Neighborhood Coalition
Robert McCullough, Board Chair, SE Uplift Neighborhood Coalition



WOODSTOCK NEIGHBORHOOD ASSOCIATION
WWW.WOODSTOCKPDX.ORG

Woodstock Community Center, 5905 SE 43rd Avenue, Portland, Oregon 97206

October 1, 2014

Portland Planning and Sustainability Commission
1900 SW 4th Ave, Suite 7100
Portland, OR 97201

Dear Planning and Sustainability Commissioners:

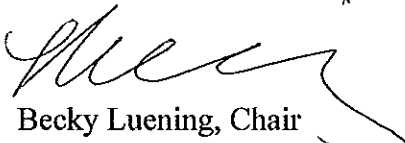
It has come to our attention that the Green Thumb/Learning Gardens Lab, which lies just southeast of Woodstock Neighborhood in Brentwood-Darlington, is in jeopardy, as the City of Portland's updates to the draft 2035 Comprehensive Plan would have this 12.8-acre site zoned high-density residential (R2A).

This urban agriculture and education center is a deeply valued community asset, not just for Brentwood Darlington, but also for Woodstock and Mt. Scott-Arleta residents. It is a thriving educational center where hundreds of children, from elementary through university levels, plus local gardeners, come to learn about gardening, fruit growing, and sustainability. It's a place where community and leadership are nurtured.

In order to ensure the preservation of this irreplaceable asset for our wider neighborhood, our board members and many of our neighborhood residents feel strongly that the 12.8-acre Green Thumb/Learning Gardens Lab should be re-designated and re-zoned to reflect its current use. We urge you to fulfill the Brentwood-Darlington Neighborhood Association's request in this matter.

Thank you kindly for your attention.

Sincerely,



Becky Luening, Chair
Woodstock Neighborhood Association

October 6, 2014

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

RE: Comprehensive Plan Testimony for Green Thumb (6801 SE 60th Avenue)

The Friends of Portland Community Gardens supports the proposed change the zoning of the 12.8 acre urban agriculture and education site known as "Green Thumb" (6801 SE 60th Avenue) from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to a designation that best reflects its actual use: Open Space (OS). FPCG has supported the designation and development of the Brentwood Community Gardens, the teaching gardens and the orchard since 1995.

Friends of Portland Community Gardens was founded in 1985 to support and expand community gardening opportunities for all Portland-area residents to grow healthy food and build community through gardening. The 12.8 acre Green Thumb site provides the Brentwood neighbors this opportunity. It also functions as a regional teaching space for PSU students, OSU Master Gardeners, and Portland Public Schools.

Green Thumb was never intended to be "vacant land" It has functioned as a vibrant, well-used garden and orchard since the 1970's, when it was established as a Portland Public School Horticultural Program. The Friends of Green Thumb worked hard to preserve it as a community garden and teaching site in the 1990's, and it serves thousands of children, teens and adults year-round. Portland Parks realized the value of such a programmed space, and purchased most of it to protect this unique asset, as sees to its operation and maintenance.

Further protection of Green Thumb will ensure the continued benefits of food security that community growing, learning and farm business activities at this traditional urban green site will provide for the Brentwood Darlington Neighborhood and the City of Portland. Therefore, Friends of Portland Community Gardens asks you to designate and re-zone 6801 SE 60th from Low Density Multi-Family Residential to Open Space.

Sincerely,

Leslie Pohl-Kosbau
Co-Chair Friends of Portland Community Gardens

Michael Wade
Co-Chair Friends of Portland Community Gardens

October 6, 2014

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

RE: Comprehensive Plan Testimony for Green Thumb (6801 SE 60th Avenue)

I support the proposed change in the zoning of the 12.8 acre urban agriculture and education site known as "Green Thumb" (6801 SE 60th Avenue) from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to a designation that best reflects its actual use: Open Space (OS). As the Director of Portland Community Gardens from 1975 to 2011, I worked on the designation and development of the Brentwood Community Gardens, and the teaching gardens and the orchard since 1995. For the past two years, I have been on the Board of the Friends of Portland Community Gardens, and am currently Co-Chair of FPCG.

The Friends of Portland Community Gardens was founded in 1985 to support and expand community gardening opportunities for all Portland-area residents to grow healthy food and build community through gardening. The 12.8 acre Green Thumb site provides the Brentwood neighbors this opportunity. Portland Parks Community Garden Program operates the Brentwood Garden, with goals that align with the FPCG. Green Thumb also functions as a prime regional teaching space for PSU students, OSU Master Gardeners, and Portland Public Schools. The site offers a unique place for this collaboration to flourish.

Green Thumb was never intended to be "vacant land" It has functioned as a vibrant, well-used garden and orchard since the 1970's, when it was established as a Portland Public School Horticultural Program. The Friends of Green Thumb worked hard to preserve it as a community garden and teaching site in the 1990's, and it serves thousands of children, teens and adults year-round. Portland Parks realized the value of such a programmed space, and purchased most of the site to protect this unique asset, and sees to its operation and maintenance.

Further protection of Green Thumb will ensure the continued benefits of food security that community growing, learning and farm business activities at this traditional urban green site will provide for the Brentwood Darlington Neighborhood and the City of Portland. Therefore, I request that Green Thumb at 6801 SE 60th be designated and re-zoned from Low Density Multi-Family Residential to Open Space.

Sincerely,

Leslie Pohl-Kosbau

7136 SW 3rd Ave.
Portland, Oregon 97219

lesliepohl@comcast.net

c. Brentwood Darlington Neighborhood Association

October 9, 2014

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Dear Planning and Sustainability Commission,

ROSE Community Development supports the Brentwood-Darlington Neighborhood Association's request to re-designate and rezone the Green Thumb/Learning Gardens Lab site from Low Density Multifamily Residential (R2A) to Open Space (OS).

ROSE is a community-based nonprofit that has been working to revitalize Brentwood-Darlington and other outer southeast Portland neighborhoods for the last 22 years. We were created by a group of neighborhood leaders who were concerned about poverty, poor housing conditions, lack of infrastructure and other livability concerns. We work closely with neighborhood members, business owners, the City, and other nonprofits to improve outer southeast as a place to live, work, and play.

One way to do this is to preserve important community assets, and the proposal to re-designate and then rezone the Green Thumb/Learning Gardens Lab site to Open Space would preserve this vital resource for future generations. ROSE sees the need for community action around youth education and food security. From educating Lane Middle School's socio-economically and ethnically diverse students about science in the garden to selling affordable, organic produce at the farm stand and donating hundreds of pounds of produce to charity each year, the diverse activities that take place at the Learning Gardens Lab increase the availability of fresh, healthy food to a lower income community, while also preparing adolescents for success in high school and life after graduation. Furthermore, the Green Thumb site also functions as an important community gathering place, a site that enhanced livability by providing space for people from the neighborhood and across the city to enjoy the outdoor setting. As a community, we should make sure that these types of community benefits are not only available today, but are also readily available in 2035.

ROSE is a member of the Brentwood-Darlington community, where ROSE has developed 20 affordable rental and homeownership properties. These include Country Squire, Johnson Creek Commons, and Woodmere Commons apartments as well as the Cooper Street Bungalows and Woodmere condominiums. While we are an affordable housing developer, we believe that healthy neighborhoods also include open space, urban agriculture and educational programs.

ROSE believes the Planning and Sustainability Commission should recommend the preservation of the Green Thumb/Learning Gardens Lab by a re-designation and then rezoning the property from Low Density Multifamily Residential (R2A) to Open Space (OS).

Thank you for your consideration.

Sincerely,

Nick Sauvie
Executive Director



Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

October 15, 2014

Naomi's Organic Farm Supply
2615 SE Schiller St
Portland, OR 97202

Dear Planning and Sustainability Commission,

It has recently come to our attention that the land presently occupied by several horticultural education and community-based programs, collectively known as Green Thumb, is currently zoned as Low Density Multi-Family Residential with an Alternative Design Density Overlay. We are also aware that the Brentwood-Darlington Neighborhood Association (BDNA) has voted in favor of strongly encouraging the Planning and Sustainability Commission (PSC) to re-designate and re-zone the land to Open Space. As a community leader committed to ecologically and socially sustainable land use, we fully support the BDNA in encouraging the PSC to designate this land as Open Space.

We are aware that the PSC must take into account social, economic and environmental issues through the lens of sustainability principles and practices. Green Thumb is a social environment unique to the region, and intersection that attracts community members regardless of class, age, race, gender and sexual identity. It is a place where trades can be learned, perspectives can be changed, experimental ecologically-focused curriculum can be developed, and, most importantly, a safe place where a person can be free to express themselves. The Green Thumb site has the potential to be an international showcase of ecologically and sustainably-driven economy through urban farming, sustainable energy, curriculum development and training, and public demonstration. With its unique location in a rapidly developing urban center, the city has an opportunity to have a model of environmental stewardship that can inspire Open Spaces throughout the city.

Green Thumb is a Portland treasure that must be protected so that its true potential can be reached. The continued collaboration between such large organizations as the City of Portland, Oregon State, Portland State, Portland Public Schools is substantial as a model of partnership. Scientific evidence suggest that ecologically driven learning has a positive effect on nutritional choices, ecoliteracy, and self-esteem. The thousands of participants each year at Green Thumb represents only a fraction of the potential of the site, which will create a positive image of PSC's commitment to sustainability, social and environmental issues.

Please feel free to contact us with any questions or concerns.



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neighborhood association

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Testimony:

My name is David Messenheimer, and I'm a board member and the Land Use chair for Brentwood-Darlington Neighborhood Association. I've lived in the neighborhood for over 3 years, and have a 2 month old daughter, who I would like to grow up with ample opportunities to understand gardening and nature in her own neighborhood.

On September 4, 2014, the Brentwood-Darlington Neighborhood Association (BDNA) unanimously voted in favor of strongly encouraging the Planning and Sustainability Commission (PSC) to re-designate and re-zone the 12.8 acre urban agriculture and education site known as "Green Thumb" (6801 SE 60th Avenue) from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to a designation that best reflects its actual use: Open Space (OS).

The Green Thumb site is a unique 12.8-acre urban agriculture and educational garden facility that is managed by four partners: Oregon State University Extension Service's Community and Urban Horticulture Program, Portland State University's Leadership for Sustainability Education Program, Portland Public Schools, and City of Portland Parks and Recreation. For decades, this site has served as an important learning laboratory for Lane Middle School students, PSU students, OSU Master Gardener volunteers and Beginning Urban Farmer Apprenticeship (BUFA) students, Community Transition School students, S.U.N Program participants, the Portland Fruit Tree Project, community gardeners, a farmer-in-residence, local residents and more. Given the size and the scope of services offered, some community members believe there is no other place like the Green Thumb site in the Portland-metro area.

As a historically under-served East Portland neighborhood, BDNA has long-fought to protect, preserve, and invest in this deeply valued community asset. The site is referenced as a community resource in our adopted 1996 Brentwood-Darlington Neighborhood Plan. In the early 2000's, the neighborhood association organized and intervened in the potential residential development of the site, successfully advocating for Portland Public Schools to sell a portion of the property to the City of Portland. As recently as last year, the neighborhood association has invested a significant portion of our savings in the development of a new project that seeks to increase civic engagement, promote social entrepreneurship, and provide affordable and nutritious organic produce to a neighborhood that faces significant food-access challenges.

Regarding the current zoning of the site, we do not want to see orchards, bird and pollinator habitat, community gardens, greenhouses, the fields of a market garden, and other community gathering spaces demolished and turned into several hundred town houses or apartments that we do not have the infrastructure and amenities to support (which is demonstrated by the city's current recommendation to downzone significant portions of our neighborhood). Rather, in our community's vision of 2035, the Green Thumb site remains a verdant and thriving place where, each year, hundreds of school-aged children, neighborhood families, university students, and



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other residents from around the city can access organic produce, build community, enhance their leadership skills, and learn about science, agriculture, and sustainability.

We hope you will seriously consider our request to re-designate and re-zone the Green Thumb site from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to Open Space (OS) as part of the 2035 Comprehensive Plan updates. Thank you

Testimony:

Hello, my name is Brad Melaugh, and I work at the Learning Gardens Laboratory through my status as a graduate student in PSU's Leadership for Sustainability Education program. I have worked at the green thumb site for over one year, and in that time I have come to love this place for what it is and what it can be. Because of the direct positive impact I have been able to observe on the community, I am asking that the site in question be rezoned from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to Open Space (OS) as part of the 2035 Comprehensive Plan updates. I would like to share some of my experiences that exemplify the community being cultivated and grown through the Learning Gardens Laboratory's involvement on the site.

In addition to coordinating the Lane Family Gardens program, I have had the pleasure of facilitating the development of the Brentwood Darlington Community Farmstand throughout its inaugural year. The farmstand has been a truly collaborative effort between the BDNA, community members, LGL staff, and PSU undergraduate capstone students. Through the farmstand initiative and our food donation program, we have been able to bring over one thousand pounds of fresh, organically grown produce to the direct and surrounding community - **in three months**. In an area of Portland where access to this type of produce is limited, an expressed niche is being filled.

Our first year of the farmstand was modest. In the coming months, we will be working closely with the neighborhood association and community members to develop a semi-permanent structure that can act as a hub for food and connection to place. This new farmstand will be designed to intentionally reflect to neighborhood and the population we are working with. We will be open from spring to fall, and listening to the community for their desires and needs regarding fresh produce varieties.

Working the farm stand each week, I was privileged to be able to connect with community elders who frequent the stand. I can say with confidence that those community members who have lived in the Brentwood Darlington neighborhood for decades are thrilled to see this site as an active, engaging, and productive community agricultural hub. They remember the days when this site was a dairy farm, and it brings them joy to taste the food growing from the land. The learning gardens laboratory is located diagonally across SE 60th avenue from Lane Middle School, who has been a partner for years. Most of the neighborhood students who pass through LMS come to LGL as a part of their six-grade curriculum, and work with our graduate student garden educators. Such a lush, well supported, and expertly staffed learning garden is



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a rarity in this country. As the school garden movement gains momentum, the Learning Gardens Laboratory serves as an exemplary model. Research by the Educational Psychology department at PSU at the Learning Gardens Laboratory, linked motivation and engagement in the garden to academic achievement. Continued engagement of LGL is an extreme asset to Lane Middle School, a focus school. It allows the school administration to focus on their academic program.

This site being zoned as R2A threatens the long-term viability of such a positive site. The loss of this site would be a deep loss to the community. This is why I am asking for the Green Thumb site to be rezoned to open space.

Testimony:

Patrick Burke, BDNA Board Member

- **Brentwood-Darlington already has a lot of property zoned R2A:** Compared to the zoning of other nearby neighborhoods west of 82nd Avenue (like Woodstock, Mt. Scott-Arleta, and Eastmoreland), Brentwood-Darlington has much more than its fair share of housing stock zoned high-density residential. This re-designation and re-zoning would not be a loss, but a great gain because of the immense value that Green Thumb/Learning Gardens Lab delivers to the community.
- **This is an equity issue:** The City should be working to protect and preserve community assets that provide value to local residents and not jeopardize them, particularly when approximately 17%, nearly 1 in 5, Brentwood-Darlington residents meet federal poverty standards — which is triple the regional average of people living in poverty. Additionally, the Learning Gardens Lab provides direct enrichment to the learning and student experience at Lane Middle School — 85% of whose students qualify for free and reduced lunch, which again is another indicator of the neighborhood's high levels of poverty. The City should be working to protect and preserve community assets and they can do that by re-designating and re-zoning the Green Thumb site to Open Space.
- **LGL provides access to fresh, affordable, organic produce:** Area is practically a food desert...
- **The neighborhood does not have the infrastructure and amenities to support R2A's intensity of development:** A 2011 article by Willamette Week titled "Dirt Roads, Dead Ends" named Brentwood-Darlington as having the City's second highest number of miles of dirt and gravel streets (4.4 miles). Also, the vast majority of the neighborhood does not have sidewalks, including the main streets — despite this being identified as an action-item in the 1996 neighborhood plan. Furthermore, the neighborhood has limited commercial business so residents must commute to other neighborhoods that have those amenities.
- **The change to Open Space simply acknowledges and formalizes the historical and current use:** While currently zoned Low-Density Multifamily Residential, the Green Thumb/Learning Gardens Lab site has always functioned as open space, serving as an



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urban agriculture and education site since the 1970's. Prior to that, the site was actually a working farm known as the Zwald Dairy. Re-designating and re-zoning the site to Open Space will simply serve as an acknowledgement and formalization of the site's current and historical use.

Testimony:

Good evening, my name is Jacob Sherman, and I am the Chair of the Brentwood-Darlington Neighborhood Association. I am also a 5th generation Portlander, and have lived in the Brentwood-Darlington neighborhood since 2010. To begin, I would like to thank you for coming to SE tonight to accept testimony on the Draft Comp Plan.

To reiterate, we would like to encourage the Planning and Sustainability Commission to re-designate and re-zone the Green Thumb site (6801 SE 60th Avenue) from R2A to Open Space as part of the updates to the City's Draft Comprehensive Plan.

As mentioned, Green Thumb is an important **community gathering space**. Annual events like the neighborhood clean-up, Earth Day celebration, Harvest Festival, plant sales, and more are held here each year. Just last week, on a rainy Friday, close to 200 people showed up to participate in the Harvest Festival.

Please help us preserve the Green Thumb site because it is an important site for urban agriculture and education. Tonight we've only provided you a snapshot of what's taking place on site. To briefly reiterate, aside from 100's of middle school students from Lane Middle School learn about science and sustainability in the garden, community members learn about urban farming on site through the OSU Beginning Urban Farmer Apprenticeship (BUFA) program; residents and community members learn about fruit trees at the community orchard maintained by Portland Fruit Tree Project; while developmentally disabled young adults learn about horticulture and develop workforce skills at the Community Transition Program; hundreds of students from Portland State University learn about urban agriculture and civic engagement; and, residents from across Portland tend garden plots at the two large community gardens on site.

We want you to help us preserve the Green Thumb site because it is important for bird, pollinator, and wildlife habitat. By preserving 12.8 acres of open space, the site's large trees, native plants, and open fields will continue to provide important ecosystem services, like habitat, clean air, and storm-water management. Additionally, many pollinator friendly plants exist on site, providing critical pesticide-free habitat and forage to pollinators which, I'm sure you know, are increasingly threatened.

For these reasons and so many more, the Learning Gardens Lab/Green Thumb is a vital asset to our historically under-served neighborhood. It was first identified as a community



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resource in the adopted 1996 Brentwood-Darlington Neighborhood Plan, and today — 18 years later —, we know it remains just as important to our neighborhood.

We know this because there is a great deal of community support for our effort to urge this body re-designate and re-zone this property to Open Space. To date, we have acquired letters of support from the Woodstock Neighborhood Association and Southeast Uplift, which is the coalition that represents 20 neighborhoods in southeast Portland. We have also received letters of support from both public and private partners, including letters from Portland State University, Friends of Portland Community Gardens, Naomi's Organic Farm Supply, and ROSE Community Development, which is not only a key stakeholder in our neighborhood, but is also one of southeast Portland's oldest affordable housing developers. Additionally, I recently learning that the property owners, Portland Public Schools and Portland Parks and Recreation, are supportive of our desired change to Open Space.

While we await letters of support from other organizations, including the property owners, many everyday citizens have expressed their support too. To date, we've also collected several hundred signatures on a neighborhood-led petition asking this body to re-designate and re-zone the property to Open Space.

We are excited to watch our community rally around the preservation of this important asset, and we urge the PSC to re-designate and re-zone the Green Thumb site to Open Space as part of the updates to the 2035 Comprehensive Plan. Thank you.

Graduate School of Education
Educational Leadership & Policy

Post Office Box 751 503-725-4716 tel
Portland, Oregon 97207-0751 503-725-3200 fax
Education 504
615 SW Harrison Street www.pdx.edu/elp
Portland, Oregon 97201

October 10, 2014

RE: Comprehensive Plan Testimony for Green Thumb (6801 SE 60th Avenue)

Dear Planning and Sustainability Commission,

We strongly support the re-designation and re-zoning the 12.8 acre urban agriculture and education site known as "Green Thumb" (6801 SE 60th Avenue) from Low Density Multi-Family Residential with an Alternative Design Density Overlay (R2A) to a designation that best reflects its actual use: Open Space (OS).

For almost a decade faculty and students in the Leadership for Sustainability Education master's program at Portland State University have been deeply engaged in community-based sustainability work at the Learning Gardens Laboratory (LGL). The Learning Garden Laboratory (LGL) is a garden-based education program that is located at the 12 acre Green Thumb site. The mission of the Learning Gardens Lab is to support academic achievement, leadership development, and a local sustainable food system by providing garden-based education for public school students and their families, university students, and community members. Established in 2005, LGL exists as a unique partnership between Portland State University, Portland Public Schools, The City of Portland's Parks and Recreation, and Oregon State University Extension Service.

The Learning Gardens Laboratory at Green Thumb provides a wide array of programs that serve the local community:

- **Garden-based education:** Lane Middle School students learn about the principles of sustainability especially as they relate to growing food via integration of school subjects.
- **Courses and workshops for PK-12 educators** about how to create garden-based sustainability curriculum.
- **Service-learning capstone courses** with over 100 Portland State University students each year.
- **Hands-on gardening and sustainable living skills** with local neighbors in the Lane Family Garden and the OSU Master Gardener Demonstration Garden.
- **Community events** open to everyone: The fall Harvest Festival and the April Earth Day Festival.
- **Economic development** and a local sustainable food system development through our Farmer-in-Residence program, our weekly farm stand, and through OSU Extension's Beginning Urban Farming Apprenticeship Program.

Given the scope and breadth of educational programs and partnerships at the Green Thumb site, we strongly urge that the site be rezoned, so as to protect the space from residential development. This

is important for several reasons. First the Learning Gardens Lab at Green Thumb aligns with the city of Portland's long-term sustainability goals. Learning gardens are rich learning sites due to their ecological and sociocultural benefits, and provide a hands-on way for university students and school children to engage in complex sustainability issues such as the development of sustainable local food systems and clean watersheds. Second, the Green Thumb site serves a diverse and disenfranchised community, often comprising new immigrant and refugee families. Each week nearly 200 middle school students from diverse racial, cultural, and socio-economic backgrounds participate in direct, hands-on learning at Green Thumb. These racial and ethnic minority students study science, math, writing, and social studies in the garden, experience the process of growing and harvesting food, and learn the importance of good nutrition and eating habits. Research at LGL has shown that this engagement in garden-based learning increases students' motivation and achievement in school. Third, the site also serves to help mitigate food insecurity in the neighborhood by offering garden plots for neighborhood families, garden-based and urban farming education, and a weekly farm stand for the community.

Portland State University has dedicated considerable resources to the Green Thumb site over the past ten years and is committed to continuing our strong relationships and programs to address the needs of outer southeast Portland. In close partnership with the Brentwood Darlington Neighborhood Association, we urge you to rezone the Green Thumb site to OS, in order to protect and reflect its actual use.




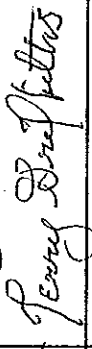






Sincerely,

Heather Burns, Ed.D.
Assistant Professor, Leadership for Sustainability Education (LSE)
Faculty Coordinator, Learning Gardens Laboratory
Educational Leadership & Policy
Graduate School of Education
Portland State University

Sybil Kelley, Ph.D.
Assistant Professor of Science Education & Sustainable Systems
Leadership for Sustainability Education
Educational Leadership & Policy
Graduate School of Education
Portland State University

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Michael Molinaro	molinaraarchitect@gmail.com	4007 SE TAZLOR	97214	
2 Terry Dublinski-Milton	Terry.Dublinski@gmail.com	6111 E Buonside Rd	97215	
3 ENRIQUEZANO	ENRIQUEZANO@gmail.com	5901 SE HAIG POB 97206	97206	
4 Terry Griffiths	treeterry@yahoo.com	4128 SE Reed Street	97202	
5 Ellen Bull	smilkland.us@gmail.com	1123 SW Harnay St	97202	
6 Linda Nettekoven	linda.n@nettekoven.net	2018 SE Linda Ave	97214	
7 Leah Scholl	leascholl@gmail.com	523 NE 96th Ave	97220	
8 Lisa Lewison-Rinder	astrawhale@gmail.com	3012 SE OLFSON	97222	
9 JEFF FLOREY	Jeff_Florey@hotmail.com	7417 SE DUKE	97206	
10 Monica Cline	mkcline@gmail.com	537 N. Stafford St	97217	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Michael Afentoulis	afentoulis@gmail.com	1335 NE 69TH AVE. Portland, OR 97213		
2 Stefanie Linch	stefanieestefanie@gmail.com	22-25 SE 89th Ave Portland, OR 97216		
3 Laurel Hulet	haleymonstake@gmail.com	6044 SE STARK ST, Portland, OR 97215		
4 Gwen Keanes	gwenchp3@gmail.com	7155 N. Westara Ave Portland OR 97203	97203	
5 Christopher ^{ASTIAN}	cpaustia@kent.edu	715 SE 68th Ave Portland OR 97213		
6 Marlene Riskey	mriskey1@gmail.com	3915 SE 132nd Portland, OR 97220	97236	
7 David ^{DAVID}	rasambairds@mailgap.net	4205 NE Halsay Street Portland, OR 97213	97213	
8 Tyler Hulet	hullettechris.com	23rd SE 50th Portland, OR 97206	97206	
9 Shelly Bumbina	sbumbina@gmail.com	64 NE 17th Ave Portland OR 97232	97232	
10 Ted Assur	ted.assur@gmail.com	6226 SE 62nd Ave. Portland OR 97206	97206	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Jennie Todd	evarella@gmail	8140 SE 51ST AVE	97206	
2 Kathleen Broderick	cayse411@gmail.com	4535 SETEMINO DR	97206	
3 Sarah Ferguson	ferguson.sc@gmail.com	7610 SE 45th	97206	
4 TERRY GRANAM	graham916@comcast.net	4855 SE MADISON	97206	
Becky O'Brady	bradandbeckstoddd@aol.com	1221 SW 10th Ave #1309 Portland OR	97205	
5 Jolene Skiner	jilenskiner@yahoo	7875 SE 48th AVE PDX OR 97206	→	
6 Mary Dawn	Mary.dawn@gmail.com	4818 SE TEMINO DR. PDX OR 97206	97206	
7 Jim Hollowell	Jillst83@gmail	8100 SE 51ST PDX OR 97206	97206	
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9 RYAN STILES	Ryan@Pickthru.com	8143 SE 52nd AVE 17206	17206	

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2.5a) to Open Space**

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2.5a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Alice Burke	alicekot53@gmail.com mwendetho@eps.net	8035 SE 60th	97206	
2 Melissa Chenoweth		7425 SW 85th	97223	MChenoweth
3 Formerly Judges	074burhamont@epi.com	7325 SE 60th Ave	97206	Harmon Hedges
4 SUSAN HOWARD		6529 SE CEDAR ST	97206	
5 JOO TOO	thottan2063@yahoo.com sherry.hague@yahoo.com	6111 SE 81st	97206	
6 Sherry Schroeder Hague			97206	
7 Erin Seitz	elorraine@gmail.com	5825 SE Flavel St. PDX	97206	
8 CURTIS FAIRMAN	cfairman@gmail.com	6026 SE HENDERSON ST	97206	
9 Ryan McMahon	RYANMCMANON@YIML.COM	6115 SE 53rd Ave	97206	
10 TRACY GRANT	tracymgcmt@hotmail.com	6152 SE Langford St.	97206	

Petition to change zoning of "Green Thumb" (6801 SE 60th from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Marian Wolfe Dixon	marianwolfedixon@gmail.com	6901 SE 65 th Ave PDX, OR 6844 SE 65 th Ave	97206	Marian J. Dixon
2 Mully Ganache	mullyganachegmail.com	PDX, OR	97206	Mully Ganache
3 Tatum Gewecke	tatumgeweckegmail.com	6844 SE 65 th Ave PDX, OR 97206	97206	Tatum Gewecke
4 Karl Oppenheimer	k2arl@hotmail.com	6701 SE 65 th Ave 97206	97206	Karl Oppenheimer
5 Lynn Espeland	lynespelan@vicloud.com	6746 SE 65 th Ave	97206	Lynn Espeland
6 Susan Angley	6824 SE 65 th Ave	PDX, OR	97206	Susan Angley
7 Pedro Angley	u			Pedro Angley
8 Carrie Lind	Bement44@hotmail.com	6737 SE 64 th Ave PDX, OR	97206	Carrie Lind
9 FIAN OSHAUGHNESSY	ocannansdens71@gmail.com	6737 SE 64 th Ave	97206	Fian O'Shaughnessy
10 Robert Emond		6746 SE 65 th Ave	97206	Robert Emond

Petition to change zoning of "Green Thumb" (6801 SE 60th from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Megan Williams	Meganwilliamspx@gmail.com	1831 SE Lexington St	97202	
2 Julianna Tiffany	jtmama@gmail.com	10519 SE Center St	97266	
3 Heather Miles	hedyhazel@rocketmail.com	10442 SE Fern Ave. Portland	97206	
4 Kris Logan	lucienlogan@gmail.com		97080	
5 Nathan Jones	njones7@gmail.com	3415 SE 74th Ave #20 Portland	97206	
6 Shabrina Shaiiff	shabrina.shaiiff@gmail.com	3415 SE 74th Ave APT #20 Portland, OR	97206	
7 Leo Qin	leozqin@gmail.com	2630 SE Center Pine St	97214	
8 Prairie Hale	prairiehale@gmail.com	5844 SE Mall St.	97206	
9 Justin Moran	FRIZIONI@LMAIL.COM	4311 SE 37th Ave	97202	
10 Kegan Moran	keganmoran@gmail.com	4311 SE 37th Ave #26	97202	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Morgan Emrich	morgane@icloud.com	7009 SE 63rd Ave Portland, OR	97206	
2 Barbara Fitch	barbarafitch@gmail.com	7209 SE 63rd Ave Portland, OR	97206	
3 John Carr	john@carry.com	2418 SE 67th Ave Portland, OR	97206	
4 Kris Gupta	Kris.gupta@nyu.edu	1123 SE Clanton St Portland, OR	97202	
5 Jim Seibert	jimseibert@comcast.net	1123 SE Marion Portland, OR	97202	
6 Mark Takiguchi	mtakiguchi@psdschools.org	1943 SE 27th Portland, OR	97214	
7 Martha Schlitt	marthaschlitt@gmail.com	Portland, OR	97214	
8 Angie Carr	angie@carry.com	2918 SE 67th Portland, OR	97206	
9 Sarah Clark	Clark4his@gmail.com	5812 SE Henderson St Portland, OR	97206	
10 Alma Sawyer		5731 S.E. Henderson Portland, OR	97206	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

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1 Mary Ann Schuch	e33mascsub@gmail.com	605 SE 38 th Avenue Portland, OR 97202	97214	
2 MOLLY STARR	molly.starr@gmail.com	4033 SE Terwind St. Portland, OR 97202	97202	
3 SUSAN HILDRETH	shildreth@equitygroup.com	6308 SE 28th Ave Portland OR 97202	97202	
4 GARDINE STORMS	GSTORMS@EQUITYGROUP.COM	1905 NE 61st PDX	97213	
5 Katy Powell	okcarey@comcast.net	8722 SE 34 th Milwaukie 97222	97222	
6 DAVE SNYDER	dsnyder@equitygroup.com	2407 SE 34th Ave Portland, OR 97214	97214	
7 Alexandra Stewart	alexapex@gmail.com	1826 SE Shawnee St Portland OR	97202	
8 Christina Hamilton	christinahamilton@comcast.net	4077 SE Boardman Milwaukie OR	97267	
9 Steve Eggeks	STEVE@STOVEEGGERS.COM	1934 46th Street SE PDX, OR	97202	
10 Bill L Felsman	judefelsman@gmail.com	0255 SW Ridge Dr. PDX OR	97219	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Drew Lovera	lovesa@seagrant.com	1733 SE Kim St Portland OR 97202	97202	
2 Shawn Skinner	Shawn@McJahara.com	7800 SE 13th Ave Portland OR 97202	97202	
3 Kellie Jenkins	Kellie@equitygroup.com	5201 SE 33rd Ave Portland OR 97202	97202	
4 Lisa Ratzlaff	lratzla@equitygroup.com	7419 SE Market Portland OR 97202	97202	
5 Wendi Super	wsuperpdx@gmail.com	1886 SE 13th Ave Portland, OR 97202	97202	
6 Gene McMe	gene@mcme.com	PO Box 1004 Gladstone, OR 97027	97027	
7 Lisa Avena	avena.lisa@gmail.com	1813 SE Locust Ave Portland, OR 97214	97214	
8 Stephanie Wilde	sns wilde@aphoo.com	188 SE Spome #4 PO Box 97202	97202	
9 Leslie Yeagers	leslie@yeagers.net	635 SW Colony Drive Portland, OR	97219	
10 Dawn McElligott	dnamc@att.net	1409 S.E. Lexington Portland, OR 97202	97202	

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Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 LARA ALVAREZ	ldoldfather@yahoo.com	4800 SE 48th PDX, OR 97206	97206	
2 Lawrence Duncan	ld1@corionimaging.com	30050 Freedom Rd Seppusse OR 97056	97056	
3 Sharin Cooper	blurred27@yahoo.com	922 SE Franklin Portland OR 97202	97202	
4 Myla Stauber	briansdoor@hotmail.com	1323 SE 50th PDX 97206	97206	
5 Ames Picoalo	amespicoalo@gmail.com	4726 SE 48th Portland, OR 97206	97206	
6 Rosalie Picoalo	Buttercreammm@gmail.com	4726 SE 48th PDX, OR 97206	97206	
7 ANNIE CUMMINGS	cummings.annie@gmail.com	1914 SE PROXIMON PDX, OR	97214	
8 Sara Knutty	sara.knutty@yahoo.com	8249 NE 10th Portland, OR	97266	
9 Katherine Gwynn	Katlegwynn@gmail.com	104 NE Faring St. Portland OR	97212	
10 Blake Bennett	gabriel397@yahoo.com	3820 N Haight Ave	97227	

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2.5a) to Open Space**

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Printed Name	Email	Address	Zip Code	Signature
1 Natalie Hannan	wataliehanan@gmail	3882 SE 11 th Ave Portland	97202	
2 JULIE HANSE	JMHANSE@GMAIL.COM	4128 SE HENDERSO ^R PORTLAND, ORE	97202	
3 NANCY CRETSINGER	ncretisinger2@gmail.com	17006 SE 28 th ST Vancouver, WA 98683	98683	
4 CAROL HUMPAGE	carol.humpage@gmail.com	2427 NE 24 th 97212	97212	
5 Leda Zawacki	leda.zawacki@yahoo.com	328 NW Stoddard St #115	97209	
6 WILLIAM DEAN	decan@ohsu.edu	2932 SE 25 th Ave	97202	
7 Siri Peterson	irisiri00@netscape.net	2043 NE Couch	97232	
8 Amy Burke	amyednaia23@ohsu.edu	4014 W Michigan Portland	97227	
9 FISS ELLER	FissEller@aol.com	1270 E Burnch APT 125	97214	
10 Jennifer Bodavala	Bodavala.j@ntnival.com	4204 SE 33rd Pl Portland	97202	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2.5a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 DOMINIQUE ESTLAND	Robert1818@gmail.com CONCAST.net	818 NE 92nd Ave PDX	97220	
2 LISA INSURE	aquefiam@gmail.com LONCAST.net	8846 NE Schuyler Portland, OR	97220	
3 Michael Johnson	michael1michael12@gmail.com	4820 SW Barbur Blvd Portland, OR Apt 32	97239	
4 Cristina Carter	CristinaCarter@gmail.com	130 NW 19th	97209	
5 Andrew Seaman	seaman.andy@gmail.com seaman@gmail.com	2614 SE Ash St PDX 97214	97214	
6 ROBIN JENNINGS	robinjennings@gmail.com	5528 NE Belmont St PDX 97215	97215	
7 SUEANNE ALPHE	suealpe@gmail.com concast.net	2105 SE Grant PDX 97214	97214	
8 Lynda Byers	lebyers484@gmail.com	2671 NE Schuyler St PDX 97212	97212	
9 Dg Aden	trexfk27@gmail.com	80497 Swannock Beaverton OR	97007	
10 Nahia Fay	midbot@gmail.com	1318 SE Yamhill St PDX 97214	97214	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Makrai Creel	makrai.creel@comcast.net	824 SE 30TH Ave #12 Portland, OR 97214	97214	Makrai Creel
2 Joray Mader	joraymader@yahoocan.com	6125 SE Lambert St PDX OR 97206	97206	Joray Mader
3 Trey Lee	lee97206@comcast.net	6125 SE Lambert PDX OR	97206	Trey Lee
4 Megan Lane	preylthingsbymeg@gmail.com			
5 Melissa Masini	melissamasi2@gmail.com	1912 SE 12th PDX 97214	97214	Melissa Masini
6 Keshin Meyers	Keshin.Meyers@gmail.com	205 Cenunks Lake Oswego OR	97035	Keshin M
7 Renee Moffitt	RMoffitt@comcast.net	1452 NE 50th Portland St Portland, OR 97220	97230	R. Moffitt
8 Erin Claussen	erinwanders9@gmail.com	5125 NE 30th PDX,	97211	Erin Claussen
9 Deborah Brown	debarino07@gmail.com	4815 SE Canuthers	97215	Deborah Brown
10 Caitie Manojel	cat2947@comcast.net	254780 Upper M. net Portion, CR 97201	9	Caitie

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2.5a) to Open Space**

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Printed Name	Email	Address	Zip Code	Signature
1 Yvonne Irvin	yvonneb@riseyaho.com	1425 NE Mason St Portland, OR 97211	97211	
2 Margaret DesLay	gretchen@gnail.com	313 NE Wy Street Portland, OR 97212	97212	
3 HEATHER MUMFORD	THEKIDNAVEN@GMAIL.COM	8729 N VERMILION AVE PORTLAND, OR 97217		
4 Margaret Foster	MARGRINF@GMAIL.COM	631 SE 10th PDX, OR	97206	
5 Jenni Heissman	jkheiss@ms.com	6154 SE 120th Ave PDX, OR 97206	97206	
6 Kelly Zaks	SNAKIS@GMAIL.COM	6922 S.E. 70th Ave PDX OR 97206	97206	
7 Chelsea Kyu	chelsea.a.kyu@gmail.com	6927 SE 10th Ave Portland, OR 97215	97206	
8 ANDREA BACH	MISS.andree@gmail.com	4921 SE TENINO CT PDX OR 97206	97206	
MORGAN	mo48hart@icloud.com	62 SE 5th PDX OR 97215		
9 DEMING	mo48hart@icloud.com	62 SE 5th PDX OR 97215		
10 MICHAEL POWELL	MPOWELL2@GMAIL.COM	602 SE 57th Ave Portland, OR 97215	97215	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 <i>Shirley Lerwin</i>	<i>joshelewis@gmail.com</i>	<i>5203 N Delaware Ave</i>	<i>97217</i>	<i>[Signature]</i>
2 <i>Kris Jarvis</i>	<i>KJARIN240@gmail.com</i>	<i>2746 NE 108th</i>	<i>97220</i>	<i>[Signature]</i>
3 <i>Thomazina Letnich</i>	<i>thomasina.letnich@yale.edu</i>	<i>8833 SE Pine</i>	<i>97216</i>	<i>[Signature]</i>
4 <i>Michelle Austin</i>	<i>cutestcookie@hotmail.com</i>	<i>2515 SE 73rd Ave</i>	<i>97206</i>	<i>[Signature]</i>
5 <i>Berry Feens</i>	<i>berryfeens@hotmail.com</i>	<i>3346 NE Peeler St</i>	<i>97232</i>	<i>[Signature]</i>
6 <i>MICHAEL C KING</i>	<i>bigkingmc@gmail.com</i>	<i>9942 SE K&A PL COMM HV 97086</i>		<i>[Signature]</i>
7 <i>VELYN APPELSCHER</i>	<i>everdick59@gmail.com</i>	<i>2708 NE 72nd Ave Portland OR 97213</i>		<i>[Signature]</i>
8 <i>Jeffrey Frame</i>	<i>jeffframe@gmail.com</i>	<i>4493 SE 50th Ave</i>	<i>97202</i>	<i>[Signature]</i>
9 <i>April Johnson</i>	<i>apriljohnson@hotmail.com</i>	<i>6607 NE 60th St</i>	<i>97218</i>	<i>[Signature]</i>
10 <i>Kapilla Lee</i>	<i>Kamillee@gmail.com</i>	<i>614 SE 18th Ave #2</i>	<i>97214</i>	<i>[Signature]</i>

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2.5a) to Open Space**

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SE
Knight

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9/6/17

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Printed Name	Email	Address	Zip Code	Signature
1 Erik Hinson	erik648@gmail.com	7720 SE Knight St	97206	
2 Alyssa Shell	AlyssaShell@gmail.com	703 NE 21st Ave Portland OR	97232	
3 Mandi Beckler	mandibackler1987@hotmail.com	723 NE 21st Ave PDX, OR	97224	
4 Justin Weather	JustinWeather@gmail.com	907 NE Fremont St PDX	97217	
5 KATELIN STUBBS	Kate@Goddess.com	POB 441 CASCAD LOCKS	97014	
6 Glenda Ryeba	glenda.ryeba@nasa.com	2414 E Burnside 97267	97214	
7 Sara Short	sashort3@gmail.com	3813 NE 65th Portland 97	97213	
8 PAM HARR	bt.harr.hwy@gmail.com	NE PRESCOTT APT H 1011 PDX, OR 97211	97211	
9 Mary Jane Moriarty	pdxmoriarty@gmail.com	403 SW 13th Ave APT 1503 PORTLAND, OR 97205	9720	
10 Cedric Justice	cedric.justice@gmail.com	2034 NE DAVIS Portland OR	97232	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Heather Mott	vobeah@comcast.net	5217 NE Everett St PDX 97213	97213	
2 Jennifer Summerville	Jsummerv@ps.net	6220 SW Mitchell St Portland, OR 97217	97206	
3 Ryan Landau	graphics@relapse.com	6220 SE Mitchell St Portland, OR 97217	97206	
4 Scott Fensler	scottfensler@gmail.com	3745 SE Grant St Portland, OR 97217	97214	
5 Mark Phillips	USBPDX@gmail.com	2625 SE 67th PDX, OR 97206	97206	
6 Carlin Ellis	eb@insaus@gmail.com	7220 SE Knight Portland, OR 97204	97204	
7 SARAH NOHRENBURG	snoh.22@gmail.com	5148 SE MILWAUKEE AVE PORTLAND, OR 97202	97202	
8 Tara J Merritt	tajmerritt@gmail.com	2874 SE Francis Portland, OR 97202	97202	
9 Chere Filimova	chere@spers.com	5145 N Williams Ave, Portland, OR 97217	97217	
10 Kelly Snyder	supercat@comcast.net	1400 NE Emmons St Portland, OR 97218	97218	











Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Erin LACERRA	ERIN.LACERRA@GMAIL.COM	546 NE Cook St. Portland OR 97212 →		
2 Rhonda Piaselli	COYAHUB@YAHOO.COM	325 NE 24th Ave Portland, OR 97213		
3 Alex SFA	sydbarrett27@yahoo.com		97212	
4 Jasanta Jay	jasanta.staff@gmail.com		97124	
5 Carmen Forchise	carmenforchise@gmail.com	2064 AE PACIFIC PORTLAND OR 97213	97213	
6 Megan Brandon	spidersubsilure@gmail.com	3111 SW 13th AVE #1 POB, OR 97239	97239	
7 Chuee [unclear]	therecobbias@gmail.com	2215 NE 48th Ave Portland, OR 97212	97213	
8 [unclear]	SONOGR35@GMAIL.COM	13690 SW KING LEAF WAY PDX	97224	ANGIE STEPHENS
9 Abigail ELSWORTH	ABBEELLSWORTH@GMAIL.COM	3825 SE 32nd, AVE #113 Portland, OR	97202	
10 Bryan Black	bryan.k.black@gmail.com	5734 SW Downer View Ct Portland, OR 97209	97221	








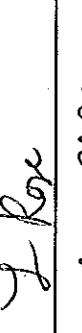

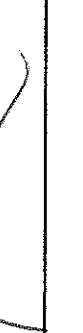
Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

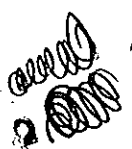
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Printed Name	Email	Address	Zip Code	Signature
1 Heather Stevens	heatherstevens@gmail.com	7128 Semutched St. PDX	97206	
2 Jason Hriegelle	jhriegelle@mac.com	2705 NE 38th Ave PDX 97212	97212	
3 Joshua Kesink	skesink@gmail.com	2761 Nwputygraze St apt 4 PDX	97210	
4 Louis Shumway	lbrishum@gmail.com	60631 NE Siskiyou 3050 NE 23rd St. Apt. #10 Gresham OR	97213	
5 Jeremy maes	soidierofthelapocalypse19@gmail.com	4137 N. Ogden Portland OR 97217	97030	
6 Alison Lanigan	alaligan@wr-net.com	2735 NE 65 Ave PDX	97213	
7 Connie Chafetz	conniejean1956@gmail.com	4053 NE 32nd PDX	97212	
8 Ann Fournier	annfournier@pps-net	2017 NE	97212	
9 Claire Oberding	colberdie@pps.net	4024 NE Multnomah St	97232	
10 Nicole Black	nicoleblack@gmail.com			

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Printed Name	Email	Address	Zip Code	Signature
1 Beth Martin	keepitsimple@comcast.net	#66 725 SE 41 st Ave	97214	
2 Scott Ballard	ScottBallardFilms@gmail.com	#66 725 SE 41 st Avenue 312 NE 61 st Ave	97214	
3 Megan Ruffe	megan.ruffe@gmail.com	312 NE 61 st Ave Portland, OR	97213	
4 Anne Ostrowski	annosz@comcast.net	3910 NE GUSMAN ST. PORTLAND OR	97213	
5 Erik Nettle		3910 NE GUSMAN ST POX. OR 97202	97232	
Jess Panaman	jpanaman@gmail.com	1841 NE 66 th Ave #60	97213	
7 Cem Rising-Shull	oscrs@sonic.net	8022 N. Mckenna	97203	
Lauren Rosenthal	laurenarose@gmail.com	8022 N. Mckenna	97203	
MARC PARKER	marc.r.parker@gmail.com	8022 N. Mckenna	97203	
10 Keirsten Smith	keysten@inspiration.com	6018 SE Woodward Portland OR	97206	








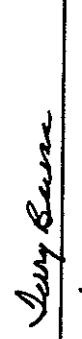

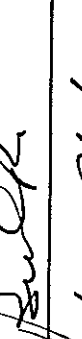
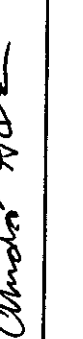

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Printed Name	Email	Address	Zip Code	Signature
1 Jane Donegan	aggie24@gmail.com	8200 SE Wadsworth Barboursville	97234	
2 Miles Munroe	milesmunroec@yahoo.com	7006 N Lancaster Portland, OR	97217	
3 LAURA Desimone	ladesimone1@gmail.com	2915 NE Tillamook	97212	
4 Sarah Marble	sarahmarble@gmail.com	815 SE 41st #80	97214	
5 Briam Wakson	alaysia.wakson@gmail.com	8429 N. Delaware	97217	
6 Paige Spore	paigespore@gmail.com	1930 SE Oak	97214	
7 Lucy Nash	lucynashville@gmail.com	1803 N Killingsworth	97217	
8 Kelly Donovan	missdantyanne@yahoo.com	4570 SE LOCUS RD	97220	
9 Erin Galey	erh.galey@gmail.com	1523 Ankeny St., Unit 1, 97214	97214	
10 CARISSA TREPPE	carissatreppa@gmail.com	832 NE 65th ave	97213	


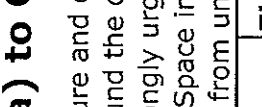
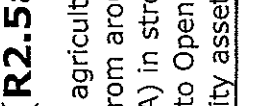
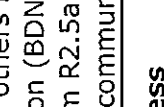
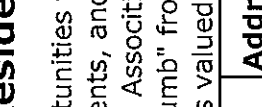
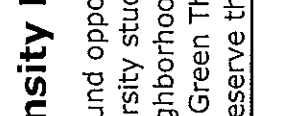
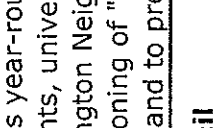
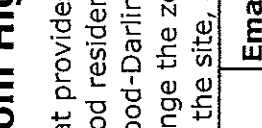
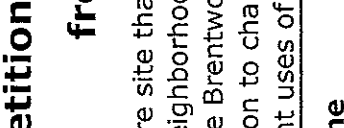
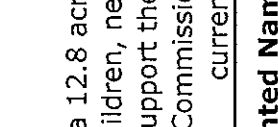
Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2.5a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Samantha Shafer	sshafer@ldark.edu	SW 608 orchid St	97219	
2 Anna Lindberg	annalindberg@clark.edu		97219	
3 James Sharp	jamessharp@clark.edu		97219	
4 Maura Hamey	hameym@clark.edu	Perblend	97206	
5 Carmen Chen	carmenchen1234@live.com	Happy Valley	97086	
6 Gail Burns	burnsgail@gmail.com	Northland	97213	
7 Terry Burns	terraceburns@gmail.com	Portland	97213	
8 Alexis Thompson		1605 SE 33rd Ave #3 Portland OR 97214	97214	
9 Bruce Ritter	bruce.ritter@ppsw.net	15930 SE Walker Rd 60th Ave 60th Ave	97267	
10 Amanda Hudson	ahudson09@gmail.com	6543 SE 60th Ave 60th Ave	97206	

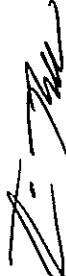







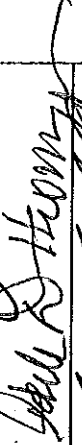

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2.5a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Keirstin Parker	parker.krishna@gmail.com	5508 SE Flavel Dr	97206	
2 ACHIL PARKER	PARKER.ACHIL@gmail.com			
3 SONIA VANDENBARE	SONIA.VANDENBARE@gmail.com	5501 SE Flavel Dr	97206	
4 Timothy Holdaway	timothy_holdaway@gmail.com	5501 SE Flavel Dr	97206	
5 Megan Whisland	MWHISLANDPPS@PPS.net	5435 SE Flavel Dr	97206	
6 Buffy L. Rhoades Maurice	BuffyRhoades@msn.com	7720 SE Reedway St #2 Portland, OR	97206	
7 Jessica Stirling	j.stirling5791@yahoo.com	Portland	97280	
8 Derek Cannon	derekcannon@gmail.com	Portland	97200	
9 Victoria Binning	victoriabinning@gmail.com	Salem	97301	
10 Zvi Calvey	evre@calvey.com	1377 NE Westoa	97211	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Travis Blackburn	Tblackburn@pdx.edu	11567 SW 135th Ave #71 T.3052, OR	97223	
2 Garrett Hirsch	Ghirsch83@aol.com	6465 NW Conary Ter Portland, OR 97209	97209	
3 Kathryn Leen	kathrynleen@gmail.com	6542 SW Texas Portland, OR 97230	97230	
4 Jenka Soberberg	jenka@pdx.edu	11567 SW 135th Ave #71 P.O. Box 912 Portland, OR	97207	
5 Heidi Liere	heidiliere@gmail.com	5520 SE 37th Ave	97207	
6 Tiffani Nutter	tn@pdx.edu	507 SE 120th Ave		
7 Meg Schmidt	megschmidt@live.com schmidt.meg@gmail.com	504 NE Grand Ave	97211	
8 Shirley Jean Edmison	housejem@gmail.com	7606 S.E. Ellis	97206	
9 Adele Thompson	adeledt@live.com	7549 N Fenwick	97217	
10 Ryan Pattenhause	ryanpattenhause@gmail.com	4804 SE 28th Ave #719 Portland, OR	97202	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to re-designate and rezone "Green Thumb" from R2a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Michael Papak	Michael.Papak@gmail.com	3724 SE 60th	97202	
2 Ron MacKenzie	ron.w.mackenzie@gmail.com	2502 SW Indian Hwy Ct Touhale, OR 97	97060	
3 Amanda Soto	amanda.soto12@yahoo.com	6755 SE 65th Ave Portland, OR 97206	97206	
4 Rigoberto Soto	rigoberto29@gmail.com	6755 SE 65th Portland, OR 97206	—	
5 Allie Dyer	adyer@colgate.edu	9500 SW 15th Ave Seaverton, OR 97057	97007	
6 Tom Graham			97	
7 Rose Quab			97203	
8 Catherine Scott	cathysplants@yahoo.com	7708 SE Grant St Portland, OR 97215	97215	
9 Kimball Stewart	kstewart@black.edu	800 SW Maplecrest Ct. Portland, OR	97219	
10 Claire Lyman	lyman@black.edu	Lewis Drive Garage MS1552 6415 SW Parkview Hill Rd Portland, OR 97224	97219	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space











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Printed Name	Email	Address	Zip Code	Signature
1 Melissa Long	wonderbee123@hotmail.com	7406 SE 67th Ave	97206	<i>M Long</i>
2 Monica Erickson	Eric Erickson ^{Gmail} MONE@GMAIL.COM	4105 NE 68th Ave	97218	<i>Monica E</i>
3 Hannah Mink	hannahmink@gmail.com	4105 NE 60th Ave	97218	<i>H Mink</i>
4 Wade Finn	wsharkfin@gmail.com	4105 NE 60th Ave	97218	<i>Wade F</i>
5 Glenn Sellmer	glenn.sellmer@gmail.com	3629 SE Rex St	97202	<i>Glenn S</i>
6 Michael Szabo	StarFollower@gmail.com	3672 SE Francis	97202	<i>Michael S</i>
7 Adrian Mealey	adrian.mealey@gmail.com	2139 N.E. Kane	97030	<i>A. Mealey</i>
8 Katie Lewis	katherinelewisart@gmail.com	503957 2582	97207	<i>Katie L</i>
9 Sybil Kelley	SybilKelley@pac.edu	6022 NE 45th Ave PDX	97218	<i>Sybil K</i>
10 Nicholas Lewis	NicholasLewis@pac.edu	7104 N. Meade St PDX	97203	<i>Nicholas L</i>

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Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Barbara Zuckert	—	7702 S.E. Waburnia	97202	
2 Nakisha Nathan		4806 SE 28th Apt 719	97202	
3 Irene Breit			97206	
4 Heidi Schmidgall	heidi.schmidgall@hotmail.com	9554 NE Alberta St.	97218	
5 Heather Burns	hburns@pdx.edu	2025 NE Rodney Ave.	97212	
6 Robin Shepard		4531-56 47th Ave	97206	
7 Rachel Hermanson	rhermans@pdx.net	4772 N. Drew St. - PDX	97203	
8 Jill Presley		60315 NE 71st Ave	97206	
9 Cynthia Kumpford	cckumpford@msn.com	6015 SE Knappa	97206	
10 William Gregory	w.gregory@pdx.edu	1235 S.E. Sabina	97114	











**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2~~0~~ā) to Open Space**

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Printed Name	Email	Address	Zip Code	Signature
1 EAC Wilkoff	edwilkoft@gmail.com	661 SE 18th Ave Portland, OR 97206	97206	
2 Harmony Hedges	arthyhedges@ic.com	7305 SE 60th Ave Portland	97206	
3 Elisha Lee	lees13@yahoo.com	5634 SE Rural St PDX OR	97206	
4 Shannon Barkley	shannivuth@gmail.com	7710 SE Lambert St Portland OR	97206	
5 Sarah Clark	Sarah.Clark@ymail.com	5812 SE Henderson St	97206	
6 Jeffrey Smith		2025 NE Rodney Av Portland OR 97212	97212	
7 LEATH KAMKIN		2949 SE HAMMILL PDX 97214	97214	
8 Claire Lagerwey			97206	
9 Kimberly Kovac	kimberlykovac@gmail.com	4701 SE 51st Ave Portland 97206	97206	
10 Michelle Sager	SAGER.MLS@gmail.com	1340 SE 62nd Ave 97206	97206	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Ellen Payne	ellenfyn17@aol.com	2132 SE Salmon St. Portland, OR	97214	
2 Millicent Zindars	millicentallyne@yahoo.com	2406 NW AUSTIN ST. #2 Portland, OR 97209 9309 SE 80th	97210	
3 Linda Hoppes	hoppes2@pdx.edu	Portland OR 97222	97222	
4 Genevieve Harding	genevieve.harding@gmail.com	1435 NE Mason St. Portland, OR 97211	97211	
5 Julie LaRoche	jlaroche@pdx.edu	6502 SE 41st Ave Portland OR 97202	97202	
6 ELISE BAKER	mydavega@gmail.com	3920 N ALBINA AVE	97227	
7 Jason Botel	botel@pdx.edu	1501 N Hayden Island Rd Space 388, Portland, OR	97217	
8 Bethany Triana	cas3peal285@gmail.com	7045 SE Franklin St. Portland, OR 97206	97206	
9 Felith Reid	ediecediereid.com	18300 NW Green Mt Rd Banks OR	97106	
10 Felipe Ferrera	fferrera@pdx.edu	9226 SE Fenino Ct.	97266	



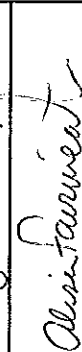





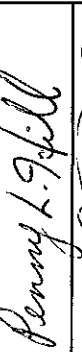
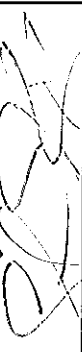
Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 India Tufa	indiatufa_mads200r_Pdx@gmail	1205 NE 76th ave	97213	<i>India Tufa</i>
2 Emily Kingsley	eking519@gmail.com	2009 NE 91st ave	97220	<i>Emily Kingsley</i>
3 Ethan Kingsley	ekingsley2016@gmail.com	2009 NE 91st ave	97220	<i>Ethan Kingsley</i>
4 Janet Julian	dizzynest57@gmail.com	5528 NE 25th Ave	97211	<i>Janet Julian</i>
5 BRAD ROSS		6917 SE 20th	97202	<i>Brad Ross</i>
6 JACK ANAND		5319 NE Broadway APT 303 PDX 9	97208	<i>Jack Anand</i>
7 Lise Paciorek	umayglow@gmail.com	5121 NE 11th Ave PDX, OR	97211	<i>Lise Paciorek</i>
8 Teel Snider	tedsnid@comcast.net	4649 NE Simpson Portland, OR 97221	97218	<i>Teel Snider</i>
9 Laura Beko	Laurabeko@gmail.com	5563 Sinclair St. West Inn OR 97208	97068	<i>Laura Beko</i>
10 Kaley Birch	KaleyinPDX@gmail.com	5035 NE 14th PDX 97211	97211	<i>Kaley Birch</i>









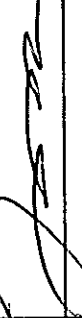

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2.5a) to Open Space**

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Printed Name	Email	Address	Zip Code	Signature
1. Myo DeMayo	Subtkorigin@gmail.com	4656 NE Simpson St.	97218	
2. Ali Smith	19247@gmail.com	480 NE Simpson St.	97211	
3. Alison Fairweather	motheroffeart@b@hotmail.com	4261 NE Simpson St. Pdx	97218	
4. Marthe Whiting	marthe_w@thoxy.com	4315 NE Summer St.	97218	
5. Paul Pearlhol		4313 NE Summer St	97218	
6. Claudia Roberts	clarobb@jun.com	5328 NE 40th Ave	97211	
7. Debra Hill	—	6036 NE 37 Ave	97211	
8. Penny Hill		4120 NE Arnsworth Ct	97211	
9. Stephanie Krentler		3430 NE 65th	97213	
10. Judith A Woodward		4350 NE Simpson St	97218	

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2~~h~~a) to Open Space**

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Printed Name	Email	Address	Zip Code	Signature
1 Gail Kiely	opollo2112@q.com	6631 SE-70th Portland OR	97206	
2 Scott Shires	scottshires@gmail.com	6934 N. Concord Portland, OR	97217	
3 Derek Carmona	dcarmona@pdx.edu	9315 SW Jasper Dr. Beaverton, OR 97007	97007	
4 Sybil Kelley	SybilKelley@pdx.edu	6002 NE 45th Ave Portland, OR 97	97218	
5 Cardyn Travers	portlandtransplant1975@gmail.com	624 N. Stafford	97217	
6 Megan Drivison	megan.drivison@gmail.com	3072 SE Francis St Portland, OR 97202	97202	
7 Curtis Borge	Cborge@Pdx.edu	1030 SW Jefferson St	97201	
8 Toby Kubler	tkubler@pdx.edu	5635 N OMaha Ave. Portland 97217	97217	
9 April Zimmer	Zimmerarell@grazul.com	6048 SW Beaverton Hillsdale Hwy Portland, OR 97208	97221	
10 Vanessa Volmer	VVolmer@pdx.edu	P.O. Box 2626 Portland, OR 97208	97208	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Jenny Dempsey Stein	jenny.dempsey@stem@gmail.com	4308 SE PDX. Coxington St.	97206	
2 Denise Jensen	nae623nae@msn.com	5933 SE PDX Hurney St	97206	
3 Sarah Hafer	sarah.hafer@gmail.com	6726 SE 80th Ave PDX 97206	→	
4 Julia Russell	friskybeagle@gmail.com	" " " " " "	→	
5 Lesley L. McFinley	lmcfinley4@yahoo.com	6123 SE KNAPP ST. Portland, OR 97206	97206	
6 David Messenheimer	tfiness@hotmail.com	7514 SE Duke St. Portland OR 97206	97206	
7 Kara Messenheimer	kara.d.mess@gmail.com	7514 SE Duke St Pdx 97206	97206	
8 JACOB SHERMAN	jobsherman@gmail.com	6002 SE 62nd Ave. PDX, OR 97206	97206	
9 SARAH SHERMAN	DDP@LIVESOYATHE.COM	↑	97206	
10 Rick Atherton	rickath@comcast.net	3905 SE Redway St 97202-7408	97202	

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2) to Open Space**

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2 to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 Kelly Feckler	kyfeck@comcast.net kyfeck@comcast.net	425 SE 30th Ave	97214	
2 Vicki Wilson	bandgarden@gmail.com	3214 SE 33rd Ave	97206	
3 Brina Bilanz	brina@restoredstones.com	3804 SE 33rd Pl 97202	97202	
4 Andie Middlebro	wonwayone@gmail.com	44 SE 50th Ave PDX, OR 97215	97215	
5 Scott Vala	SVV@vala.com	7521 SE Knights	97206	
6 Colleen Vala	hicoil@comcast.net	4727 SE 70th Ave	97206	
7 Jessica Kelly	jesskelly219@gmail.com	4617 SE 33rd Ave	97202	
8 Brian Kelly	BrianKelly12@gmail.com	see above	97202	
9 Thea Kindschuh	theak@pdx.edu	4543 NE 31st	97211	
10 Sophie Bindschuh	kind088@gmail.com	4214 NE 27th Ave	97211	

**Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.)
from High-Density Residential (R2~~MSA~~) to Open Space**

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Printed Name	Email	Address	Zip Code	Signature
1 Jenny McNamara	Jenny.mcnamara@pdx.edu	6014 NE Maccarty Ave. PDX edu	97211	Jenny McNamara
2 Anthony Hair	ahair@pdx.edu	16755 SW Florence St.	97007	Anthony Hair
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4 DANIEL MORGAN	DMORGAN@PDX.EDU	5241 SE 46th Ave	97206	Daniel Morgan
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6 Mark Hardel	mark-hardel@hotmail.com	5626 SE 46th Ave	97206	Mark Hardel
7 Agnes Ho		SE 46th Ave	97206	Agnes Ho
8 CARROUR RUTH MESKEL		4758 SE Mitchell St	97206	Ruth Meskel
9 Michael Carbone		4423 SE 15th Ave PDX, OR 97206	97206	Michael Carbone
Jacqueline Jarran	Jacky.jarran@gmail.com	4316 SE Bybee Blvd.	97206	Jacqueline Jarran
10 Jarranzadeh				Jarranzadeh


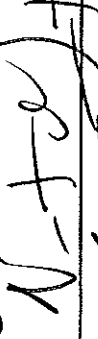

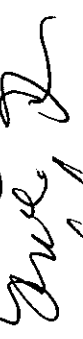

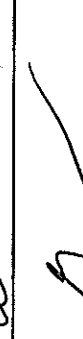




Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

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Printed Name	Email	Address	Zip Code	Signature
1 Daniel Kimbro	danielkimbro7@gmail.com	7225 SE 60th Ave. Portland, OR 97206	97206	
2 Brad Melaugh	bradmelaugh@gmail.com	5012 SE SWAN Kelly St Portland, OR 97206		
3 Brynna McCarter	brynna.mccarter@gmail.com	2149 SE Yamhill St. Apt. 11 Portland, OR 97214	97214	
4 Eleanor Porter	p.v.porter85@yahoo.com	4925 SE TAYLOR CT. PORTLAND, 97215	97215	
Jenjee Sengkhammee	jenjee@gmail.com	4514 SE 46th Ave Portland OR 97206	97206	
PHILIP KELSUVEN	phkelsuven@panacea.com	5104 SE MARGINS 97206 PDX	97206	
Nicole	nicole.bonard	4205 SE Long St. Portland, OR 97206	97206	
DIANNE BURTON	energytrust.org	5221 SE 47th Pdx 97206	97206	
Judith Ross		5234 SE 47th Ave PTLD OR 97206	97206	
Dale Ross		5234 SE 47 PLTD OR 97206	97206	

Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2.5a) to Open Space

As a 12.8 acre site that provides year-round opportunities for urban agriculture and education to hundreds of school-aged children, neighborhood residents, university students, and others from around the city each year, we, the undersigned, support the Brentwood-Darlington Neighborhood Association (BDNA) in strongly urging the Planning and Sustainability Commission to change the zoning of "Green Thumb" from R2.5a to Open Space in order to best reflect the past and current uses of the site, and to preserve this valued community asset from undesirable future development.

Printed Name	Email	Address	Zip Code	Signature
1 CHELSEA ROSENVAL	CHELSEROS@GMAIL.COM	301 NE IVY ST. PORTLAND OR 97212		
2 Yvonne Girimonte	vingirimon@ gmail.com	301 NE IVY ST Portland OR	97212	
3 Tim Wood	twoods667@gmail.com	6052 SE Flavel St. PDX, OR	97206	
4 Lydia Gibb	lgibb@pdx.edu	2455 NW Quincy St. #101 PDX OR 97210	97210	
5 Edet	habellede@olmeca@yahoo.com	5263 SE Henderson St Portland OR	97206	
6 Giles LYON	GilesLYON@GMAIL.COM	6515 SE 63rd Ave	97206	
7 Glenn Sellmer	glenn.sellmer@gmail	3689 SE 5th St 97202	97202	
8 Jennifer Basham	basham.jennifer@gmail.com	7217 N Concord Ave Portland, OR	97217	
9 Luke Maurer	lukemaurer@gmail.com	6646 SE 56th Ave Portland 97206, OR	97206	
10 Jessica Amaga	JessicaRuns26.2@gmail.com	5323 SE Malden St 97206	97206	

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Printed Name	Email	Address	Zip Code	Signature
1. Merrilee Spence	MerrileeWPA@comcast.net	4219 SE Reedway	97206	Merrilee Spence
2. Ann Crowder	anncrowdere@gmail.com	5506 SE 41st Ave 5522 SE 54th Ave	97202	Ann Crowder
3. Elise Edgington	ekedging@gmail.com	5130 SE Ellis St	97206	Elise Edgington
4. Tristan Tarwater	tristartarwater@gmail.com	5918 SE Reedway St	97206	Tristan Tarwater
5. Krista Connerly	Krista.connerly@pqa.com	4419 SE 44th Ave Portland, OR	97206	Krista Connerly
6. PETER ZOLTANSKI		7006 SE 57th Ave	97206	Peter Zoltanski
7. Patrick Burke	Patrick.Burke834@gmail.com	5442 SE Floard Dr PDX	97206	Patrick Burke
8. HAGGACK		4153 SE Flavel St Portland OR 9	97206	Haggack
9. Kendall Palmer	palmkbump@aol.com	6611 SE 78th Ave PDX OR	97206	Kendall Palmer
10. Robin Wilkoff	Robnwilkeff@gmail.com		97206	Robin Wilkoff



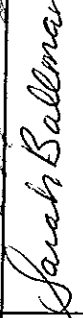

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Printed Name	Email	Address	Zip Code	Signature
1 Marianne Colgrave	Mcolgrave@earthlink.net	3707 SE Berkeley Way	97202	<i>Marianne Colgrave</i>
2 NOSTE LENSKE	nlenske@earthlink.net	4314 SE Crystal Springs 97206	97206	<i>Noste Lenske</i>
3 Robert McClellan	robert@mrsosch.com	6123 SE Ford College Pl	97202	<i>Robert McClellan</i>
4 Peter Mertz	pmcmertz@gmail.com	27 SE 7th Ave 97215	97205	<i>Peter Mertz</i>
5 Mandy Hecker	heckermandy@gmail.com	2804 SE 31st Av 100 PDX	97202	<i>Mandy Hecker</i>
6 Cately Riddell	riddell7@gmail.com	100 NE 58th Ave	97213	<i>Cately Riddell</i>
7 PAUL CORANO	TCORANO@GMAIL.COM	5901 SE 14th PORTLAND, OR 97215	97206	<i>Paul Corano</i>
8 Jeff Cole	tieffcole@gmail.com	4343 SE MADISON ST PORTLAND, OR 97202	97215	<i>Jeff Cole</i>
9 Bill Crawford	williamcrawford@hotmail.com	3015 SE 25th Ave PDX 97202	97202	<i>Bill Crawford</i>
10 Seth Gardner	SethsPurchases@gmail.com	4411 SE Com St 97206	97206	<i>Seth Gardner</i>





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Printed Name	Email	Address	Zip Code	Signature
1. MAUREEN HOFBERG	maureen.hofberg@concast.net	223 SE 61st PDX	97215	
2. Michelle Krakowski	mkrakowski3@gmail.com	2034 NE Clackamas St.	97232	
3. Sarah Ballman	spards@s@hotmail.com	909 NE 71st	97213	
4. Kara Godwin	kaa kaa82080@hotmail.com	1623 N. Vancouver Ave Apt 2 Portland, OR	97217	
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Petition to change zoning of "Green Thumb" (6801 SE 60th Ave.) from High-Density Residential (R2a) to Open Space


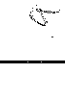
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Printed Name	Email	Address	Zip Code	Signature
1 Ashly Blair	archteacher@presett.com	26 NE Presett	97211	
2 Daniela Perez	danielperez@hotmail.com	1717 SW Park Ave	97201	
3 Ayasha Shamsud-Din	nejmah@pdx.edu		97211	
4 Danielle Jones	jondmd7@gmail.com	3434 SE 13th Ave	97202	
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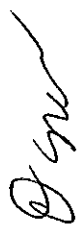


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Printed Name	Email	Address	Zip Code	Signature
1. Nick Fanning	nick.fanning@portlandnurseries.com	2440 SE 78th Ave 97206	97206	
2. Corina Reynolds	corinar@portlandnurseries.com	4639 SE 75th Portland	97206	
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Printed Name	Email	Address	Zip Code	Signature
1 Dan Thomas		Po Box 482 Neskovin	97144	
2 John Baranuk	jbaranuk@thumb.com	615 SE Knappa	97206	
3 Adam Scott	adamscottmvp@gmail.com	6707 SE 63rd Ave	97206	
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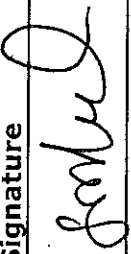
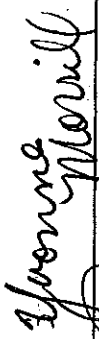
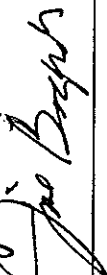

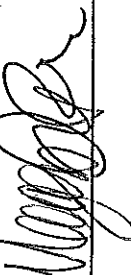
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Printed Name	Email	Address	Zip Code	Signature
1 MARGIE MORROW	MARGIE195062@ GMAIL.COM	5810 SE HENDERSON ST. PORTLAND, OR	97206	Margie Morrow
2 ARLITH PALACIOS		5810 SE HENDERSON ST. PORTLAND, OR	97206	Arlith Palacios
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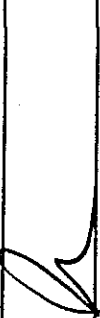







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Printed Name	Email	Address	Zip Code	Signature
1 Sarah Acala	sarah.acala@gmail.com	3623 NE Rodney Ave	97212	
2 Yvonne Morrill		6419 S/B 80th	97206	
3 Jaime Boydash		8314 NE Undermonk St	97220	
4 STEVE STEGEMAN	STEGEMANFB@gmail.com	7835 SE ALTA VERDE PORTLAND, 97216	97216	
5 Megan Pifer	Meganpifer@gmail.com	8484 SE 15th Ave Portland 97202	97202	
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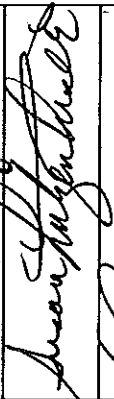


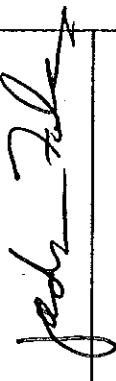

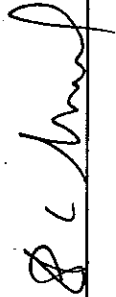
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Printed Name	Email	Address	Zip Code	Signature
1 James Marks	captmarks@chotmail.com	13450 NE Fauling	97230	
2 ROBERTA MEXIA	snappydebue@gmail.com	4501 NE SKIDMORE RD	97218	
3 Sean Gillman	sean.gillman@hotmail.com	2603 NE Buntin ST. PDX	97232	
4 Terra Zittenfeld	terrazittenfeld@gmail.com	836 SE MARTINS PDX	97206	
5 Corina Reynolds	corinar@portlandnurseries.com	4039 SE 75th Ave. Port	97206	
6 Tracy Hancock	tracyh@portlandnurseries.com	5740 SE Flavel Dr Portland	97206	
7 NATE O'NEAL		5442 SE FLAVEL DR PDX	97206	
8 SEAN DUFFY	seanduffy-vo@yahoo.com	5722 SE Flavel Dr PDX	97206	
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400 units 10/28/2014


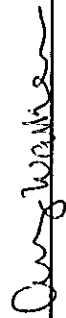





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Printed Name	Email	Address	Zip Code	Signature
1 Dare Morgan	dare.morgan@gmail.com	15 NE Serotage St	97211	
2 Meghan Bean	mbean@gmail.com	5111 NE 26th Ave.	97211	
3 Susan Lutzenhiser	LLutz@comcast.net	7010 SE 36th Ave.	97202	
4 Alexandra Wills-Dun	aldun@gmail.com	11437 SE Powder	97266	
5 Nathaniel Albers	nathanielalbers@gmail.com	4420 NE 77th Ave	97218	
6 Jordan Folks	jfolks86@gmail.com	4324 SE Madison	97215	
7 Maria Everhart	mteverhart@comcast.net	539 SE 57th Ct	97215	
8 Benjamin Messer	aluvial@gmail.com	6624 N. Boroye Ave.	97217	
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Printed Name	Email	Address	Zip Code	Signature
1 Kevin Walker	walker3539@gmail.com	1905 NW 29 th Ave	97210	
2 Ashley Walker	amited@gmail.com	1905 NW 29 th Ave	97210	
3 KARA STUSTER	Kara.givoda@gmail.com	9022 NE Sacramento	97220	
4 GREGORY STUSTER	STUSTERGANDADYNAMIC.COM	8028 NE SACRAMENTO ST	97220	
5 CRAIG FITTS	craigfitts613@gmail.com	3725 SE RIVERVIEW ST #B7	97202	
6 Luke Bonham	LUKE.BONHAM@yelp.com	8529 SE Tolman St	97266	
7 Kat Bonham	Maria.bonhamkat@gmail.com	8529 SE Tolman St.	97266	
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400 units 10/28/2014

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Printed Name	Email	Address	Zip Code	Signature
1. Amy Schurman	amyschurman@att.net	6725 SE 57th Ave Portland, OR 97206	97206	Amy Schurman
2. Patricia Davis	GESHIN@HEVANET.COM	6725 SE 57th Ave Portland, OR 97206	97206	Patricia Davis
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November 4, 2014

Subject: Draft Comprehensive Plan Preliminary Comments

Dear Chairman Baugh, Eric Engstrom, and Planning Commission,

This letter continues discussion of Draft Comprehensive Plan requests made by the Eastmoreland Neighborhood Association Board in December of 2013 as well as providing testimony for the direction of the proposed Comprehensive Plan Update released in July, 2014.

Key Directions

Complete Neighborhoods is a concept we strongly support and in our case this includes support for adjacent neighborhood center plans and for retention of existing neighborhood supported commercial uses as proposed in changes 766 and 639.

One size Does Not Fit All. “Plan and design to fit local conditions” is a concept we strongly support. However reading the details in *GP3* makes clear that the authors have not been listening to cries from neighborhoods across the city and from the Residential PEG group that found “Five Portlands” aka *Pattern Areas* to be an inadequate approach to meet goals for preserving and enhancing neighborhood character while adapting to change.

Noticeably absent in the Key Directions is mention of engaged public participation in guiding the process. Certainly there are public processes influencing the Comprehensive Plan however no mention in *Key Directions*. Given the difficulty of locating and understanding the significance of the various documents associated with the Plan, the cutoff of public verbal testimony on Election Night in early November seems unrealistic and should be aligned with the March 2015 cutoff for written testimony especially since the “Urban Design Direction” which illustrates the intent of the plan was not issued until mid-September 2014.

Planning Goals and Policies

GP4 Design and Development. Goals are laudable. Goal 4A “Context –sensitive design and development” is an important goal that we support but when reduced to “Five pattern areas” it loses most credibility. Context is localized in space - not categorical. The GP4 section deserves a separate critique beyond the scope of this testimony.

GP2-1. Community Involvement notably fails to mention Neighborhood Associations as primary vehicles or even participants for public participation in the planning process. In *GP-4.2* and *4.3* the role of the Neighborhood Associations are similarly omitted.

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. While admittedly varying in capacity, these organizations along with business associations (that are mentioned) the Neighborhood Associations need to be

recognized as integral to ongoing success of formulation, implementation and enforcement of policies.

The role of the *Policy Expert Groups* in addressing the Draft Comprehensive Plan is omitted as well. Months of effort by staff and participants should be referenced and hot linked from this document- especially the final draft version of the “Residential Design and Compatibility” report before it was effectively whitewashed by staff editors (see example below).

GP10.5 Land Use Designations. The land use designations indicated for single family residential substantially misrepresent the intended densities. For example, the R5 designation is used to indicate an area in which it is intended that each dwelling has approximately 5,000 square feet of land. In fact lots of 3000 SF are allowed and, at corners, lots as small as 1600 SF. These designations should not be reinforced by approval in the Comprehensive Plan but should be on the docket for reconsideration.

Alternative development options. The policies are intended to make use of “underutilized land”, a worthy goal in concept, but in the details they neglect to consider the unintended impacts when misapplied to a local context. The “alternative development options” effectively double the allowable density by doubling the density on all corner sites, and by including accessory dwellings (that we support when accessory to a primary residence) potentially doubling the density on every site. In RICAP 7 there is a proposal to allow accessory dwellings to be carved off as flag lots.

Another “alternative” land use irregularity is the recognition of substandard platted lots – aka historic lots of record. These are lots or portions of lots that are accidents of history randomly located in the city that may or may not meet the density standards established by the code and were – except in rare instances – amalgamated into larger tax lots. Until 19xx these were not recognized at entitled parcels for building. When they were recognized they were portrayed as empty lots on which smaller more affordable houses could be built. As is well known that is not what happened. By splitting lots, developers were given a free hand to produce clusters of highly inefficient “skinny” housing with garages and driveways dominating the street at a scale that overshadowed neighboring houses and left little open land for landscape or garden. In general they were less affordable than the houses they replaced.

Without considering context, these “one size fits all” policies encourage wasteful redevelopment and infill – often destructive to the fabric of existing or intended neighborhoods and not consistent with other Goals and Policies. They have proved to be corrosive to public trust, often reduce affordability and result in displacement of groups specifically targeted for protection in the goals and policies, and threaten historic architectural and cultural fabric. By definition they greatly increase the carbon footprint from producing replacement materials, and add significantly to landfill from demolition and new construction.

It can be argued that these policies are intended to “make room” for new residents and contain the urban growth boundary. Our information is that these policies are producing little in the way of affordable new housing or accommodating more residents but meanwhile undermining confidence and trust in local government. The primary benefit accrues to private development

interests at the expense of existing neighborhood residents and artificially drives up the value and cost of land and housing.

Summary. The 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. They need to be clear and concise, and they need to be able to be understood by the public as well as City staff responsible for review and enforcement.

[These issues were addressed in considerable depth by the “Residential Design and Compatibility” Policy Expert Group but their recommendations are omitted in the Proposed Draft Comprehensive Plan.]

Submitted by Rod Merrick, AIA
Eastmoreland Neighborhood Association Land Use Committee Co-chair
Residential Design and Compatibility Policy Expert Group member

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2014 NOV -4 P 4: 41

From: Planning and Sustainability Commission
Sent: Friday, November 07, 2014 9:34 AM
To: Kovacs, Madeline
Subject: FW: Hayden Island

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 translation, 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: Kathy Garrett [mailto:garrettcollegeconsulting@gmail.com]
Sent: Thursday, November 06, 2014 5:32 PM
To: Planning and Sustainability Commission
Subject: Re: Hayden Island

4825 SE 44th Ave
Portland, OR 97206

Kathy Garrett

On Nov 5, 2014, at 2:24 PM, Planning and Sustainability Commission <psc@portlandoregon.gov> wrote:

Hello Kathy,

Thank you for your comments to the Planning and Sustainability Commission. So that I may forward your testimony to the commissioners and include it in the record, can you please email me your mailing address as is required for all 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: Kathy Garrett [mailto:garrettcollegeconsulting@gmail.com]
Sent: Tuesday, November 04, 2014 5:45 PM
To: Planning and Sustainability Commission; Hales, Mayor; Commissioner Novick;
Commissioner Fritz; Commissioner Saltzman; Commissioner Fish
Subject: Hayden Island

Please do not destroy our wonderful natural areas (Hayden Island) in order to add more industrial land. We need to stop worshipping business and start taking care of people and our environment. There is lots of industrial land. Be creative and use some of that if we really need it. I am so disappointed that you are still considering destroying Hayden Island.

Kathy Garrett

From: Planning and Sustainability Commission
Sent: Wednesday, November 12, 2014 11:53 AM
To: Kovacs, Madeline
Subject: FW: FW: Proposed Change #297 - Rezoning Broadmoor Golf Course

First one for the 2015 batch!

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: Willow Campbell [mailto:willowdevin@gmail.com]
Sent: Monday, November 10, 2014 5:23 PM
To: Planning and Sustainability Commission
Subject: Re: FW: Proposed Change #297 - Rezoning Broadmoor Golf Course

Hi Julie,
My mailing address is 4404 SE 35th Ave, Portland, Oregon 97202.
Please let me know if there is anything further you need.
Thank you,
Willow

On Wed, Nov 5, 2014 at 2:30 PM, Planning and Sustainability Commission
<psc@portlandoregon.gov> wrote:
Hello Willow,

Thank you for your comments to the Planning and Sustainability Commission. So that I may forward your testimony to the commissioners and include it in the record, can you please email me your mailing address as is required for all 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: PDX Comp Plan
Sent: Wednesday, November 05, 2014 9:40 AM
To: Planning and Sustainability Commission
Subject: FW: Proposed Change #297 - Rezoning Broadmoor Golf Course

From: Willow Campbell [mailto:willowdevin@gmail.com]
Sent: Tuesday, November 04, 2014 6:17 PM
To: PDX Comp Plan
Subject: Proposed Change #297 - Rezoning Broadmoor Golf Course

To the change committee,

I am gravely disappointed to learn that the City of Portland is considering change #297. As a Portland native and an environmental scientist and consultant, I adamantly oppose the rezoning to IG2-Medium Industrial. This unique urban habitat is imperative for countless numbers of species of plants, birds, fish and animals that are flourishing and returning to the region and rezoning and developing these lands could be detrimental to these species. Have we not learned lessons with our history of industrial development and pollutants and the impact they have on our environment? If you need reminding, take a look at The Portland Harbor; it is a disastrous and costly mess both financially and environmentally. We don't need another CERCLA stretch within our city limits and by adding more industry to a section of sensitive habitat, we are simply repeating previous mistakes not to mention going against the very values that the City claims to hold in high concern for its citizens. Rezoning a current Open Space to IG2-Medium Industrial is asinine when the City promotes green spaces and reclaiming natural areas from development. Why create more industrial footprints when there are plenty of unused or underutilized locations to work with directly in that region? Why not focus on what are already impervious surfaces and developed land and not contribute to the exact opposite to what the City preaches? It simply doesn't make sense. Please reconsider change #297.

Regards,
Willow Campbell

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 10:06 AM
To: Kovacs, Madeline
Subject: FW: SW Neighborhood Association

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 MUNFORD [mailto:rkmun2@msn.com]
Sent: Tuesday, November 04, 2014 8:31 AM
To: Planning and Sustainability Commission
Cc: Hales, Mayor; Commissioner Fritz; Anderson, Susan; City Auditor Griffin-Valade; Commissioner Fish; Commissioner Saltzman; mnaLandUseCommittee@gmail.com
Subject: SW Neighborhood Association

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,

Robert & Karyn Munford
2710 SW Troy St.
Portland, OR 97219

cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov
Amanda@portlandoregon.gov Commissioner Amanda Fritz,
Commissioner Nick Fish, nick@portlandoregon.gov
Commissioner Steve Novick, novick@portlandoregon.gov
Commissioner Dan Saltzman, dan@portlandoregon.gov
City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov
Susan Anderson, Susan.Anderson@PortlandOregon.gov
MNA Land Use Committee, mnaLandUseCommittee@gmail.com

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 10:06 AM
To: Kovacs, Madeline
Subject: FW: Multnomah 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: ROBERT MUNFORD [mailto:rkmun2@msn.com]
Sent: Tuesday, November 04, 2014 8:43 AM
To: Planning and Sustainability Commission
Cc: Hales, Mayor; Commissioner Fritz; Anderson, Susan; City Auditor Griffin-Valade; Commissioner Fish; Commissioner Saltzman; mnaLandUseCommittee@gmail.com
Subject: Multnomah Neighborhood

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,
Robert and Karyn Munford
2710 SW Troy St
Portland, OR 97219

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 10:07 AM
To: Kovacs, Madeline
Subject: FW: Environmental concerns for planned rezoning

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 MUNFORD [mailto:rkmun2@msn.com]
Sent: Tuesday, November 04, 2014 9:05 AM
To: Planning and Sustainability Commission
Cc: Hales, Mayor; Commissioner Fritz; Anderson, Susan; City Auditor Griffin-Valade; Commissioner Fish; Commissioner Saltzman; mnaLandUseCommittee@gmail.com
Subject: Environmental concerns for planned rezoning

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

Robert and Karyn Munford
2710 SW Troy St
Portland, OR 97219

POLICIES & OBJECTIVES—LAND RESOURCES:

8.9 Open Space

Protect Portland Parks, cemeteries and golf courses through an Open Space designation on the Comprehensive Plan Map.

8.10 Drainageways

Regulate development within identified drainageways for the following multiple objectives.

Objectives:

A. Stormwater runoff

Conserve and enhance drainageways for the purpose of containing and regulating stormwater runoff.

B. Water quality and quantity

Protect, enhance, and extend vegetation along drainageways to maintain and improve the quality and quantity of water.

C. Wildlife

Conserve and enhance the use of drainageways where appropriate as wildlife corridors which allow

the passage of wildlife between natural areas and throughout the city, as well as providing wildlife

habitat characteristics including food, water, cover, breeding, nesting, resting, or wintering areas.

8.11 Special Areas

Recognize unique land qualities and adopt specific planning objectives for special areas.

Objectives:

A. Balch Creek Watershed

Protect and preserve fishery, wildlife, flood control, and other natural resource values of the Balch

Creek Watershed through the application of special development standards and approval criteria in

the environmental overlay zones.

B. East Buttes, Terraces and Wetlands

Conserve wildlife, forest and water resource values and the unique geology of East Portland through implementation of the East Buttes, Terraces and Wetlands Conservation Plan.

C. Fanno Creek Watershed

Conserve fishery, wildlife, flood control, and water quantity and quality values of the Fanno Creek

Watershed through implementation of the Fanno Creek and Tributaries Conservation Plan.

D. Johnson Creek Basin

Protect and preserve the scenic, recreation, fishery, wildlife, flood control, water quality, and other

natural resource values of the Johnson Creek basin through application of environmental overlay zones and implementation of the Johnson Creek Basin Protection Plan.

E. Northwest Hills

Protect and preserve forest, wildlife and watershed resources through implementation of the Northwest Hills Natural Areas Protection Plan.

F. Skyline West

Conserve wildlife, forest and water resource values of the Skyline planning area through implementation of the Skyline West Conservation Plan.

G. Southwest Hills

Protect and preserve fish and wildlife, forest, and water resources through implementation of the Southwest Hills Resources Protection Plan.

H. The Willamette River Greenway.

Protect and preserve the natural and economic qualities of lands along the Willamette River through

implementation of the city's Willamette River Greenway Plan.

I. Portland International Airport

Conserve, restore, and enhance natural resource values through environmental zoning, voluntary strategies, and the implementation of special development standards in the plan district and the Portland International Airport/Middle Columbia Slough Natural Resources Management Plan.

8.12 National Flood Insurance Program

Retain qualification in the National Flood Insurance Program through implementation of a full range of floodplain management measures.

8.13 Natural Hazards

Control the density of development in areas of natural hazards consistent with the provisions of the City's Building Code, Chapter 70, the Floodplain Ordinance and the Subdivision Ordinance.

8.14 Natural Resources

Conserve significant natural and scenic resource sites and values through a combination of programs which involve zoning and other land use controls, purchase, preservation, intergovernmental coordination, conservation, and mitigation. Balance the conservation of significant natural resources with the need for other urban uses and activities through evaluation of economic, social, environmental, and energy consequences of such actions.

Objectives:

A. Acquisition Program for Significant Resources

Prepare and maintain a long-range list of properties, in order of priority, desirable for public acquisition in order to insure long term natural resource conservation. Actively solicit donations of property or easements to protect and enhance identified resources.

B. Intergovernmental Coordination

Notify and coordinate programs with affected local, state, and federal regulatory agencies of development proposals within natural resource areas.

C. Impact Avoidance

Where practical, avoid adverse impacts to significant natural and scenic resources.

D. Mitigation

Where adverse impacts cannot be practicably avoided, require mitigation or other means of preservation of important natural resource values. The following order of locational and resource preference applies to mitigation:

- (1) On the site of the resource subject to impact, with the same kind of resource;
- (2) Off-site, with the same kind of resource;
- (3) On-site, with a different kind of resource;
- (4) Off-site, with a different kind of resource.

E. Soil Erosion Control

Protect natural resources where appropriate from sediment and other forms of pollution through the use of vegetation, erosion control measures during construction, settling ponds, and other structural and non-structural means.

F. Pruning to Maintain and Enhance Views

Actively manage the pruning and cutting of trees and shrubs on public lands or on non-public areas with scenic designations to maintain and enhance scenic views which may be impacted by vegetation.

G. Improving Turnouts along Scenic Routes and at Viewpoints

Improve and maintain turnouts along scenic corridors and at identified viewpoints throughout Portland.

H. Bike and Pedestrian Routes

Enhance the value and beauty of Portland's bicycle and pedestrian routes by locating them to take

advantage of significant viewpoints, scenic sites, and scenic corridors.

I. Consideration of Scenic Resources in Street Vacations

Require the preservation and maintenance of existing and potential view corridors and viewpoints

when approving street vacations. Require view easements within or near street vacations where access to viewpoints or view corridors is desired.

J. Consideration of Scenic Resources in Planning Process

Ensure that master plans and other planning efforts include preservation and enhancement of significant scenic resources.

K. Enhancing View Corridors

Improve the appearance of views along designated view corridors by placing utility lines underground.

8.15 Wetlands/Riparian/Water Bodies Protection

Conserve significant wetlands, riparian areas, and water bodies which have significant functions and

values related to flood protection, sediment and erosion control, water quality, groundwater recharge

and discharge, education, vegetation, and fish and wildlife habitat. Regulate development within significant water bodies, riparian areas, and wetlands to retain their important functions and values.

Objectives:

A. Wetland/water body Buffer

Conserve significant riparian, wetland, and water body natural resources through the designation and protection of transition areas between the resource and other urban development and activities.

Restrict non-water dependent or non-water related development within the riparian area.

B. Water Quality

Maintain and improve the water quality of significant wetlands and water bodies through design of

stormwater drainage facilities.

C. Stormwater and Flood Control

Conserve stormwater conveyance and flood control functions and values of significant riparian areas within identified floodplains, water bodies, and wetlands.

D. Fish

Balch Creek cutthroat trout will be maintained in a range at least as extensive as their range in 1987

and at a population of at least 2,000.

8.16 Uplands Protection

Conserve significant upland areas and values related to wildlife, aesthetics and visual appearance, views

and sites, slope protection, and groundwater recharge. Encourage increased vegetation, additional

wildlife habitat areas, and expansion and enhancement of undeveloped spaces in a manner beneficial to

the city and compatible with the character of surrounding urban development.

Objectives:

A. Wetland/water body Buffer

Provide protection to significant wetland and water body natural resources through designation of significant upland areas as a buffer between the resource and other urban development and activities.

B. Slope Protection and Drainage

Protect slopes from erosion and landslides through the retention and use of vegetation, building code regulations, erosion control measures during construction, and other means.

C. Wildlife Corridors

Conserve and enhance drainageways and linear parkways which have value as wildlife corridors connecting parks, open spaces, and other large wildlife habitat areas, and to increase the variety and quantity of desirable wildlife throughout urban areas.

8.17 Wildlife

Conserve significant areas and encourage the creation of new areas which increase the variety and quantity of fish and wildlife throughout the urban area in a manner compatible with other urban development and activities.

Objectives:

A. Natural resource areas

Regulate activities in natural resource areas which are deemed to be detrimental to the provision of food, water, and cover for fish and wildlife.

B. City-wide

Encourage the creation or enhancement of fish and wildlife habitat throughout the city.

C. City Parks

Protect existing habitat and, where appropriate, incorporate new fish and wildlife habitat elements into park plans and landscaping.

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 10:07 AM
To: Kovacs, Madeline
Subject: FW: Proposed rezoning of corner lots

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 MUNFORD [mailto:rkmun2@msn.com]
Sent: Tuesday, November 04, 2014 9:10 AM
To: Planning and Sustainability Commission
Cc: Hales, Mayor; Commissioner Fritz; Anderson, Susan; City Auditor Griffin-Valade; Commissioner Fish; Commissioner Saltzman; mnaLandUseCommittee@gmail.com
Subject: Proposed rezoning of corner lots

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,

Robert and Karyn Munford

2710 SW Troy St

Portland, OR 97219

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 10:48 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan and zoning in SW

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: Jacob Grady [mailto:grady.jacob@gmail.com]
Sent: Tuesday, November 04, 2014 10:46 AM
To: Planning and Sustainability Commission
Subject: Comprehensive Plan and zoning in SW

To whom it may concern,
We live at 5505 SW Brugger st. in the Ashcreek neighborhood where the proposed rezoning would take place. We have a wonderfully wooded backyard and have no intention of subdividing our lot. While we have no intention of subdividing, the very ability to do so makes our lot that much more valuable. The proposed rezoning plan appears to be nothing more than a Taking of privately owned land. Many neighbors on my side of the street (north side) are not happy with the proposed rezoning. Again, not that we all want to have our lots further developed but that it would seriously effect the value of OUR land.

As for natural disasters, there is a litany of regulation that exists already that controls erosion and tree removal. I know this because I am in the process of building a garage behind our house and we have had to engineer every last thing for our foundation, plant grass, install straw waddles and indicate where all existing trees are located. All that to say, this rezoning in the fear of a natural disaster seems like nothing more than a thinly veiled attempt to implement eminent domain.

Please reconsider how this is going to financially impact families in these proposed areas (where I might add, we already pay an ungodly amount of property tax).

Jacob Grady
971-400-7909

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 11:45 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan Testimony: Broadmoor Golf Course

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: PDX Comp Plan
Sent: Tuesday, November 04, 2014 11:40 AM
To: Planning and Sustainability Commission
Subject: FW: Comprehensive Plan Testimony: Broadmoor Golf Course

Sara Wright
p: (503) 823-7728

From: Karli Dahl [mailto:karldahl@pdx.edu]
Sent: Tuesday, November 04, 2014 10:17 AM
To: PDX Comp Plan
Subject: Comprehensive Plan Testimony: Broadmoor Golf Course

Hello,

This email is written in opposition of the proposed change # 297 to rezone a section of the Broadmoor Golf Course to IG2-Industrial. The Buffalo Slough and the Broadmoor Golf Course are special habitat areas, deserving extra protection and preservation. Please do not destroy this special place for wildlife. Vital wetlands are within this area that, too, are more important than the proposed industrialization.

Thank You.

Karli Dahl

4814 SE 28th Avenue #294
Portland, OR

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 11:45 AM
To: Kovacs, Madeline
Subject: FW: Comprehensive Plan and TSP Comments

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: PDX Comp Plan
Sent: Tuesday, November 04, 2014 11:40 AM
To: Planning and Sustainability Commission
Subject: FW: Comprehensive Plan and TSP Comments

From: Keith Liden [mailto:keith.liden@gmail.com]
Sent: Tuesday, November 04, 2014 9:45 AM
To: PDX Comp Plan
Subject: Comprehensive Plan and TSP Comments

The city could make it easier to submit comments than the Map App, which is set up for people to make very specific comments and project recommendations. So I'm submitting my more general comments here. If this is not the "proper" place, please forward them to the appropriate staff and the Planning and Sustainability Commission. I have been involved in the plan amendment process as a member of the Networks PEG and now the TSP TEG, but these comments represent my personal views. Thanks.

Keith Liden
4021 SW 36th Place
Portland, OR 97221
503.757.5501

General Comment

I find the plan to generally be a well-crafted document with lots of positive changes from the current Comprehensive Plan. I do agree with the observations of several TSP TEG members that in some cases, the policy language is too "wishy-washy" with terms like "encourage," "support", etc.

Chapter 1: The Plan and Guiding Principles (p. GP1-1)

This contains a bullet list regarding the intent of the plan. The last bullet acknowledges the importance of

"consistency and coordination among agencies." This is fine, but it needs to include coordination between city bureaus. Generally speaking, the plan assumes coordination is occurring between city bureaus when all too often quite the opposite is true. This has often hampered progress in providing active transportation facilities in a timely and cost-effective way. I can provide over 10 examples in SW Portland along where coordination has been poor and bike/pedestrian improvement opportunities lost.

Policy 1.1 Comprehensive Plan (p. GP1-5) talks about plan maintenance. It needs to stress adopting modal and other plans promptly and not letting them languish for years as "unofficial" city documents of limited influence. An example is the Portland Bicycle Plan for 2030, which was completed in early 2010, and is still not adopted or officially recognized. It will practically need an update before it is finally adopted as an official part of the TSP and Comprehensive Plan.

Chapter 3: Urban Form

Policy 3.20 (p. GP3-10) should refer to "... the region's multi-modal transportation hub..."

Figure 3-2 (p. GP3-26) is difficult to interpret. Can corridors have more than one designation, such as civic corridor and freight corridor? Also, the titles for this figure and Figure 3-3 are reversed.

Figure 3-5 (p. 3-29) doesn't include any "enhanced greenway corridors" in SW Portland. Why? This seems particularly strange given the description of SW Portland as having lots of green, ravines, hills, natural areas, etc. Terwilliger would appear to be an ideal candidate, for example.

Chapter 5: Housing

Policies 5.23 - 5.38 (pp. GP5-9 - GP5-11) cover various aspects of housing affordability, but they don't cover the cost of transportation and the importance of providing low-cost transportation alternatives, such as bicycling, walking, and transit. Policies under Health and Safety begin to address this, but not completely, in my opinion.

Chapter 6: Economic Development

Policy 6.42 (p. GP6-14) refers to "multi-modal freight corridors." What does this mean?

Chapter 7: Environment and Watershed Health

Earlier, I had objected to the chapter title of "Watershed Health and the Environment" because it implied that watershed health was the most important and the other environmental issues, including air quality, green house gas emissions, were secondary. Although the title ordering has been reversed, I continue to be concerned that watershed health trumps other environmental objectives in practice. A couple years ago, I brought the issue to the attention of the city and BAC. BES storm water quality requirements essentially make it much more difficult and costly to provide bike lanes because widening a street is considered "bad" and subject to water quality requirements. This often makes such improvements cost-prohibitive. SW Capitol Hwy. is an example of a city-sponsored project, and the Walgreens and Safeway developments on Barbur Blvd. are private development examples where bike lanes were not provided (in spite of TSP policy and mapped designations), largely due to the associated storm water requirements. Now, the intersections are permanently compromised for safe bicycle use.

Policy 7.12 State and Federal Coordination (p. GP7-8) should be modified to emphasize inter-bureau coordination and cooperation.

Policy 7.24 Impervious surfaces (p. GP7-11) should be modified to acknowledge that impervious surfaces to promote active transportation are environmentally beneficial and deserving of a more balanced and flexible approach.

Chapter 8: Public Facilities and Services

Policy 8.7 Internal coordination (p. GP8-11) notes the importance of internal city agency and bureau coordination "as appropriate." When would this not be appropriate? This needs to be emphasized as a major theme in the plan especially in this time of dwindling resources. The city needs to stop wasting money due to uncoordinated public improvement projects. An example: BES recently finished intersection improvements along Terwilliger (at SW 7th

and SW Chestnut, which are 200+ feet apart) to address storm water issues. Between these streets, the SB bike lane on Terwilliger drops creating a serious gap, which has been identified for years. So although the city had the right-of-way, crews and equipment on-site to close this bike lane gap (and the urging of several SW residents well before the project started), it did not. To make matters worse, the new sidewalk at 7th will need to be partially removed to provide the bike lane in the future!

Policy 8.43 right-of-way vacations (p. GP8-15) calls for adopting and maintaining city code provisions regarding ROW vacations. It mentions “require pedestrian or bicycles facilities, if needed.” This wording seems awfully vague. Who determines need? Adjoining property owners? Shouldn’t important connections be identified in a plan? This issue may be most important in SW and outer E Portland where undeveloped street ROW can present significant opportunities to provide a more interconnected and convenient active transportation system. This policy should be clarified.

Chapter 9: Transportation

Policy 9.6 Transportation hierarchy for people movement (p. GP9-7) this hierarchy, if implemented, will represent a major shift in transportation for the city. My question is how will freight fit into this? As observed during the last TSP TEG meeting, describing the weighing of modal transportation needs with a “hierarchy” sends the wrong message by implying that motor vehicles will be shunned, and perhaps not even accommodated on some streets. In practice this will not be how it works. Some other term and diagram, which will more closely resemble how this will be implemented in practice would be a better idea and promote clearer understanding regarding the intent. I fully support the intent of this policy and decision-making framework, and I believe, if done right, will be a valuable tool for thoughtfully and appropriately accommodating the transportation needs of city residents and businesses.

Policy 9.50 On-street parking (GP9-13) how does the management of on-street parking relate to the transportation hierarchy above? In practice, storage of cars in the public ROW often trumps all other roadway users.

Policy 9.51 Off-street parking (GP9-13) covers the private parking side of the equation. The policies should cover how the hierarchy, on-street, off-street, and city parking standards will be coordinated to achieve the desired outcomes – including the accommodation of active transportation.

Policy 9.54 Coordination (GP9-14) covers intergovernmental coordination to plan for and provide transportation facilities. Related to my comments on Policy 8.7 above, there needs to be much better inter-bureau coordination and cooperation to avoid outcomes like the Terwilliger and Barbur examples.

Resilience to Natural Disasters

The plan makes several references related to increasing our resilience to natural disasters. However, it doesn't seem to fully appreciate the extent to which energy supplies could be disrupted - potentially for extended periods. There should be greater recognition about the value of bicycling and walking in the wake of a natural disaster.

List of Significant Projects – Transportation

Citizens are directed to the Map App to make comments regarding the TSP and the project improvements. I find the transportation projects list in Map App to be completely deficient in multiple ways:

- * Relationship between lists in the Comprehensive Plan and Map App. The project list (without a map) in the Comprehensive Plan does not coincide with those shown on the Map App. The city needs to produce one consolidated list and map(s) for people to comment on and not give them materials, which are difficult to read, comprehend, and reconcile.

- * Old projects don't necessarily support the new plan. After adopting the Portland Plan and creating a totally updated Comprehensive Plan, why would we simply dust off the old project list (many, I suppose over 20 years old) as a place to start? How will a fundamentally old project list move us in the new directions articulated in the Portland Plan and Comprehensive Plan?

- * No apparent strategy. The organization makes the list (at least) appear to be a grab bag of projects

leading me to the question – Even if we complete the list, will these investments do the best possible job of supporting the outcomes described in the plan? Will we have a first-rate and functional active transportation network that appeals to people of all ages and abilities? A paper/pdf map would help a bunch. The Map App is cool, but it's time consuming to have to click on each line/dot on the map to know what it is.

* Most new projects are missing. Projects from recent planning efforts are not included, and the method for adding them to the list should be clarified. The Portland Bicycle Plan for 2030 projects are largely excluded in SW Portland and probably other areas of the city as well. The Central City Plan prominently features the “Green Loop” as one of the big ideas, but it's not shown. How do projects such as this get onto the list?

* Many project descriptions are vague and meaningless. For example, Project 90016 Inner Barbur Multimodal Improvements, includes Barbur from I-405 to Terwilliger. It is a \$4,000,000 project, with a timeline TBD to “design and implement transit, bicycle, and pedestrian improvements.” Once completed, how would this portion of Barbur be different? How would we know when it's finished?

* Cost estimates are often highly suspect and generally too low. Example: Project 90063 Sunset Boulevard from Dosch to Capitol Hwy. (LP-37) has a \$1.7 million estimate to provide bicycle facilities, sidewalks, and crossing improvements for about 1 mile of roadway. The first phase of this was recently completed for about 3 blocks in Hillsdale for \$800,000. How can the remaining mile be done with a theoretical remaining budget of \$900,000? A big concern is how will projects be fairly evaluated and prioritized when cost estimates may be off by a factor of 10.

* Some projects make no sense. Looking at pedestrian and bicycle projects in SW Portland, we typically have expensive, and sometimes unnecessary projects listed. In today's funding climate these projects generally will have no realistic chance of being funded. At the same time, the more affordable and functionally valuable projects, are nowhere to be found. Example: Project 90001 Montgomery to Vista Bikeway is described to “design and implement bicycle facilities” for \$4.5 million. This windy route on several very steep residential streets makes no sense for this level of investment. At the same time, SW Montgomery, which is used by the majority of cyclists and pedestrians today, is not listed. With a few safety improvements and wayfinding provided for a small fraction of \$4.5 million, this street could provide a functional and more direct walking and bicycling connection between downtown, Council Crest, and other SW destinations.

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 1:07 PM
To: Kovacs, Madeline
Subject: FW: [User Approved] RE: R10 to R20 zoning change

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: Jon Simonson [mailto:jonsimonson@msn.com]
Sent: Tuesday, November 04, 2014 12:10 PM
To: PDX Comp Plan; Planning and Sustainability Commission
Subject: [User Approved] RE: R10 to R20 zoning change

I think I'm beyond the comment period but here are my comments regarding changing zoning of land along Barbara Welch Road from R10 to R20 if the city wants to add them to the record:

I am entirely in favor of changing the zoning along SE Barbara Welch Road from R10 to R20. The terrain along this road is very steep and wooded. To potentially develop it into anything with a density greater than R20 would be foolish. I would actually be in favor of changing to zoning to RF.

Jon Simonson
15309 SE Ogden Dr.
Portland, OR 97236

From: pdxcompplan@portlandoregon.gov
To: jonsimonson@msn.com
Subject: RE: R10 to R20 zoning change
Date: Tue, 4 Nov 2014 20:02:35 +0000
Hi:

If there is a development currently under way, it will be regulated by current zoning. The new zoning, if the designation and zoning changes are adopted, will take effect some time in 2016.

You can testify about the proposed change (in support or opposition) until march 13, 2014.

Sara Wright
p: (503) 823-7728

From: Jon Simonson [mailto:jonsimonson@msn.com]
Sent: Friday, October 31, 2014 12:49 PM
To: PDX Comp Plan
Subject: RE: R10 to R20 zoning change

That's good to hear. The hills are rather steep around there. Would this affect the proposed development at 6925 WI/ SE 152ND AVE?

From: pdxcompplan@portlandoregon.gov
To: jonsimonson@msn.com
Subject: RE: R10 to R20 zoning change
Date: Fri, 31 Oct 2014 19:07:23 +0000
Hi:

There is a proposed designation change from R10 to R20 along Barbara Welch Rd, yes. If the designation change is approved, and the following zoning change is approved, the new zoning would take effect some time in 2016. (The exact date will be determined based on when it is approved.) Please don't hesitate to call me for more information or clarification.

Sara Wright
p: (503) 823-7728

From: Jon Simonson [mailto:jonsimonson@msn.com]
Sent: Friday, October 31, 2014 9:48 AM
To: PDX Comp Plan
Subject: R10 to R20 zoning change

It looks like the comp plan has a zoning change from R10 to R20 along Barbara Welch Road in Outer SE Portland. Is this still in the works for 2015?

-Jon

From: Planning and Sustainability Commission
Sent: Tuesday, November 04, 2014 2:00 PM
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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www.portlandoregon.gov/bps

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From: Stockton, Marty
Sent: Tuesday, November 04, 2014 1:32 PM
To: Jack Hopkins
Cc: Planning and Sustainability Commission
Subject: RE: Comprehensive Plan Testimony

Hi Jack,

Thanks for your email. I am copying the Planning and Sustainability Commission email address for your request to be part of the official public comment.

Please feel free to contact me for process updates.

With kind regards,
Marty

Marty Stockton | Southeast District Liaison
Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue | Suite 7100 | Portland, OR 97201
p: 503.823.2041
f: 503.823.5884
e: marty.stockton@portlandoregon.gov
w: www.portlandoregon.gov/bps

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From: Jack Hopkins [mailto:Jack@nwmed.com]
Sent: Tuesday, November 04, 2014 12:49 PM
To: Stockton, Marty
Subject: Comprehensive Plan Testimony

Marty,
Thank you for your help.

I am following up our phone conversation concerning my property at 1801 SE Belmont. Portland, Oregon 97214

The property is currently zoned R 2.5 and has a Conditional Use approved in 1995, to allow a community service agency operate there.

The tenant there has out-grown that space and will be moving within this next year. In reviewing both the correct zoning and the available conditional uses I see a very limited use for this building. My biggest fear is having a long-term vacant building which hurts economically, and looks terrible for the neighborhood.

I have walked, driven and printed out a Google map of the area. It appears that the area has a very eclectic group of property users. I am not a professional planner but I am a 70 year old guy who has lived in Portland my whole life. I think that a Comprehensive plan designation of "Mixed Use Urban Center" and a zoning like "Commercial Mixed 2" would benefit the area.

Thanks for your consideration.

Jack Hopkins
JAX EPV, LLC
1010 SE Stark St.
jack@nwmed.com
503.887.4000

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From: Planning and Sustainability Commission
Sent: Wednesday, November 05, 2014 2:22 PM
To: Kovacs, Madeline
Subject: FW: Comment

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: Jasmine [mailto:jasminum.flora@gmail.com]
Sent: Tuesday, November 04, 2014 3:53 PM
To: Planning and Sustainability Commission
Subject: Comment

Do not destroy critical natural areas in order to find new industrial land. Use the brownfields that currently exist. Do not treat natural areas like piggy banks for industrial development. Of special concern are areas along the Columbia River and West Hayden Island.

Thank you,
Jasmine Zimmer-Stucky
5918 NE 13th Ave
Portland, Oregon 97211

From: Planning and Sustainability Commission
Sent: Wednesday, November 05, 2014 2:28 PM
To: Kovacs, Madeline
Subject: FW: PSC 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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www.portlandoregon.gov/bps

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From: PDX Comp Plan
Sent: Wednesday, November 05, 2014 9:38 AM
To: Planning and Sustainability Commission
Subject: FW: PSC Comprehensive Plan Testimony

From: Eric Schnell [mailto:eric8schnell@gmail.com]
Sent: Tuesday, November 04, 2014 3:38 PM
To: PDX Comp Plan
Subject: PSC Comprehensive Plan Testimony

Dear Portland City Planners,

As a Portland resident in Homestead neighborhood, I would like to make two specific suggestions/concerns regarding the current Comprehensive Plan Draft.

1. The new comprehensive plan should not supersede previously adopted neighborhood and district plans. Specifically, the Marquam Hill Plan and the Terwilliger Parkway Plan should be referred to by name and prioritized to stand as currently intended. These plans were adopted only after a long public process involving all stakeholders, and thus are more legitimate in their planning intent and more location-specific than the closed-door writing that appears to have resulted in the Comp Plan. I fear that depending in its interpretation/implementation, the Comp Plan may seriously degrade livability in our neighborhood as it has a one-size-fits-all approach to some issues. As the other plans already exist- again after a long involved public dialogue- these processes and hard work should not be discarded.

2. Neighborhood associations should still be explicitly mentioned as a primary component

of the political and land use planning process. Portland's NA system is an astoundingly successful way to get public involvement in the planning process and in inspiring volunteerism and civic interactions between neighbors. The Comp Plan appears to minimize its significance, and will, in effect, have the effect of reducing citizen involvement in city planning. Perhaps this is intentional, but I can say that I am saddened by the thought. The Comp Plan should reinforce the importance of the NA system as well as ONI as institutions with an important role in city planning.

Thank you for the opportunity to testify. I am sorry that I could not make a meeting to testify in person.

Thanks,
Eric Schnell
4408 SE Hamilton Ter
Portland OR 97239

From: Planning and Sustainability Commission
Sent: Wednesday, November 05, 2014 2:29 PM
To: Kovacs, Madeline
Subject: FW: PSC Comprehensive Plan Testimony

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: PDX Comp Plan
Sent: Wednesday, November 05, 2014 9:37 AM
To: Planning and Sustainability Commission
Subject: FW: PSC Comprehensive Plan Testimony

From: Alfredo [<mailto:azangara@msn.com>]
Sent: Tuesday, November 04, 2014 3:30 PM
To: PDX Comp Plan
Subject: FW: PSC Comprehensive Plan Testimony

Dear Planning Commission:

Please refer to the testimony message below that was sent to Leslie Lum on October 31st. I'm forwarding the message to this general pdxcompplan email address to ensure that it is received/registered by November 4th, as Leslie Lum is out of the office through November 6th (see copy of auto-reply message from Leslie pasted directly below).

Please contact me with any questions or if additional information is needed.

Thank you,

- Alfredo

Alfred (Alfredo) and Renee Zangara
9539 N Decatur Street
Portland OR 97203
503.927.4348
azangara@msn.com

=====

Hello.

I will be out of the office until Thursday, November 6, 2014. I will reply to your email as quickly as possible upon my return.

Thank you.

Leslie Lum
Urban Designer/North Portland District Liaison
Bureau of Planning and Sustainability
leslie.lum@portlandoregon.gov

=====

From: azangara@msn.com
To: leslie.lum@portlandoregon.gov
Subject: PSC Comprehensive Plan Testimony
Date: Fri, 31 Oct 2014 15:15:04 -0700
Hello Leslie,

I'm writing in regards to the proposed Comprehensive Plan Map designation change for my property located at 9539 N Decatur Street in Portland, zip code 97203.

The current designation is Mixed Employment, and the proposed designation is Single - Dwelling 5,000

I believe the current Mixed Employment designation is the most suitable for this particular property, and would prefer to keep the existing designation when the new Plan Map is approved and deployed.

If there are any actions that I need to take, or if there is additional information that you would like me to provide, please advise. My contact information is included below.

Thanks and regards,

- Alfredo

Alfredo and Renee Zangara
9539 N Decatur Street
Portland OR 97203
503.927.4348
azangara@msn.com

From: Planning and Sustainability Commission
Sent: Wednesday, November 05, 2014 2:31 PM
To: Kovacs, Madeline
Subject: FW: 2035 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: PDX Comp Plan
Sent: Wednesday, November 05, 2014 9:41 AM
To: Planning and Sustainability Commission
Subject: FW: 2035 Comprehensive Plan

From: Dar ren [mailto:darringlee@hotmail.com]
Sent: Tuesday, November 04, 2014 4:59 PM
To: PDX Comp Plan
Subject: 2035 Comprehensive Plan

Regarding Proposed Change #714 from R5 to R7:

Address: 8226 SE 52nd Ave

I bought my property back in 2001 with the intention of developing it into 4 lots (including the existing home), in the future. With the downturn in the market back in 2007/2008, I put that plan on the back burner. With the new proposed plan, I would essentially lose 1 of those lots. Is there anyway to "grandfather" my initial intentions and keep the R5a designation?

Darren Lee
Owner

From: Planning and Sustainability Commission
Sent: Wednesday, November 05, 2014 2:51 PM
To: Kovacs, Madeline
Subject: FW: West Hayden Island

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: Barbara Hanawalt [mailto:bhanawalt@gmail.com]
Sent: Wednesday, November 05, 2014 2:48 PM
To: Planning and Sustainability Commission
Subject: RE: West Hayden Island

Barbara Hanawalt
9017 SW 9th Place
Portland, OR 97219
sent from my phone
On Nov 5, 2014 2:24 PM, "Planning and Sustainability Commission"
<psc@portlandoregon.gov> wrote:
Hello Barbara,

Thank you for your comments to the Planning and Sustainability Commission. So that I may forward your testimony to the commissioners and include it in the record, can you please email me your mailing address as is required for all 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
www.portlandoregon.gov/bps

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From: Barbara Hanawalt [mailto:bhanawalt@gmail.com]
Sent: Tuesday, November 04, 2014 9:01 PM
To: Planning and Sustainability Commission; Hales, Mayor; Commissioner Novick; Commissioner Fritz; Commissioner Saltzman; Commissioner Fish
Subject: West Hayden Island

Dear City Leaders,

Honestly, I can't understand why West Hayden Island is coming up again. At this point in the use of our natural resources on earth, we need to re-use areas already taken out of nature, and leave the ones we have. We NEED these places to stay wild. Such places are making our environment hospitable for humans in ways we are only beginning to understand. We must not keep paring down our natural areas until the last tree and bush are gone. It's beyond time to stop environmental destruction and degradation.

PLEASE leave West Hayden Island wild and just the way it is. Find industrial land elsewhere. There seems to be a lot of land available in other parts of Portland on both the Columbia and the Willamette.

What ever forces are pressuring you to develop West Hayden Island-- please do not succumb. Be the leaders you were elected to be-- leaders who have the health and safety of the populace as a first priority, not leaders who are beholden to industry whose first priority is making a profit for shareholders, not the health and safety of the populace.

Thank you. -- Barbara Hanawalt, Portland voter

From: Planning and Sustainability Commission
Sent: Wednesday, November 05, 2014 3:32 PM
To: Kovacs, Madeline
Subject: FW: [User Approved] RE: portland 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: catherine dee [mailto:cathdee@msn.com]
Sent: Wednesday, November 05, 2014 2:41 PM
To: Planning and Sustainability Commission
Subject: [User Approved] RE: portland plan

Sure
It is 3112 SE 35th Ave portland 97202

From: psc@portlandoregon.gov
To: cathdee@msn.com
Subject: FW: portland plan
Date: Wed, 5 Nov 2014 22:24:01 +0000
Hello Catherine,

Thank you for your comments to the Planning and Sustainability Commission. So that I may forward your testimony to the commissioners and include it in the record, can you please email me your mailing address as is required for all 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
www.portlandoregon.gov/bps

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From: BPS Mailbox
Sent: Tuesday, November 04, 2014 4:57 PM
To: Ocken, Julie
Subject: FW: portland plan

Comp plan letter

NaTasha Gaskin
City of Portland
Bureau of Planning and Sustainability
Ph: 503-823- 7802
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From: Catherine Dee [mailto:cathdee@msn.com]
Sent: Tuesday, November 04, 2014 4:56 PM
To: BPS Mailbox; Stockton, Marty
Subject: portland plan

I am very disappointed in the way the city has been addressing the need for higher density. I realize we need to grow and we don't want huge sprawl, but I have not liked what's been going on in my neighborhood
I live 5 blocks off of Division on se 35th.
There are way too many condos without parking. I have been very concerned about the possibility of over flow parking in front of my house because the condos don't have to provide parking
It is totally unrealistic to think these people will only use public transportation.
Also very few of the business provide parking.
The buses are very full during certain hrs. There is no park and ride by the Lloyd center max

My neighborhood has seen lots of infill and what I don't like are perfectly nice houses with nice yards being torn down and replaced with 3 story mansions and no yard. So what's livable for me when a huge house towers over my yard and is just feet from my house. What is worse is when 3-4 units are jammed on a lot that had a modest home. Eliminating yards and trees will not do anything to make our neighborhoods what there were.
Packing people closer and closer together will start looking like a project
I wrote of my concerns 2 yrs ago and did get a nice reply but none of my concerns were addressed.
We need to rethink what we are doing and not continue to change so much so fast that we can't keep the Portland we all love.

Also I don't see any really affordable condos near me.

My other question is where are kids going to go to school. There is no land left to build new

schools .

I was planning in staying in my house for many more yrs. I have been her since 1990, but It is unrealistic to think that I might have to park blocks from my house if the parking situation is not addressed.

I'm healthy ,but in my mid 60's and don't have off road parking.

I hope you really look at the input people are giving you and not just plow ahead with your plan.

Catherine Dee

Woodstock's Unimproved Streets

Woodstock's unimproved streets have been a neighborhood issue for decades. Eight percent of Woodstock's streets are unimproved, as compared to two percent of all streets citywide.

Woodstock's 1995 Neighborhood Plan contained a good description of the problems of unimproved streets. It stated the following objectives for unimproved streets, but contains no guidance as to how these objectives are to be realized: *but is vague on solutions*

Objectives:

~~2.1 Evaluate unimproved rights-of-way to determine which streets should be given the highest priority for full multimodal improvements and which should be considered for bicycle and pedestrian pathways, conversion to linear parks, or street vacations.~~

~~2.2 Study the feasibility of improving unimproved or partially improved east-west rights-of-way to facilitate circulation and relieve traffic congestion within and around the Village Center (now termed the Woodstock Neighborhood Center).~~

2.3 Minimize the negative impacts of additional traffic on adjacent residential areas when improving streets.

In the spring term of 2010, a group of five PSU Masters in Urban Planning students did a thorough study of Woodstock's unimproved streets titled "Roadway not Improved." Two conclusions of this report were that streets were not being improved because the cost of Local Improvement Districts (LIDs) was prohibitive for adjacent residents and because residents adjacent to streets needing improvement feared that street improvement would result in an undesired increase in traffic.

On January 11, 2011, the PSU group gave a presentation of their findings From "Roadway not Improved" to the Portland Planning Commission.

Perhaps some of you can remember that presentation. The report can be accessed at <http://www.RoadwaynotImproved.com>.

Also that more flexible and context sensitive options for street improvements were needed.

The majority of Woodstock's unimproved streets cluster within a ¼ mile of the commercial core of the Woodstock Neighborhood Center, which is essentially Woodstock Boulevard between SE 39th (or SE Chavez) and SE 52nd. Language in the proposed 2035 Draft of the Comprehensive Plan calls for increased density and a "wider variety of housing options" close to Neighborhood Centers (see Policy 3.30). Most blocks adjacent to Woodstock's commercial core are designated for R 2.5 zoning, meaning that the City's vision is for these blocks to be developed as rowhouses or

Terry Griffiths
4128 SE Reedway

similar development at double the density of their current R5 zoning. This intended higher density development is effectively blocked by the presence of the unimproved streets since up zoning from lower to higher density is contingent on having adequate infrastructure to support the density increase. The point here is that while the Comp Plan envisions higher density in and around the Woodstock Neighborhood Center, the continued existence of extremely substandard streets undermines that objective.

From the neighborhood's perspective the goal of improving key neighborhood streets is not as straightforward as it might initially seem. Many residents see positive qualities in the unimproved streets. Often they serve as a de-facto buffer between commercial and residential areas. And the degraded aspect of these streets prevents them from being used by pass-through traffic trying to avoid congestion on Woodstock Boulevard.

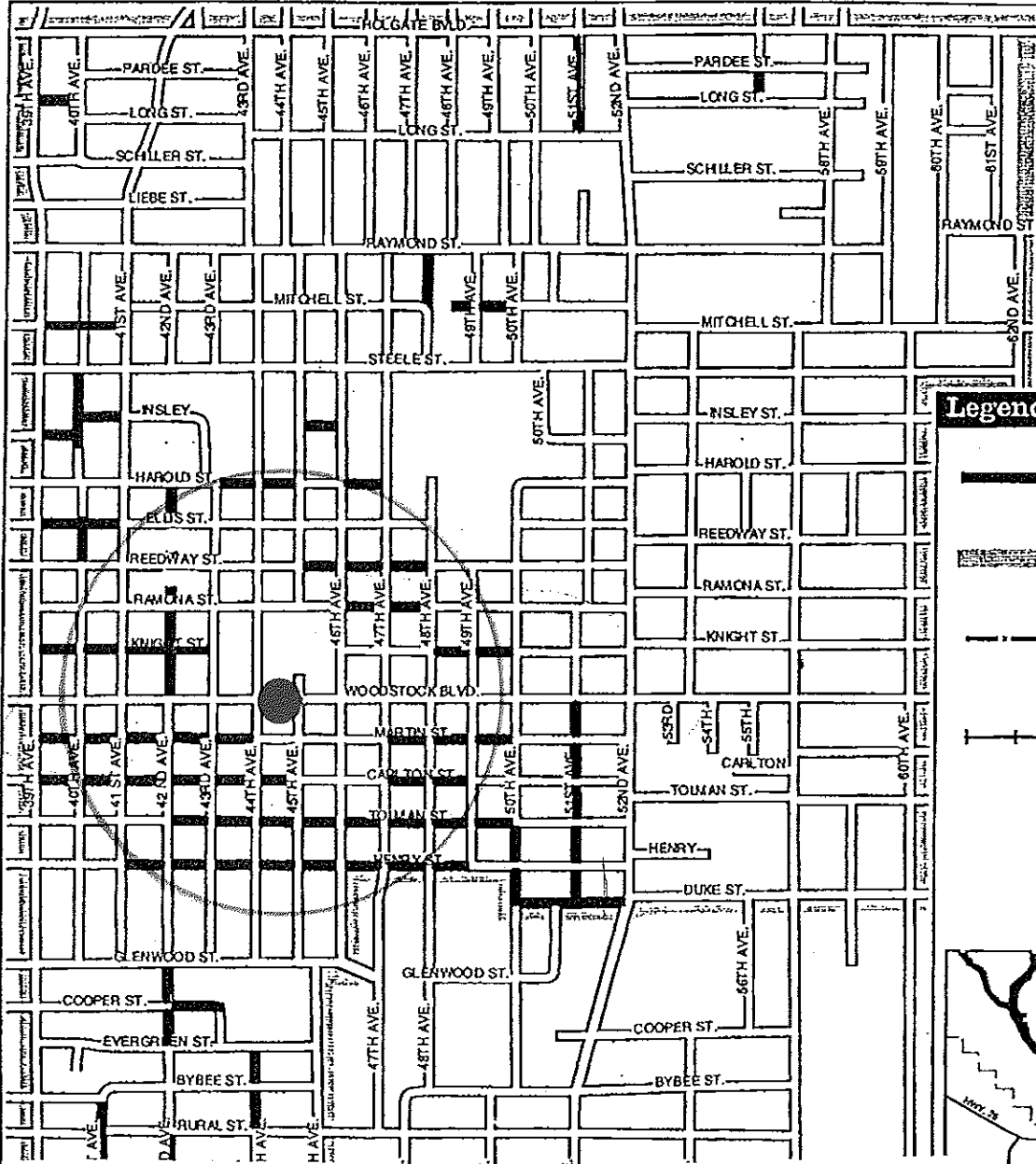
Woodstock needs city help to develop an overall plan for these streets to enhance our Center's role as a 20 Minute Neighborhood, to provide attractive and convenient pedestrian and bicycle pathways, as well as allowing limited vehicle access for increased housing density. Such a plan should also strive to preserve the buffering qualities and the disincentives to cut-through traffic that these streets in their present condition afford today.

Both SE Knight and Martins parallel the Woodstock business district. With commercial lots being different depths, some residents face the backs of commercial buildings. In our recent charrette, neighbors from these streets were shown several applications that could be used to buffer them with landscaping, head in parking, bike and walking paths. Residents liked the "street by street" approach and would be most comfortable with street improvements that were flexible in their approach and sensitive to context.

TERRY BRITAIN

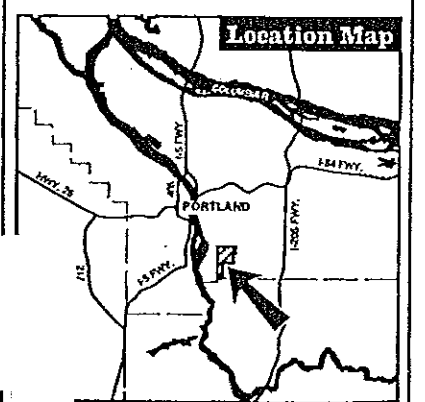
Map 5

Unimproved Rights of Way

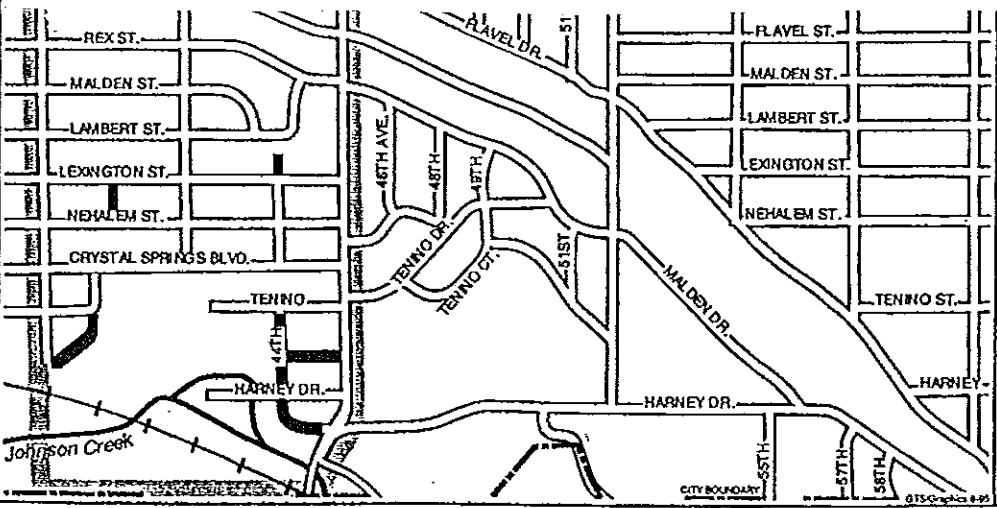


Legend:

- Unimproved Rights of Way
- Neighborhood Boundary
- City Boundary
- Railway (Springwater Corridor)



UNIMPROVED STREETS W/IN 1/4 MILE OF WOODSTOCK NEIGHBORHOOD CENTER



WOODSTOCK Neighborhood Plan

NORTH

0 1,000'

Scale In Feet

June 1995
Bureau of Planning
City of Portland, Oregon

My name is Terry Chung, President of the Portland Chinatown History and Museum Foundation, and a member of Old Town Chinatown Community Association.

The Revisions to the 2035 plan that focus on the historic and cultural resources are written in such a way that they significantly weaken the original intent to preserve, save and utilize the designated historic landmarks and historic and conservation districts.

Is the planning bureau listening to the people and community that work and live within the New Chinatown/Japantown Historic District, or just the individuals who seek to develop their properties, while having the taxpayers assist them to make the maximum amount of money. Where is the balanced recognition that those who work and live in the area have an even greater stake in what type of environment they will have to face and work in? Preservation of buildings was identified as one of the top three items that was identified as a need by the Old Town Chinatown Community association. In this new revision, in key places, verbs have been changed from preserve/accentuate/support/Maintain/protect to 'encourage/protect until. This is like going from required to recommended in term of paying your property taxes, or deciding what to do when coming to a stop signal.

Encourage does little or nothing to help in preservation of the city's historic sites if a developer has a plan in mind to maximize his investment return. What you get is the same basic plan for development of each piece of property by each different developer. Removal and new development to the same magnitude of each new building, build to the maximum heights. We already have seen the type of spread of buildings through out other "historic districts" even those that have had no real historical population base. I believe that we already have enough new building of the same design with the same objective, market rate housing.

You've probably all herd the term or song "little boxes". We've seen this approach in the housing developments in the suburbs, and now we're seeing this same approach being proposed as "development" in New Chinatown/Japantown Historic District. We need to protect this district and request and require that the developers work within the height limits established by the National Park Service, to preserve and augment the historic feel and importance of a Historic District.

The spirit of this comprehensive plan should be to maintain and augment the Historic District that is New Chinatown/Japantown. This is Portland's one and only Historic District that still have the potential ability to draw people from all walks of life, with an interest in the history and development of Portland, our city. Once this Historic District is gone, rather than preserve, you've lost your only street front presence to the historic past. No museum, no painting, no exhibit can give you the feel of a time and place, like a preserved environment.

We preserve forest, create parks, create wetlands, create amusement centers, create cultural villages, This plan should maintain and augment one of Portland's last stories of

historical and cultural development.

I've attached a list of comments and recommendations that were passed on to me, that I feel would help make this a better and more significant proposal for Portland's future.

Comments/Recommendations:

- 1) Proposed 2035 language significantly weakens current preservation policy. In key places, verbs changed from 'preserve/accentuate/support /maintain/protect' to encourage/protect until' Problematic, undefined qualifiers are added in several places. The strength and spirit of the existing comprehensive plan language should be maintained and enhanced, not diminished. It should be recognized that historic and cultural resources are irreplaceable.
- 2) Proposed policies 4.39, 4.40, 4.41, 4.42, 4.43, 4.44, and 4.45 are good additions and Should be maintained.
- 3) Remove 'statewide' from last sentence of introductory paragraph. Remove the following undefined qualifiers: "high quality" and "where feasible" (4.36) "under-utilized" (4.37) "significant" (4.38)
- 4) Policy 4.38 is especially problematic and should be revised to read: "Protect historic and culturally significant structures from demolition. Where no economically viable use is apparent, allow demolition only after opportunities for public comment and consideration of preservation and mitigation alternatives."
- 5) Replace text of proposed Policies 4.36 with language in existing Objective A. Correspondingly, revise Policy 4.37 to read: "Preserve and complement historic resources when infill development occurs."

Thank you

Terry Chung

Doug Klotz
1908 SE 35th Place
Portland, OR 97214

November 4, 2014

Chair Baugh, and PSC Commissioners:

In light of the number of neighborhood associations clamoring for reductions in the zoning capacity in Centers and along Corridors in their neighborhoods, I would point out that while certainly you need to understand the neighborhood association members' concerns, the city has greater goals to consider. The Comprehensive Plan will shape our city, to serve all current and future residents, not just the single-family homeowners that such associations often primarily represent. In addition, the city, county and state Climate Action Plans address how the actions the city takes will affect the planet's climate and resources.

It is important for the Commission to think about what type of plan will reduce auto travel, reduce carbon emissions, and encourage alternative transportation means, as well as best serve not only homeowners, but renters, those of limited means, and disadvantaged communities. Allowing more housing, and a variety of sizes of housing units to be built, in all parts of the city will further this goal. It will best serve these goals if the majority of these units are located in places with good access to transit, such as Town Centers and Neighborhood Centers, as well as Downtown.

To achieve this, the first step would be to preserve the by-right capacity of the existing zoning, and to even increase the capacity of those zones near services and transit, in order to put more Portlanders within the 20-minute neighborhoods the plan seeks to support. While compatibility with existing adjacent houses should be considered, it should not be at the cost of housing capacity in these critical locations.

Although the city may have enough theoretical capacity in existing zoning, much of it seems to be in areas where the market is not building housing. The capacity needs to be available in locations where developers see a need and will build the units. If enough units are built, the market price will drop, allowing more affordability for many residents. There is still a need for subsidized, and for incentivized, low income housing, and provision for these should also be part of the Comprehensive Plan.

I ask that you look at extending the Mixed-Use – Urban Center designation to all those properties slated for Mixed-Use designation on Division from east of 44th to just east of 50th, and on SE 50th from Hawthorne south to Powell. I have written to the Commission twice with details of my reasoning and will not repeat that here.

Increasing the use of transit, bicycling and walking are another key to making the whole plan work. The concept of Civic Corridors, that are "safe for all types of transportation", the "most prominent streets" in the city, is a good step toward building a more modally integrated city. Policy 3.40 on page GP3-13, specifies these corridors will "accommodate all modes of transportation", but then backtracks to say "within their right-of-way or on nearby parallel routes". Such side street routes may work for commuting, but not for shopping or participating in the civic life the previous language imagines. While compromises may sometimes be necessary, they should not be given away in the policy language. The "parallel routes" language should be removed.

Doug Klotz



Jeff Geisler (FOR) → Ron Ebersole

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Conflicting Goals

Goals of Comprehensive Plan

1. **Complete Neighborhoods:** Complete neighborhoods are places where people of all ages and abilities have safe and convenient access to the goods and services needed in daily life — where they can get to grocery stores, schools, libraries, parks and gathering places on foot or by bike. They are well connected to jobs and the rest of the city by transit. And they have a variety of housing types and prices for households of different sizes and incomes.
2. **Encourage Job Growth:** The Comprehensive Plan supports a robust economy and job growth by providing and increasing the productivity of land and infrastructure for businesses, institutions, and industry.
3. **Improve Natural Areas and Open Spaces:** City greenways and habitat corridors will expand Portland's system of streets, parks, trails, open spaces and natural areas to better connect people, places, water and wildlife. They will also improve human and environmental health.

The above 3 (of 6) goals for the comprehensive plan are conflicting goals given the proposed plan. While the residents of Portland are continuing to reconcile themselves to infill and denser replacement housing, significant amounts of irreplaceable green space is being dedicated to industry. Instead of intensifying the use of existing industrial lands and increasing the use brownfield sites to support new industry, the plan sacrifices needed community green spaces that allow for the desired goal of complete, livable neighborhoods and protecting natural resources.

Hayden Island: Conflict of Goals

West Hayden Island is a well known to the commissioners. 300 acres provide a significant portion of available space for the jobs growth goal. However, based on existing Port of Portland Terminals, it would provide very few jobs at a very high cost!

The following projects are from the Significant Projects List and reflects just some of the infrastructure that the public would be paying for those few jobs:

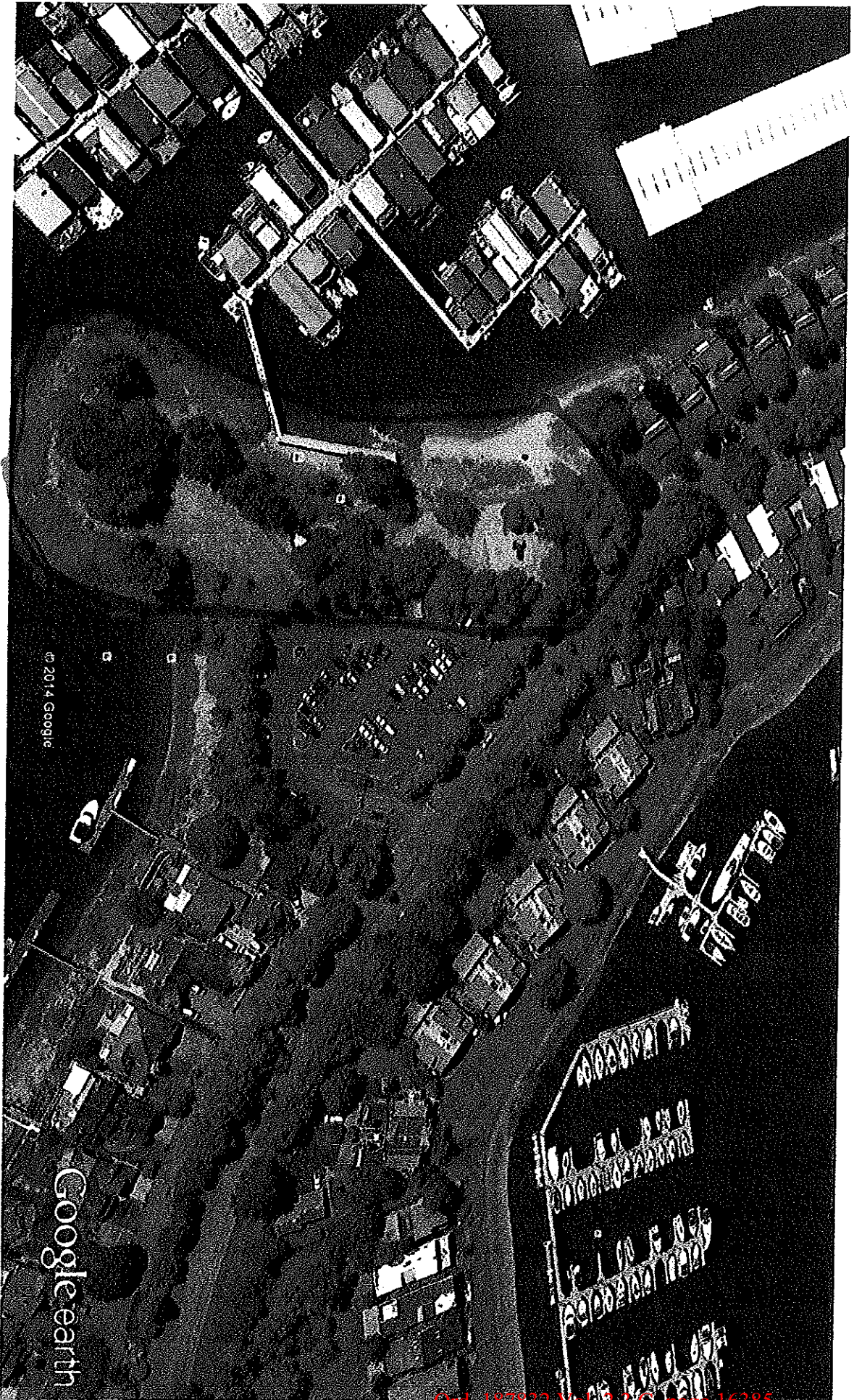
- \$3,000,000? for rail access bridge from Hayden Island to Rivergate,.
- \$9,500,000 for West Hayden Island Rail Loop.
- \$8,000,000 to improve approaches to moveable spans at Columbia Bridge
- \$12,350,000 to reconstruct N Hayden Island Drive from the Burlington Northern Bride to the Hayden Island I-5 Interchange.

The \$3,000,000 for a bridge over a river is clearly not realistic, but irrespective of that, these are all very major projects that will have an enormous impact on our taxes as well as impacting the environment of the whole Island.

East Hayden Island is another point of conflict. The current zoning combined with existing projects has the potential to double the population of the Island, with all of the new population to the east of Lotus Isle Park. The attached photo from Google Earth shows the chook point for traffic coming from the east end of the Island. The width of the Island at this point is just over a 100 yards and has housing on both sides. It is also the location of the only park on the Island (outlined in red). The density and height allowed in the zoning needs to be reduced to reflect the reality of the location.

Google earth

feet
meters



© 2014 Google

Google earth

Alastair Roxburgh, aroxburgh@ieee.org,
HILP Board Member
1503 N Hayden Island Drive
Portland, OR 97217

Chairman Baugh and PSC Commissioners:

Tonight I would like to discuss some deficiencies that I've noticed in the published methodology used by Portland Bureau of Planning and Sustainability for evaluating land for the Regional Industrial Lands Inventory.

The Industrial Lands inventory tries to categorize land according to some simple constraints:

- Acreage (25+)
- Floodplain
- Slope (< 10%)
- Wetlands
- Habitat
- ISLAND LAND <--suggested additional constraint

and market readiness factors:

- Transportation
- Availability
- Infrastructure
- Assembly
- Brownfields

Nowhere does the methodology acknowledge, or attempt to quantify, that the cost of bringing an acreage to "shovel ready" effectively down-weights the acreage. Unfortunately, the methodology strongly suggests that "an acre is an acre, wherever it may be." In particular, the methodology does not recognize that island acreage is different. An acre on an island, particularly a small one like Hayden Island, is relatively costly to develop, compared to normal land-locked acres. Therefore, island acres should be reduced by some factor, which would introduce a special new constraint (see above).

Development of island land, whether for industrial use or high-rise housing is fraught with difficulties (all of which are cost drivers) that may be orders of magnitude larger than for landlocked land.

Island development uniquely passes down much higher costs to existing island residents/ businesses/users in terms of congestion, loss of property values, air pollution, health effects, safety, noise pollution, displacement, etc. Such costs could easily reduce that embarrassingly big

blue WHI "jobs" area on the Map App by 80% or so (e.g., 330 acres effectively becomes 26 acres).

In particular, Hayden Island suffers from or is affected by:

- Limited or poor transportation
- Limited interconnectivity
- ~~Amish and other rural residents (immigrants)~~
- An appearance that may look tempting to a developer, but is not worth the cost of travel delays/mitigation/litigation/etc., due to heavy impact on an already fragile community and infrastructure.

Hayden Island is already in a precarious position with regard to limited access (one road, I-5), few internal roads (poor interconnectivity), a severely inadequate evacuation plan (3-4 days), and no medical.

The PBPS seems to have forgotten what a boon it is for a city to have an island. As recently as 2009 the Hayden Island Plan shows that Portland was extremely proud of having an island community in its midst.

Unfortunately, the largest blue area on the PBPS Map App also conveys the impression that most of the job acres for the next several decades are on WHI, an area that is blank in the PBPS Industrial Districts Atlas.

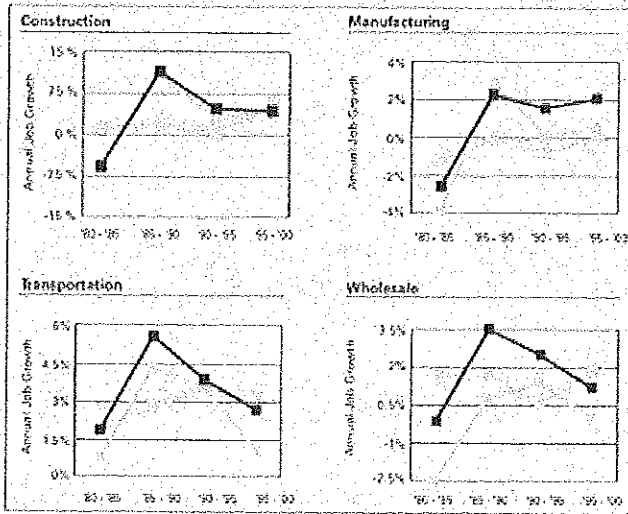
The lack of correlation of jobs and acres is there for all to see. The same Atlas states that jobs per developed acre are anywhere from 3 to 37 (with a mean of 9), as follows:

- 3 Rivergate
- 9 Airport
- 11 Northwest
- 11 Outer SE
- 13 Swan Island/Lower Albina
- 15 Columbia Corridor East
- 18 Banfield
- 37 Inner East Side

In other words, there is little correlation between acres and jobs.

Moreover, by 2004 in our region, Construction, Transportation, and Wholesale had been in decline since 1985 (a trend that has continued), which is against the US trend, so Portland seems to be becoming less popular for these types of industries. However, Mfg has been level since 1985 (Same as US). These trends were not discussed in the Conclusion of the Atlas! Here's the graphs:

INDUSTRIAL GROWTH TRENDS



Industrial employment in the Portland metro area (5-County Oregon portion of PMSA) grew by 37 percent between 1980 and 2000, three times as fast as the U.S. average of 12 percent. The distribution sectors created 46 percent of those new jobs, manufacturing 26 percent, and construction 28 percent. The metro area share of U.S. manufacturing jobs grew by 31 percent during this period (Bureau of Planning, 2003). The graphs show job growth rates by sector.

These data show that development of WHI as a port facility is contraindicated, and that if use for general industrial purposes is too costly. WHI's value as a natural habitat area, one of Portland's largest, is, on the other hand, extremely high.

Therefore, I ask that WHI be removed from the industrial lands inventory. Most importantly, in the interests of due public process, the PBPS should offer the public clear and timely explanations for all zoning changes, and make it clear to political pressure groups and other special interests that there will be no secrets; that due public process will continue; and that the decade-long public process on West Hayden Island will not be held to ransom.

Bibliography:

City of Portland, Bureau of Planning, "Industrial Districts, 2004 Atlas, Portland Oregon." (Apparently not updated since 2004).

Hayden Island Plan (PBPS Recommendation to City Council, June 2009, 172pp.) http://www.oregon.gov/ODOT/HWY/REGION1/hayden_iamp/appendix_a.pdf

Powerpoint "Regional Industrial Lands Inventory Findings" NAIOP Breakfat, Feb 16, 2012 http://naioporegon.org/downloads/2_16_12_regional_industrial_land_naiop.pdf

To: Portland Sustainability Commission
Nov 4, 2014

Subject: Portland Comprehensive Plan Comments

From: Tom Liptan, fasla
Landscape Architect
2216 NE 50th Ave
Portland, Or 97213
TLIPTAN@MSN.COM
503 730-7467

Recommendations:

1. Protect all of West Hayden Island. 300 acres of rust-belt development is not worth the loss! There is no guarantee that the industries will provide what they purport, but the benefit of the existing landscape is working everyday. It is a mistake to loose such a natural treasure in our midst.
2. It's time to create incentives and requirements for installation of ecoroofs on new multi-family, commercial and especially industrial development. Ecoroofs are a proven and affordable technology. Ecoroofs and solar panels are complimentary one doesn't preclude the other.
3. Determine specific goals for green infrastructure. In addition to centers and corridors we need better attention to green infrastructure associated with new development for all land use types, especially industrial lands. Special attention should be made to reduce impervious surfaces on private developments and in the public Right of way. Specify that a Portland Green Factor, such as Seattle's or Berlin's, be developed to assist in achieving these green infrastructure goals.
4. With 42 years of urban development experience I have learned that the manifestation of the built environment is a result of design practices, many of which are not compatible with new policies. This is especially true for conventional infrastructure bureaus. The Comp Plan needs to be specific and also find those areas of conflict with these existing design conventions. If you don't address it now many new policies are not likely to get through when they encounter PBOT, BES, BPS, Urban Forestry and other bureaus common and oft times inconspicuous barriers. Several years ago BES had what they called Greenscan, a process of identifying existing codes and practices that would prevent application of new green goals and policies. It was successful, but unfortunately BES discontinued this program. I strongly recommend that you incorporate attention and resources to set up such a process in the city. This could dovetail with developing a Green Factor.

To, Audubon suggestions support.

PSC-DCP Testimony, 11.4.14: Timme Helzer, West Hayden Island

I've been saying to you for months, "You Got It Right." I'm sure you've heard me, but I want to explain how I've come to this conclusion about your work. I've been a business management consultant for 35 years, helping organizations become more profitable, across the US, in Central Europe, and Southeast Asia.

And, for 40 years I've been teaching doctoral students how to do publishable research for their Ph.D. dissertations, bringing valid and reliable new knowledge to the world. I know good research when I see it. As a business consultant, I've read the public testimony and expert studies about marine development on West Hayden Island. As a long-time business consultant, I know marine development is not financially feasible or economically sustainable there.

And as a doctoral research professor I know you studied the facts, weighed the social, transportation, human health, and environmental consequences, then required highly responsible mitigations for all of Hayden Island. Many of you have research experience through advanced degrees, and all of you value fact-based decision-making; so I'm not surprised "you got it right" in the best interest of the City of Portland regarding West Hayden Island.

But, the Bureau of Planning and Sustainability is much more easily persuaded by the politicized but unsupported promises and unbridled greed of Portland's marine industry special interests. Although a major contributor of this Commission's final decision in August, 2013, our own BPS in this Draft Comprehensive Plan has completely rejected all of your well-researched facts, disregarded your measured conclusions, and denied your carefully weighed recommendations.

Your previous work stands on its own merits. The Draft Comprehensive Plan does not! You got it right the first time; follow through on it. Yours is the more highly responsible document; theirs is not. Yours calls for any marine industrial development on West Hayden Island to be fully mitigated; theirs contains no mitigations there, what so ever.

Better yet, simply take West Hayden Island out of the industrial lands inventory; that's the best outcome of all for West Hayden Island and all of Portland, now and in the future! You got it right the first time. Now, trust what you've done, and act on it.

Thank you.

Timme A. Helzer, Ph.D.
Consultant and Professor of Business Management
220 North Hayden Bay Drive
Portland, Oregon 97217



Rose City Park Neighborhood Association

Land Use & Transportation Committee

Nov. 4th, 2014 (Sent this day via e-mail to addresses listed below)

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 ManagerJoe.Zehnder@portlandoregon.gov
Erik Engstrom, Comp. Plan Project Manager Eric.Engstrom@portlandoregon.gov
Alison Stoll, Exec. Director Central NE Neighbors alisons@cnncoalition.org

Subject: RCPNA Recommendations for Comprehensive Plan Update – Proposed Draft

Honorable Chairman Baugh & Commissioners,

Thank you for the opportunity to speak with you and your staff regarding elements of the Proposed Draft of the Portland Comprehensive Plan that directly impact our neighborhood. As you know, Rose City Park Neighborhood Association contains over 5,000 residents and is located directly east of the Hollywood Town Center. Bound by NE 47th and NE 65th Aves. and NE Fremont and I-84, to the south. We share Neighborhood Corridors NE 47th Ave. and NE Fremont St. with the Hollywood NA and Cully NA, respectively. We share the 60th Ave. Station Area with North Tabor NA and are bisected by the Sandy Blvd. Civic Corridor and Halsey St. Our recommendations at this time are those of the RCPNA Land Use & Transportation Committee (LU & TC) and are to be considered by the RCPNA Board the evening of Nov. 4th. The LU & TC for RCPNA is authorized to act on land use matters on behalf of the Association when the action is time sensitive, as it is in this case since it the PSC's final hearing on this matter.

In general the Proposed Draft creates a number of new issues and reflects only a handful of our recommendations submitted in January of this year. We do appreciate the PSC's extension of the public comment deadline for this document until March 13, 2015. As other Neighborhood Associations have expressed we too are concerned about the implementation, height, and transportation impact of 'Mixed Use' and 'Campus Institution'. We look forward to this language as it emerges from both the Mixed Use and Campus Institution Committees prior to this deadline. We anticipate reviewing these committee proposals before submitting our final recommendations.

We have serious concerns regarding the lack of planning for off-street parking to meet the growing population's needs. The severe limitations being placed on vehicles will generate a negative impact on air quality as people search for a non-existent parking space, livability is compromised since there is no viable alternative to vehicular use for a timely commute, and anemic access to stores and services reduces chances for viability. We recommend language changes throughout the document that will allow the Parking Study Committee to implement a management program where strategically located off-street parking could be developed for Centers and major corridors. We see the transition from use of the private vehicle to public transportation as a future possibility that needs to occur over a 20+ year timeframe. The transition is incumbent on the increased provision of timely transportation service alternatives and high gas prices. Neither which we have right now.

We appreciate that the Proposed Draft states that it will honor adopted plans such as the Hollywood and Sandy Blvd. Plan. We address the need to continue the 45' height limit in segments of the Sandy Blvd. Civic Corridors that need to step down 'Mid-Rise' to 'Low-Rise' intensity as it moves away from the Central Business District (CBD)/Regional Centers and Town Centers.

Finally, we were surprised and saddened by the dramatic change in policies in Chapter 2 – Community Involvement. The Public Involvement PEG saw most of its recommendations removed in the Proposed Draft. We offer our limited recommendations to reinstate information regarding neighborhood and business associations that had been part of the 1981 Comprehensive Plan. Nonetheless, we ask you to take serious consideration of the public involvement material that had been removed between the Preliminary Draft and the Proposed Draft of the Comp. Plan Update.

The following are the RCPNA recommendations to the Comprehensive Plan Update - Proposed Draft that is contained in the Comp Plan Map App and the Comprehensive Plan text.

Additions to the text of the Plan are noted with a highlight. Deletions are ~~struckout~~.

Comp. Plan Map/Map App Recommendations:

1. Properties recommended for rezone/designation from R2(Multi-Family Residential) to CN2(Mixed Use-Dispersed): Deborah & John Field/Paperjam Press @ 4730 NE Fremont-Rose City Block 156, Lot 1, Ramod Chhetri @ 3436 NE 48th Ave - Rose City Block 155, Lot 16 and Peter Collins 3634 NE 47th Ave., Rose City PK, Block 156, W 1/2 of Lot 16 (subject to the approval of Dean Pottle's/ Dean's Scene property located at 4714 NE Fremont still under consideration by RCPNA Board)

2. Property recommended for rezone/designation in Plan draft from CN2 (Mixed Use-Dispersed) to R-5(Low Density Residential), which is the existing designation, is the New Deal restaurant, located on the SW corner of NE Halsey and NE 53rd Ave. This property is identified as 5315 NE Halsey St. - Elmhurst, Block 23, Lot 10, is currently zoned R-5, Single Dwelling. RCPNA requests this property remain zoned Residential and the site function as a Pre-Existing Non-Conforming use since this will provide the neighborhood more control in maintaining the low level of commercial impact the site has on the surrounding neighborhood.

3. At NE 60th Ave. between NE Halsey and the 60th Ave. Max Station add the comment “NE 60th, between Halsey and the MAX station, is substandard for pedestrians, bikes, buses, and even cars. It is busy at all times of the day. In addition to Tri-Met bus stops the school buses have 2 stops within this same stretch. The full use of the 60th Ave. MAX station is greatly hampered since 60th Ave. contains sidewalks only a few feet wide making it dangerous and unpleasant for pedestrians, especially impairing access for handicapped and families with young children. We recommend pedestrian and bicycle upgrades to this section of NE 60th, so that it can be safely shared by all members of the community.”

4. On NE Sandy Blvd. Civic Corridor from NE 50th Ave. eastward, state “definitive definition of “Mixed Use” for this area needs to include adequate off-street parking for expected apartment buildings, continued parking on Sandy for businesses, and a height restriction of 4 stories or 45 ft. as a continuation of the CS identified in the Hollywood and Sandy Blvd. Plan. We want to promote diversity and stability in Rose City Park. One way to achieve that is through a mix of rentals and condos in the new buildings along Sandy Blvd. Developers need to provide one parking space per unit, and TriMet needs to step up to ensuring convenient, reliable transit.

The Hollywood and Sandy Blvd. Plan was recommended for approval by the Planning Commission in 1999 after agreeing with RCPNA neighbors that the section of NE Sandy Blvd. from NE 50th to 54th needed to retain a maximum height of 45 feet. We now recommend that the Sandy Civic Corridor from NE 50th eastward retain the 45 foot height limitation as ‘Low-Rise’ Mixed Use from the Hollywood Town Center eastward.

Transportation Plan Projects & Land Use Map App and Comp. Plan text.

Sandy Blvd Streetscape Improvements, Phase 2

RCPNA Recommendation: Support expanding this process to include a Visioning for Sandy Blvd. as a Civic Corridor from the eastern end of the Hollywood and Sandy Blvd. Plan through NE 82nd Ave.

60th Ave MAX Station Area Improvements

RCPNA Recommendation: Strongly supports the development of infrastructure, bike, pedestrian improvements including sidewalks and pedestrian crossings in this Station Area, from the Halsey St/ NE 60th Ave. to the 60th Ave. Max Station. The Station Area improvements need to resolve the need for improved bike/vehicle/freight movement at Hassalo St. from the 60th Ave. intersection to Normandale Park and integration of the Sullivan Gulch Corridor improvements. Upgrading the NE Halsey and 60th Ave. intersection to address traffic failure with southbound turns from Halsey St. onto 60th Ave. and westbound turns from 60th Ave. onto Halsey St. as well as pedestrian safety. These improvements are needed prior to up-zoning area to Multi-Family.

Sullivan's Gulch Trail, Phase 2

RCPNA Recommendation: Strongly support the development of the Sullivan's Gulch Trail to and through the 60th Ave. Station Area. It is an essential link for bike commuting to and from downtown and needed to reduce motorized vehicle use. It has been envisioned by RCPNA that the 60th St. Station area may serve as a 'Bike Central' for NS bicycle commuters to access Max. Ancillary uses could support this trip connection through bike lockers, repair shops, etc. that could be encouraged as commercial elements in the Light Industrial zone near the Station.

Halsey St Bikeway

Halsey St. is unique in that it connects the Gateway Regional Center to the Hollywood Town Center and serves as a primary commute corridor for NE Multnomah County. It is constricted in width by a built environment limiting the safety of bicycle use in certain segments.

RCPNA recommends shifting bike routes at least one block off Halsey St. for safe commute travel through this constricted area. The constriction appears highest on Halsey St. from NE 67th through to NE 45th. NE Broadway and Tillamook St. offers an excellent alternative bike routes. We oppose losing a lane of vehicular travel in exchange for a bicycle lane in that section of Halsey.

The following are recommended changes to the Comprehensive Plan Update – Proposed Draft, July 2014.

Chapter 2 Community Involvement

Goal 2.A: Community involvement as a partnership

The City of Portland government works together as a genuine partner with Portland communities. The City promotes, builds, and maintains relationships and communicates with individuals, communities, neighborhood and business associations, businesses, organizations, institutions, and other governments to ensure meaningful community involvement in land use decisions.

RCPNA Commentary: Neighborhood and business associations need to be called out since they are geographic in nature and cover most of the city. Neighborhood associations offer a means to relay important land use and transportation proposals to residents and businesses throughout their neighborhood.

Goal 2.B: Social justice and equity

The City of Portland seeks social justice by working to expand choice and opportunity for all community members, recognizing a special responsibility to identify, orient, and involve under-served and under-represented communities in land use planning. The Office of Neighborhood Involvement (ONI) promotes the integration of community diversity into Bureau public outreach programs as well as in the neighborhood and business associations. The City actively works to improve its land use-related decisions to achieve more equitable distribution of burdens and benefits.

RCPNA Commentary: The Office of Neighborhood Involvement has become the leading bureau at the city in developing contacts and citizen involvement with diverse populations that are often underserved. ONI provides the neighborhood and business associations with opportunities for greater inclusion of these diverse populations in all our activities.

Goal 2.E: Meaningful participation

Community members have meaningful opportunities to participate in and influence all stages of planning and decision-making. Neighborhood and business associations and other affected stakeholders are to be notified when issues impact their communities. Public processes engage

the full diversity of affected community members, including under-served and under-represented individuals and communities.

***RCPNA Commentary:** Neighborhood associations and most business associations have developed procedures and a means to facilitate public involvement for land use and transportation issues that impact their areas. It is important to list these communities to allow the reader and city bureaus to understand their roles.*

Partners in Decision Making

Policy 2.2 Broaden Partnerships. "Work with neighborhood associations and business associations, as depicted in Graphics #1 and #2, to increase diversity and to help them reflect the diversity of the people and institutions they serve." *<Insert maps depicting the #1 Portland Neighborhood Associations and #2 Portland Business Associations>*

***RCPNA Commentary:** Both neighborhood business associations are geographically identified throughout the city. Including them in a map form provides the user of the Comprehensive Plan a better understanding of who may be impacted by a pending study or proposal.*

Invest in Education and Training

Policy 2.3 Community capacity building. ONI and other Bureaus enhance the ability of community members, particularly those in under-served and/or under-represented groups, to develop the relationships, knowledge, and skills to effectively participate in land use planning processes.

***RCPNA Commentary:** The Office of Neighborhood Involvement has developed citizen involvement training into an art form. They have and continue to be instrumental in the city developing communities of diversity that participate regularly in public involvement programs. Inserting this language identifies that they will continue to serve this vital role.*

Policy 2.1 Partnerships and coordination. Maintain partnerships and coordinate land use and transportation planning engagement with:

RCPNA Commentary: Transportation planning should also be included in this coordination. If the term 'land use' is intended to be all inclusive in reference to transportation then that needs to be clarified in a definition located in the Glossary.

Chapter 3 Urban Form – Corridors

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 to low-rise in scale. Mid-rise development includes buildings from five to 10 stories in height, but most frequently ranging from five to six stories, that are to be located nearer the City Center and Regional Centers. Low-rise development includes buildings from three to five stories in

height, but most frequently ranging from three to four stories. The low-rise development Civic Corridor segments are to be located further from the City Center/Regional Centers and contain supportive mixed uses for Town Centers and Neighborhood Centers.

RCPNA Commentary. *The concept of NE Sandy Blvd. consistently being built up with five to ten stories from near the City Center at NE 7th out to NE 122nd is not reasonable. The scale of the structures should reflect where sections of these corridors are in proximity to the City Center/Regional Centers connecting to Town Centers versus Town Centers connecting to Neighborhood Centers. The section of NE Sandy Blvd. from NE 47th to NE 57th has been through several studies, including the Hollywood and Sandy Boulevard Study. There was the agreement by the Planning Commission back in 1999 with the approval of this study that from NE 50th eastward development along Sandy Blvd. would NOT exceed 45 feet in height, which is currently considered four stories. RCPNA strongly recommends retaining the 45' height limitation on Sandy Blvd. from NE 50th eastward as 'low-rise' development along this corridor. Higher structures than 45' would structurally create a canyon effect and negatively impact the adjacent low density residential light and air.*

Policy 3.38 Integrated land use and mobility. Enhance Civic Corridors as distinctive places with transit-supportive densities of housing and employment, and high-quality transit service and pedestrian and bicycle facilities and strategically located off-street parking facilities that are models of ecologically-sensitive and human-scale urban design.

RCPNA Commentary. *Off-street parking spaces will be required to maintain commercial vitality along these corridors. This concept was approved by the Planning Commission in 1993 in the Livable Cities – Growing Better Study stating on p. 78, “For larger Main Streets projects, more extensive private improvements and public investments might be undertaken including the addition of such facilities as-pocket parks; landscaping; and parking lots/ garages shared between various businesses and uses, including possibly some city-owned facilities.” The addition of ‘human-scale’ is a very critical attribute for creating an attractive pedestrian space. This can be done through simple design elements such as building façade step-ups in height that give the pedestrian more light and air while lessening the impact of the ‘canyon’ effect.*

Policy 3.39 Design to be great places. Encourage public streets and sidewalk improvements along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe, healthy, and attractive pedestrian environment, and contribute to creating quality living environments for residents.

RCPNA Commentary. *The term ‘healthy’ needs to be inserted in this policy to assure that design, materials, and environmental features are to be considered in these pedestrian environments since the development of these Corridors needs to consider air pollution caused by the Corridor’s dual use as major mobility and freight corridors.*

<Add New> Policy 3.42 “Enhance as Centers of Community. Enhance Civic Corridors as unifying places of community identity by maintaining and enhancing neighborhood integrity through preserving historic features and structures, promote development designs integrate the

character and scale of the existing neighborhood and structures that step down in building height near the lower density residential uses”

RCPNA Commentary. This added policy addresses key elements that were in the 1981 Comprehensive Plan and the earlier draft of the Comp. Plan Update. It is critical that historical and geological features are not lost with new development. These corridors should serve as beacons for community identity.

Chapter 4 Design and Development – Historic and cultural resources

Page GP4-11 Policy 4.37 Continuity with established patterns. Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources and elements unique to the Pattern Area.

RCPNA Commentary: Language needs to be added here to help design review carry out the elements that are unique to the 5 Pattern Areas. Further, we recommend the establishment of separate Design Review Boards for each of these Pattern Areas. The over-sight by such a Board would likely help guide better development along NE Sandy Blvd. rather than the mismatched facades that have been going up on Division, Hawthorne, and Fremont.

Chapter 6 Economic Development - Campus Institutions.

Page GP6 -15 Policy 6.55 Development impacts. Protect the livability of surrounding neighborhoods through regular communication with adjacent neighborhood associations in the provision of adequate infrastructure for trip generation, transit/shuttle services, and campus development standards that foster suitable density and attractive campus design.

RCPNA Commentary. It is critical for Institutions to maintain a level of communication with the affected neighborhoods. This on-going relationship will serve to help facilitate discussion of potential development impacts. The general intent stated in the initial paragraph for Campus Institutions concludes, “Examples of new directions in the policies below include designation of major campuses as employment land, regulatory improvements, and transportation-related improvements.” There is no mention of these transportation improvements in any of the proposed policies. Transit services, whether through shuttles or Tri-Met, should be encouraged and has the least impact on neighborhoods together with walking and biking as modes of travel.

Page GP6-16 Policy 6.58 Satellite facilities. Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality. Expand campus shuttle service and/or provide secured separate pedestrian path where trip generation between campus facilities needs to be managed.

RCPNA Commentary. The Providence office building workers at NE 43rd and Halsey regularly generate trips to Providence Hospital on NE Glisan and likely receives trips from this hospital as well. The intersection at NE Halsey and NE 47th Ave. has been pushed into failure mode due to these added trips. Satellite facilities located within one-mile of the main campus need to have shuttle services linking them throughout the workday.

Chapter 9 - Transportation

Page GP9-5, GOAL 9.C: Environmentally sustainable

The transportation system increasingly uses renewable energy, or electricity from renewable sources, achieves adopted carbon reduction targets, and reduces air pollution, water pollution, noise, and Portlanders' reliance on ~~private vehicles~~ single occupancy cars and trucks.

RCPNA Commentary. Over 70% of the congestion we currently experience on our streets is caused by single occupancy cars and trucks. The term 'private vehicles' is too broad as it would apply to carpooling vehicles, motor cycles, scooters, and bicycles.

<New>Policy 9.43a Transit Traffic Management.

Encourage the addition of bus pullouts and/or bus zones at transit stops so freight movement and traffic flow is maintained and not obstructed by buses stopping in travel lanes when discharging and/or boarding passengers.

RCPNA Commentary. Traffic congestion created by and associated with buses stopping in motor vehicle travel lanes is counter-productive to promoting freight travel and reducing fuel consumption and emissions.

Chapter 9 Transportation - Parking Management

Page GP9-13 Policy 9.48 Parking management. "Manage parking supply to achieve transportation policy objectives for neighborhood livability, safety, business district vitality, VMT and carbon reduction, and improved air quality."

RCPNA Commentary: We recommend the policy and goal to include carbon reduction which would be a more targeted approach toward reducing single occupancy cars/trucks(70% of congestion-which is the other target for VMT use) while supporting carpooling, electric vehicle use and scooters. This has the added benefit of better aligning the Comprehensive Plan with city and regional climate action plans.

Page GP9-13 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 to support adjacent uses. ~~in support of broad City policy goals and local land use context.~~

RCPNA Commentary. What the heck does this mean? The statement "broad City policy goals and local land use context."? We recommend deleting this part of the phrase as it is using vague references and language that undermine the understanding by the average citizen. It also may infer goal language that would best be repeated here for clarity. We hold serious concern that local businesses and commerce may be unduly harmed if left out of the consideration of on-street parking uses.

Page GP9-13 Policy 9.51 Off-street parking. ~~Limit~~ **Manage** the development of new parking spaces to achieve land use, transportation, and environmental goals. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, ~~encourage lower rates of car ownership,~~ and promote the vitality of commercial and employment areas. Utilize transportation demand management and pricing of parking in areas with high parking demand.

RCPNA Commentary. The term ‘limit’ definitely should be replaced with ‘manage’. The term ‘limit’ is not encompassing enough for what is needed here. The term ‘manage’ allows for a strategic implementation of off-street parking when and where it is needed. There should be a gradual transition over from single occupancy vehicles to other modes of travel over the next 20 years. It will not happen overnight without drastic consequences to economic vitality and neighborhood livability. Over time these same parking spaces could then be transitioned into additional Mixed Use or transitioned over to serve an increasing number of spaces for car pool, shared cars, motor cycles, scooters, and electric cars/carts. Businesses need parking in order to be viable, seniors need parking in order to thrive, living quarters and their inhabitants need parking in order to work, play and grow. Parking spaces in the neighborhoods are needed for deliveries, the residents, friends and relations who visit, and care givers who tend those in need.

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~~ Zero emission vehicles
5. ~~Zero emission vehicles~~ Taxi / commercial transit / shared vehicles/ Other private vehicles
6. ~~Other private vehicles~~

RCPNA Commentary: Zero emission vehicles should be promoted. The remaining ones on the list should be given equal rating as #5.

Appendix A: Glossary

Civic Corridors: “These are a prioritized subset of the city’s most prominent transit and transportation streets. They connect Centers, provide regional connections, and include segments where commercial development and housing are focused. Civic corridors are intended to become places that continue their important transportation functions **by maintaining a safe and efficient traffic flow that is compatible with the adjacent neighborhood residential and commercial uses.** They are also intended to provide livable environments for people and evolve into distinctive places that are models of **livability, commerce, and** ecological design.”

RCPNA Commentary: The Civic Corridors need to support transportation functions while enhancing segments of the neighborhoods. They are intended to evolve into models of both livability and thriving commerce. This language is intended to assure pedestrian functions for crossing the Corridor are enhanced and the travel speed do not compromise safety.

<New>

Page G-9 Glossary

Office of Neighborhood Involvement (ONI). A City of Portland bureau that provides assistance through promoting community involvement, drawing together representatives from Portland's diverse communities, and supporting information exchange within the city network of neighborhood associations.

Neighborhood Association. A group of residents, business representatives, and/or other interested citizens that devote their time and energy to improve and enhance a well-defined, geographic area that they and others live.

RCPNA Commentary: The definitions for Office of Neighborhood Involvement and Neighborhood Associations are needed to correctly identify these terms in the proposed Plan.

-<>-

Thank you again for allowing our participation in this process. These proposed recommendations to amend the Proposed Draft of the Comprehensive Plan Update are critical to our neighborhood livability, economic vitality, and to help us meet our goal for increased diversity. We look to you to step out of the downtown and help work with us in embracing the Pattern Areas concept as well as broaden the vision for the Civic Corridors so development can best be guided to integrate with the integrity of existing neighborhoods.

Please let us know if you have any questions or we can be of assistance to clarify these comments.

Respectfully,



Tamara DeRidder, AICP
Co-Chair, LU & TC
Rose City Park Neighborhood Assoc.



Nate Carter, AIA
Co-Chair, LU & TC
Rose City Park Neighborhood Assoc.

Additional testimony by RCPNA Members:

Stephen Effros: "As new residents of the Rose City Park neighborhood, we love how well this community is connected to other neighborhoods in Portland. There are multiple transportation options available, from surface street connectors like Sandy Blvd to Hwy 84, to a network of bus connections on Halsey at NE 58th where we live, to the MAX line stop at NE 60th, and several nearby bike boulevards. However, we have been surprised at how poorly NE 60th, between Halsey and the MAX station, is set up for pedestrians, bikes, buses and even cars, considering how busy it is at all times of the day. We'd love to use the 60th St MAX station more often, but this street, with sidewalks only a few feet wide, is so dangerous and unpleasant for pedestrians, that we have trouble using it, especially with our two young kids. We would like to therefore recommend that the Plan Update include pedestrian upgrades to this section of NE 60th, so that it can be safely shared by all members of the community."

Sharron Fuchs: "On NE Sandy Blvd. from NE 47th the eastward, state "definitive definition of "mixed use" to include adequate off-street parking for expected apartment buildings, continued parking on Sandy for businesses, and a height restriction of 4 stories or 45 ft."

Susan Ferguson: "As a long time aficionado of Jane Jacobs, I do support mixed use development, but we must be careful how it is implemented. The Pearl is an extreme example of mixed use, having become a ghetto for the privileged. We want diversity and stability in Rose City Park. One way to achieve that is through a mix of rentals and condos in the new buildings which will be going up on Sandy Blvd. I'd like to see affordable housing targeting specific populations (e.g. 25% seniors, 25% young people just starting out, with the remaining 50% being market rate--both condos and apartments.) Developers need to provide one parking space per unit, and TriMet needs to step up to ensuring convenient, reliable transit. (I lived in Toronto where we owned a house and had one car, which we parked in our driveway, yet chose to use transit frequently as the wait was usually less than 5 minutes.)

The City of Portland held a design contest a 10 years ago to come up with aesthetically pleasing designs for houses on small lots. The idea was that if builders chose one of these designs to build, permit fees would be substantially reduced. The City could demonstrate that it is listening to its taxpayers by doing something similar with condos and apartments. We don't want to see the cheap facades that have been going up on Division and Hawthorne and Fremont repeated on Sandy. Have a juried design review, with balanced citizen input; winning designs end up with reduced permitting fees which would partially offset the cost of providing a parking space for each living unit.

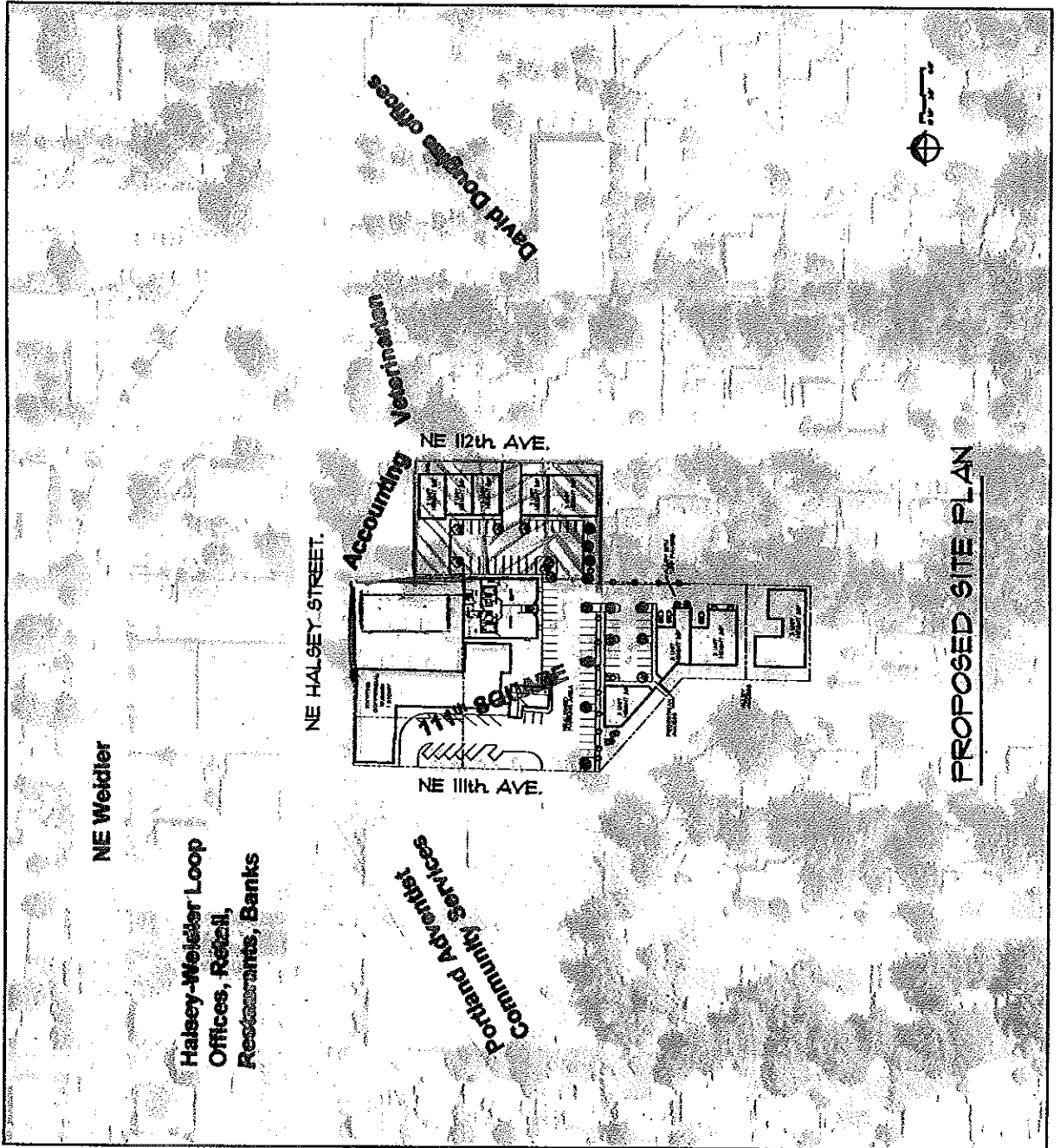
Crowded streets come with increased density. We already have overcrowded streets, in part because people choose to park in the street rather than in their garages or on their driveways. I support an annual parking fee for on-street parking permits. My husband and I have 2 small vehicles, both of which we park in our garage. When friends visit us, we encourage them to park in our driveway. We pay property taxes on both our garage and driveway. Why shouldn't people who park in the street pay a fee to park on the public roadway? Such a fee would accomplish not only raising funds to repair our streets, but it would reduce congestion as some people would "rediscover" their driveways and/or garages."

Terry Parker: I have an issue with **Policy 9.47 Regional Congestion Management** .To put the statement "to price or charge for auto trips and parking, better account for the cost of auto trips, and to more efficiently manage the regional system" in context, any monies collected must be used to improve motor vehicle flow and capacity. To use the monies collected other than to make motor vehicle improvements or to subsidize or fund an alternative transport mode would be discriminatory in that it no longer accounts for the cost of auto trips. Likewise, any gas tax dollars and/or other motorist paid taxes and fees need to be deducted from the cost of driving before additional charges are considered to be relevant. This is an equity issue in that transit is taxpayer subsidized at over 60 cents per passenger mile and bicyclists basically freeload paying no user fees at all while continually wanting more space on the roads including reserved infrastructure that removes motor vehicle lanes and parking. In other words, if the monies collected are not being used to directly support auto trips and motor vehicle infrastructure, then the monies collected are being used to support something else that should be financially self-sustainable on its own. Policy 9.47 should be eliminated.

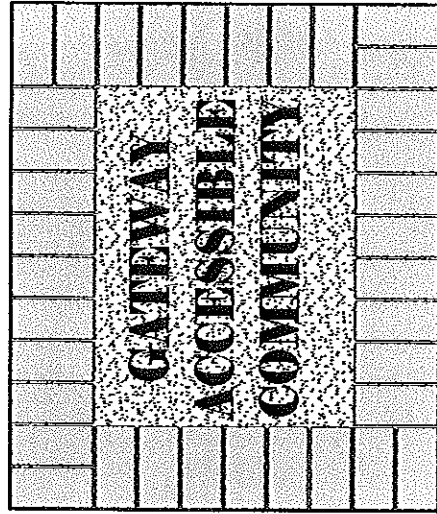
Janet Hammer:

1. VMT and carbon reductions are both of value. I don't think it needs to be either/or.
2. Parking - while we want to encourage a vital commercial area that provides goods and services that serve the neighborhood, what options are there for minimizing parking impacts to neighbors (e.g., resident parking stickers, zones with a time limit)? Also, why is so much of 58th Avenue between Sacramento and Alameda a no parking zone and can that be changed?
3. Bike/Ped path - there is an area between the ridge and the golf course that is risky for pedestrians and cyclists (the curve around 72nd). It would be helpful to have a designated path there.

1421, 1409 and 1353 NE 112th (cross hatched in red) These existing (R7) residential properties South of NE Halsey St on 112th in the Eastern Neighborhood are proposed to be changed to Mixed Use Neighborhood. This designation will allow the three properties to be developed into a much needed accessible community in Gateway.



PROPOSED SITE PLAN



1421, 1409 and 1353 NE 112th
 (cross hatched in red)
 Mixed Use Neighborhood designation will allow the properties to be developed into a much needed accessible community /

SPECIAL FEATURES

- Fitness and Exercise Spa, Music & Art Gallery for Residents
- Most Units Thoughtfully Designed for 100% Accessibility
- Green Building techniques used for Earth Friendly project



I am **John Koehler**. Three weeks after my 21st birthday, which was well over half of my life ago, I was involved in an accident that dislocated my spine, leaving me paralyzed from the waist down. Being a young father at the time it was clear from the start that nothing, not even a wheelchair, was going to stop me from providing for my family and contributing to the Portland community. I've worked as an alarm and a 911 dispatcher, as an IRS employee, and am now self-employed. I pride myself on being a good dad, a good citizen and a contributing member of society.

Thank you for allowing me to comment on properties at **1353, 1409, and 1421 NE 112th Ave.** These are existing residential properties South of NE Halsey St on 112th, in the Eastern Neighborhood. Proposed change is **#645** for each of the properties. I support the new designation of **Mixed Use Neighborhood** for these parcels under Proposed change #645.

Of all the hardships that the disabled endure, the hardest for me is not the wheelchair, but rather the world, which doesn't naturally accommodate it. It takes strength and willpower to get from my bed into the chair, but no amount of either can circumvent a curb, step or narrow door. Although public facilities have seen marked improvement in recent years, wheelchair-bound people still cannot enter (let alone live) in over 90% of the private housing in Portland.

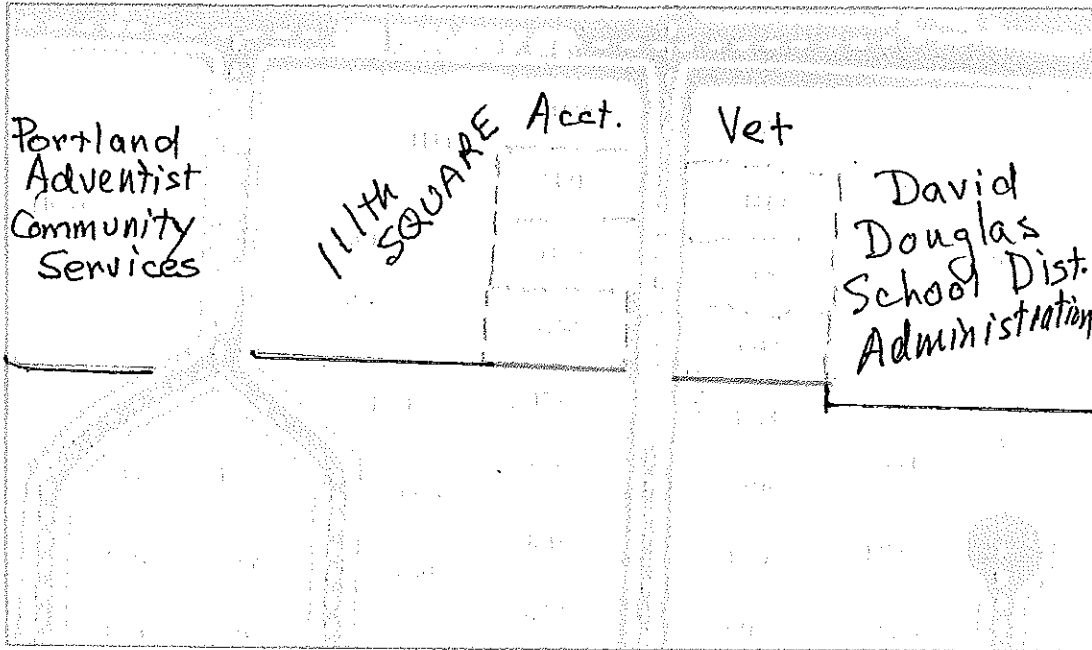
In 2010-11, I worked with Architect Joe Van Lom to create an accessible community in the Gateway Area at 111th SQUARE and on NE 112th. Mr. Van Lom went above and beyond designing a structures and grounds meeting ADA guidelines. He listened to my suggestions and those of some of my other disabled friends to create a real community of accessible paths, gardens, homes and facilities for recreation, physical therapy, personal training, massage, acupuncture, chiropractic and support offices for vocational therapy, counseling and other complementary disciplines. Thank you Mr. and Mrs. Sanchez, Joe Van Lom and Linda Sanchez for trying to do something meaningful for the disabled.

I've known the owners of the 112th properties since 1976. I trust them to build state-of-the-art residences and fitness and therapy facilities if the zoning is changed to accommodate their dream of helping others like me live in homes and communities which meet our basic needs, but facilitate our independence. I'll be proud to be a part of their project if the zoning will allow it.

Planning Commission Members and Staff. I am Linda Sanchez, owner of 111th SQUARE Fitness and Therapy, LLC. I agree with the City's proposed mixed use neighborhood designation for the properties on NE 112th, south of Halsey Street. I am an Oregon State graduate and live on 140th and Russell in NE Portland. My specialty as a personal trainer is working with disabled individuals and our staff includes an expert physical therapist, chiropractor, counselor, naturopath, acupuncturist and masseuse. If we're able to build a facility with an accessible pool for the disabled, hot tubs, exercise equipment and examination and therapy rooms, I could hire additional qualified personnel and help to fulfill the Comp Plan's 2nd goal to "Encourage Job Growth". Thank you for your time and allowing us to speak in favor of Portland's comp plan designation of Mixed Use Neighborhood for the currently residentially zoned properties of NE 112th.

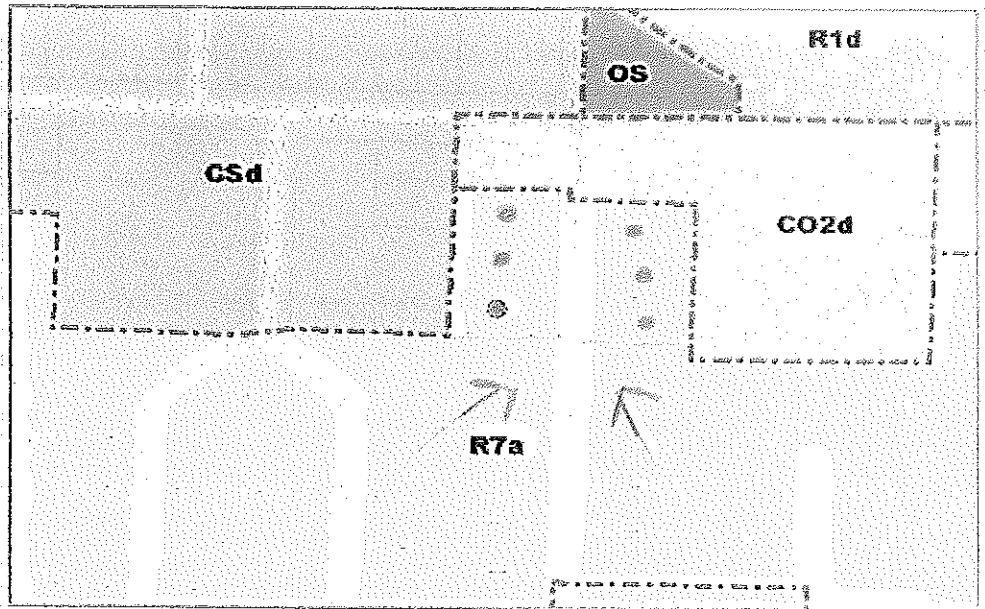
NE 112TH AVE - HAZELWOOD - PORTLAND

Property & Location



Zoning

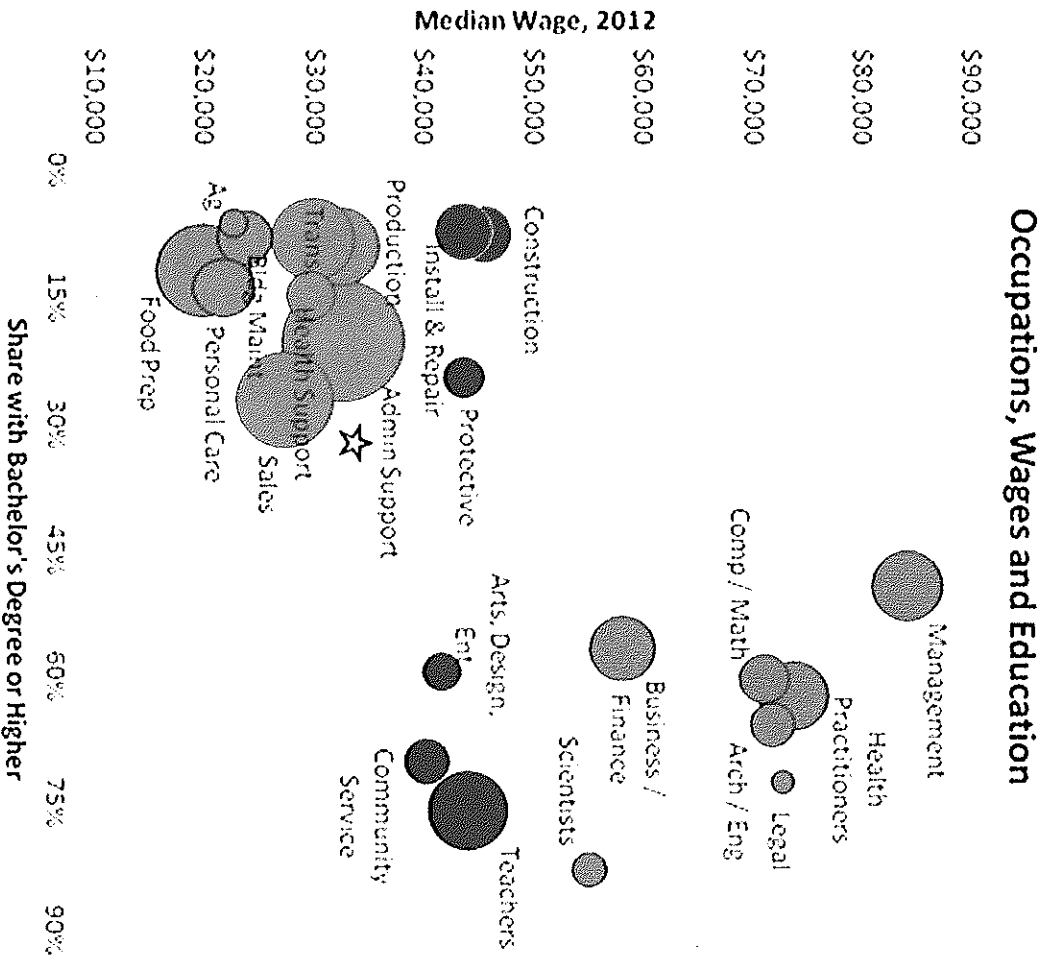
Property	
Zone	R7
Description	Residential 7,000
Overlay	R
Comp Plan	R7
Comp Plan Overlay	
Historic District	
Conservation District	
Plan District	
NRMP District	
Urban Renewal District	n/a
Zoning Map	2942



1421, 1418, 1409, 1406, 1352 and 1342 NE 112th are zoned R7 with proposed designation of Mixed Use Neighborhood. Eight of the boundaries of these R7 lots are CSd and CO2d. It just makes sense to extend the mixed use neighborhood zoning to straighten out the lines

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Wage distribution by occupations and education



Source: Oregon Office of Economic Analysis



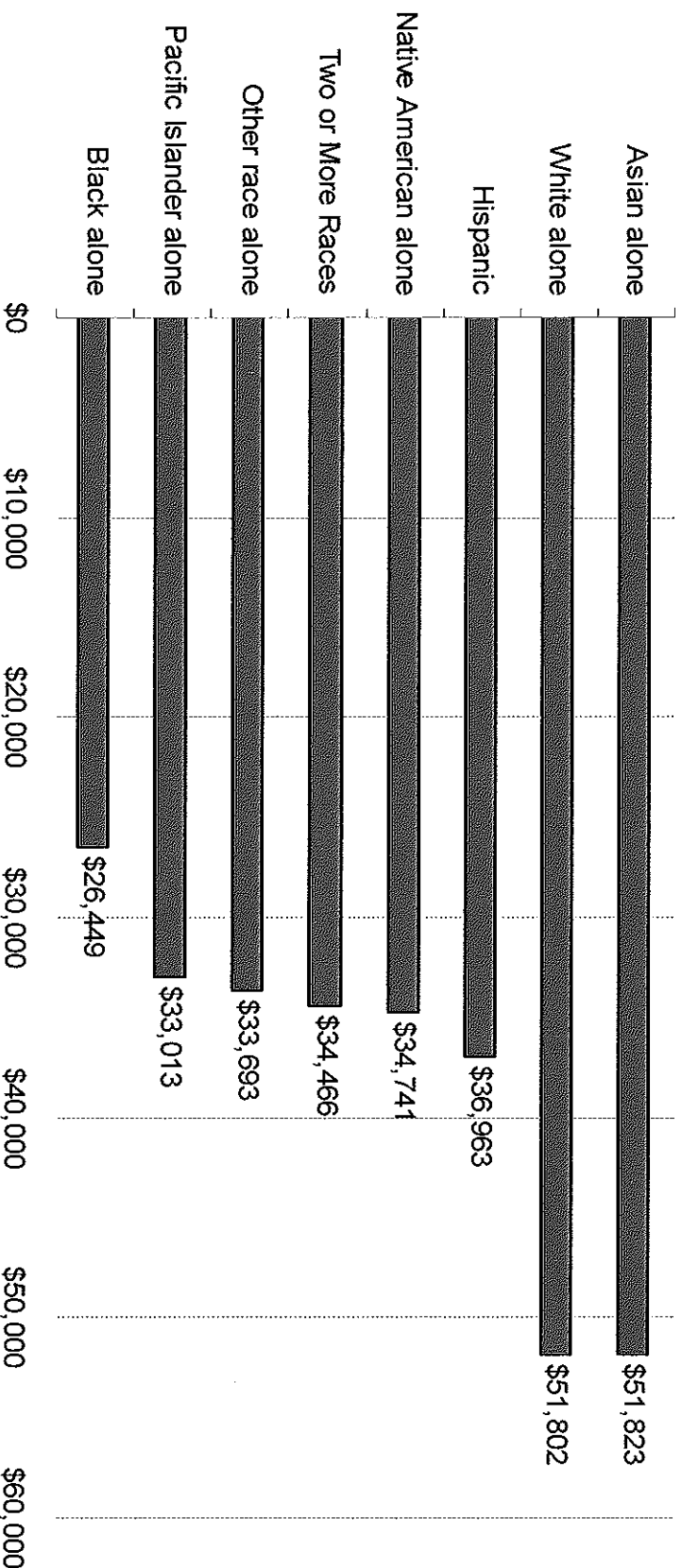
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1. Tightening middle-wage economy

Income disparities by race

(Median household income, Portland, 2010)

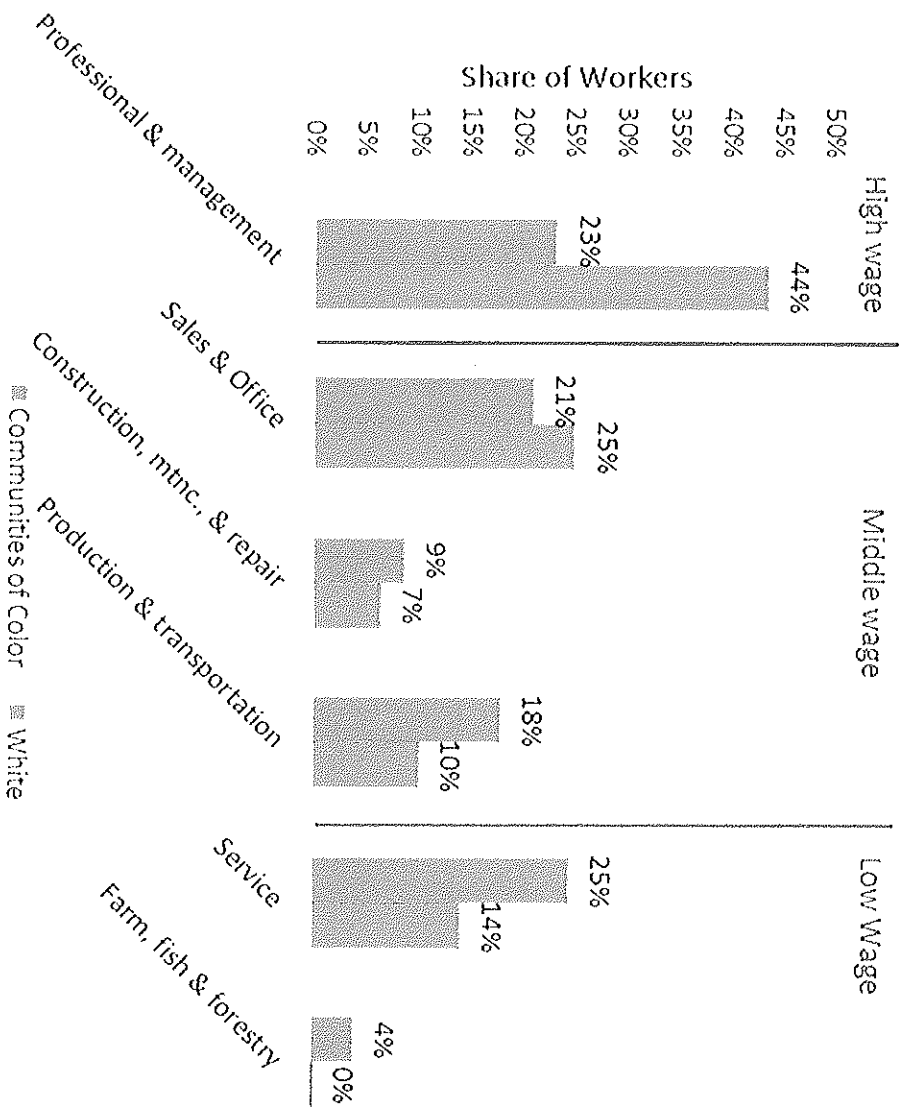


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2. Equity roles of industrial jobs

Occupational disparities by race (Multnomah County, 2008)



Source: Coalition of Communities of Color in Multnomah County



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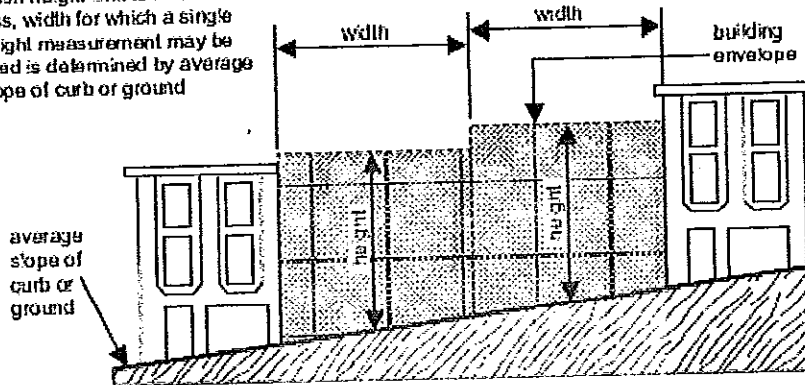


Richard Johnson

TABLE 260 HEIGHT MEASUREMENT ON LATERAL SLOPES WHERE HEIGHT LIMIT IS 65 FEET OR LESS

Average Slope of Curb or Ground From Which Height is Measured	Maximum Width for Portion of Building that May Be Measured from a Single Point
5 percent or less	No requirement
More than 5 percent but no more than 15 percent	65 feet
More than 15 percent but no more than 20 percent	55 feet
More than 20 percent but no more than 25 percent	45 feet
More than 25 percent	35 feet

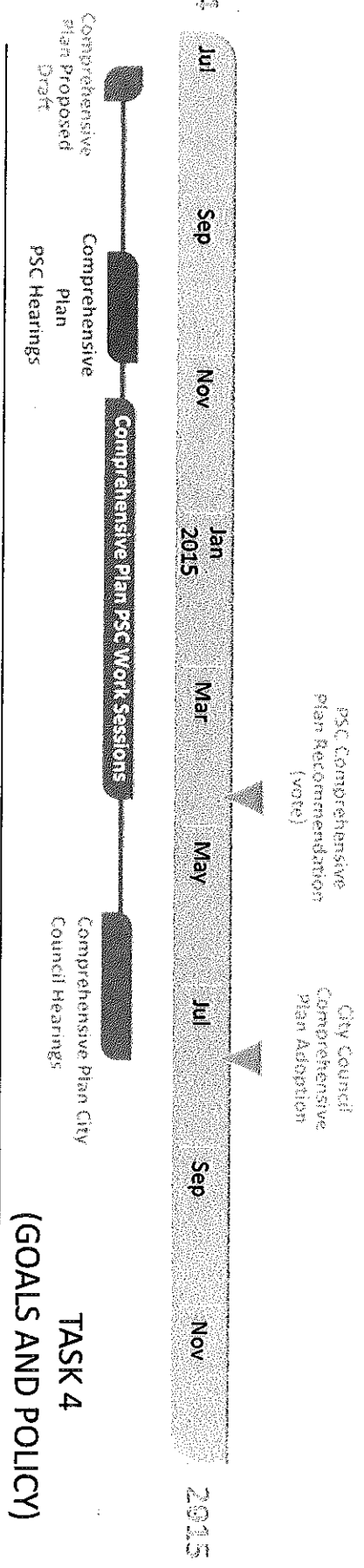
when height limit is 65 feet or less, width for which a single height measurement may be used is determined by average slope of curb or ground



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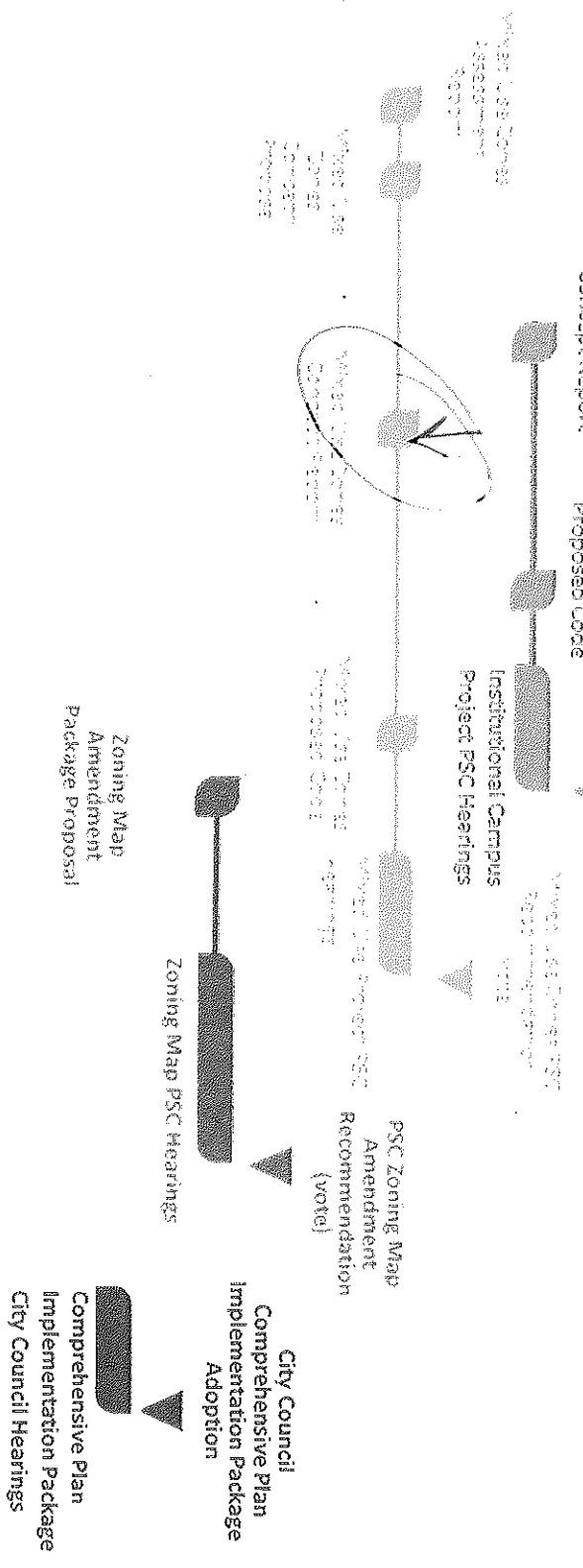
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2014 Jul Sep Nov Jan 2015 Mar May Jul Sep Nov 2015



**TASK 4
(GOALS AND POLICY)**

**TASK 5
(IMPLEMENTATION)**



James F. Peterson
 Land Use Chair
 Multnomah
 2502 SW Multnomah Blvd.
 Portland, Oregon 97219

Planning and Sustainability Commission
 1900 SW Fourth Ave
 Portland, Oregon 97201-5380



November 4, 2014

Dear Chair Baugh and Members of the Planning and Sustainability Commission,

Please accept the following comments from the Audubon Society of Portland regarding the Comprehensive Plan Update. These comments supplement our prior comments submitted on 9-23-14.

Process Issues:

- 1) **Please Consider Adding Additional Hearings:** We would urge the PSC to add additional hearings to allow for additional general comments on the Comprehensive Plan. The development of the Comprehensive Plan has been years in the making. The two volume document and supplemental materials are very dense and complex and the drafts have changed tremendously since the prior review drafts to the point where some sections are virtually unrecognizable. In addition it is important to also have time to cross reference the plan with the equally complicated Portland Plan We are hearing from numerous organizations that have only recently become aware of the draft plan and are still formulating positions. Under ordinary circumstances a three month review and hearing period would be reasonable, but for a document of this significance and complexity, three months seems truncated, especially when compared with more deliberate pace of prior portions of this process.
- 2) **The Economic Opportunities Analysis (EOA) should have been released for comment prior to the release of the draft Comprehensive Plan:** The EOA provides the basis for some of the most difficult and controversial decisions included in the comprehensive plan. It provides an analysis of economic trends, supply and demand of buildable lands and policy alternatives. By releasing the draft Comp Plan prior to the EOA, the City has functionally denied the public the opportunity to evaluate or understand the basis for many of the policies included in the Comp Plan or to explore other strategies for meeting Goal 9 not included in the draft Comp Plan. It is important to note that all other background reports were released for public review and adoption far in advance of the draft Comprehensive Plan. The EOA should serve as a starting point for policy discussion development, not a post hoc rationalization.

Substantive Issues:

1) The City Should Seek a Goal 9 Exception

The focus of the Goal 9 discussion to date has been West Hayden Island. However, West Hayden Island is only one example among many of how the City's efforts to remedy the 670 acre industrial land deficit are undermining its ability to protect natural areas, openspace and natural resources in the City. The July 2014 draft Comprehensive Plan includes not only the conversion of 300 acres of wildlife habitat on West Hayden Island, but also includes the conversion of significant portions of two golf courses along the Columbia Slough and strict limitations on regulations to protect natural resources on industrial sites along the Willamette and Columbia Rivers and Columbia Slough. In addition, the Industrial Development Chapter includes numerous policies which mandate that the City continue to find new industrial lands above and beyond the existing deficit if 5 and 20 year growth forecasts indicate an increased demand. In recent years the PSC has approved and forwarded several natural resource plans to council including North Reach River Plan, Portland Tree Code Update, and Airport Futures, only to have elements of the plans that applied to industrial lands abandoned due to Goal 9 conflicts. All of the above is indicative of the fact that Portland has run out of capacity to meet goal 9 mandates unless it is willing to compromise the health of our environment. Our rivers are already seriously degraded and the policies contained in this plan ensure that they will continue to degrade over the life of this plan.

The City of Portland has reached a major decision point that will define whether it retains its reputation as a "green" city in the coming decades.

First, it is critical to understand that the land use system does allow the city to inform the state that it has run out of land and is unable to meet industrial land targets. State land use planning goals do not require the city to sacrifice our environment or our neighborhoods in order to meet industrial land goals. In fact Goal 9 explicitly states that industrial land objectives "should consider as a major determinant, the carrying capacity of the air, land and water resources of the planning area." Instead, Portland should inform the state that it will meet job targets through strategies other than creation of new industrial lands.

Second, the City has over 900 acres of brownfields---contaminated industrial sites that have either limited or no productive use. In short there are more than enough brownfield sites to meet the industrial land deficit. The problem has been that owners of these sites have been reticent to invest the capital to clean them up and put them back into productive use. It is absolutely critical that the city to develop an aggressive strategy to hold polluters accountable for these sites through a combination of enforcement actions and incentives.

Finally, to the degree an industrial land crisis exists at all, it is a self-inflicted crisis. Although city forecasts predict a surplus of commercial and residential property, the city and industrial stakeholders have spent the last 15 years rapidly converting industrial lands to residential and commercial uses. Today the city brags about the transformation of the Pearl District and South Waterfront from "industrial wasteland" to high end development. The Port of Portland, one of the loudest advocates for more industrial land, sold its property at Terminal One to make way for low rise condos and it converted industrial land next to Portland International Airport for a big box shopping center. Whether intentional or not, the strategy pursued by both industrial interests and the city over the past 15 years has been one of allowing industrial land owners to cash out by

upzoning their industrial land to more profitable use and then backfilling the industrial land deficit through conversion of greenspace.

It is time for a new strategy, one that does not necessitate destruction of our natural resources, open spaces and undermine the health and livability of neighborhoods. We urge the City to take the following approach to addressing the industrial lands deficit:

- The City should inform the state that it has run out of adequate undeveloped land to meet industrial land forecasts and therefore will develop other strategies to meet jobs supply objectives. This does not mean that the city will never add new industrial land to the inventory, but it does mean that the city will not be held hostage to an artificial target that would necessitate destruction of natural areas, openspace and neighborhoods.
- The City should develop an aggressive strategy to force industrial polluters to clean-up brownfields. This should include a combination of enforcement actions as well as non-subsidy based incentives. The City should set a target of 80% clean-up of Portland's brownfields over the next 20 years. **(The current draft lowers the goal from 80% to 60%)**
- The City should put in place regulatory and non-regulatory programs to increase use intensification on the existing industrial land base, something that is already occurring in cities in Europe and Asia with limited land supply. Far too much of Portland's existing industrial land base is used inefficiently. We need a real consolidation and intensification strategy for industrial lands in Portland. **(The draft does this but is not clear about what portion of the deficit it hopes to meet with this strategy)**
- The City should put in place strong protections to prevent the upzoning of existing industrial lands except in extraordinary cases. **(The Draft does effectively incorporate this policy)**
- The City should ensure that whenever land is rezoned for industrial development that strong mechanisms are in place to ensure the significant numbers of jobs are actually delivered. Public investments in public infrastructure should be tied to job creation targets. **(The Draft does not address this issue)**
- The City should avoid policies in the Comprehensive Plan which limit the City's ability to protect natural resources on industrial lands through both regulatory and non-regulatory mechanisms. It is critical that the city retain the ability to protect natural resource values which often overlap with prime industrial land, especially along our urban waterways. **(The Draft does the opposite)**
- The City should reject proposals to rezone 300-acres on West Hayden Island for industrial development. This irreplaceable resource should be permanently protected as openspace. **(The Draft does the opposite)**
- The City should reject proposals to rezone Columbia Corridor golf courses for industrial use. If it does move forward, it should simultaneously put in place zoning and other mechanisms to implement a landscape scale Columbia Slough Restoration Strategy including expanded P-Zones along the entire Slough within Portland, implementation of the new tree code on industrial lands, and permanent protection and restoration strategies on golf course areas that will be retained as openspace. **(The draft proposes to rezone the golf courses without committing to any of the other objectives)**
- The City and State should take a hard look at strategies to promote real collaboration and cooperation and potentially unification of the Columbia River Ports in order to maximize efficient use

of land, promote a sustainable regional Port economy and stabilize our Port system which is on the brink of system failure. This is something which has been in the Port of Portland's Marine Terminal Masterplan since 1991 but which has never been seriously pursued. (The draft does not address this issue)

2) Environment and Watershed Health (chapter 7)

In general the language in the Environment and Watershed Health Chapter has become significantly less detailed, weaker, and more difficult to track and understand than the January 2013 draft. Many reasonable and important policies have simply been eliminated without explanation. This stands in stark contrast to the Industrial Development Chapter (discussed below) which has been expanded, strengthened and been infused with far more detail since the January 2013 draft. We will provide additional specific details to staff and the PSC in the coming weeks, but for now we would like to highlight the following issues as a sample of our concerns:

- a) **Goals:** The goals of this chapter have been entirely rewritten since the 2013 draft. While we agree with the new goals we would note that two very significant goals have been removed from this chapter since the 2013 draft: 1) Sustain the quality of Portland's environment by preserving natural resources and focusing development in already built areas" and 2) "consider cumulative effects of decisions on the environment." Both of these goals should be restored. In addition Goal 7.B should be strengthened from "watershed conditions have improved over time" to "Healthy watershed conditions are achieved." In addition the goals should explicitly reference protecting and restoring biodiversity.
- b) **The action verbs throughout the section have been substantially weakened from the 2013 draft and in many instances now indicate the goal is simply to maintain the status quo rather than enhance and restore ecosystem health:** The 2013 draft clearly and explicitly stated that the goal was to "protect, enhance and restore" Watershed quality and function (4.1) groundwater systems (4.2), vegetation (4.3), Fish and Wildlife Habitat (4.4), At-risk habitats (4.5), biodiversity (4.6) and prevent and minimize the effects of invasive species. These policies have been replaced with a new section "Improving environmental quality and preventing degradation" which is far weaker placing an emphasis on preventing degradation, "considering impacts" "improving" "addressing" "encourage" and inserting qualifiers such as "where practicable." We would urge the city to restore the "protect, enhance and restore" verbiage and make it explicitly clear that the goal is not just improvement but achieving ecological health in each of the target areas.
- c) **The draft inserts the following new language at the start of many policies: "ensure that plans and investments are consistent with and advance programs...."** This is nothing more than bureaucratic gobbledygook that confuses the reader. No other section has this type of obscuring language and it should be removed.
- d) **Cumulative Effects:** Goals and policies requiring the city to consider cumulative effects of decisions on the environment found in the 1-2013 draft have been removed entirely from the current draft. These should be restored.
- e) **Mitigation:** The requirement to "fully mitigate" impacts on natural resources (policy 4.12) in the 1-2013 draft has been weakened to simply require "mitigation: (policy 7.11) The city should restore the requirement to "fully" mitigate for unavoidable impacts to natural resources and that it should also

add language requiring that mitigation result in "net increase in ecological function." The goal should be improvement in ecological health over time.

- f) **Carrying Capacity:** Policy 4.11 b from the 2013 draft, "Strive to maintain and sustain the carrying capacity of air land and water resources by enhancing natural resource quality and function" has been removed in the current draft. It should be restored. Notably Goal 9 has very similar language about economic development being done such that it does not exceed the carrying capacity of the land, air and water.
- g) **Goals and Policies encouraging the efficient use of already developed land before encroaching on natural resources found in the 2013 draft have been completely removed.** The current draft appears to have completely abandoned the commitments of the 2013 draft to focus on already developed land before destroying natural resource land. In fact the 2014 draft appears go entirely the opposite direction by including several policies on the Economic Development Chapter which promote encroachment onto non industrial lands. The priority on already developed lands should be restored.
- h) **Johnson Creek:** Policy 42.2 in the 1-2-13 draft "to protect and enhance connectivity of natural resources in the East Buttes that provide habitat and natural stormwater management..." has been removed. It should be restored. This is a critical part of the JC Watershed Strategy.
- i) **Policy 7.3** should mention recovering threatened, endangered sensitive species; it only a reference to "including at-risk" species. More could be in here to continue support for the species recovery planning the City committed to over a decade ago.
- j) **Policy 7.9 Impact Evaluation"** could be stronger: Analyze the potential direct and cumulative impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide.
- k) **Policy 7.10 Add:** "Adopt regulations, plans and programs that address cumulative environmental impacts of development on environmental quality."
- l) **Policy 7.11** - "Require" instead of encourage "mitigation approaches..."
- m) **Policy 7.12** – This policy should be changed. Local policies do not have to be consistent with State and Federal Policies. While we agree that the City should coordinate with state and federal regulators, the city should also be free to develop its own policies and priorities.
- n) **Policy 7.14 and 7.16:** We would suggest "with an emphasis on underserved and underrepresented communities most vulnerable to health impacts." The reason to prioritize these communities is because they lag behind in many human health indicators so this policy should be more specific in this respect.
- o) **Policy 7.24.** "Limit and remove impervious surfaces to reduce impacts on hydrological function air and water quality, habitat connectivity, and tree canopy.
- p) **Policy 7.22** - "Require and encourage low impact development, habitat-friendly development, bird-friendly design, and green infrastructure into all new and existing development including but not limited to City-owned, managed, and funded facilities.
- q) **Policy 7.23** - Access to Nature. This policy is focused on access to nature in the macro-landscape and in balancing access and conservation in protected natural areas. In reference to the environmental equity goal, it should also address equitable neighborhood access to nature where people access "nature in their daily lives" there by promoting the interstitial green; we need anyway for biodiversity and air and water quality. I would add the following bullets:

- i) Prioritize park investments to toward the goal of ensuring 100% Portlanders are within 1/4 mile of a public park or natural area.
- ii) Prioritize green infrastructure investments in neighborhoods with poor access to parks, nature and with limited tree canopy.
- iii) Consider increasing housing densities near to active recreation parks to increase the percentage of Portlanders living within ¼ of a mile of a park.
- r) **Policy 7.32** - Re-write this policy to be both more explicit and broader: "Integrate stormwater management and planning: Develop programs, regulations, and design standards to more fully integrate stormwater management and transportation planning and infrastructure in order to improve water quality, safety, access to nature and overall neighborhood livability. Prioritize improvements for unimproved or substandard rights-of-way, accident-prone locations, and neighborhoods with less access to nature or active transportation."

3) Economic Development (Chapter 6)

In contrast to the weakening of the Watershed Chapter, the Economic Development Chapter appears to have been put on steroids relative to the 2013 draft, especially with regards to industrial lands. For example the Industrial Districts Section has ballooned from half a page to three pages. More importantly, the draft includes numerous new and modified policies that undermine the ability of the city to protect natural resources on industrial sites, which require that the city find new industrial lands regardless of impact on other city goals, and which weaken the city's commitment to focusing development in already built areas before impacting natural resource areas. Again, in contrast with the severe streamlining of the policies in the Watershed Chapter, the policies in the industrial lands section are often repeated several times over. We believe that the Land Development and Industrial Employment District Sections will significantly reduce the city's ability protect and restore natural resources along the Willamette and Columbia River and Columbia Slough below what is possible under the existing Comprehensive Plan. It appears that the City has simply acquiesced to industrial interests who have long advocated for minimal environmental protection on industrial lands. If the city adopts these sections as written, it will ensure that our already degraded waterways will continue to degrade in the coming decades.

There is absolutely no evidence that environmental regulations cost industrial jobs, especially given the non-existent link between industrial land supply and recent industrial job growth in Portland. The City's most recent "Economic Opportunities Analysis" documents the widely recognized trend that "Industrial employment has been dropping at the same time the city is experiencing increases in industrial land development." The study provided no analysis to indicate environment regulations hurt job growth, only a comment in focus group. The argument that environmental regulations hurt job growth or even significantly impact land supply comes directly from industry lobbyists not from any credible evidence or analysis." Meanwhile there continues to be evidence and analysis that environmental quality- especially in our region- attracts a skilled and educated workforce and increases work productivity.

The following are a sample of out specific concerns:

- a. **Brownfield Redevelopment:** The City has reduced the brownfield redevelopment target from the 80% goal which was discussed throughout the PEG process and which was include in the 2013

draft to 60%. This will increase pressure to develop greenfield sites and decrease pressure to clean-up contaminated sites. The City should restore the more ambitious 80% target.

- b. **Policies that require the City to maintain a supply of industrial land without any consideration of how this might impact other city goals:** The Land Development and Industrial and Employment Sections are now replete with redundant policies that require the city to find an ongoing supply or new industrial land regardless of conflicts with other city goals. This includes policies 6.12, 6.15, 6.18, 6.36.d, 6.47. It is important to note that the action verb used in these sections (“provide”) is not discretionary. Given the fact that the city is already converting openspace and natural areas to find new industrial land, these policies can only result in additional losses for the environment.
- c. **Policies which appear to restrict the City’s ability to require natural resource protection or restoration on industrial lands:** Several policies appear to limit or prohibit the city from instituting new protections for natural resources on industrial lands. These include 6.35, 6.36.b, and 6.37. The draft ignores the fact that our industrial lands often overlap with some of our most high value natural resource areas. These policies should be rewritten to ensure that it is clear that the city can implement and update environmental policies on industrial lands.
- d. **Emphasis on incentives to achieve industrial land objectives:** Throughout the industrial land sections, many of the policies now explicitly rely upon an incentive based strategy. While incentives are fine, they are not the only way to achieve city objectives. Policies should clearly allow for a range of mechanisms including regulation to achieve its objectives.
- e. **Policy 6.17 Regulatory Climate:** This policy appears to severely limit the city’s ability to put new regulations on industrial lands by requiring that the city prioritize economic development over all other goals (6.17), requiring that the city’s regulations be competitive with other cities (a “middle of the pack” mentality rather than maintaining Portland as an environmental leader) (6.17a), and potentially eliminating city jurisdiction over areas where the state or federal government have regulatory programs (6.17e) even though the City has long recognized the importance of local regulatory authority over our urban natural resources.
- f. **Policy 6.36 Prime Industrial Land Retention:** This policy appears to prevent the city from updating environmental or community protections on industrial lands if those protections in anyway diminish the capacity of those industrial lands. Policy 6.36b explicitly limits conversion of industrial lands through land use plans, regulations, or non-industrial uses. This policy appears to completely ignore the need to also protect health of the community and the environment. Policy 6.36c requires the city to minimize the impacts of regulations on industrial lands without consideration of any other goals. Policy 6.36d requires the city to strive to offset any loss of industrial land with replacement lands--given the existing deficit, this policy could effectively prevent any new regulations on along the river that protect natural resources. Taken together, these policies appear to us to make it practically impossible to establish new natural programs on these lands and negate the responsibility of industrial landowners to protect and restore the natural environment.

Taken together, these policies appear to move us into an era in which other public values such as protection of natural resources, protection of human health, Goal 15 objectives, etc. appear to have been abandoned on industrial lands. This is inconsistent with our land use planning system, community values, the city’s past

planning practices, and Policy 10.2b in the draft comp plan. It places the interests of industrial developers above all other city goals.

4) **Green Infrastructure needs to be more robust in the urban design, housing and transportation chapters:**

In order to achieve the city's watershed health objectives, it is critical that all elements of the plan explicitly adopt green infrastructure policies. We would urge the city to make the design with nature/ green infrastructure policies in the housing, transportation and urban design sections much more robust and explicit. For example in the transportation chapter, the design with nature policy (9.16) simply states that the city should "promote street alignments and designs that respond to topography and natural features and, when feasible" protect, streams, habitat and native trees." This says virtually nothing other than avoid harming natural resources when possible. Each of these sections should contain strong proactive policies requiring the city to actively incorporate green infrastructure into their projects. The City's Watershed Management Plan calls for the city to consider green infrastructure opportunities on all public projects and this should be written large throughout the Comp Plan.

5) **We support the proposal to reduce residential density in specific areas with natural hazards and drainage constraints, and where the current Comp Plan and zoning designations would allow significant additional residential development.**

The intent of the proposed "down-designations" is to reduce future risks to public health and safety by reducing future development potential and associated cumulative impacts in these areas. This part of the Comp Plan proposal is notable, and represents the integral "flip-side" of the proposal focus most of the new development in urban centers and along corridors. These proposed down-designation areas are generally characterized by steep slopes with poorly draining soils, and limited stormwater pipes so runoff from new development, roads, etc. must be routed to local streams. These areas have a mix of landslide, wildfire, and earthquake hazards, and can be difficult to access or evacuate during emergencies. We view this as a common sense proposal to protect natural resources and public safety.

Thank you for your consideration of these comments.



Bob Sallinger
Conservation Director
Audubon Society of Portland

Testimony before the Planning and Sustainability Commission

By: Jim Howell jimhowell89@hotmail.com

Subject: Portland's 2035 Comprehensive Plan

November 4, 2014

Thank you for the opportunity to testify on Portland's 2035 Comprehensive Plan.

I wish to speak in opposition to the proposed down-zoning of the Eliot residential neighborhood from its current low density multi-dwelling R-2 zone to a still lower density single-dwelling R-2.5 zone.

The residential area bounded on the west by Williams Ave, the east by Martin Luther King Jr. Blvd, the north by Fremont St, and the south by Hancock St has traditionally been a medium density multi-dwelling neighborhood of affordable housing types that include modest detached homes, duplexes, 4-plexes, town-houses, row-houses and apartments.

It is an ideal compact transit and bike oriented Neighborhood. There is no property within its boundaries that is more than 600 feet from a frequent service bus line. Over 600 buses and streetcars serve its residents every day by six different routes. It is also served by an extensive bike network. The new Rodney Bikeway goes north and south directly through the middle of the neighborhood. There are east/west bike routes on Tillamook, Russell and Morris Streets and of course, the Williams/Vancouver Bikeway, probably the heaviest used bike route in the city, borders it on the west.

For those who live light, by choice or economic condition, Eliot is an ideal neighborhood. It has two great parks, Albina and Dawson Parks, a brand new New Seasons Super Market and a modern but mothballed elementary school (the former Eliot Elementary School) ready for an influx of new students from a compact, diverse and family friendly neighborhood.

The Eliot Neighborhood has always accommodated the working class and never had a high-end enclave of stately homes for the more affluent class like the neighboring Irvington and Alameda neighborhoods. Now is not the time to try to change this historic tradition.

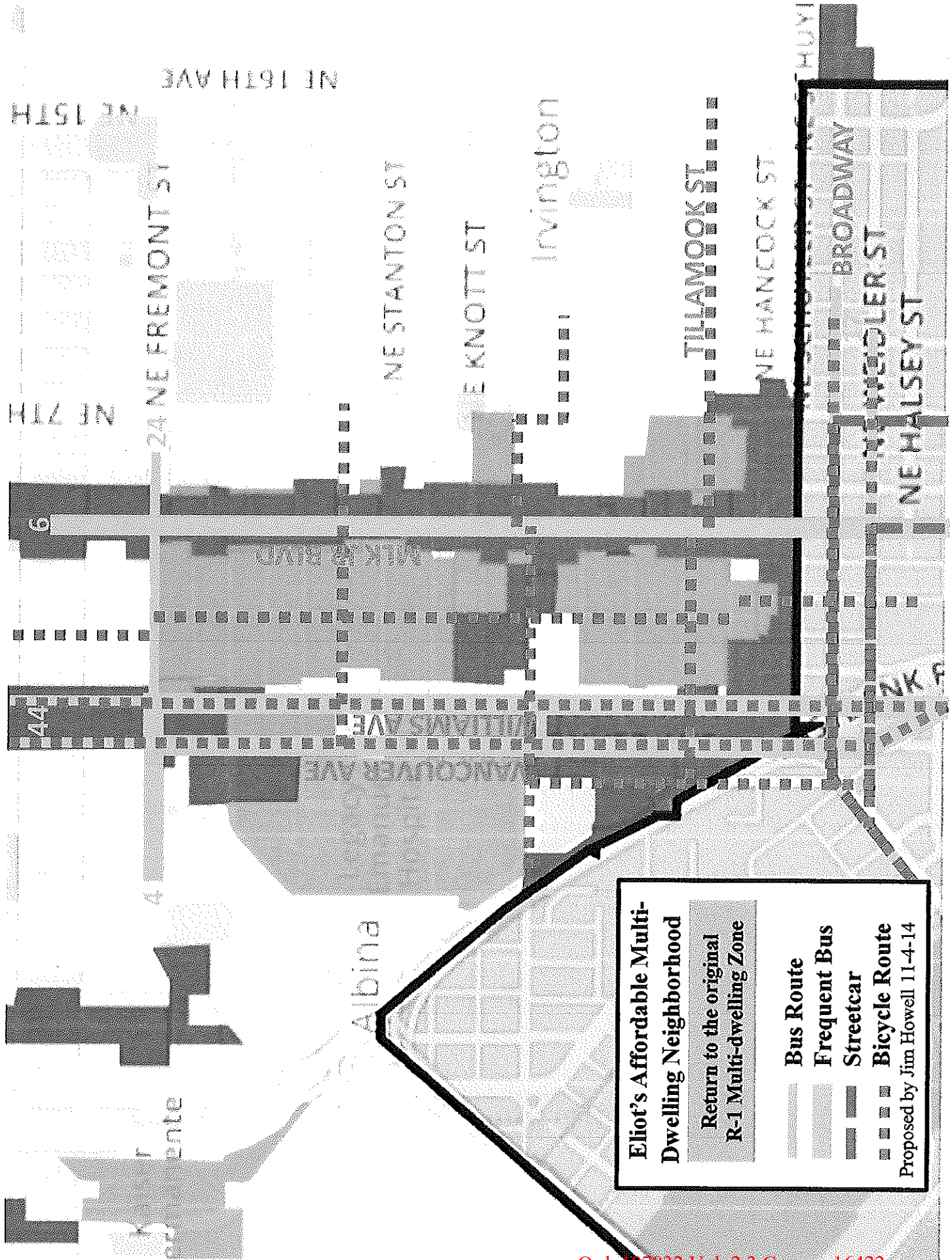
The Albina Community Plan of 1993 reduced the density of this area by one-half by rezoning it from A-1 (now R-1) to R-2 to help stabilize Eliot from decline due to the then frenetic flight to the suburbs. Since that time, values have skyrocketed and affordability has plunged. Now is the time to increase inclusiveness with affordable multi-family housing, not impose more exclusive single-dwelling zoning (R-2.5) as currently proposed.

Objectives 9 and 12 (page 54) of the 1993 Albina Community Plan's Housing Policy stated:

Revisit the housing affordability issue in the Albina Community neighborhoods in 10 to 15 years after the Albina Community neighborhoods have stabilized. Seek to increase opportunities for affordable housing and reductions in displacement that might otherwise result from neighborhood stabilization and rising property values.

Revisit the issue of housing density in 10 to 15 years after Albina Community Plan neighborhoods have been stabilized. Seek opportunities for increasing housing density and accommodating a greater share of the region's growth.

Now, 21 years later, we should follow the advice of these farsighted planners and increase neighborhood density to better accommodate a greater share of the region's growth, as well as help to preserve affordable living in the heart of the city.



Eliot's Affordable Multi-Dwelling Neighborhood

Return to the original R-1 Multi-dwelling Zone

- Bus Route
- Frequent Bus
- - - Streetcar
- · · Bicycle Route

Proposed by Jim Howell 11-4-14

Woodstock's Unimproved Streets

Woodstock's unimproved streets have been a neighborhood issue for decades. Eight percent of Woodstock's streets are unimproved, as compared to two percent of all streets citywide.

Woodstock's 1995 Neighborhood Plan contained a good description of the problems of unimproved streets. It stated the following objectives for unimproved streets, but contains no guidance as to how these objectives are to be realized: *but is vague on solutions*

Objectives:

~~2.1 Evaluate unimproved rights-of-way to determine which streets should be given the highest priority for full multimodal improvements and which should be considered for bicycle and pedestrian pathways, conversion to linear parks, or street vacations.~~

~~2.2 Study the feasibility of improving unimproved or partially improved east-west rights-of-way to facilitate circulation and relieve traffic congestion within and around the Village Center (now termed the Woodstock Neighborhood Center).~~

2.3 Minimize the negative impacts of additional traffic on adjacent residential areas when improving streets.

In the spring term of 2010, a group of five PSU Masters in Urban Planning students did a thorough study of Woodstock's unimproved streets titled "Roadway not Improved." Two conclusions of this report were that streets were not being improved because the cost of Local Improvement Districts (LIDs) was prohibitive for adjacent residents and because residents adjacent to streets needing improvement feared that street improvement would result in an undesired increase in traffic.

On January 11, 2011, the PSU group gave a presentation of their findings From "Roadway not Improved" to the Portland Planning Commission.

Perhaps some of you can remember that presentation. The report can be accessed at <http://www.RoadwaynotImproved.com>.

Also that more flexible and context sensitive options for street improvements were needed.

The majority of Woodstock's unimproved streets cluster within a ¼ mile of the commercial core of the Woodstock Neighborhood Center, which is essentially Woodstock Boulevard between SE 39th (or SE Chavez) and SE 52nd. Language in the proposed 2035 Draft of the Comprehensive Plan calls for increased density and a "wider variety of housing options" close to Neighborhood Centers (see Policy 3.30). Most blocks adjacent to Woodstock's commercial core are designated for R 2.5 zoning, meaning that the City's vision is for these blocks to be developed as rowhouses or

*Terry Griffiths
4128 SE Reedway*

similar development at double the density of their current R5 zoning. This intended higher density development is effectively blocked by the presence of the unimproved streets since up zoning from lower to higher density is contingent on having adequate infrastructure to support the density increase. The point here is that while the Comp Plan envisions higher density in and around the Woodstock Neighborhood Center, the continued existence of extremely substandard streets undermines that objective.

From the neighborhood's perspective the goal of improving key neighborhood streets is not as straightforward as it might initially seem. Many residents see positive qualities in the unimproved streets. Often they serve as a de-facto buffer between commercial and residential areas. And the degraded aspect of these streets prevents them from being used by pass-through traffic trying to avoid congestion on Woodstock Boulevard.

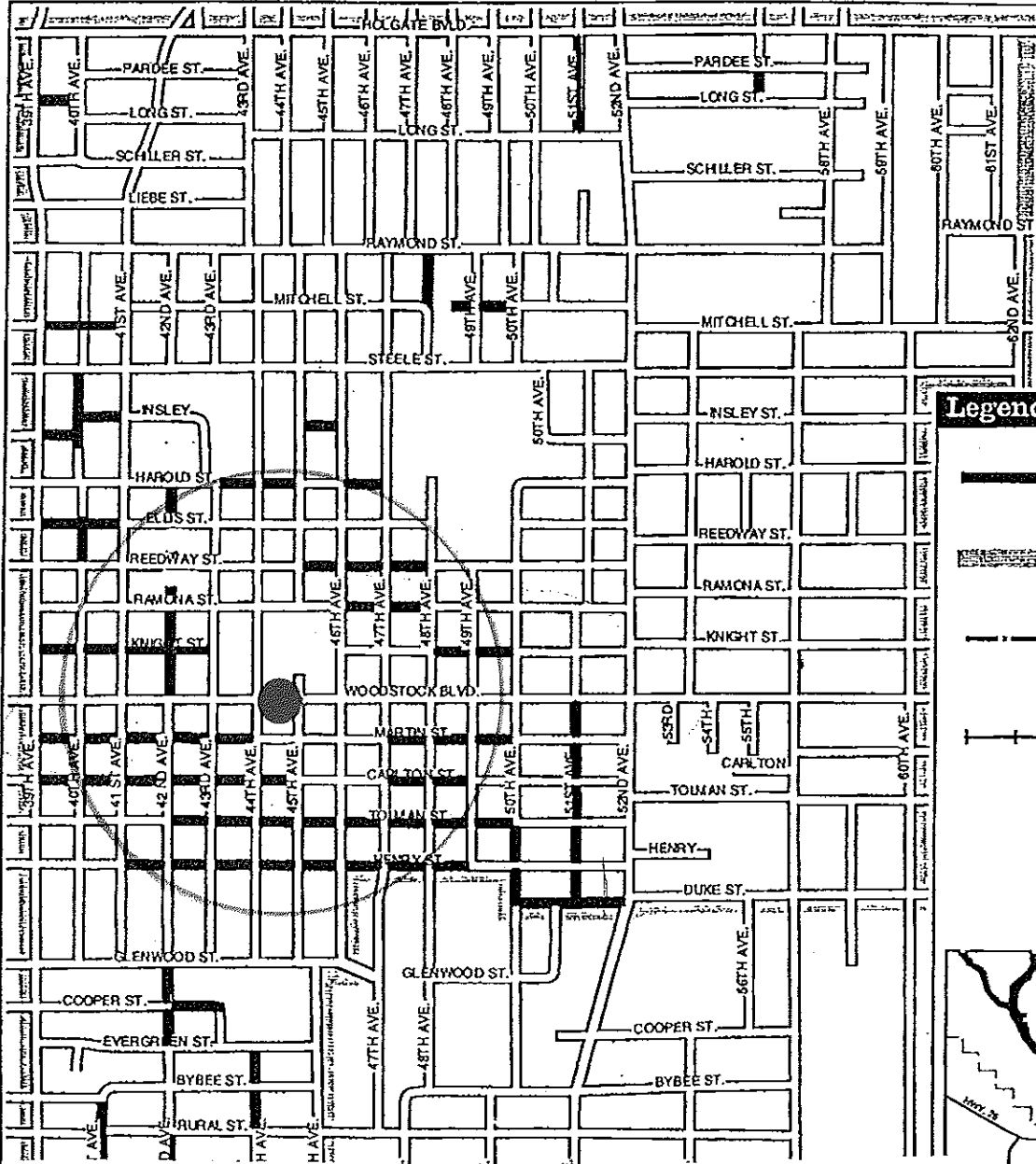
Woodstock needs city help to develop an overall plan for these streets to enhance our Center's role as a 20 Minute Neighborhood, to provide attractive and convenient pedestrian and bicycle pathways, as well as allowing limited vehicle access for increased housing density. Such a plan should also strive to preserve the buffering qualities and the disincentives to cut-through traffic that these streets in their present condition afford today.

Both SE Knight and Martins parallel the Woodstock business district. With commercial lots being different depths, some residents face the backs of commercial buildings. In our recent charrette, neighbors from these streets were shown several applications that could be used to buffer them with landscaping, head in parking, bike and walking paths. Residents liked the "street by street" approach and would be most comfortable with street improvements that were flexible in their approach and sensitive to context.

TERRY BRITAIN

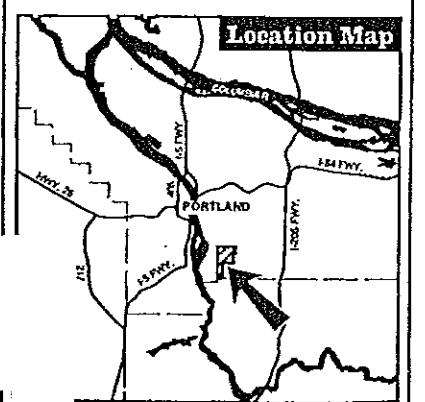
Map 5

Unimproved Rights of Way

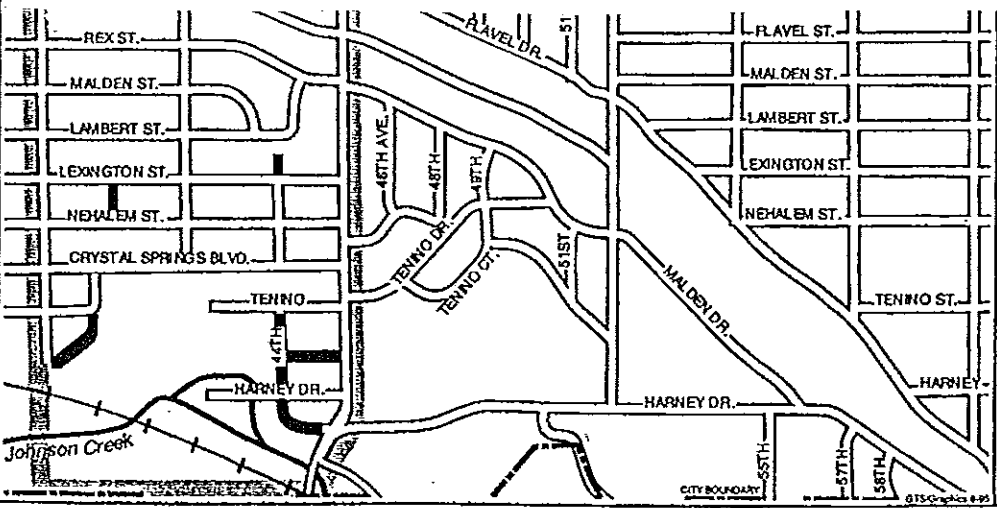


Legend:

- Unimproved Rights of Way
- Neighborhood Boundary
- City Boundary
- Railway (Springwater Corridor)



UNIMPROVED STREETS W/IN 1/4 MILE OF WOODSTOCK NEIGHBORHOOD CENTER



WOODSTOCK Neighborhood Plan

NORTH

0 1,000'

Scale In Feet

June 1995
Bureau of Planning
City of Portland, Oregon

November 4, 2014

Good afternoon commissioners.

My name is Juliet Hyams. I live at 2324 NW Marshall. I am Vice President of the NWDA and instigated the Con-way Clean Construction agreement.

Today I want to comment about the words "sustainability" and "resiliency" as used in the comp plan draft.

"Sustainability" is mostly used to refer to economic issues, while "resiliency" refers to responding to the effects of global warming. These terms are significant enough to be added to the glossary. And while I appreciate the thoughtfulness of these terms, I believe the plan needs greater emphasis on a complementary term: "conservation." Conservation addresses the intention of both terms, because the least costly unit of energy is obtained through conservation, rather than generating new power.

True resource conservation requires robust regulation, beyond that provided by the state of Oregon. This plan must drive ambitious regulation at the city level to protect our air, water, land use and quality of life. I want the plan to think big, further strengthening resiliency with policies like an increased gas tax, a carbon tax and congestion pricing. These concepts will help us leap ahead of other states in terms of both economic sustainability and environmental resiliency. Currently, we lag embarrassingly far behind neighboring states in our environmental regulations. Providing scarce resources like energy and parking for free or at little cost ensures their overconsumption and disguises their true cost.

Let this plan perpetuate Portland's reputation as a national leader in treasuring both its economy and ecology.

Thank you.

October 30, 2014

Portland Planning and Sustainability Commission
1900 SW 4th Ave. Suite 7100
Portland, OR 97201

I would like to outline the position of Riverside Golf & Country Club regarding the designation of portions of our property as Industrial Sanctuary. As an overall perspective on this issue, Riverside plans on continuing to operate as a golf course for a very long time. We don't have any desire to change our great facility and we are operating successfully.

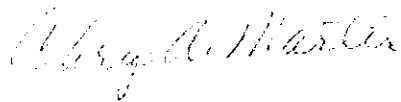
After extensive evaluation of the issues, the Riverside Board of Directors has determined that it must oppose any effort to designate any of Riverside's real property as Industrial Sanctuary. While the Board appreciates the City's need to review its comprehensive plan map and update its inventory of industrial lands, the Board feels that its primary obligation is to take all steps necessary to fulfill the mission of Riverside. That mission is to ensure the ultimate golfing and social experience for not only the current members but members to come in the future as well.

Riverside takes particular pride in the fact that it has generations of families as members. Our business model is focused on maintaining a strong membership base and we compete with other courses in the area, both public and private. As potentially attractive as an industrial sanctuary designation may appear as a long-term investment, we see more short-term negative impacts on our ability to continue to market to new members. Those short-term impacts could erode from the Board's ability to honor its commitment to Riverside's mission statement.

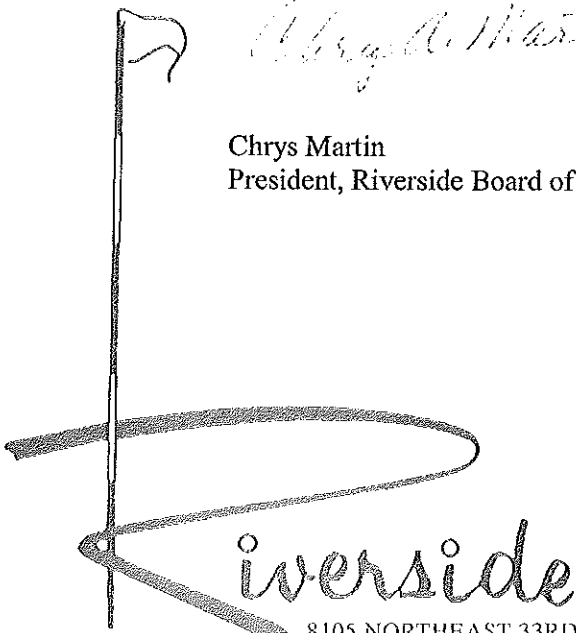
The Board believes that it is best to be forthcoming with staff on its position so that staff can continue their efforts to satisfy the requirements for reviewing the City's comprehensive plan. In as far as Riverside has made a long-term commitment to continuing to serve its members as a premiere golf club, its property is not likely a property that is a legitimate option to include in an inventory for many years. Staff should have the opportunity to evaluate other properties that have more potential for conversion to industrial land and thus better meet the obligations of the City in the review process.

We appreciate the professional work by City staff to meet with us and explain the process. We just cannot agree to this designation in the best interest of Riverside.

Sincerely,



Chrys Martin
President, Riverside Board of Directors



GOLF AND COUNTRY CLUB

8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97218 (503) 228-6468 FAX (503) 282-1383

Ord 187832 V6032238 C, page 16427

Portland Planning & Sustainability Commission

Re: Comprehensive Plan

November 4, 2014

My name is Sharon Genasci, and I am Testifying on behalf of NWDA. I am Chair of the NWDA Air Quality Committee.

The Air Quality Committee in NW Portland recognizes the need for adjustments to the Comprehensive Plan to protect the quality of Portland's air shed. Portland's air is a natural resource, like water or trees that must be preserved for the health of city residents. It is a resource that has been historically abused through industrial and other emissions.

The Comprehensive Plan offers an opportunity for the city and neighborhoods to work together to clean up Portland's air.

We suggest three strategies to meet this goal:

- Construction projects in Portland should utilize the clean diesel agreement between NWDA and John Residential, using tier 4 retrofits and oversight as a standard for all new construction. Adopting this standard will greatly reduce diesel particulate (a known carcinogen) from the air shed. Small and minority contractors should be given special consideration and assistance to meet the standard.
- Fill the gap between DEQ and the city by additions to the existing permit system, which would regulate businesses citywide, currently unregulated by DEQ. These are businesses that use stacks on their roofs or other means to emit pollution into the air.
- Regarding demolitions: city regulations that limit the release of asbestos and lead should be enforced on demolition sites. Currently, demolitions are occurring with no protection for neighboring residents.

Date: November 4, 2014
To: Portland Planning and Sustainability Commission
Subject: 2035 Comprehensive Plan: Proposed Draft
Testimony of Gustavo J. Cruz, Jr., President, Northwest District Association

Good afternoon, my name is Gustavo Cruz, and I am the President of the Northwest District Association, or the NWDA. I live at 2224 NW Johnson Street, and I am a life-long resident of Northwest Portland. I appreciate the opportunity to testify on behalf of our neighborhood association regarding the draft Comprehensive Plan.

We feel this is an invaluable opportunity to improve our city by setting goals and policies that reflect our values and aspirations. Our committees have reviewed the draft Plan carefully, and representatives from our Planning, Air Quality, and Transportation Committees will also testify today with more specific comments. Overall, we are excited and optimistic about this project, but we have several global concerns to share with you.

First, although the draft Plan states that “one size does not fit all,” our members are concerned that the unique qualities of Northwest Portland may not be fully appreciated in this process. Our neighborhood combines an extremely dense residential area with robust commercial activity, a historic district, and a major institutional campus. We also adjoin an industrial area, the Pearl District and downtown Portland. Very few neighborhoods outside of major cities like New York and San Francisco have a similar cross-section of influences and challenges. Our members are concerned that the infrastructure and amenities that we value may not be able to keep pace with rapid development in what is already an extremely dense area.

Second, we encourage you to include neighborhood associations as part of “community involvement” in the draft Plan. Neighborhood associations are grass roots democracy at its finest, and they play a key role in addressing the day-to-day concerns of neighbors and businesses. We encourage you to respect and build on existing neighborhood plans.

Third, our members are concerned that the goals and policies expressed in the draft Plan may not be specific enough to be implemented effectively. We encourage you to adopt goals and policies that are clear, direct and capable of evaluation in the future.

Finally, given the scope and importance of this project, we request that you leave the written record open and hold additional public hearings. This project is extremely complicated and challenging, especially for those who lack a formal land use planning background, and we feel that additional time for consideration - and more than four public hearings - are both warranted.

Thank you for your consideration, and for your efforts to improve our city.

James L. Dreiling

BOOK 1969 PAGE 1966

EXHIBIT B
to
NILES TO DREILING DEED

In accepting this deed, Grantees and their heirs, and assigns, agree that in the event a minor land partitioning is accomplished and Grantees are provided with the entire fee ownership of a parcel of approximately 6 acres which is substantially in the configuration and location shown as Parcel II-A on the attached map of survey, together with access to the public road, Grantees, their heirs and assigns, will convey all of their rights in the remainder of the parcel described in Exhibit A to the Oregon Parks Foundation, or its assigns.

In accepting this deed, Grantees, their heirs and assigns understand that the remainder of the property will be used for wild life purposes and for the improvement of wildlife habitat and they agree not to interfere with such activities and they agree to allow flooding of the lowland portions of their property for such purposes.

This deed is accepted on the foregoing conditions:

James L. Dreiling

JAMES L. DREILING
Laura A. Dreiling

LAURA A. DREILING

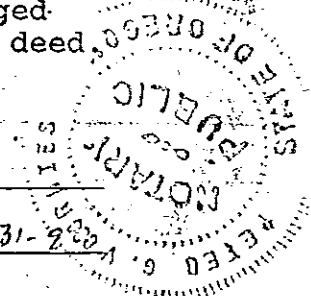
STATE OF OREGON)
) SS.
County of Multnomah)

on Dec 30th, 1986, personally appeared, JAMES L. DREILING and LAURA A. DREILING, and acknowledged the foregoing instrument to be their voluntary act and deed.

Before me:

Pat S. Voorhes

NOTARY PUBLIC FOR OREGON
My Commission expires: 8-31-2001



(36384.3)

BARGAIN AND SALE DEED—STATUTORY FORM
INDIVIDUAL GRANTOR



RICHARD D. and MARIAN H. NILES, husband and wife

Grantor,

conveys to JAMES L. DREILING and LAURA A. DREILING, husband and wife

Grantee, the following real property situated in Multnomah

County, Oregon, to-wit:

The one-quarter undivided interest acquired from the Estate of Rance W. Niles (Tax account No. R-94105-0581) in the real property described in the attached Exhibit A subject to the easements and other matters of record, without limitation by this specific reference, to an access easement over and across said property to Portland General Electric Co., and to the agreement contained in the attached Exhibit B; both of the exhibits attached are incorporated by this reference.

[Handwritten initials]

(IF SPACE INSUFFICIENT, CONTINUE DESCRIPTION ON REVERSE SIDE)*

The true consideration for this conveyance is \$15,000. (Here comply with the requirements of ORS 93.030)

Dated this 31 day of December, 19 86

Richard D. Niles
by Peter G. Voorhies, his atty. in fact
Marian H. Niles
by Peter G. Voorhies, her atty. in fact

THIS INSTRUMENT WILL NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY APPROVED USES.

STATE OF OREGON, County of Multnomah) ss. DECEMBER 31, 1986

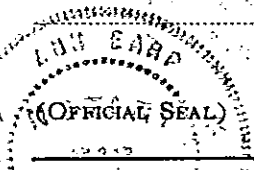
Personally appeared the above named Peter G. Voorhies, as attorney-in-fact for Richard D. and Marian H. Niles,

and acknowledged the foregoing instrument to be his/her voluntary act and deed.

Before me:

[Signature of Notary Public]

Notary Public for Oregon—My commission expires: 9-19-89



BARGAIN AND SALE DEED

GRANTOR
GRANTEE

GRANTEE'S ADDRESS, ZIP

After recording return to:

Peter Voorhies, Attorney
421 SW Sixth Ave., Ste. 1308
Portland, OR 97204

NAME, ADDRESS, ZIP

Until a change is requested, all tax statements shall be sent to the following address:

James L. Dreiling et ux
11197 N. Portland Road
Portland, OR 97203

NAME, ADDRESS, ZIP

STATE OF OREGON,

ss.

County of

I certify that the within instrument was received for record on the day of 19, at o'clock M., and recorded in book/reel/volume No. on page or as fee/file/instrument/microfilm/reception No., Record of Deeds of said county.

Witness my hand and seal of County affixed.

NAME

TITLE

Ord. 187832 Vol. 2.3.G, page 16431 Deputy

SPACE RESERVED FOR RECORDER'S USE

EXHIBIT A

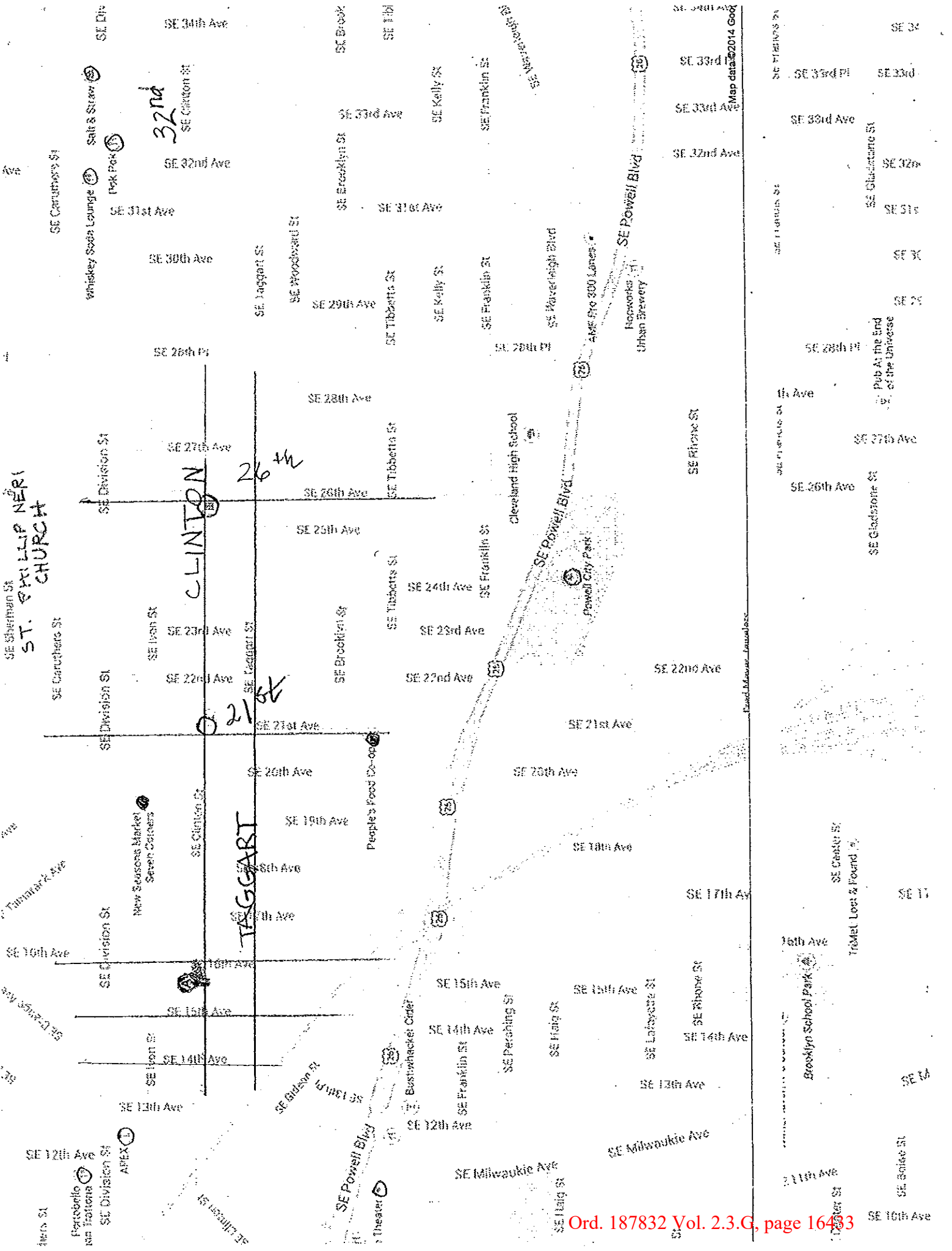
to

NILES TO DREILING DEED

TRACT 1: A tract of land in the Northeast quarter of Section 6 and the Northwest quarter of Section 5, Township 1 North, Range 1 East of the Willamette Meridian, in the County of Multnomah and State of Oregon, described as follows:

Beginning at the Northwest corner of the Van Schuyver D.L.C. in said Section 6; thence South $86^{\circ} 51' 22''$ East 1461.54 feet to an iron pipe; thence South $3^{\circ} 08' 38''$ West 173.64 feet; thence South $88^{\circ} 35' 42''$ West 625.78 feet; thence South $12^{\circ} 00' 00''$ East 637.31 feet; thence South $63^{\circ} 03' 05''$ East 136.10 feet; thence North $75^{\circ} 51' 33''$ East 314.57 feet; thence South $3^{\circ} 08' 38''$ West 212.81 feet to a point in the Northwesterly right of way line of North Portland Road (an 80 foot right of way); thence South $43^{\circ} 34' 31''$ West 168.48 feet along said Northwesterly right of way line to the center of the Columbia Slough; thence along the center of the Columbia Slough through the following courses: North $59^{\circ} 36' 22''$ West 216.71 feet; North $61^{\circ} 51' 22''$ West 250.00 feet; North $71^{\circ} 21' 22''$ West 250.00 feet; North $80^{\circ} 36' 22''$ West 250.00 feet; North $87^{\circ} 43' 30''$ West 408.15 feet to a point in the West line of said Van Schuyver D.L.C.; thence North $2^{\circ} 56' 08''$ East 848.26 feet to the point of beginning.

TOGETHER WITH all those easement rights existing for the benefit of the above described property as set forth and reserved in deeds to Myron P. Patten and wife, recorded September 23, 1986 in Book 1939 page 1035 through 1067, Deed Records.



SE Sherman St
ST. PHILLIP NERI CHURCH
 SE Caruthers St

32nd
 SE 32nd Ave

26th
 SE 26th Ave

21st
 SE 21st Ave

TAGGART
 SE Taggart St

CLINTON
 SE Clinton St

Schuster, 11/2014
Re-zone change #330

Re-zone, comprehensive plan update for 2035

Proposed change #330 re-zone area on SE Clinton Street at 14th and 16th ;

Re-zone from R2 (family dwelling) to CS (commercial)

Area border (L shape): S.E. Clinton Street 14th to 16th; south on 16th to Taggart;
Taggart to 15th , north on 15th to Clinton, west on Clinton to 14th.

(see attached map)

I live at 1522 SE Clinton. Homes in the area were built between 1885-1906. It is a community of people. Went to houses that could be impacted and spoke with the residents. Every person with whom we spoke signed a petition against this zoning change.

We need more affordable housing in Portland

Rentals impacted and approximate number residents: 45-50

Private duplex 4-6

REACH house: 1- family

REACH houses family: Three houses on Taggart

REACH house duplex family: 2-6

Private house 4

Private house 2

Private house 4-6

Private houses : Three 4 people each

Five houses are rented by young people/students (\$450/month)

REACH low income, elderly, disability, rent affordable.

New apartments to east on Division / Clinton: one studio \$1200-1500/month.

We do not need more commercial buildings

Area from 12th and Clinton / Division to SE 26th

Restaurants : more than 21

Coffee (including coffee beans): 3

Yoga studios: 2

Gourmet ice cream: 2

Hair salons: 2

Tattoo: 2

Food stores: 2

Clinton St. Theater; Video Store; vintage clothing, children's clothing, shoes, Blink for eye glasses, real estate office, marital arts , New Day School, Abernathy Elementary School, Naturopath, mental health counseling, Community Gardens, Massage therapy and alternative health, acupuncture (2), bike shops (3), art gallery/studio (2), 'recycled' children's clothing.

Within a few blocks: Aladdin Theater, Classic Pianos, hardware store, travel agency, Food Pod, CPA office, car repair (2), gas stations (2), veterinary office, Stem Wellness Center.

Commercial storefront property exists that could be developed: immediately surrounding Max Station and empty buildings in the area.

Schuster, 2014
Page two
Re-zone change # 330

We are exactly the people Portland wants as residents!

We live in the 1885 home with a back yard. We Recycle: The roof on the house is made of recycled metal from WW II airplane. Steve is re-finishing the wood floors.

We have 2 rain barrels, downspouts water diverted into the yard. Steve has two honeybee hives, the entire yard is planted for the bees and (especially) hummingbirds and neighborhood children. We have more than 80 plants : vegetables, flowers, ground covers etc. No grass. No poisons, recycle, compost bins. We are Green.

We pay taxes on time; simple lifestyle, one car, bikes, mass transit, walk; volunteer; donate money food to Oregon Food Bank.

If we decided to sell the house because the zoning changed, our home would be demolished and the garden leveled. Two structures would be built on the lot - and they would not resemble homes built 1885-1906.

We are a low to moderate income neighborhood.

I don't want to move.

I don't want to be surrounded by commercial buildings.

I just want to retire and garden, make art, teach children to read....

Our children are twenty something one described the house as "magical", another said it is "a sanctuary". My daughter told me "This will always be *home*" and asked me to not sell the house.

Thank you for considering to leave our neighborhood as it is and not changing the zoning.

#1782



PORTLAND PUBLIC SCHOOLS
Facilities & Asset Management
501 North Dixon Street • Portland, OR 97227
(503) 916-3401 • Fax: (503) 916-3253

November 4, 2014

To: Portland Planning and Sustainability Commission
From: Sara King, AICP, Program Director -- Planning and Asset Management

Dear Commissioners,

Portland Public Schools (PPS) thanks you for your efforts, and that of the Bureau of Planning and Sustainability, to support modernization of its high schools, build robust partnerships, and respond to the needs of our students, families, and communities-at-large.

At present, all PPS high schools sites are residential zoned but are typically adjacent or near commercial use areas. Often predating residential build out, our high schools are considered conditional uses with limitations on how each site can provide students, families, and communities with wrap-around services and economic development opportunities.

PPS participated as policy experts during the Comprehensive Plan Update (Comp Plan Update), as technical advisors to the West Quadrant Plan, and as stakeholders in the Institutional Campus Zoning project. We thank you for including us in this effort to date and we fully support your efforts to modernize school designations in the Comp Plan Map and in possible zoning changes.

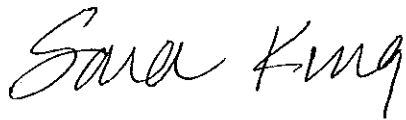
The West Quadrant Plan, and actions items, as proposed are positive and will serve to support the future redevelopment of Lincoln High School. The proposed Central Commercial Comp Plan Map Designation for Lincoln recognizes the site's location in the Central City and the Goose Hollow Subdistrict. Under the West Quadrant Plan Implementation Action RC6, the zone change for Lincoln from High Density Residential to Central Commercial will run parallel to the Comp Plan Update process. This change in zoning is timely and will help Lincoln develop unique, robust partnerships.

The proposed Institutional Campus (IC) Comp Plan Map designation can provide similar opportunities across all other district high school sites and is a very positive step towards endorsing and encouraging school sites to serve as true community hubs. However, it is the understanding of PPS that actual IC zoning change implementation for its other high school sites will not run parallel to the Comp Plan Update. We would strongly encourage the Commission and the Bureau to include such updates to foster positive development at all PPS and Portland high school sites.

As you are aware, PPS has embarked on an ambitious long-term project to fully modernize all of the high schools in the district. We have already begun with Franklin and Roosevelt High Schools and will be shortly followed by Grant High School, then Lincoln, Benson and Madison High Schools and finishing with Cleveland, Jefferson and Wilson. This is a project that will propel the district forward, however, current zoning for school sites severely limits our ability to think and act in ways that will revolutionize the way we view our high schools. That includes partnerships with institutions of higher education.

We thus fully support the Comp Plan Map designations of Institutional Campus for the high schools but would request that the Commission recommend the actual IC zoning changes for high schools as part of the current Comp Plan Update. We believe our high schools should be treated similarly to higher education campuses in the code and would fully support wrapping these designations together.

We stand ready to assist the Commission and the Bureau in this effort and hope that you will give this request favorable consideration.

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

Sara King, AICP
Program Director – Planning and Asset Management
Portland Public Schools

PSC-DCP Hearing: Testimony from David Red Thunder, West Hayden Island

I am David Douglas Red Thunder, an American Indian, member of the Sisseton-Wahpeton Sioux Tribe, and am named after the great Scottish botanist, David Douglas, who's honored by the conifer species, Douglas Fir, that bears his name.

After years of expert testimony before this Commission, the facts are well established that West Hayden Island will not succeed economically as a marine industrial development. And the Port agrees; it said it was just too expensive to build there, and withdrew its proposal to the city for annexation and re-zoning.

That Commission testimony also established that West Hayden Island is a high-value urban natural wildlife habitat. Along with its 81 bird species, nine different mammals, four kinds of amphibians, and important forest areas, it also is a critically important river shallows for juvenile salmon and other migrating fish.

For me as an American Indian, I practice Animism as my spiritual tradition. We believe that non-human entities – animals, birds, plants, rocks, trees, sands, waters, as well as humans – all possess spiritual essence, and I embrace the Judeo-Christian tenets of faith as well. For me, West Hayden Island is my sanctuary, my place of worship, a place where the spirits teach me more righteous ways.

My tribal brothers and sisters of the Yakama and Grand Ronde Federations share these traditions with me. And for us, the Columbia River's conditions surrounding West Hayden Island support us spiritually and physically through our ancient fishing practices, protected by treaty with the United States.

Many argue WHI must be developed for more jobs and greater world trade, while others argue development will degrade livability for all islanders, and the environment. For me and mine, it is a spiritual place, one of the very few left for us to practice our faith in communion with the full range of our spiritual teachers.

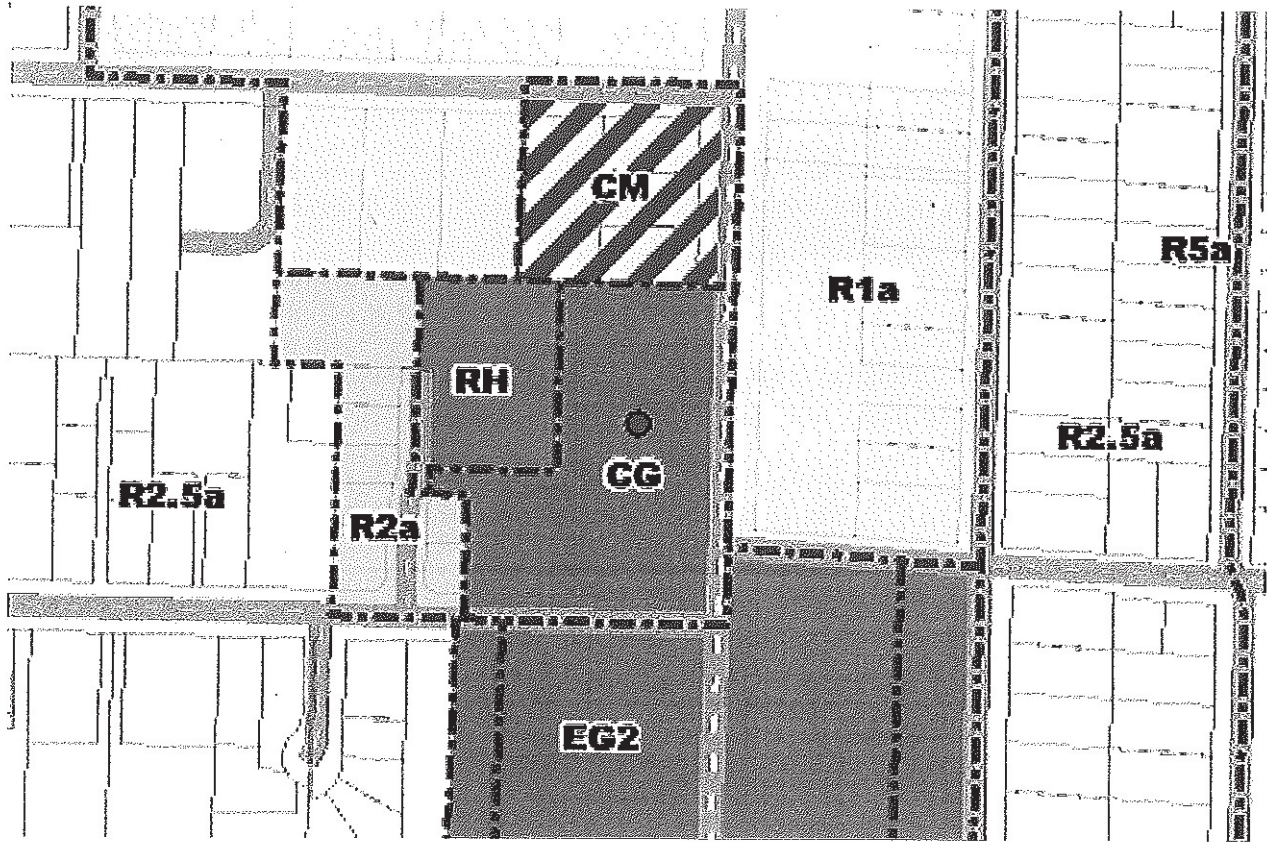
Over the next several months, as you consider how the Draft Comprehensive Plan categorically excludes your carefully researched and written requirements, have the courage of your wisdom, and re-affirm that any development of West Hayden Island must also include all mitigations you recommended last year, or it must be completely removed from the DCP's industrial lands inventory.

Come next spring, when you are writing your decisions again, please remember me, David Douglas Red Thunder, and know that West Hayden Island is my sanctuary. It can and should be a sanctuary for us all.

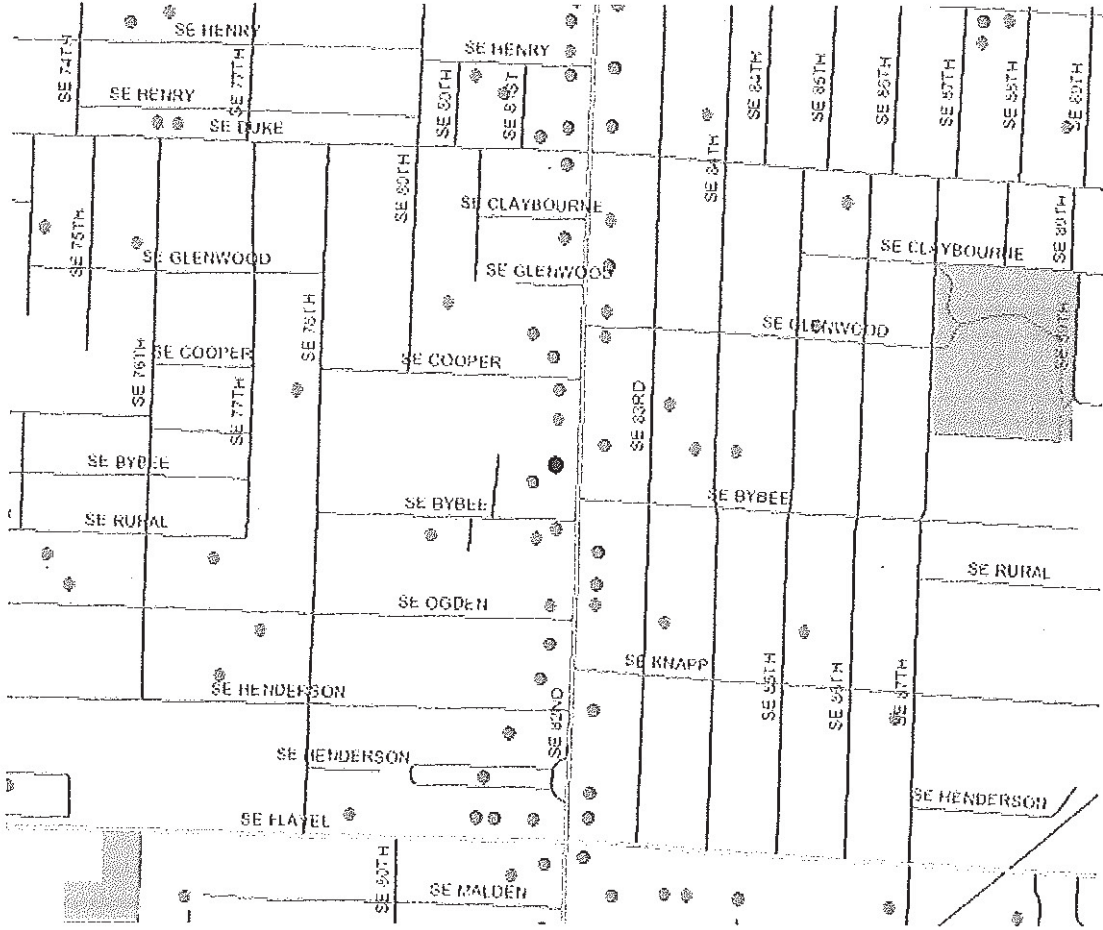
Thank you.

David Douglas Red Thunder

Lily Nguyen

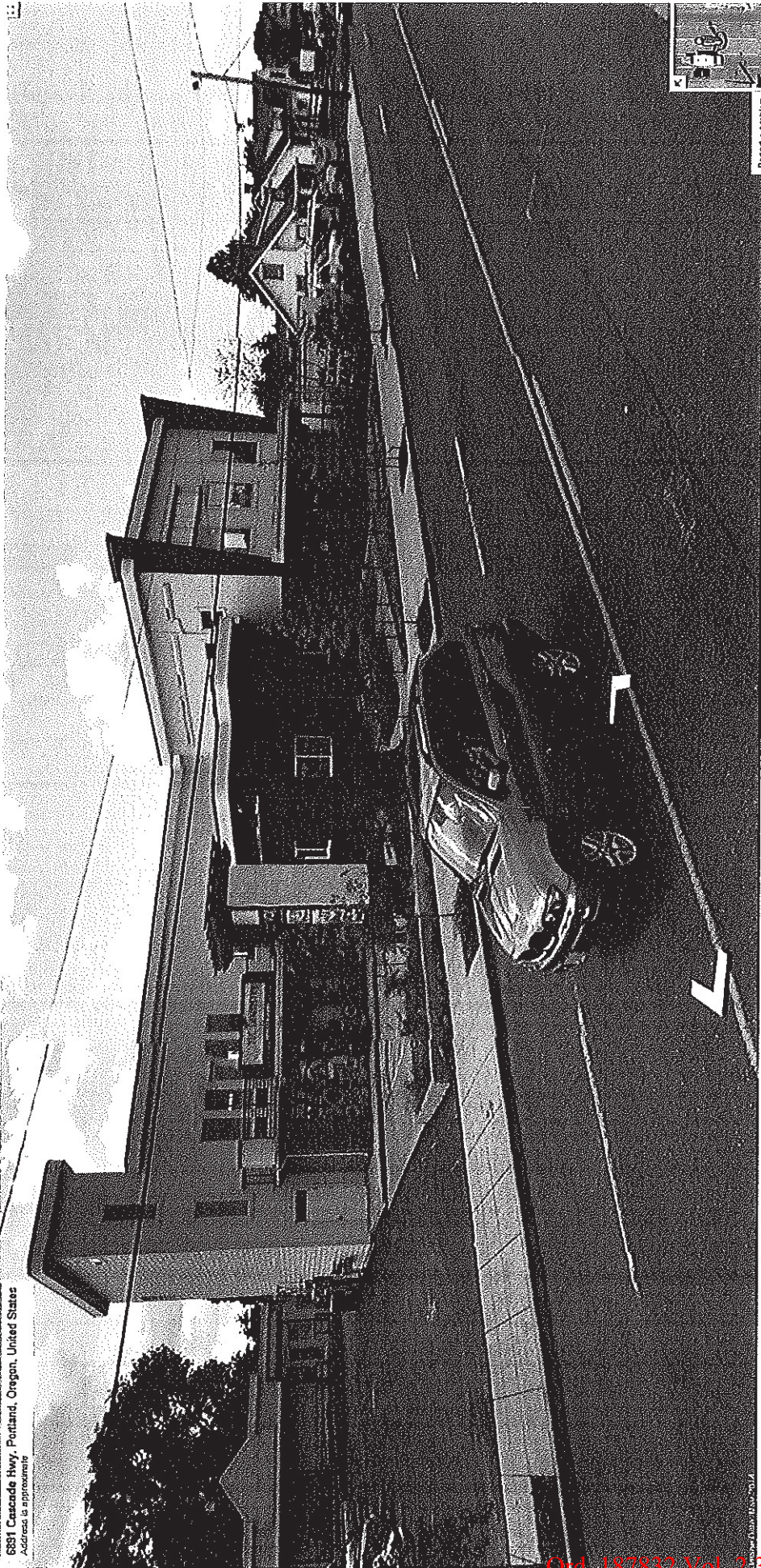


CURRENT ZONING CODE AT 6919 & 6933 SE 82nd Ave.





AERIAL HYBRID VIEW



6851 Cascade Hwy, Portland, Oregon, United States
Address is approximate

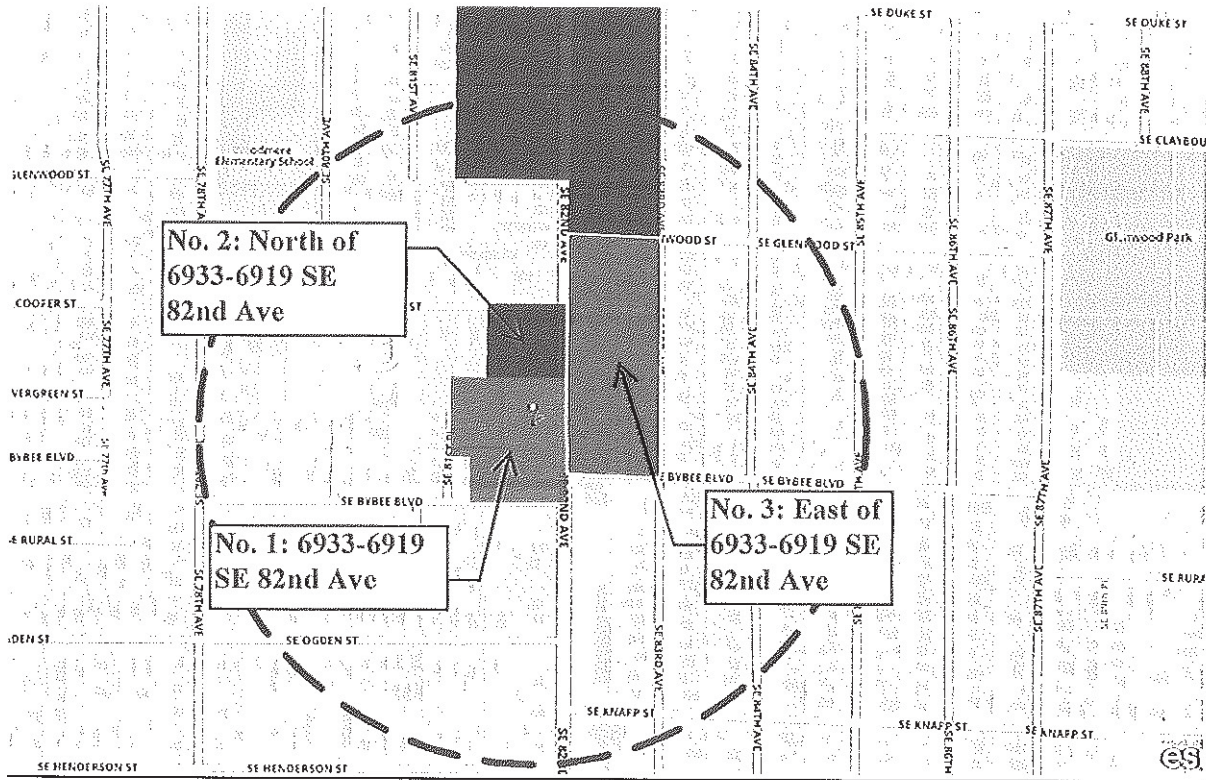
Product e Design

6933 & 6919 FRONT VIEW



6917 Cascade Hwy, Portland, Oregon, United States
Address is approximate

6933 & 6919 FRONT VIEW



No. 1: 6933-6919 SE 82nd Ave

337

Proposed Change #

Proposed Comprehensive Plan Designation Multi - Dwelling 2,000

Existing Comprehensive Plan Designation General Commercial

Proposed Zone (*tentative, tbd in 2015*) Residential 2,000 (R2)

Existing Zone General Commercial (CG)

No. 2: North of 6933-6919 SE 82nd Ave

Proposed Change #

673

Proposed Comprehensive Plan Designation Mixed Use - Civic Corridor

Existing Comprehensive Plan Designation Urban Commercial

Proposed Zone (*tentative, tbd in 2015*) Mixed Commercial / Residential (CM), or closest comparable zone

Existing Zone Mixed Commercial / Residential (CM)

No. 3: East of 6933-6919 SE 82nd Ave

Proposed Change #

339

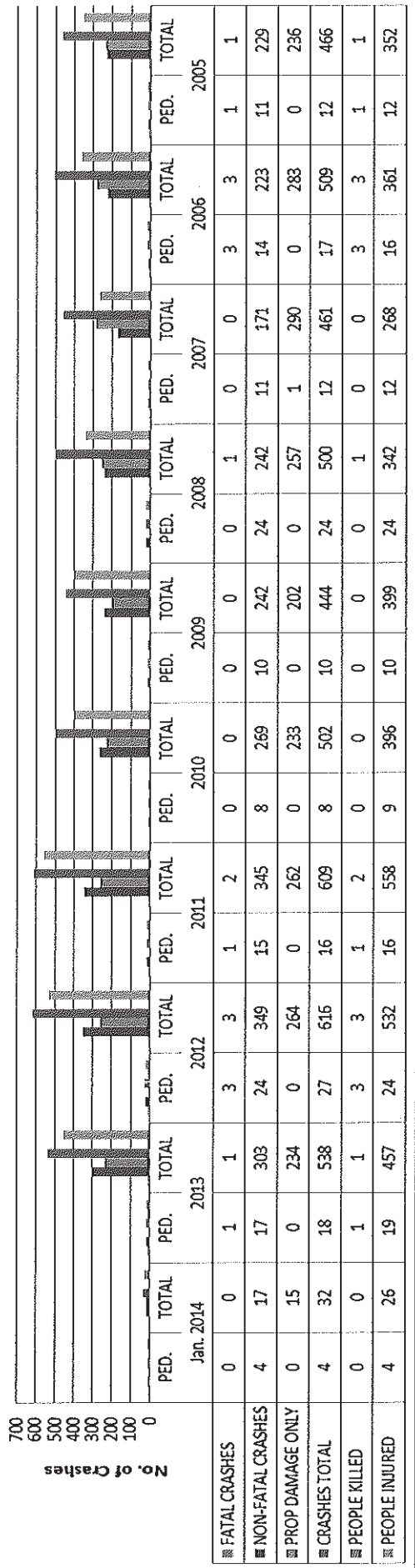
Proposed Comprehensive Plan Designation Mixed Employment

Existing Comprehensive Plan Designation Medium Density Multi-Dwelling

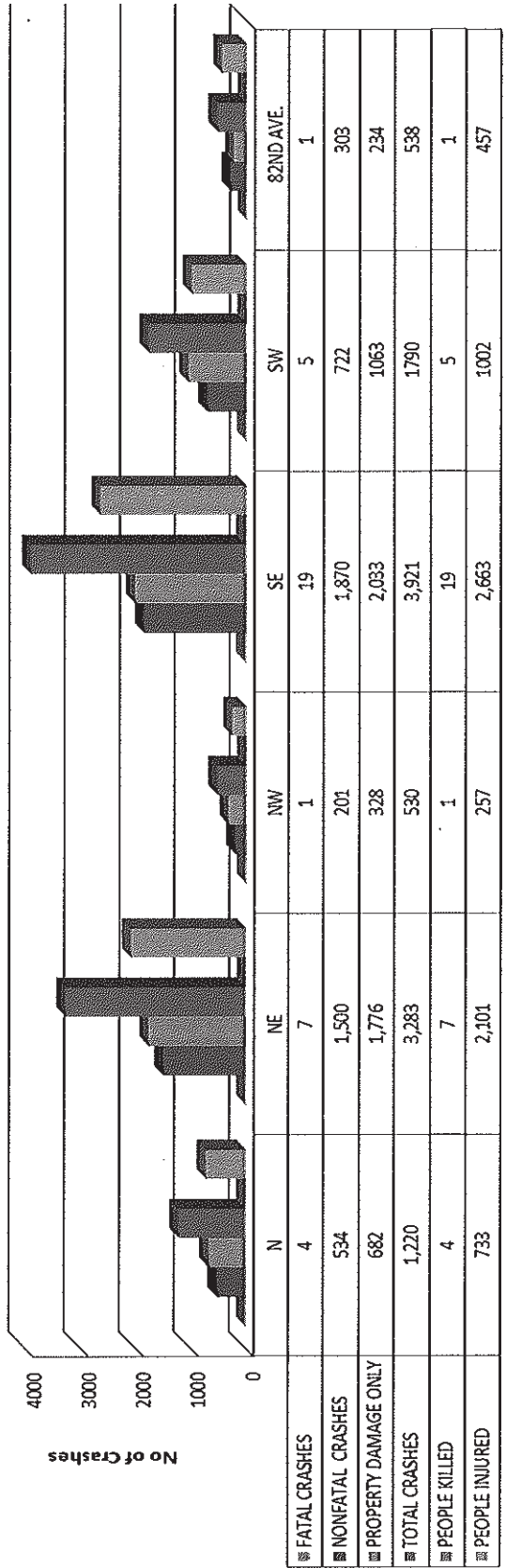
Proposed Zone (*tentative, tbd in 2015*) General Employment 2 (EG2)

Existing Zone Residential 1,000 (R1)

**SUMMARY OF TRAFFIC CRASHES ON 82ND AVE.,
BETWEEN TOTAL CRASHES AND PEDESTRIAN TYPE
01/01/2005 to 01/31/2014**



2013 COMPARATIVE SUMMARY OF TOTAL TRAFFIC CRASHES IN PORTLAND & 82ND AVE.



82ND AVE. CRASHES

(From 1/01/2005 to 01/31/2014)

YEAR	COLLISION TYPE	FATAL CRASHES	NON-FATAL CRASHES	PROP DAMAGE ONLY	PEOPLE KILLED	PEOPLE INJURED	DRY SURF	WET SURF
2009	HEAD-ON	0	3	1	0	6	1	3
	NON-COLLISION	0	4	0	0	5	4	0
	PEDESTRIAN	0	10	0	0	10	8	2
	REAR-END	0	117	90	0	213	147	55
	SIDESWIPE - MEETING	0	0	3	0	0	3	0
	SIDESWIPE - OVERTAKING	0	8	14	0	12	14	5
	TURNING MOVEMENTS	0	72	69	0	113	106	29
	TOTAL	0	242	202	0	399	325	103
2008	ANGLE	0	21	26	0	33	38	8
	BACKING	0	0	4	0	0	2	1
	FIXED / OTHER OBJECT	0	5	6	0	5	7	4
	HEAD-ON	0	1	3	0	1	1	2
	MISCELLANEOUS	0	1	0	0	1	1	0
	PEDESTRIAN	0	24	0	0	24	17	7
	REAR-END	0	117	96	0	176	160	51
	SIDESWIPE - MEETING	0	1	3	0	1	1	3
	SIDESWIPE - OVERTAKING	0	9	34	0	12	30	11
	TURNING MOVEMENTS	1	63	85	1	89	112	35
TOTAL	1	242	257	1	342	369	122	
2007	ANGLE	0	18	21	0	27	28	9
	BACKING	0	0	6	0	0	5	1
	FIXED / OTHER OBJECT	0	8	2	0	11	8	2
	HEAD-ON	0	0	1	0	0	1	0
	MISCELLANEOUS	0	0	1	0	0	1	0
	NON-COLLISION	0	2	0	0	2	0	2
	PEDESTRIAN	0	11	1	0	12	10	1
	REAR-END	0	80	125	0	132	136	61
	SIDESWIPE - MEETING	0	3	0	0	4	2	1
	SIDESWIPE - OVERTAKING	0	3	33	0	5	27	8
	TURNING MOVEMENTS	0	46	100	0	75	107	37
TOTAL	0	171	290	0	268	325	122	
2006	ANGLE	0	25	23	0	44	33	14
	BACKING	0	0	4	0	0	3	1
	FIXED / OTHER OBJECT	0	4	10	0	5	9	4
	HEAD-ON	0	1	1	0	1	2	0
	MISCELLANEOUS	0	1	0	0	1	1	0
	PEDESTRIAN	3	14	0	3	16	7	10
	REAR-END	0	109	127	0	173	161	65
	SIDESWIPE - MEETING	0	0	1	0	0	1	0
	SIDESWIPE - OVERTAKING	0	5	25	0	6	21	7
	TURNING MOVEMENTS	0	64	92	0	115	112	40
TOTAL	3	223	283	3	361	350	141	
2005	ANGLE	0	26	16	0	41	34	8
	BACKING	0	1	2	0	2	2	1
	FIXED / OTHER OBJECT	0	4	4	0	7	6	2
	HEAD-ON	0	2	4	0	6	4	2
	PEDESTRIAN	1	11	0	1	12	7	5
	REAR-END	0	114	107	0	173	155	64
	SIDESWIPE - OVERTAKING	0	6	29	0	8	25	8
	TURNING MOVEMENTS	0	65	74	0	103	102	37
TOTAL	1	229	236	1	352	335	127	
1/1/2005 to 1/31/2014 TOTAL		11	2,390	2,276	11	3,691	3,268	1,252

82ND AVE. CRASHES

(From 1/01/2005 to 01/31/2014)

YEAR	COLLISION TYPE	FATAL CRASHES	NON-FATAL CRASHES	PROP DAMAGE ONLY	PEOPLE KILLED	PEOPLE INJURED	DRY SURF	WET SURF
Jan. 2014	ANGLE	0	2	0	0	5	2	0
	FIXED / OTHER OBJECT	0	1	0	0	1	1	0
	PEDESTRIAN	0	4	0	0	4	4	0
	REAR-END	0	7	10	0	11	13	3
	SIDESWIPE - OVERTAKING	0	0	1	0	0	1	0
	TURNING MOVEMENTS	0	3	4	0	5	2	5
	TOTAL	0	17	15	0	26	23	8
2013	ANGLE	0	19	15	0	30	25	7
	BACKING	0	4	2	0	4	5	1
	FIXED / OTHER OBJECT	0	6	9	0	9	9	6
	HEAD-ON	0	2	0	0	2	2	0
	NON-COLLISION	0	1	0	0	1	1	0
	PEDESTRIAN	1	17	0	1	19	15	2
	REAR-END	0	169	107	0	272	214	46
	SIDESWIPE - MEETING	0	0	2	0	0	2	0
	SIDESWIPE - OVERTAKING	0	16	24	0	25	30	9
	TURNING MOVEMENTS	0	69	75	0	95	103	38
TOTAL	1	303	234	1	457	406	109	
2012	ANGLE	0	17	18	0	35	21	14
	BACKING	0	1	3	0	1	4	0
	FIXED / OTHER OBJECT	0	5	9	0	5	6	8
	HEAD-ON	0	3	1	0	3	2	1
	MISCELLANEOUS	0	2	0	0	2	2	0
	NON-COLLISION	0	2	0	0	2	1	1
	PEDESTRIAN	3	24	0	3	24	18	8
	REAR-END	0	171	133	0	261	192	98
	SIDESWIPE - MEETING	0	1	4	0	2	3	2
	SIDESWIPE - OVERTAKING	0	20	26	0	29	31	13
	TURNING MOVEMENTS	0	103	70	0	168	121	49
TOTAL	3	349	264	3	532	401	194	
2011	ANGLE	1	28	11	1	56	27	11
	BACKING	0	0	2	0	0	2	0
	FIXED / OTHER OBJECT	0	8	5	0	9	6	7
	HEAD-ON	0	5	1	0	8	4	2
	MISCELLANEOUS	0	0	1	0	0	0	1
	NON-COLLISION	0	1	0	0	1	0	1
	PEDESTRIAN	1	15	0	1	16	9	6
	REAR-END	0	186	128	0	319	220	82
	SIDESWIPE - MEETING	0	0	3	0	0	0	3
	SIDESWIPE - OVERTAKING	0	20	38	0	23	41	12
	TURNING MOVEMENTS	0	82	73	0	126	108	41
TOTAL	2	345	262	2	558	417	166	
2010	ANGLE	0	18	14	0	27	21	11
	BACKING	0	2	5	0	2	2	4
	FIXED / OTHER OBJECT	0	7	10	0	8	12	5
	HEAD-ON	0	2	2	0	2	3	0
	MISCELLANEOUS	0	1	0	0	1	1	0
	NON-COLLISION	0	1	0	0	1	0	0
	PEDESTRIAN	0	8	0	0	9	3	5
	REAR-END	0	132	103	0	198	146	78
	SIDESWIPE - MEETING	0	0	3	0	0	2	1
	SIDESWIPE - OVERTAKING	0	17	31	0	27	28	16
	TURNING MOVEMENTS	0	81	65	0	121	99	40
TOTAL	0	269	233	0	396	317	160	
	ANGLE	0	23	14	0	35	29	8
	BACKING	0	2	7	0	2	7	0
	FIXED / OTHER OBJECT	0	3	4	0	3	6	0

OREGON DEPARTMENT OF TRANSPORTATION - TRANSPORTATION DEVELOPMENT DIVISION
 TRANSPORTATION DATA SECTION - CRASH ANALYSIS AND REPORTING UNIT
 CRASH SUMMARIES BY YEAR BY CITY

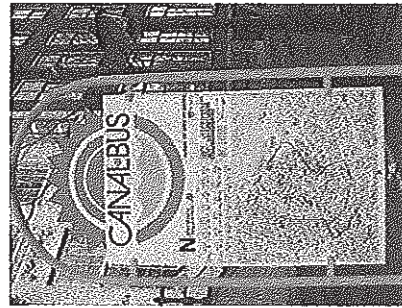
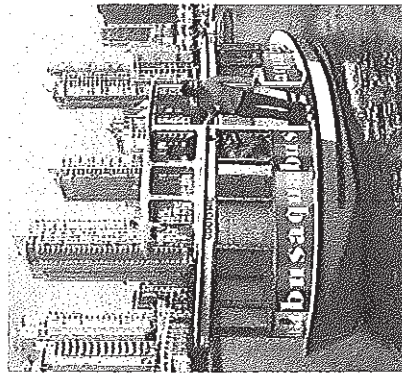
Statewide Motor Vehicle Crashes: Incorporated Cities
 2013

CITY	FATAL CRASHES	NON- FATAL CRASHES	PROPERTY DAMAGE ONLY	TOTAL CRASHES	PEOPLE KILLED	PEOPLE INJURED	TRUCKS	DRY SURF	WET SURF	DAY	DARK	INTER- SECTION RELATED	INTER- SECTION RELATED	OFF- ROAD
NEHALEM	0	0	4	4	0	0	1	1	3	3	1	2	0	1
NEWBERG	1	97	102	200	1	129	4	157	36	153	47	123	2	19
NEWPORT	0	71	91	162	0	108	4	106	48	132	30	100	1	22
NORTH BEND	0	71	98	169	0	94	12	137	32	132	37	108	13	15
NORTH PLAINS	0	4	7	11	0	4	1	9	2	10	1	3	0	1
NORTH POWDER	0	0	1	1	0	0	0	0	1	0	1	1	0	0
NYSSA	0	7	3	10	0	11	0	8	2	5	5	5	0	6
OAKLAND	0	1	2	3	0	2	2	3	0	2	1	0	0	1
OAKRIDGE	0	7	5	12	0	7	2	6	5	8	4	4	2	7
ONTARIO	0	86	73	159	0	123	7	120	37	134	25	95	0	17
OREGON CITY	1	294	292	587	1	415	22	438	137	418	167	282	13	42
PENDLETON	0	77	110	187	0	106	9	140	45	138	49	95	0	38
PHILOMATH	0	5	12	17	0	8	0	13	4	13	3	6	2	2
PHOENIX	1	15	11	27	1	20	2	21	5	20	7	10	0	4
PILOT ROCK	0	2	4	6	0	4	2	4	2	2	4	3	0	5
PORT ORFORD	0	1	0	1	0	1	0	0	0	0	0	0	0	0
PORTLAND BRIDGES	0	75	92	167	0	107	11	114	45	114	51	1	1	10
PORTLAND E. BURNSIDE	0	79	88	167	0	105	4	126	35	105	62	114	4	19
PORTLAND N	4	534	682	1,220	4	733	83	894	258	892	324	529	23	136
PORTLAND NE	7	1,500	1,776	3,283	7	2,101	123	2,417	697	2,330	937	1,539	131	316
PORTLAND NW	1	201	328	530	1	257	26	394	117	378	150	301	13	75
PORTLAND SE	18	1,870	2,033	3,921	19	2,663	97	2,987	762	2,737	1,158	2,133	166	370
PORTLAND SW	5	722	1,063	1,790	5	1,002	60	1,332	392	1,288	491	694	53	158
PORTLAND UNK.	0	2	7	9	0	4	0	4	2	3	4	0	0	0
PORTLAND W. BURNSIDE	0	54	44	98	0	75	2	66	27	58	39	63	4	8
PRAIRIE CITY	0	1	0	1	0	1	0	1	0	1	0	0	0	1
PRINEVILLE	0	45	41	86	0	62	2	72	12	69	17	43	0	17
RAINIER	0	17	20	37	0	21	5	20	15	32	5	12	0	11
REDMOND	0	117	154	271	0	178	3	233	36	212	59	207	3	45
REEDSPORT	0	6	12	18	0	8	0	12	6	12	6	8	0	7
RIDDLE	0	3	1	4	0	3	0	2	2	3	1	2	0	1
RIVERGROVE	0	1	1	2	0	1	0	1	1	2	0	0	0	0
ROCKAWAY BEACH	0	6	2	8	0	9	0	6	2	7	1	4	0	3
ROGUE RIVER	0	13	7	20	0	15	1	17	3	12	8	6	0	6
ROSEBURG	1	172	158	331	1	255	12	272	53	286	43	151	3	34
RUFUS	0	1	1	2	0	1	0	0	2	2	0	0	0	2
SALEM	3	1,264	1,357	2,624	3	1,918	65	2,004	586	2,015	607	1,359	157	299
SANDY	0	42	49	91	0	72	2	72	16	67	24	48	3	9
SCAPPOOSE	0	28	36	64	0	37	5	44	17	50	14	26	0	7
SCOTTS MILLS	0	1	1	2	0	1	1	2	0	1	1	1	0	1
SEASIDE	0	28	31	59	0	46	1	40	17	50	9	32	1	13
SHADY COVE	0	2	5	7	0	2	0	5	2	5	2	3	0	4

Rediscovering the river as a transportation corridor

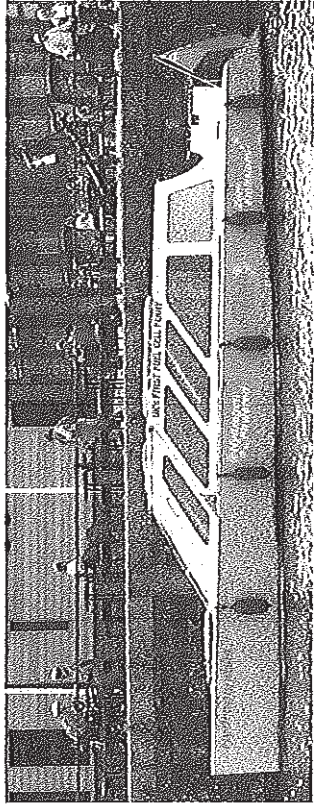


Increased livability



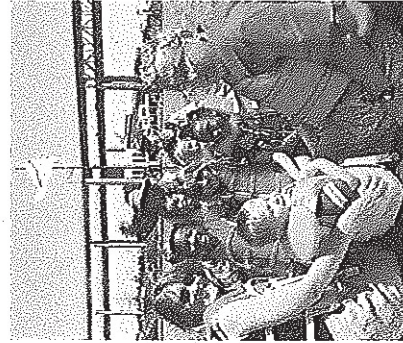
- Access for all to the city's heart
- Unsurpassed way to meet and talk
- Strengthens bond between east & west sides
- Last & most vital multimodal transit component

Innovative Sustainability



- Hybrid solar-electric-local biodiesel power to start
- Hydrogen: Cleaning the water as she goes...
- Lower carbon emissions per passenger mile than light rail, trolleys or buses
- Protecting salmon: existing public docks plus a few new docks out of the river channel

Least costly - by far - yet the most fun & beautiful transit



- Public already owns R.O.W. and ext'g docks
- US DOT grants for majority of facilities' costs
- Private funds for boats and operations
- Institutional-business support likely- an LID

Multiple economic benefits



- Increased tourism w/more PDX conventions probable
- Safety: Eyes on the river and bridges – Plus redundancy
- Some terrific living wage jobs: crew, advanced green mechanics, naturalists and historians, clean fuels
- Stimulus for new waterfront development

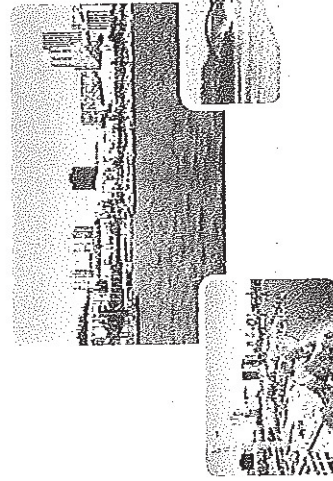
Is this feasible? Yes!

June 2005



**Willamette River Ferry
Feasibility Study
City of Portland
River Renaissance Initiative**

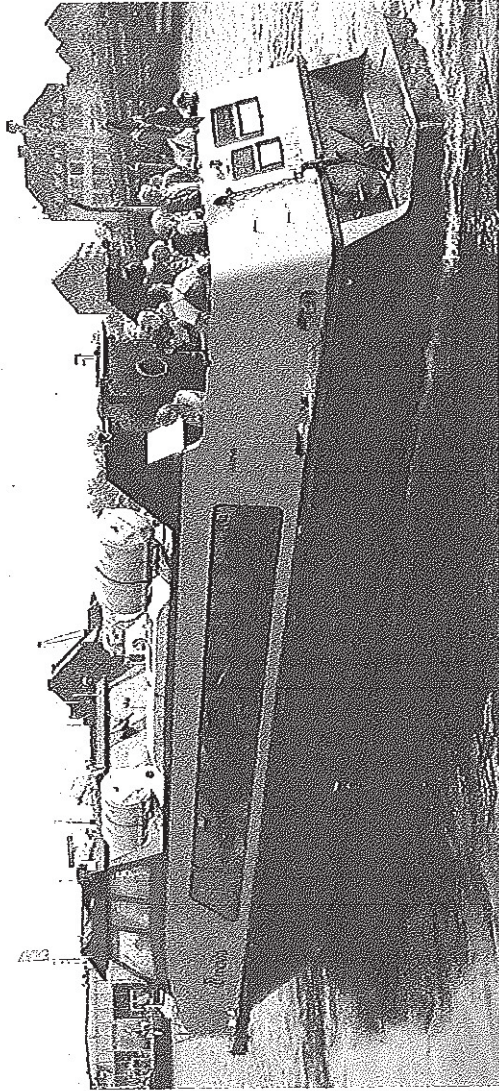
FINAL REPORT



Submitted by:
Nelson\Kincaid
CONSULTING ARCHITECTS
Cogan Owens Cogan
IBJ Associates

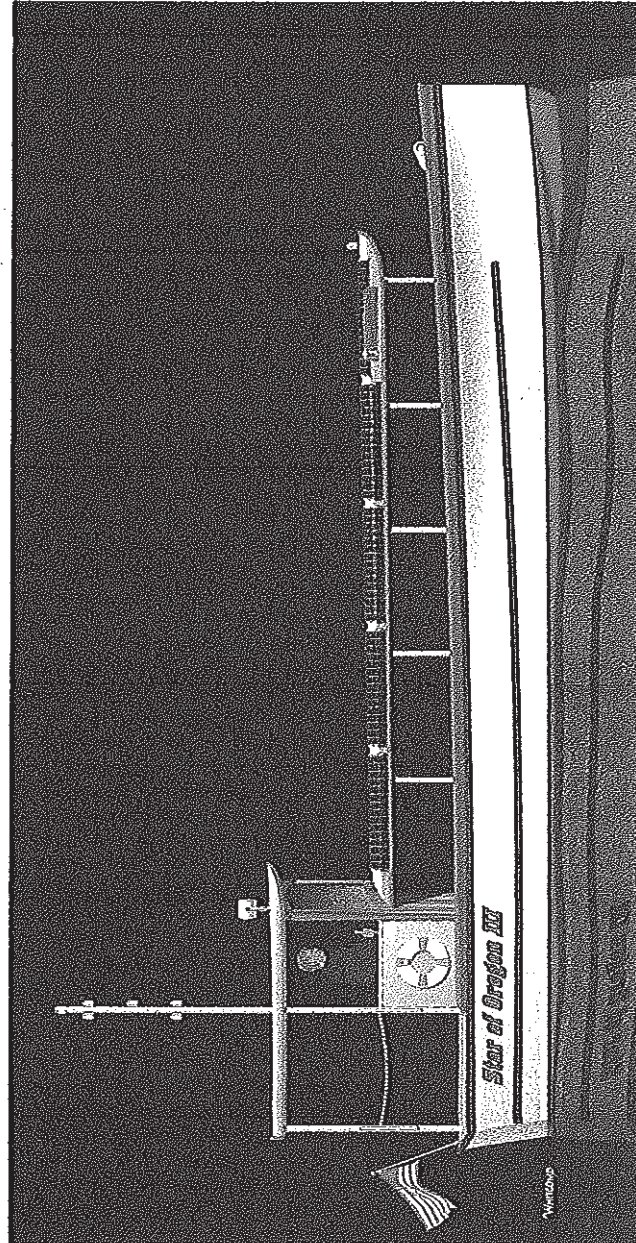
- These cities say: Absolutely!**
- Vancouver • Portland, ME
 - Victoria • New York
 - Nanaimo • Boston
 - Seattle • Toronto
 - Minneapolis • Sydney
 - San Francisco • Hong Kong
 - Chicago • Amsterdam
 - Charleston • Copenhagen
 - San Diego • London
 - San Antonio • Paris
 - Oklahoma City • Frankfurt
 - Fort Lauderdale • Tokyo

Add water transit to the Comp Plan!



- The Central Reach Planning process has demonstrated that Portlanders want it now!
- Potential operators are waiting for City action
- Start now: grant writing and system planning

Time to leave the dock! Thanks.



Solar-Biodiesel Hybrid Ferry

- Capt. Peter Wilcox, Licensed Master Mariner
pwilcox@easystreet.net

VIEWS OF WEST HAYDEN ISLAND.

A UNIQUE PHOTOGRAPHIC JOURNEY

© 2014 DD RED THUNDER, A and J ROXBURGH,

A Microsoft PowerPoint Presentation.

WILDLIFE HABITAT

A DIVERSITY OF WILDLIFE

WETLANDS, MEADOWS, FLOODPLAINS,
AND SHALLOW WATER SALMON HABITAT

DEGRADED HABITAT

* * *

MAY THESE PHOTOS HELP SHOW SOMETHING
OF THE IMPORTANCE AND VALUE
OF ONE OF PORTLAND'S LAST REMAINING
LARGE TRACTS OF WILDERNESS.

Janet Roxburgh hummingbirdzoo@yahoo.com
HILP Board Member
1503 N Hayden Island Drive,
Portland, OR 97217

November 4, 2014

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) and the proposed Comprehensive Plan. 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. The Alliance has a history of supporting all modes, including freight, auto, bicycle, and transit because each plays an important role in a well functioning transportation system.

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. We need to be strategic when crafting transportation policies and investing in projects to ensure a balanced multi-modal system that seeks to accommodate all system users. Projects and policies must be evaluated holistically and trade-offs considered when making investment decisions among a variety of modes.

The proposed criteria to identify Transportation System Plan (TSP) projects do not appear to promote that type of evaluation and instead are unduly biased toward bike/ped and transit. For example, in two of the nine criteria (neighborhood access and health), auto- and freight-oriented projects are not eligible for any points. The transportation system is just that, a system, but the proposed criteria fail to adequately and objectively consider all modes. Furthermore, criteria should be added related to improving the economy, managing congestion and traffic flows, evaluating the number of people benefitted or impacted by a project, and minimizing projects that reduce capacity of the existing system. In the current draft, these issues are not addressed.

It is our understanding that the TSP selection criteria for freight-related projects are to be considered separately under similar but different selection criteria that are yet to be developed. Without the ability to evaluate both sets of criteria simultaneously, it is unclear whether that approach impedes the ability to develop a balanced multi-modal system. Decisions to invest in one mode may undermine another mode, so the criteria should be developed together. There is a significant amount of economic activity and goods movement that occur on all city streets; it is not sufficient to focus only on freight-designated streets and freight-specific projects when determining the impact of transportation projects on goods movement and the economy.

The strong preference for active transportation is also evident in the goals and policies of the proposed Comprehensive Plan, as evidenced by the "green hierarchy." The Alliance supports a multi-modal transportation system, but is concerned about how such a green hierarchy may be

applied. While the policy related to the hierarchy states that “all users’ needs are balanced,” explicitly prioritizing certain modes over others does not allow all users’ needs to be balanced, particularly for the vast majority of Portlanders who use automobiles. This concern is exacerbated by policies that seek to “expand the use of streets beyond their transportation function.” As noted, the capacity of the existing system will be tested; reducing the capacity of the system for non-transportation purposes is short sighted given the growth the city is forecasting. At a minimum, current lane capacity should not be compromised as we anticipate growth over the next 20 years.

Thank you for your consideration of these comments. We look forward to working together to refine TSP selection criteria and project lists and comprehensive plan goals and policies.

Sincerely,

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

Sandra McDonough
President & CEO

cc: Mayor Charlie Hales
Commissioner Steve Novick
Leah Treat, Portland Bureau of Transportation
Susan Anderson, Bureau of Planning and Sustainability

APPENDIX OF COMMENTS ON TSP CRITERIA:

- The economic benefit criteria should be strengthened by eliminating “lower cost” language from access to areas of high growth. The need is access and not always “lower cost” access. For example, in some instances investments in freight mobility are needed as opposed to bike/ped investments in order to increase access to traded-sector industrial land that promotes middle-income job growth.
- The economic benefit criteria on revitalization should be on the broader concept of economic vitality instead. The emphasis should be on whether or not a project benefits Oregon’s economy rather than on revitalization projects. Furthermore, there should not be a focus on Neighborhood Prosperity Initiative areas or urban renewal areas but rather more broadly on areas that would benefit from improved transportation access.
- The economic criteria should also factor access to retail, the central city, traded-sector employment, and industrial land.
- The scoring system currently awards up to three points on the positive end but only one point on the negative end. The number of eligible points awarded on both the positive and negative side should be equal to one another. For example, up to three points should be subtracted for negative aspects of a project in order to mirror the three points that are eligible on the positive side. This will ensure a more thorough analysis that acknowledges and considers trade-offs on a project basis.
- A criteria related to managing congestion and traffic flow should be added; this criteria has been used by the Portland Bureau of Transportation in the past.
- A criteria should be added that evaluates relative to other projects, which will have the greatest impact on the greatest number of people.

An Ordinance amending the Comprehensive Plan Map for Tax Lot 7 of Section 8, T1S, R1E, and Lots 2, 3, and 4 of Block P, Greenway Add. from High-Density Single-Family to Local Commercial, and changing the zoning from R5 to C3, located at 2855 S.W. Patton Road, under certain conditions, and declaring an emergency.

The City of Portland ordains:

Section 1. The Council finds:

1. The applicants, Wayne Strohecker, Wesley G. Strohecker, U.S. National Bank of Oregon, and Michael Fifield, deedholders, seek a Comprehensive Plan Map Amendment from High-Density Single-Family to Local Commercial and a Zone Change from R5 to C3, for Tax Lot 7 of Section 8, T1S, R1E, and Lots 2, 3, and 4 of Block P. Greenway Add., located at 2855 S.W. Patton Road.
2. An application complying in all respects with all requirements of Title 33, Planning and Zoning, of the Code of the City of Portland and seeking such Comprehensive Plan Map Amendment and Zone Change has been received.
3. Applicants have paid the proper fee for the filing of such application.
4. The City's Hearings Officer by Report and Recommendation dated November 16, 1983 (Planning Commission File No. 7334-PA), after and as a result of a duly authorized and conducted public hearing held November 8, 1983, on said property, has recommended that the Comprehensive Plan Map Amendment and Zone Change be granted, with conditions.
5. That Report and Recommendation of the Hearings Officer was appealed by the Southwest Hills Residential League, J. W. Kamp, and others. The City Council, in accordance with the City's appeal procedures, held a hearing on January 25, 1984, adopted the Hearings Officer's Report with modifications to Condition 2a, and denied the appeal.
6. The notice requirements for public hearings were fulfilled according to law.
7. This rezoning constitutes an amendment of the City's Comprehensive Plan Map. Based upon the facts, findings and conclusions of the Hearings Officer's Report and Recommendation, this amendment of the Comprehensive Plan Map from High-Density Single-Family to Local Commercial is found to be in accordance with the Comprehensive Plan.
8. This rezoning is in conformance with the Comprehensive Plan for the City, is in accordance with generally accepted land use planning standards and with applicable City and State legislative enactments as indicated in the Report of the Hearings Officer.

NOW, THEREFORE, the Council directs:

- a. That the facts, findings, conclusions, and recommendation of the Hearings Officer in P.C. File No. 7334-PA are adopted by City Council.
- b. The Comprehensive Plan Map is hereby amended to Local Commercial and the zone of Tax Lot 7 of Section 8, T1S, R1E, and Lots 2, 3, and 4 of Block P, Greenway Add. is changed to C3.
- c. This Zone Change is granted under the following conditions:
 - 1) The following conditions recommended by the applicants are included herein:
 - a) Use of the site shall be restricted to a grocery store.
 - b) Neither the site area nor the building outline shall again be expanded over what is now approved.
 - c) The building shall maintain a 35-foot setback from the northerly property line and the area beyond the building shall not be regraded.
 - d) No accessory buildings may be located on the site. The existing accessory buildings shall all be removed prior to occupancy of the addition.
 - e) No recycling or refuse containers shall be permanently located outside the building.
 - f) The owners shall require all employees who drive to this site to park in the covered area under the new addition.
 - g) All delivery vehicles shall enter and exit the site in a forward manner. All loading and unloading must be done on-site.
 - h) The property owners shall provide additional planting for buffering on City park property to the west, as required by the Park Bureau.
 - i) The maximum height of the building shall not exceed the roof profile proposed in this application and may not exceed 15 feet above the grade of S.W. Patton Road pavement, except for skylights.

The footprint of the building shall not exceed that shown on the plans submitted as Exhibit 5.
 - j) All mechanical equipment shall be relocated from the roof surface to the interior of the building.
 - k) Exterior lighting shall be as low as feasible and shall not shine onto neighboring residential property.

VZ 113-84
EXHIBIT F

- 1) Final plans for the exterior design of the building and for landscaping on the entire site, along with plans for signage and exterior lighting shall be submitted to the Planning Bureau for their review and approval prior to the issuance of Building Permits. To assist the Bureau in determining whether the proposed building, landscaping, signage and lighting are appropriate for this location and adequately protect surrounding residential and park property, the final plans shall be submitted to the Design Commission for their advice prior to Planning Bureau approval. The Commission's review should take place at a meeting of the Commission.
- 2) The following conditions recommended by the Planning Bureau are included herein:
 - a) There shall be no deliveries to the site by large trucks from 4:30 p.m. to 7:30 p.m. and from 9:00 p.m. to 7:00 a.m.
 - b) Signage shall be limited to one wall sign no greater than 100 square feet. Changeable readerboards are not permitted. On-site directional signs shall be no greater than 4 square feet each.
 - c) An entrance to the store shall be provided at the lower level.
 - d) Noise from store loudspeakers shall not be audible to any residential property.
 - e) All requirements of Chapter 70 of the Building Code relating to soil stability and drainage shall be met.
- 3) The following conditions recommended by the City's Traffic Engineers and Transportation Planning Section are included herein:
 - a) One 40-foot-wide entrance/exit shall be located opposite the intersection of S.W. Old Orchard Road, rather than separate entrances and exit points.
 - b) At least 58 parking spaces shall be provided on-site.
 - c) A left-turn lane with 30 feet storage southbound and 60 feet storage northbound be installed on S.W. Patton Road at Old Orchard Road by the applicants with the design to be approved by the City Engineer and the City Traffic Engineer.
 - d) If room is available and design is acceptable to the City Engineer and the City Traffic Engineer, a right-turn lane shall be provided for the traffic heading south on S.W. Patton Road to turn into the parking lot.
- 4) The following conditions recommended by the Department of Public Works (Sanitary Engineering) are included herein:

ORDINANCE No.

- a) A site drainage plan must be submitted prior to the issuance of Building Permits, with the plan to be approved by the Bureau of Sanitary Engineering and the Bureau of Buildings, Plumbing Division.
 - b) The issue of the sewer location on-site and the accompanying issues of maintenance, risk, damage, etc., (as discussed in Exhibit 6e) shall be resolved to the satisfaction of the Bureau of Sanitary Engineering prior to the issuance of any Building Permits for this site.
 - 5) The applicants shall meet all requirements of the Fire Marshal relating to hydrant location and other fire protection measures.
 - 6) The entrance to the under-building parking area shall be blocked to individuals and vehicles when the store is closed.
 - 7) Nothing contained in this approval or these conditions authorizes Variances to any provisions of the City Code. Any required Variances must be sought through appropriate channels.
 - 8) A Building Permit or an Occupancy Permit must be obtained from the Bureau of Buildings at the Central Permit Center on the first floor of The Portland Building, 1120 S.W. 5th Avenue, 97204, 796-7310, before carrying out this project in order to assure that all conditions imposed here and all requirements of the pertinent Building Codes are met.
- d. This order shall not be effective and no change shall be made to the zoning maps until acceptance and recording as provided in Section 33.102.010.

Section 2. The Council declares an emergency exists because there should be no delay in the beneficial use of the above-described property; therefore this ordinance shall be in force and effect from and after its passage by the Council.

Passed by the Council, FEB 16 1984

Mayor Ivancie
February 1, 1984
P.Norr/ja

Jewel Lansing
Auditor of the City of Portland

By

Eana Curran

Deputy

VZ 113-84
EXHIBIT F

Dear Planning and Sustainability Dept

Nov 4 2014

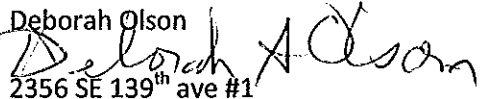
Hi: I hope the city starts doing inspections on every apt that comes up for rent. I have lived in my place 8 years. 6 months ago I requested repairs on the broken floor tiles in the bathroom, bugs and 1 other issue. Next month with rent check also same request and they were ignored. I called the City of Portland they came out 9/17/14 and wrote up 11 problems. Now Home Forward (Housing Authority) Came out August 27th 2014. That morning the Land Lord Connie Choa did finally Hire Cascade Home Enhancement LLC to fix the broken tiles. Just hours before the 1st Housing inspection. Well the sub floor underneath was soaking wet and was cut & pulled out. When Housing arrived the toilet was in the bathtub. No pass.

Matt (Cascade) told me He replaced the flooring in apt # 7 Same property Cody age 11 at the time fell the bathroom floor 2 months earlier. Matt also said he had done work at a couple of Connie's places in North or NE Portland and was scared when he pulled up floors to find roach nests. (Connie Choa has 62 rentals) My apartment has failed 2 more City of Portland Inspections. Charles Myrick told Ms Choa as of yesterday (11/3/14) that she had to take out the whole bathroom floor and replace it. The bathroom wall behind the toilet is not caving in. And there is Mold in the wall. Looks like I can afford to live in Gresham. And further out.

We need safe, bug free, mold free, warm, affordable housing

Thank you,

Deborah Olson


2356 SE 139th ave #1

Portland Or 97233



homeforward

hope. access. potential.

October 21, 2014

Please Read Carefully

Connie Chao
9459 SE Tarnahan Dr.
Happy Valley, OR 97086

RE: Deborah Olson-2356 SE 139th #1

Dear Landlord:

The above rental property has not met the Housing Quality Standards (HQS) on four separate occasions—**8/27/14, 9/18/14, 10/02/14 and 10/16/14**. A copy of the needed repairs is enclosed.

Per the HUD Housing Assistance Payment Contract, Paragraphs 3c and 3d, as of **11/1/2014** all Housing Assistance payments will be abated until repairs are completed and the unit passes HQS inspection. You will not be eligible for any Housing Assistance payments from the Housing Authority of Portland during this time and the tenant is not responsible for this abated amount.

The repairs must be completed by 11/04/2014 or the Housing Assistance Contract will terminate on 12/31/2014 due to a program violation and the Housing Authority of Portland **will not** re-inspect. This letter is your official notice. The tenant will have the right to be re-certified and transfer to a new unit.

If the repairs are completed on or before the above date, the tenant and/or you will need to call Inspections (503) 802-8333, Option 5, to schedule a final inspection. The tenant must assure that an adult (someone age 18 or older) is present in the unit on the scheduled day of the final inspection.

Thank you for your immediate attention to this matter.

Sincerely,

Nicholas Basua
Rent Assistance Inspector

cc: Tenant
File

Enclosure



hope. access. potential.

October 21, 2014

Deborah Olson
2356 SE 139th #1
Portland OR 97233

IMPORTANT

Please Read Carefully

Dear Participant:

Enclosed is a copy of a letter sent to your landlord, letting him/her know that the Housing Authority of Portland will be abating the subsidy portion of your unit's rent. Please contact your landlord to assure the repairs are made in a timely manner.

If the failed items in the unit are not repaired by **11/04/2014**, you will be required to transfer or lose your assistance and you will receive a transfer packet in the mail. The contract on your unit with the landlord will terminate on **12/31/14** if these repairs are not made.

If the repairs are completed before **11/04/2014**, please contact the Section 8 Inspection Team at (503) 802-8333, Option 5, to reschedule a final inspection. **NOTE: You must allow the landlord access to your unit to complete the repairs if the request is made of you so you are not in violation of your rental agreement.** Remember, someone over the age of 18 must be present in your unit at the time of the inspection. We will **not** re-inspect after **11/04/2014**. You will be required to move if you wish to continue your assistance.

If you have any questions, please contact the Inspection Team at 503-802-8333 Option 5.

Sincerely,

Scott White
Housing Program Manager – Inspections
Rent Assistance

Enclosures

Важная информация о вашем жилье! Если вам необходима помощь, немедленно свяжитесь с нами.

Información importante acerca de su vivienda! Si usted necesita asistencia, por favor comuníquese con nosotros inmediatamente

PETITION IN OPPOSITION TO
 NOTICE OF PROPOSED COMPREHENSIVE PLAN MAP CHANGE
 FROM GENERAL COMMERCIAL TO MULTI-DWELLING 2000
 6919-6933 SE 82ND AVENUE, PORTLAND, OR 97266

	Name	Address	Signature	Date
1	LIEN CHUNG	6735 SE 82nd Avenue, Portland, OR 97266	Lien Chung	10/26/14
2	7 Zodiacs Tattoo	6919 SE 82nd Ave. suite 102 / PDX, OR 97266	Peter R. Laun	10/28/2014
3	TNS construction	6919 SE 82nd Ave Suite 201 PDX OR 97266	Tran Nguyen	10/28/14
4	STREET ESTIMATING	7004 SE 82ND AVE PDX OR 97266	SEE SIGN	10/28/14
5	Van Phan - DUC NGUYEN	2007 SE 82nd Ave PDX OR 97266		10/28/14
6	Ben Francisco Global	7036 SE 82nd Ave. PORT. OR. 97266		10.28.14
7	Kris Turner Drive	6850 SE 82nd Ave. PORT. OR. 97266	Kris Turner	10.28.14
8	PDX CARS LLC	6724 SE 82ND AVE PORT OR 97266		10.28.14
9		6708 SE 82ND AVE PORT OR 97266		10.28.14
10		6706 SE 82ND AVE PORT OR 97266		10.28.14
11		6718 SE 82ND AVE PORT OR 97266		10.28.14
12	TLC DENTISTRY	6919 SE 82nd AVE #103 PDX OR 97266	Dr. Andrew Witz	10-28-14
13	POB SUPPLY	7110 SE 92nd Ave PDX OR 97266		10/28/14
14	Fuji Yama Sushi Bar	4124 SE 82nd Ave. Cl. 550 97266	Gieselle Brown	10/28/14
15	Lee Sandwiches	4124 SE 82nd Ave #788 97266		10/28/14
16	Jackie DO	8125 SE cooper st PDX 97266		10/28/14
17	Vinh Phan Vape	6919 SE 82nd Ave 97266		10/28/14
18	HAPPY TORVINE	7217 SE 82nd Ave 97266		10/28/14
19	Barrett Cabinets	6829 SE 82nd Ave 97266		10/28/14
20	Bigfoot Spa	6805 SE 82nd Ave. 97266 St. 101	Xiaoxia Wu	10/28/14
21	Lily Massage	6805 SE 82nd Ave. 97266 St. 101	Lily	10/28/14
22	82nd Ave Mobile Home Park	6933 SE 82nd Ave 97266	Ormy	10/28/14
23	CHANG TERIAKI INC	7217 SE 82nd Ave 97266	Ormy	10/28/14
24				
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35				

7 ZODIACS TATTOO LLC
6919 SE 82nd Avenue, Ste. 102, Portland, OR 97266
Phone: 503-999-8886

October 27, 2014

City of Portland, Oregon
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

**RE: PSC Comprehensive Plan Testimony (from General Commercial to Multi-Dwelling
2,000)
6919 SE 82nd Avenue and 6933 SE 82nd Avenue, Portland, OR 97266**

To Mayor Hales, Commissioners Fritz, Saltzman, Fish, Novick and other members of the City of Portland:

My name is Peter Roman Paun. I am writing this letter to oppose the proposed comprehensive plan map change for 6919-6933 SE 82nd Avenue, Portland, OR 97266 because it will hurt/kill my business.

I own 7 Zodiacs Tatto LLC, located at 6919 SE 82nd Avenue, Ste. 102, Portland, Oregon 97266 for several years. I have been doing business at this location and leasing space from Nguyen-Bui Enterprises LLC. My business is doing well and I am busy.

I have worked very hard to save up enough money to open my own business. I tried to help out my family, friends, and other tattoo artist. I do not have a higher education but instead of taking to the streets, I focus and channel my energy into creating unique tattoos. This business supports me, my wife, my kids, and other families. I also hire a number of tattoo artists and keep them off the streets. I pay them and give them creative productive things to do. We are all very artistic and talented tattoo artists. My business on 82nd Avenue gives everyone a place to come and get a great, safe, clean, tattoo.

I cannot afford to start another business elsewhere if I am forced to shut down my business here because the City decided to change a perfectly fine general commercial zoning to residential. How can the City do this to poor businesses that are trying to make it work? This is horrible. I have been very upset since hearing about this. I am very afraid to lose my business and all the money I have invested in my business. It is not easy to save up money to do business and to produce good quality work. I don't want to lose everything I have worked so hard to save up to do and also not have a job and income to support my family. Why doesn't the City try to help the businesses but instead try to shut them down?

I just do not understand how the City can change the zoning when there are already so many businesses around 82nd Avenue, including my business. Please do not change the zoning to residential. It makes no sense. It is a terrible idea. Please help keep Portland businesses going and stop this terrible senseless proposal.

Thank you



Peter Roman Paun

TNS CONSTRUCTION LLC
Timmy Thanh Quoc Nguyen
6919 SE 82nd Avenue, Ste. 201, Portland, OR 97266
Phone: 503-799-2948

October 26, 2014

City of Portland, Oregon
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

**RE: PSC Comprehensive Plan Testimony (from General Commercial to Multi-Dwelling 2,000)
6919 SE 82nd Avenue and 6933 SE 82nd Avenue, Portland, OR 97266**

To Mayor Hales, Commissioners Fritz, Saltzman, Fish, Novick and other members of the City of Portland:

My name is Tim Nguyen. This is my written opposition to the proposed comprehensive plan map change for the properties of 6919-6933 SE 82nd Avenue, Portland, Oregon 97266. I currently own TNS Construction and rent space from Nguyen-Bui Enterprises (owned by my sister and brother-in-law) at 6919 SE 82nd Avenue, Ste. 201, Portland, Oregon 97266. My construction company just finished building the tenant improving for Lee's Sandwiches at Eastport Plaza, about ½ a mile north on SE 82nd Avenue. Lee's Sandwiches has 62 franchises across the states and this one is the very first one to be brought into Oregon. Over 10,000 people attended the grand opening on October 18, 2014. My business is doing well and I do not want to relocate. I have been living and working in Portland for over 20 years.

From 2002/2003 to 2012/2013, I owned 6919 SE 82nd Avenue and 6933 SE 82nd Avenue. It was my dream to develop this underdeveloped site and turn it into a beautiful multi-use complex, where you could live and work and not drive. I believe in the City of Portland's goals of healthy, safe, sustainable living. However, I did not have the financial resources to make my dreams come true and had to let 6933 fall into foreclosure and had to turn 6919 over to my family for bail out. My sister, Lily Nguyen and my brother-in-law, Nam Bui, currently own 6919. My other brother-in-law, Dr. Andrew Phan, has his dental office on the site as well. I have worked tirelessly for over a decade to see this property developed and improve.

From 2002 to 2003 I purchased 6919 and 6933. I lived there and did business there for over a decade. From 2004 to 2007, I spent hundreds of thousands of dollars to change the zone on both properties from residential to its current zoning of general commercial, R2 and RH. This process took 3 years. In that time I had to pay for a feasibility study, a

traffic impact study, engineering plans and designs, and met with the City of Portland planning and zoning, PDOT, ODOT, PDC, worked with the Brentwood Darlington Neighborhood, and attended City Council meetings. This experience was a long drawn out nightmare that nearly bankrupted me, but I did not give up and I was finally granted my zone change after much compromising. However, after that, the economy took a turn for the worse and I did not have any money to develop the site the way I wanted and I could not get any investors or a loan. By 2011/2012, I had to let 6933 fall into foreclosure and hand over 6919 to my family in order to save it.

With the help of my sister Lily, and her husband Nam Bui, and my sister Tiffany, and her husband, Dr. Andrew Phan, we were able to build a dental office and rent the 6919 building out to a total of 4 businesses (including my construction company and the dental office). By 2014, things have steadied.

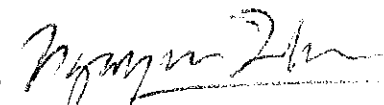
Then recently, we received the notice of proposed comprehensive plan change and now the nightmare begins all over again. It is like a terrible sick joke. I was upset to the point of utter disbelief and shock that I have to go through all this with the City again.

If this terrible proposal goes through, 6919-6933 will be out of compliance and will have to be grandfathered in and the use will be non-conforming. This is exactly what I wanted to avoid in the first place. This is what I worked so hard to change back in 2004.

For the next few days I will be gathering signed letters of opposition and also a signed petition from the nearby businesses in protest of this god awful proposal. I will forward those items to you as soon as I have them.

You can contact me at any time at 503-799-2948 or email at superiorteam2001@yahoo.com.

Sincerely,



Tim Nguyen

TLC DENTISTRY LLC
Dr. Andrew Phan
6919 SE 82nd Avenue, Ste. 103, Portland, OR 97266
Phone: 503-774-3546

October 27, 2014

City of Portland, Oregon
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

**RE: PSC Comprehensive Plan Testimony (from General Commercial to Multi-Dwelling 2,000)
6919 SE 82nd Avenue and 6933 SE 82nd Avenue, Portland, OR 97266**

To Mayor Hales, Commissioners Fritz, Saltzman, Fish, Novick and other members of the City of Portland:

My name is Dr. Andrew Phan. This is my written opposition to the proposed comprehensive plan map change for the properties of 6919-6933 SE 82nd Avenue, Portland, Oregon 97266. I have been a dentist for over 25 years in Oregon. My dental practice is located on 6919 SE 82nd Avenue, Ste. 103, Portland, Oregon. I have been on this site since 2011. I average roughly 15-20 patients a day. I use part of 6933 SE 82nd Avenue for my parking lot, and so does the other tenants on the property. I plan on continuing my dental practice for a very long time.


In 2011, my wife and in-laws talked me into opening my own dental practice, which was a long time dream of mine. I took out my savings of over 20 years, refinanced my home, and borrowed additional funds from the bank in order to realize my dream. I wanted a dental office with the most high tech equipment and up to date services. It cost me almost 1 million dollars to open TLC Dentistry LLC. I have been very happy serving the SE 82nd Avenue folks ever since. I have no regrets opening my own practice. I love the location I am in and I love my dental office. I have hired several employees, including dental hygienists, assistants, receptionist, and bookkeeper.

82nd Avenue is a very busy business street. I have never considered 82nd Avenue to be a residential street. I see hundreds of businesses around my dental office. I go to eat at the restaurant across the street. It came as a shock to me to receive the notice from the City. I have to admit I did not read it in the beginning or notice what it was saying. Once my family and I realized what the notice was proposing, we were beside ourselves. Being a dentist is my only profession. I have invested my entire life's savings into my dental practice. To me, 6919-6933 is a commercial piece of property. When I moved in, the adjoining suite to my dental office was the Law Office of Samantha N. Dang.

She was my sister-in-law and she has been practicing law in the adjoining suite from 2002 to roughly 2012/2013 when she accepted a teaching position at Irvine University College of Law in California.

I cannot imagine this property being anything but commercial. At this point, there are 3 other tenants in the adjoining suites 101 (Vape 9), 102 (7 Zodiacs Tattoo), and 201 (TNS Construction). How can the City possibly propose to remove all these businesses and replace it with multi-dwelling units? Is the City considering reimbursing the \$1 million dollar I invested into my business? Please enlighten me on the basis of the Planning and Sustainability Commission's reasoning and research into its proposed finding to change the current zoning (general commercial, which works) to something that completely does not work (multi-dwelling). This proposal is not in character with the current use of the property or even the future use of the property. The City of Portland should encourage, assist, and help develop more jobs and businesses into underdeveloped areas and not hinder, stifle, and terminate all the good that has already been done to move this site forward.

Sincerely,



Dr. Andrew Phan

VAPE 9 LLC

6919 SE 82nd Avenue, Ste. 101, Portland, OR 97266
Phone: 408-202-5342

October 27, 2014

City of Portland, Oregon
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

**RE: PSC Comprehensive Plan Testimony (from General Commercial to Multi-Dwelling 2,000)
6919 SE 82nd Avenue and 6933 SE 82nd Avenue, Portland, OR 97266**

To Mayor Hales, Commissioners Fritz, Saltzman, Fish, Novick and other members of the City of Portland:

My name is Vinh Pham. I am writing this letter to oppose the proposed comprehensive plan map change for 6919-6933 SE 82nd Avenue, Portland, OR 97266, because it will affect my business.

I own Vape 9 LLC, located at 6919 SE 82nd Avenue, Ste. 101, Portland, Oregon 97266 for half a year, I have been doing business at this location and leasing space from Nguyen-Bui Enterprises LLC. I have a three year contact lease at this space with options to renew. My business is doing well and I am busy.

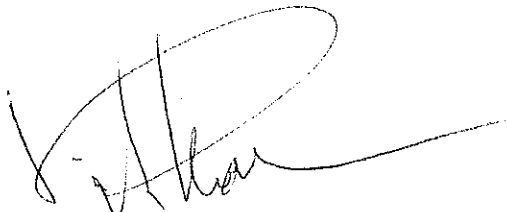
I have worked very hard to save up enough money to open my own business. I tried to help out my family by employing my nephew and brother to work at the shop. I love the current space I am in because there is so much business around the area and it is always busy.

I also love the building I am in. It is new and I also put a lot of money into the tenant improving in order to get my business open. I cannot afford to start another business elsewhere if I am forced to shut down my business here. How can the City do this to poor businesses that are trying to make it work? This is such a shock. I am very stressed since I hear about this. I am very afraid to lose my business and all the money I have invested in my business. It is not easy to save up money to do business. I don't want to lose everything I have worked so hard to save up to do and also not have a job for my brother and nephew. It is all of our livelihood. Why doesn't the City try to help the business but instead try to shut them down?

I just do not understand how the City can change the zoning when there are already so many businesses around and also my business. Please do not change the zoning to residential. It makes no sense. Please help keep Portland businesses going and stop this terrible senseless proposal.

Thank you,

Vinh Pham



Nov 1, 2014

Planning and Sustainability Commission
c/o Bureau of Planning and Sustainability
City of Portland
1900 SW Fifth Ave., Suite 7100
Portland, OR 97201-5380

Re: Comments on Comprehensive Plan Proposed Draft Map

Dear Commissioners:

Meeting Room Holdings, Inc. owns five contiguous parcels (R267986, R267987, R 267988, R268176, R268177) at 8738 SE 19th Avenue in Southeast Portland (the "Property"). The Property is currently zoned Residential 2,500, with an underlying Comprehensive Plan designation of R 2.5. No change is proposed under the Comprehensive Plan Proposed Draft Map. However, for the reasons set forth below, we urge the Commission to consider a comprehensive plan designation that would allow for a higher density of residential development, with a corresponding High Density Residential ("RH") zone.

- A.** A higher density designation is warranted because the Property is close proximity to urban amenities necessary to support a higher density residential use, and adjacent to existing high-density residential uses.

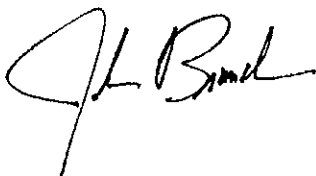
The Property is located in close proximity to TriMet bus lines, near the Springwater Corridor and Johnson Creek Park, and within several blocks of the Portland-Milwaukie Light Rail line. Consistent with the City's Healthy Connected City Strategy, this would provide Portlanders the opportunity to live in a complete community that offers a mix of desirable services and opportunities. The Property is ideally located near active transportation, open spaces, high-quality schools and various services and amenities that would enhance the general quality of life for residents. Moreover, the Property is located adjacent to existing multi-family units, making the location appropriate for more intense residential development.

- B.** A higher density designation is consistent with the City's goal to provide a diverse and expanding housing supply.

The Comprehensive Plan Proposed Draft notes that about 122,000 new households are expected in Portland between 2010 and 2035. Oregon's Statewide Planning Goals and Metro's Housing Rule require the City of Portland to provide adequate land and plan for a range of housing types that can meet the diverse housing needs of various types of households. Consistent with that direction, the City's proposed housing policies aim to "maintain sufficient residential development capacity to accommodate Portland's projected share of regional household growth" (Policy 5.1) and "strive to capture at least 25 percent of the seven-county region's residential growth." A higher density designation of the Property is consistent with those goals and policies.

We appreciate the opportunity to provide comments on the Comprehensive Plan Proposed Draft Map, and thank you in advance for your thoughtful consideration of our comments.

Sincerely,





**First American
Title Company of Oregon**

Customer Service Department
121 SW Morrison Street Suite 300 - Portland, OR 97204
Phone: 503.219.TRIO (8746) Fax: 503.790.7872
Email: cs.portland@firstam.com
Today's Date : 10/8/2014

OWNERSHIP INFORMATION

Owner : Meeting Room Holdings Inc
CoOwner :
Site Address : 8738 SE 19th Ave Portland 97202
Mail Address : 5521 SE Woodstock Blvd Portland Or 97206
County : Multnomah (OR)

Bldg # 1 Of 1
Ref Parcel Number : 1S1E26AA 01800
Parcel Number : R267986
T: 01S R: 01E S: 26 Q: NE QQ: NE

PROPERTY DESCRIPTION

Map Page Grid : 626 J7
Census Tract : 2.00 Block: 4
Neighborhood : C740
School District :
Subdivision/Plat : Sellwood
Improv Type : Cu Miscellaneous
Property Use : Church
Land Use : 211 Com,Res,Improved
Legal : SELLWOOD, BLOCK 102, LOT 7 MAP 3932
:
:

ASSESSMENT AND TAX INFORMATION

Mkt Land : \$94,400
Mkt Structure : \$1,046,090
Mkt Total : \$1,140,490
%Improved : 92
M50AssdTotal :
Levy Code : 201
13-14 Taxes :
Millage Rate : 24.1334
Zoning : R2.5

PROPERTY CHARACTERISTICS

Bedrooms :	BldgSqFt :	5,356	Year Built :	1991
Bathrooms :	1stFlrSqFt :	5,356	Total Units :	
Family Room :	2ndFlrSqFt :		LotAcres :	.11
Kitchen :	AtticSqFt :		LotSqFt :	5,000
Dining Room :	BsmtFinSqFt :		Lot Dimen :	
Utility Room :	BsmtUnFinSqFt :		Curb/Gutter :	
Living Room :	BsmtTotalSqFt :		StAccess :	
Other Rooms :	TotalLvgSqFt :	5,356	Paving Matl :	
Floor Cov :	GarageSqFt :		ElecService :	
Fireplace :	GarageSpaces :		Nuisance :	
Cooling :	GarageType :		Sewer :	
Heat Method :	Patio SqFt :		View Qlty :	
Heat Source :	Patio :		Foundation :	
WallMaterial :	Deck SqFt :		Roof Mat :	
Water Source :	Deck :		Roof Shape :	
Bldg Style :	Stories :	1	Const Type :	Various Imps

TRANSFER INFORMATION

Owner Name(s)	Sale Date	Doc#	Sale Price	Deed Type	Loan Amount	Loan Type
:Meeting Room Holdings Inc	:12/01/1988	2183-1730	:\$90,000	:Deed	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:



**First American
Title Company of Oregon**

Customer Service Department
121 SW Morrison Street Suite 300 - Portland, OR 97204
Phone: 503.219.TRIO (8746) Fax: 503.790.7872
Email: cs.portland@firstam.com
Today's Date : 10/8/2014

OWNERSHIP INFORMATION

Owner	: Meeting Room Holdings Inc	Bldg #	Of
CoOwner	:	Ref Parcel Number	: 1S1E26AA 01700
Site Address	: 8738 SE 19th Ave #W1 Portland 97202	Parcel Number	: R267987
Mail Address	: 5521 SE Woodstock Blvd Portland Or 97206	T: 01S	R: 01E S: 26 Q: NE QQ: NE
County	: Multnomah (OR)		

PROPERTY DESCRIPTION

Map Page Grid : 626 J7
Census Tract : 2.00 Block: 4
Neighborhood : C740
School District :
Subdivision/Plat : Sellwood
Improv Type :
Property Use : Church
Land Use : 211 Com,Res,Improved
Legal : SELLWOOD, BLOCK 102, INC PT VAC ST
: LOT 8, INC PT VAC ST-E 32' OF LOT 9
: MAP 3932

ASSESSMENT AND TAX INFORMATION

Mkt Land : \$168,950
Mkt Structure :
Mkt Total : \$168,950
%Improved :
M50AssdTotal :
Levy Code : 201
13-14 Taxes :
Millage Rate : 24.1334
Zoning : R2.5

PROPERTY CHARACTERISTICS

Bedrooms	:	BldgSqFt	:	Year Built	:
Bathrooms	:	1stFlrSqFt	:	Total Units	:
Family Room	:	2ndFlrSqFt	:	LotAcres	: .24
Kitchen	:	AtticSqFt	:	LotSqFt	: 10,660
Dining Room	:	BsmtFinSqFt	:	Lot Dimen	:
Utility Room	:	BsmtUnFinSqFt	:	Curb/Gutter	:
Living Room	:	BsmtTotalSqFt	:	StAccess	:
Other Rooms	:	TotalLvgSqFt	:	Paving Matl	:
Floor Cov	:	GarageSqFt	:	ElecService	:
Fireplace	:	GarageSpaces	:	Nuisance	:
Cooling	:	GarageType	:	Sewer	:
Heat Method	:	Patio SqFt	:	View Qlty	:
Heat Source	:	Patio	:	Foundation	:
WallMaterial	:	Deck SqFt	:	Roof Mat	:
Water Source	:	Deck	:	Roof Shape	:
Bldg Style	:	Stories	:	Const Type	:

TRANSFER INFORMATION

Owner Name(s)	Sale Date	Doc#	Sale Price	Deed Type	Loan Amount	Loan Type
:Meeting Room Holdings Inc	:12/01/1988	2183-1730	:\$90,000	:Deed	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:



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Phone: 503.219.TRIO (8746) Fax: 503.790.7872
Email: cs.portland@firstam.com
Today's Date : 10/8/2014

OWNERSHIP INFORMATION

Owner	: Meeting Room Holdings Inc	Bldg #	Of
CoOwner	:	Ref Parcel Number	: 1S1E26AA 01600
Site Address	: 8738 SE 19th Ave #WI Portland 97202	Parcel Number	: R267988
Mail Address	: 5521 SE Woodstock Blvd Portland Or 97206	T: 01S	R: 01E S: 26 Q: NE QQ: NE
County	: Multnomah (OR)		

PROPERTY DESCRIPTION

Map Page Grid : 626 J7
Census Tract : 2.00 Block: 4
Neighborhood : C740
School District :
Subdivision/Plat : Sellwood
Improv Type :
Property Use : Church
Land Use : 211 Com,Res,Improved
Legal : SELLWOOD, BLOCK 102, INC PT VAC
: ST-W 18' OF LOT 9, INC PT VAC ST
: LOT 10, LOT 11 MAP 3932

ASSESSMENT AND TAX INFORMATION

Mkt Land : \$239,420
Mkt Structure :
Mkt Total : \$239,420
%Improved :
M50AssdTotal :
Levy Code : 201
13-14 Taxes :
Millage Rate : 24.1334
Zoning : R2.5

PROPERTY CHARACTERISTICS

Bedrooms	:	BldgSqFt	:	Year Built	:
Bathrooms	:	1stFlrSqFt	:	Total Units	:
Family Room	:	2ndFlrSqFt	:	LotAcres	: .35
Kitchen	:	AtticSqFt	:	LotSqFt	: 15,340
Dining Room	:	BsmntFinSqFt	:	Lot Dimen	:
Utility Room	:	BsmntUnFinSqFt	:	Curb/Gutter	:
Living Room	:	BsmntTotalSqFt	:	StAccess	:
Other Rooms	:	TotalLvgSqFt	:	Paving Matl	: Gravel
Floor Cov	:	GarageSqFt	:	ElecService	:
Fireplace	:	GarageSpaces	:	Nuisance	: Lt Traffic
Cooling	:	GarageType	:	Sewer	:
Heat Method	:	Patio SqFt	:	View Qlty	:
Heat Source	: Oil	Patio	:	Foundation	:
WallMaterial	:	Deck SqFt	:	Roof Mat	:
Water Source	: Yes	Deck	:	Roof Shape	:
Bldg Style	:	Stories	:	Const Type	:

TRANSFER INFORMATION

Owner Name(s)	Sale Date	Doc#	Sale Price	Deed Type	Loan Amount	Loan Type
:Meeting Room Holdings Inc	:12/01/1988	2183-1730	:\$90,000	:Deed	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:



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Email: cs.portland@firstam.com
Today's Date : 10/8/2014

OWNERSHIP INFORMATION

Owner	: Meeting Room Holdings Inc	Bldg #	Of
CoOwner	:	Ref Parcel Number	: 1S1E26AA 01500
Site Address	: 8738 SE 19th Ave #W1 Portland 97202	Parcel Number	: R268176
Mail Address	: 5521 SE Woodstock Blvd Portland Or 97206	T: 01S	R: 01E S: 26 Q: NE QQ: NE
County	: Multnomah (OR)		

PROPERTY DESCRIPTION

Map Page Grid : 626 J7
Census Tract : 2.00 Block: 4
Neighborhood : C740
School District :
Subdivision/Plat : Sellwood
Improv Type :
Property Use : Church
Land Use : 211 Com,Res,Improved
Legal : SELLWOOD, BLOCK X, INC PT VAC ST
LOT 1 MAP 3932
:

ASSESSMENT AND TAX INFORMATION

Mkt Land : \$104,220
Mkt Structure :
Mkt Total : \$104,220
%Improved :
M50AssdTotal :
Levy Code : 201
13-14 Taxes :
Millage Rate : 24.1334
Zoning : R2.5

PROPERTY CHARACTERISTICS

Bedrooms	:	BldgSqFt	:	Year Built	:
Bathrooms	:	1stFlrSqFt	:	Total Units	:
Family Room	:	2ndFlrSqFt	:	LotAcres	: .18
Kitchen	:	AtticSqFt	:	LotSqFt	: 8,000
Dining Room	:	BsmtFinSqFt	:	Lot Dimen	:
Utility Room	:	BsmtUnFinSqFt	:	Curb/Gutter	:
Living Room	:	BsmtTotalSqFt	:	StAccess	:
Other Rooms	:	TotalLvgSqFt	:	Paving Matl	:
Floor Cov	:	GarageSqFt	:	ElecService	:
Fireplace	:	GarageSpaces	:	Nuisance	:
Cooling	:	GarageType	:	Sewer	:
Heat Method	:	Patio SqFt	:	View Qlty	:
Heat Source	:	Patio	:	Foundation	:
WallMaterial	:	Deck SqFt	:	Roof Mat	:
Water Source	:	Deck	:	Roof Shape	:
Bldg Style	:	Stories	:	Const Type	:

TRANSFER INFORMATION

Owner Name(s)	Sale Date	Doc#	Sale Price	Deed Type	Loan Amount	Loan Type
:Meeting Room Holdings Inc	:11/01/1988	2163-2082	:\$37,000	:Deed	:	:
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:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:



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Email: cs.portland@firstam.com
Today's Date : 10/8/2014

OWNERSHIP INFORMATION

Owner	: Meeting Room Holdings Inc	Bldg #	Of
CoOwner	:	Ref Parcel Number	: 1S1E26AA 01400
Site Address	: 8738 SE 19th Ave #W1 Portland 97202	Parcel Number	: R268177
Mail Address	: 5521 SE Woodstock Blvd Portland Or 97206	T: 01S	R: 01E S: 26 Q: NE QQ: NE
County	: Multnomah (OR)		

PROPERTY DESCRIPTION

Map Page Grid : 626 J7
Census Tract : 2.00 Block: 4
Neighborhood : C740
School District :
Subdivision/Plat : Sellwood
Improv Type :
Property Use : Church
Land Use : 211 Com,Res,Improved
Legal : SELLWOOD, BLOCK X, INC PT VAC ST
: LOT 8 MAP 3932
:

ASSESSMENT AND TAX INFORMATION

Mkt Land : \$104,220
Mkt Structure :
Mkt Total : \$104,220
%Improved :
M50AssdTotal :
Levy Code : 201
13-14 Taxes :
Millage Rate : 24.1334
Zoning : R2.5

PROPERTY CHARACTERISTICS

Bedrooms	:	BldgSqFt	:	Year Built	:
Bathrooms	:	1stFlrSqFt	:	Total Units	:
Family Room	:	2ndFlrSqFt	:	LotAcres	: .18
Kitchen	:	AllcSqFt	:	LotSqFt	: 8,000
Dining Room	:	BsmtFinSqFt	:	Lot Dimen	:
Utility Room	:	BsmtUnFinSqFt	:	Curb/Gutter	:
Living Room	:	BsmtTotalSqFt	:	StAccess	:
Other Rooms	:	TotalLvgSqFt	:	Paving Matl	:
Floor Cov	:	GarageSqFt	:	ElecService	:
Fireplace	:	GarageSpaces	:	Nuisance	:
Cooling	:	GarageType	:	Sewer	:
Heat Method	:	Patio SqFt	:	View Qlty	:
Heat Source	:	Patio	:	Foundation	:
WallMaterial	:	Deck SqFt	:	Roof Mat	:
Water Source	:	Deck	:	Roof Shape	:
Bldg Style	:	Stories	:	Const Type	:

TRANSFER INFORMATION

Owner Name(s)	Sale Date	Doc#	Sale Price	Deed Type	Loan Amount	Loan Type
:Meeting Room Holdings Inc	:11/01/1988	2163-2082	:\$37,000	:Deed	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:
:	:	:	:	:	:	:

OK

WARRANTY DEED—STATUTORY FORM
INDIVIDUAL GRANTEE

BOOK 2163 PAGE 2082

Gary L. Dressler and Alice L. Steele, not as tenants in common, but with the right of survivorship, Granlor, conveys and warrants to Meeting Room Holdings, Inc.,

Grantee, the following described real property free of encumbrances except as specifically set forth herein situated in Multnomah County, Oregon, to-wit:

Lots 1 and 8, Block X, TOWN OF SELLWOOD, in the City of Portland, County of Multnomah and State of Oregon

The said property is free from encumbrances except ordinance including the terms and provisions thereof recorded September 30, 1988 in Book 2143, Page 829

The true consideration for this conveyance is \$37,000.00 (Here comply with the requirements of ORS 93.030)

Dated this 4th day of November, 1988

THIS INSTRUMENT WILL NOT ALLOW USE OF THE PROPERTY DESCRIBED IN THIS INSTRUMENT IN VIOLATION OF APPLICABLE LAND USE LAWS AND REGULATIONS. BEFORE SIGNING OR ACCEPTING THIS INSTRUMENT, THE PERSON ACQUIRING FEE TITLE TO THE PROPERTY SHOULD CHECK WITH THE APPROPRIATE CITY OR COUNTY PLANNING DEPARTMENT TO VERIFY APPROVED USES.

Gary L. Dressler

Alice L. Steele

STATE OF OREGON, County of Multnomah) ss.

This instrument was acknowledged before me on November 4th, 1988 by Gary L. Dressler and Alice L. Steele

(SEAL)

Notary Public for Oregon
My commission expires 7/6/92

180008
180008
180008

WARRANTY DEED	
Gary L. Dressler	GRANTOR
Alice L. Steele	GRANTOR
Meeting Room Holdings, Inc.	GRANTEE
GRANTEE'S ADDRESS, ZIP	
After recording return to:	
Meeting Room Holdings, Inc.	
6505 S. E. 16th	
Portland, Oregon	
NAME, ADDRESS, ZIP	
Until a change is requested, all tax statements shall be sent to the following address:	
same as above	
NAME, ADDRESS, ZIP	

098589

STATE OF OREGON,) ss.

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RECORDING SECTION
MULTNOMAH CO. OREGON

BOOK 2163 PAGE 2082

1, a Deputy for the Recorder of Conveyances, in and for Multnomah County, Oregon, do hereby certify that the instrument of record herein was recorded for record and recorded in the record of said County.

Witness my hand and seal of office at this place, Recorder of Conveyances

M. B. Burt
Deputy

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DEC. 16, 1988

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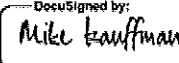
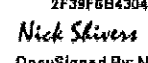
**KELLER WILLIAMS REALTY
REFERRAL INFORMATION FORM**

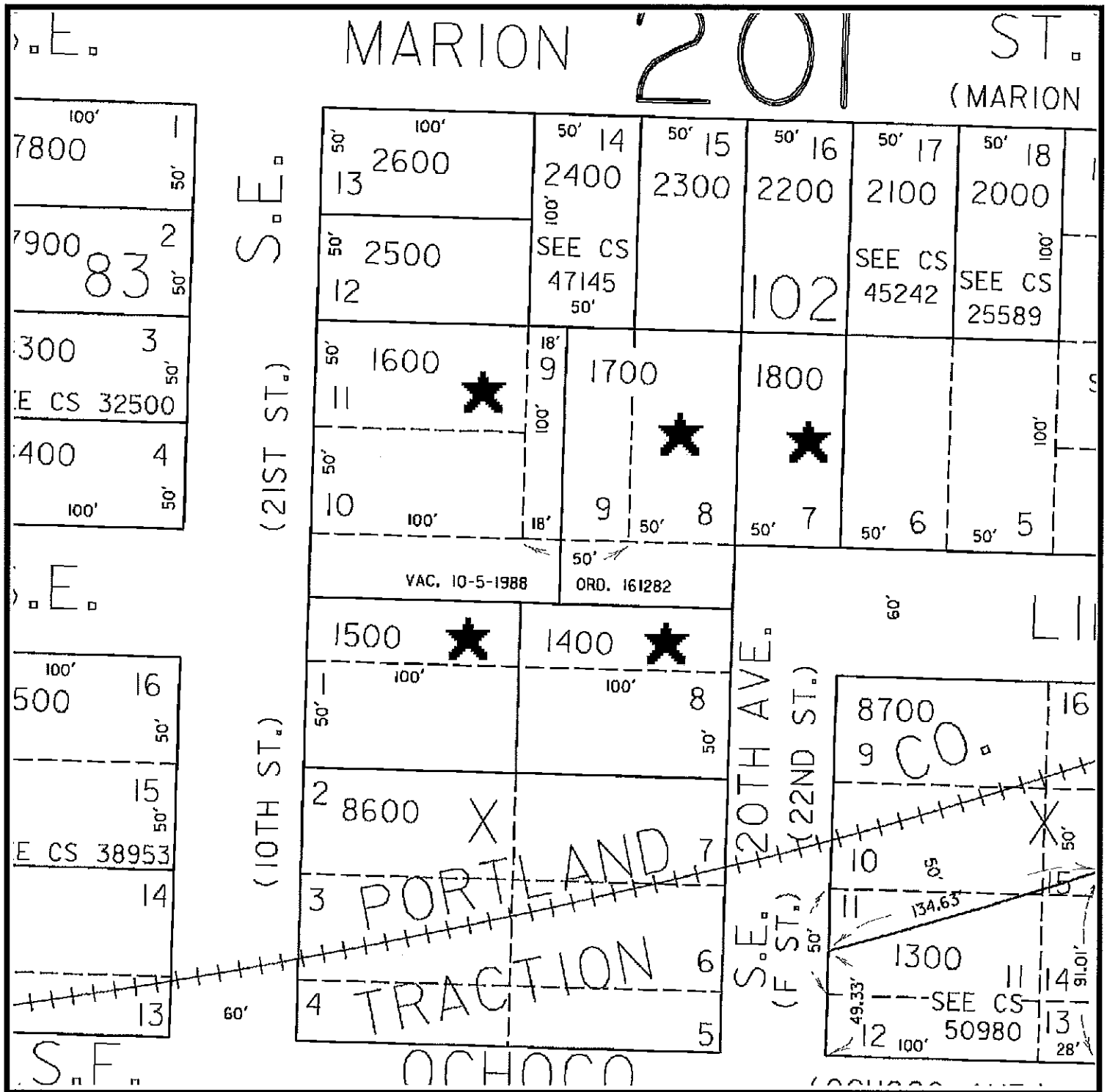
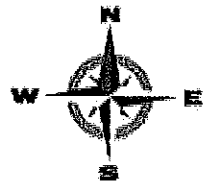
SECTION 1 - RECEIVING OFFICE		SENDING OFFICE	
TO: Agent:	Mike Kauffman	Make Checks Payable to: Keller Williams Portland Central	
Firm Name:	Keller Williams Realty	Put in memo line: WestOne Pro	
Address:		Address:	919 NE 19th Ave, Ste. 100
City/State/Zip:		City/State/Zip:	Portland, OR 97232
Business Phone:	503-496-5151	Business Phone:	503.594.0805
Email:	mkauffman@kwcommercial.com	Email:	sold@westonepro.com
Firm Tax ID#:		Firm Tax ID#:	

SECTION 2 - SELLER INFORMATION			
Seller Name:	Terry Brandsen	When to make initial contact:	ASAP
Address:		Property address to be listed:	8738 SE 19th Street
City/State/Zip:			Portland, OR 97232
Business Phone:		Additional Helpful Information:	
Home Phone:	503 775 0034		
Email:	terry@bhf-nw.com		

SECTION 3 - BUYER INFORMATION			
Buyer's Name:		New Employer:	
Address:		Address:	
City/State/Zip:		City/State/Zip:	
Business Phone:		Position & Approx Salary:	
Home Phone:		Must home be sold first?	
Email:		Company buyout?	
Preferred Location:		Cash Available for Purchase:	
Size & Type of Home Desired:		Contact Buyer at this # first:	
Price Range: \$		By this date:	
Number in Family:		Expected Arrival Date:	
Adults:		Moving:	
Children:		Comments:	

SECTION 4 - REALTOR'S ACCEPTANCE OF REFERRAL			
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Date Contacted:			
Date of First Appt:			
WE ACCEPT THIS REFERRAL AND WHEN THE SALE IS CONSUMMATED, WE AGREE TO SEND 40% (OF THE GROSS COMMISSION) REFERRAL FEE. WE WILL ENCLOSE DETAILS OF THE SALE WITH THE CHECK.			

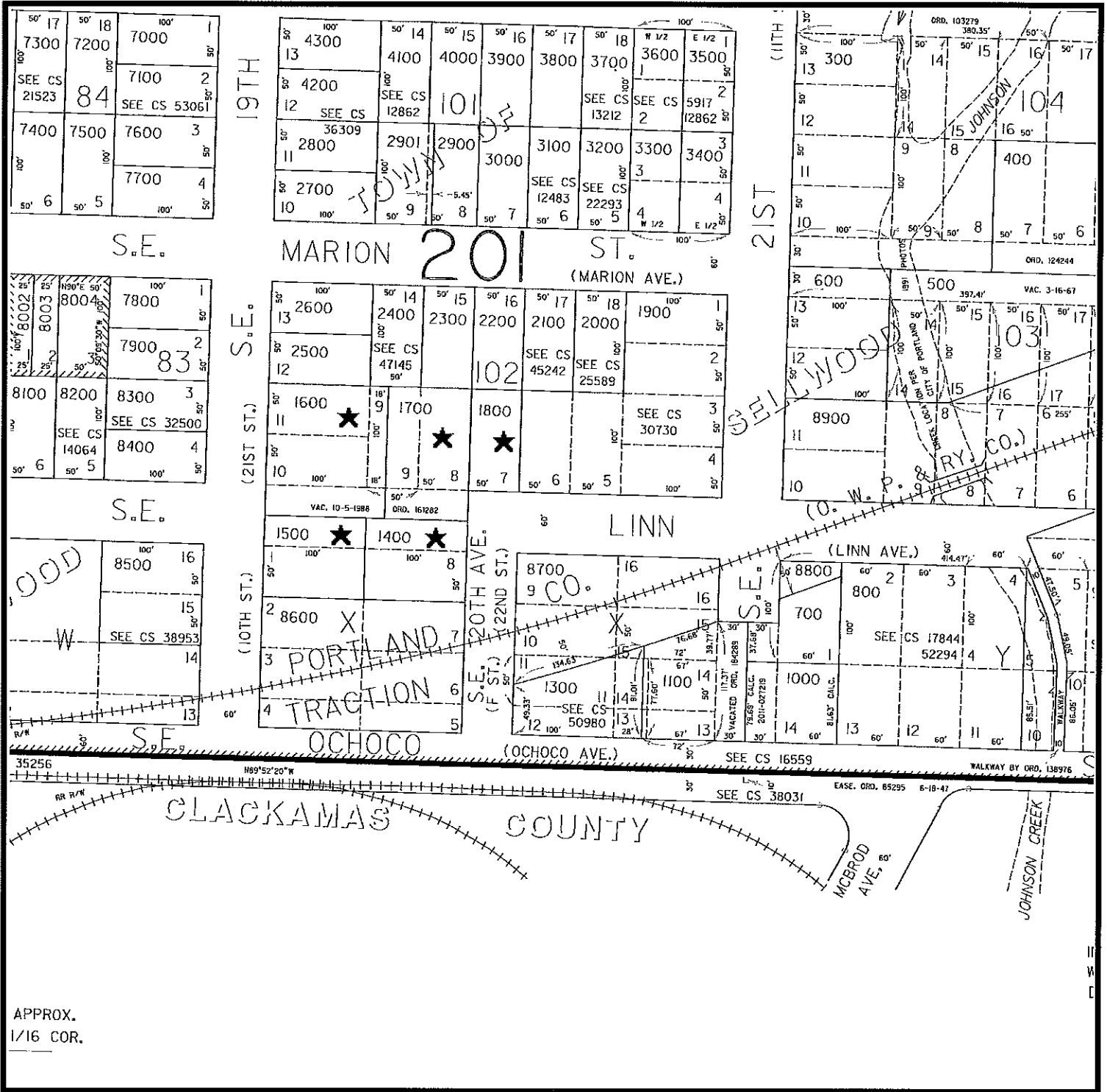
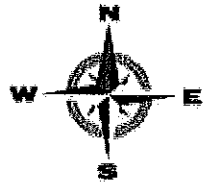
Receiving Sales Associate Signature:	Date:	Receiving Broker's Signature:	Date:
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For BPS Comp Plan Hearing Nov 4, 2014.

I'm sorry I couldn't be in attendance at the Hearing today. However, I would like to provide testimony.

11 years ago my life changed significantly. I bought my first house. It was a dream come true for I am someone for whom a house means: not worrying about rent increases, having more privacy, having a "canvass" with which to be creative – both indoors and out, having a workshop to make and fix things, having a garden.....and on and on. It even meant getting in much better physical shape / becoming much healthier because that was necessary to have the energy, stamina and flexibility to do all the things I wanted to around my home. I am a senior, by the way.

There is only one reason why I was finally able to buy a house. H.O.S.T. Community Development Corp. – a non-profit affordable housing developer [no longer in existence, unfortunately] built an "affordable housing development" in St Johns.

The community fought like crazy to keep this from happening, using every possible avenue – city, courts, LUBA, etc. Some folks thought "undesirables" would come in. Funny thing is, I have paid back in community work many times over the investment of public monies that helped me to have the house. I am an advocate for the community of St Johns and have helped accomplish some striking changes – for example, routing freight trucks back onto the freight route, rather than taking a short cut through the middle of St Johns.

The point of all this is, of course, that programs that help people get into good, affordable housing, help the whole community. The housing might be single family, or attached single family or multi-family. Bottom line is that affordable, stable housing is a necessity for all – and fewer and fewer have access.

I would like to see more affordable housing in St Johns – new or remodeled multi-family buildings on Fessenden / St Louis, especially. This corridor, if you are not familiar with it, was the one that used to have the freight trucks. Not only are they gone but PBOT won a grant to provide a total transformation to the corridor, which will make it safer and pleasanter to cross and walk along and will, in the next 10 years cause the street to come alive. But, we don't want that to happen at the expense of those who already live there. We must find a way to increase multi-family affordable housing without displacing people. One way to do this is to use currently empty lots to build on for residents living in run-down apartments on the corridor. Let the people living in the run down buildings move in and then rebuild/remodel the previously occupied buildings for new tenants.

Lastly, I want to comment on the push in some areas of the city for their neighborhoods to not be allowed to become denser; in some cases, neighborhoods asking for zoning changes for less density! This is outrageous. All parts of the city must participate in increasing density due to the UGB. For any community to think they should be exempted from this is wrong. And, if the city caves in to the demands of, often already advantaged, neighborhoods, I can tell you I will be right there fighting it.

Thanks.

Donna Cohen
8443 N Bliss St
PDX 97203

November 4, 2014

Portland Planning and Sustainability Commission

Comprehensive Plan Update

1900 S.W. Fourth Ave., Suite 7100

Portland, OR 97201

Planning and Sustainability Commission Public Hearings

Public comment- 2035 Comprehensive Plan

Dear Portland Planning and Sustainability Commission,

The quality of life in Portland begins with safe drinking water. Portland's open reservoirs have provided healthy drinking water without chemical or microbiological illness for over 100 years. In 2004 the citizen representatives of Portland voted by majority to retain our open reservoirs at Mount tabor and Washington Park.

Our elected officials still have the opportunity to retain these valuable reservoirs providing public health benefits that covered reservoirs and a closed system cannot. Covered reservoirs cannot provide the efficient public health scientific principles open reservoir ecosystems demonstrate daily.

- Sunlight to break down unwanted chemicals and providing disinfection

- Oxygenation – allowing aerobic bacteria to breakdown unwanted chemicals
- Open air exposure to allow vaporization of unwanted chemicals such as radon, chloroform, etc.

The EPA is reviewing the EPA LT2 drinking water regulation through 2015 so there is time to place on hold the destruction and disconnecting of our open reservoirs. New York City and other utilities in New York along with New Jersey are in discussion now with EPA. Portland can do that also to stop the unnecessary removal of the open reservoirs.

Please make these vital public health treasures a part of our 2035 Comprehensive Plan. For us now, and future generations to the have safe and healthy drinking water covered reservoirs cannot provide.

Sincerely,

Scott Fernandez M.Sc. Biology/ drinking water microbiology-chemistry

Portland Utility Review Board 2001-2008

Portland Water Quality Advisory Committee 1995- 2000

**SCIENTIFIC and PUBLIC HEALTH BASIS to
RETAIN OPEN RESERVOIR WATER SYSTEM
for the CITY OF PORTLAND, OREGON**

**Request for Waiver from the U.S. EPA Long Term 2
Enhanced Surface Water Treatment Rule (LT2)
Regarding Covered Reservoirs**

“Science will determine the ultimate outcome.”

–EPA Administrator Lisa Jackson, August 2011
letter to U.S. Sen. Charles E. Schumer (D-NY) acknowledging
his request for an “LT2 Rule” reservoir waiver

***“We’re just trying to get at the public health impacts
and if there’s a better way to do that
we’ll be wide open to it.”***

–EPA Administrator Gina McCarthy, April 2014
Congressional testimony response to U.S. Rep. Eliot Engel’s (D-NY)
question about the status of New York City’s reservoir waiver request

**By Scott Fernandez
M.Sc. Biology / microbiology & water chemistry**

May 2014

www.bullrunwaiver.org | bullrunwaiver.org@gmail.com

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Page 1 of 75

Ord. 187832 Vol. 2.3.G, page 16487

Preface

Scientific accuracy is of utmost concern when determining the best system for treatment and storage of Portland's water supply. However in recent years public officials and some of the media have framed decisions affecting the city's water policy around opinion and expediency instead of sound science and engineering.

Far from being merely an “aesthetic” issue affecting Mt. Tabor and Washington parks, open reservoirs are of critical importance to drinking water quality and public health for every Portland resident. This paper addresses the urgent need to clear up confusion surrounding the vital public health component of open reservoirs for maintaining Portland's record of exceptional municipal water quality and will show that:

- City Council's push to cover Portland's open reservoirs – before the Environmental Protection Agency (EPA) completes its “LT2 Rule” review and waiver process in 2016 – will create more public health problems for residents than it solves.
- Unlike in other cities, Portland's water supply from the federally protected Bull Run watershed is not at-risk from sewage based microorganisms such as “Cryptosporidium” – which the EPA's blanket “LT2 Rule” is meant to address.
- Covering Portland's reservoirs will carry risk from enabling toxic and carcinogenic contaminants such as radon, chloroform and other disinfection chemical byproducts to accrue in the water supply in addition to nitrification, lack of oxygenation, and absence of sunlight.
- There are demonstrable public health benefits of open reservoirs due to efficient atmospheric volatilization, chemical biodegradation, and broad-spectrum sunlight saturation that reduce and eliminate contaminants. Portland's open reservoirs can already meet EPA microbial standard and are the most important water quality “barrier” in the Bull Run system. They block contaminants from reaching the downstream distribution system using the scientific principles of chemistry, physics, and microbiology.
- Public officials must preserve Portland's open reservoirs as an essential component of the water system to maintain municipal water quality and protect public health. The basis and merits for communicating effectively with EPA on this matter simply requires coordinated and committed support from Portland City Council, the Oregon Health Authority, Gov. Kitzhaber, and Oregon's Congressional delegation.

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I. EXECUTIVE SUMMARY

The letter and spirit of the EPA drinking water regulation is to provide equal or greater public health benefits. *A decade of experience under the 1986 EPA Safe Drinking Water Act (SDWA) revealed several areas where responsible, science-based flexibilities and a better prioritization of effort could improve protection of public health compared to the one-size-fits-all approach of the 1986 statute. (EPA 1996)* It will be shown that the chemistry, physics, and microbiology principles of open reservoirs of Mt. Tabor Park and Washington Park will continue to provide safe healthy drinking water for generations to come. The reliable and scientifically-sound approach to unwanted environmental chemicals will be achieved through open reservoirs. Covered reservoirs degrade drinking water quality and increase public health risk through toxic and carcinogenic chemicals progression.

In the past 30 years the Safe Drinking Water Act has been highly effective in protecting public health and has also evolved to respond to new and emerging threats to safe drinking water. Disinfection of drinking water is one of the major public health advances of the 20th Century. One hundred years ago typhoid and cholera epidemics were common throughout American cities; disinfection from chlorine was a major factor in reducing these epidemics.

EPA's "Long Term 2 Enhanced Surface Water Treatment Rule" (LT2) addresses microorganisms which is the primary reason Portland deserves a waiver from the regulation. Because the Bull Run watershed does not have exposure to industrial, agricultural, or municipal sewage, Cryptosporidium, viruses, and other microorganisms become a non-issue in regard to public health risk for water users. In addition, sunlight is a powerful source of natural broad spectrum ultraviolet light (UV) that reduces infectivity of microorganisms. Portland's open reservoirs already meet EPA microbiological standards.

There have been no positives for Cryptosporidium, Giardia, and viral microorganisms in sampling of Portland open reservoir drinking water throughout the 1990's and beyond; in addition to a recent year-long study (AWWA RF 3021) in which the sampling methodologies used were more rigorous in assessment. Furthermore EPA assertions for the basis of LT2 nationwide proved to be incorrect. Cryptosporidium has not had the negative public health impact EPA projected. Scientists have not seen the deaths, widespread outbreaks, or endemic disease identified from Cryptosporidium drinking water public health data around the U.S.

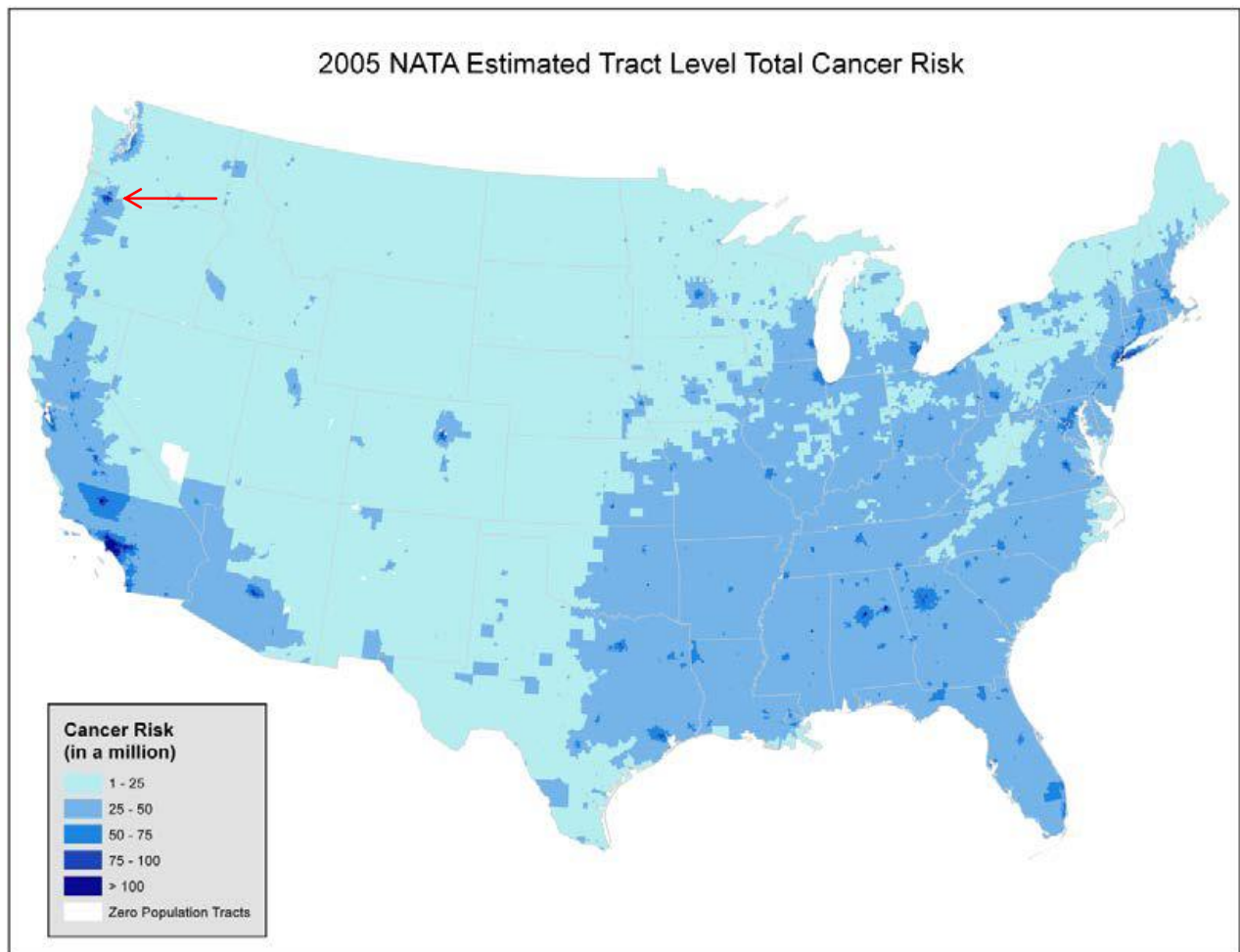
Second, open reservoirs allow for efficient ventilation of toxic gases such as radon.

Third, over the years scientists have learned that chlorine and chloramine can generate many unwanted disinfection byproducts. Open reservoirs address the issue of effectively managing chemical disinfection byproducts using a natural ecosystem, thus providing safer water quality in complete contrast to that of covered reservoirs. Open reservoirs provide safe drinking water by acting as a barrier to toxic and carcinogenic chemicals along with disinfection byproducts by vaporizing, microbial biodegradation, or sunlight break down of molecules.

While critical to maintaining Portland's healthy drinking water system, these scientifically supported public health benefits of open reservoirs have not been recognized by Portland City

Council and the Portland Water Bureau. These open reservoir public health benefits must be recognized as the basis for responsible management of Portland’s existing high-quality water treatment and delivery system.

An additional note is that Portland has significant air quality problems. Thirty-five (35) Portland schools were ranked in the bottom 5% in the nation’s high toxic hot spots from airborne metals and gases. Covering the reservoirs will not allow the chemical disinfection byproducts and other toxic and carcinogenic gases to vaporize efficiently before entering the water distribution system. These toxic and carcinogenic chemicals will end up being released from drinking water into homes, schools, and workplaces, thus adding to the already present and problematic environmental air public health burden.



Portland ranks in the highest percentile of U.S. cities for toxic air quality cancer risk. Residents, especially children with their lower body weight, are at highest risk from the additional toxic burden of degraded water quality. (See Refs. 1-5)

II. GLOSSARY

AWWA RF – American Water Works Association Research Foundation

CSSW – Columbia South Shore Wellfield located on the Columbia River between the Portland airport and Blue Lake areas. It is the source of our drinking water containing radioactive radon 222.

DBP – Disinfection By-product

pCi – pico Curie- measurement of radioactive material

EPA – United States Environmental Protection Agency

IARC – International Agency for Research on Cancer

LT2 – EPA Long Term 2 Enhanced Surface Water Treatment Rule

NAS – National Academy of Sciences

NDMA – Nitrosodimethylamine, a drinking water disinfectant byproduct that is broken down by sunlight in open reservoirs

NOM – Natural Organic Material, reaction with chlorine and chloramines

OHA – Oregon Health Authority

PAEC – Potential Alpha Energy Concentration

Precautionary Principle – Adopted by Portland City Council in 2006. “When an activity raises threats of harm to the environment or human health, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically.” See “Toxics Reduction Strategy: A plan for minimizing use of toxic substances of concern in government operations by using the Precautionary Principle” (<http://www.sehn.org/pdf/portland.pdf>)

PWB – Portland Water Bureau

Radioactive Chemicals from Columbia South Shore Wellfield –

Bi- bismuth 214, 210 β , Γ

Pb- lead 214, 210, 206 β , Γ

Po- polonium 218, 214, 210 α

Rn- radon 222 α , Γ

(Symbol Key: α -alpha / β -beta / Γ -gamma – forms of radioactive particles)

S2DBP – Stage 2 Disinfection and Disinfectant Byproduct Rule

SDWA – EPA Safe Drinking Water Act

USGS – United States Geological Survey

WHO – World Health Organization

III. INTRODUCTION

Citizens of Portland have been asking City Council to formally request a waiver from the EPA “Long Term 2 Enhanced Surface Water Treatment Rule” regulation for over a decade. We are not alone in requesting this waiver. The City of New York, the New York State Department of Health, and the entire New York Congressional delegation are all requesting a similar waiver for their Hillview open reservoir.(Ref. 6) Portland City Council needs to join the citizens of Portland in pursuit of a scientifically supported EPA open reservoir waiver of the “LT2 Rule.”

This paper will review, identify, and demonstrate the superior public health benefits of the open reservoirs at Mt. Tabor Park and Washington Park that covered reservoirs cannot provide. These public health benefits were known over 100 years ago (see sidebar at right). Misinformation presented by the Portland Water Bureau will also be scientifically corrected.

Portland has had safe and healthy drinking water for over 100 years because federally protected Bull Run and the open reservoirs have been the foundation of the multiple-barrier approach to public health. This multiple-barrier approach allows Portland to already meet and exceed EPA regulated contaminant standards. Microbial contaminants have traditionally received more attention from a public health standpoint. Bull Run has no sewage exposures so microorganisms are principally a non-issue. However in recent years there has been a growing concern regarding chemical contaminants present in drinking water that affect public health.

As a community we have challenged the applicability of EPA’s LT2 Rule and Cryptosporidium in Portland’s drinking water system as a public health problem that does not exist because we don’t have agricultural, industrial, or municipal sewage exposures in our Bull Run source water. Cryptosporidium has never been found in our open drinking water reservoirs. Equally important for continued public health, we need to include a discussion of the EPA Stage 2 Disinfection and Disinfectant Byproducts Rule (S2DBP) relating to disinfection byproducts and other unwanted chemicals that our open reservoirs remove from our drinking water. Utilizing the applied natural laws of microbiology, chemistry, and physics we show that our open reservoirs in Mt. Tabor Park and Washington Park provide safe and healthy drinking water superior to water in covered reservoirs. Direct sunlight, oxygenation, an aerobic microbial ecosystem, and the large surface areas of open-air reservoirs allow break down and venting of harmful gaseous chemicals reflecting the functioning of a healthy water system.

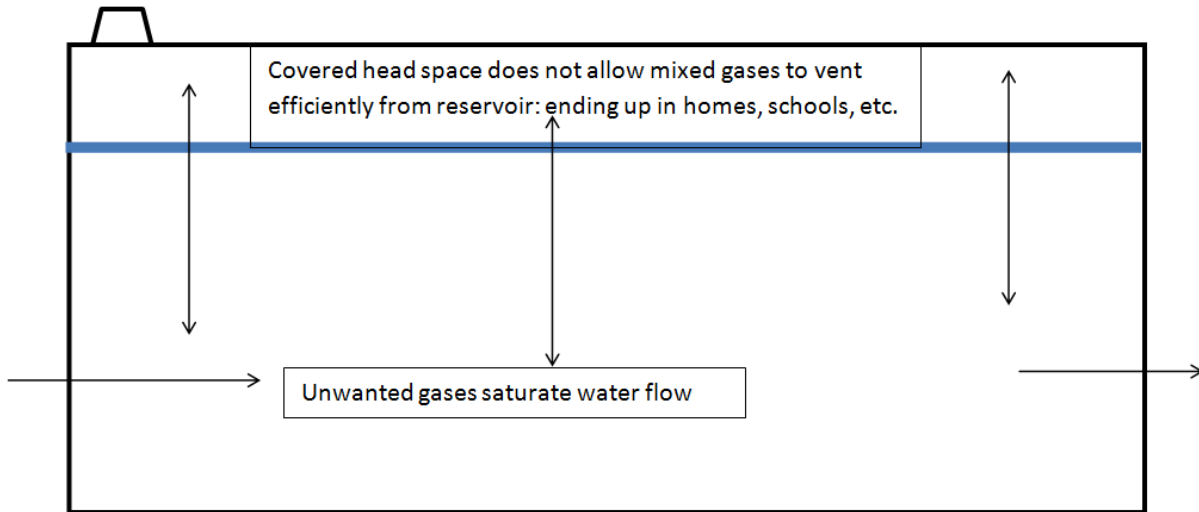
The fundamental principles of sunlight disinfection are well-established. Esteemed epidemiologist Milton J. Rosenau wrote in 1902:

“Sunlight (direct) is an active germicide. It destroys spores as well as bacteria. The importance of the sun’s rays in destroying or preventing the development or growth of microorganisms in nature cannot be overestimated. Even diffused light retards the growth and development of microorganisms, and if strong enough may finally kill them. In water or clear solutions it penetrates some distance. The importance of oxygen in the influence of light upon bacteria is emphasized. Bacteria in light, in the presence of oxygen and water, cause a production of hydrogen peroxide which is well known to have strong disinfection powers.”

--Milton J. Rosenau, M.D., was commissioned as an assistant surgeon in the United States Marine Hospital Service (now the United States Public Health Service) in 1890. In 1899, he was appointed Director of the Hygienic Laboratory of that service. He was instrumental in 1922 in the establishment of the Harvard University School of Public Health and, in 1940, became first dean of the School of Public Health at the University of North Carolina.

A. Adverse effects and public health problems of covered reservoirs

Covered reservoirs cannot effectively remove toxic and carcinogenic gases and other chemicals. Gases such as radon and chloroform remain saturated in the drinking water and they cannot efficiently escape. Because covering the reservoirs creates a drinking water system closed to sunlight and poorly exposed to the atmosphere, these toxic and carcinogenic gases then end up venting in our schools, homes, and businesses. Without sunlight carcinogenic chemicals such as NDMA (Nitrosodimethylamine) are not broken down and bacterial metabolic processes promoting toxic nitrification byproducts continue on unimpeded.



Two (2) small air vents opening combine to ~75 sq. ft. on a ~217,000 sq. ft. ~5-acre reservoir roof such as PWB 9-6-2013 Powell Butte 2. Small vent allows water to move through covered reservoir – otherwise a vacuum would be created and water flow would be restricted. Small air vents are inefficient in removing toxic and carcinogenic gases. The history of U.S. covered reservoirs also documents bird entry through small air vents to roost and contaminate water resulting in human death.

B. Public health benefits of open reservoirs

The Portland open reservoirs provide safe and healthy drinking water by naturally engaging in removal of toxic and carcinogenic disinfection byproducts and other chemicals. It is important to remove these environmental chemical exposures because they are the sources of great health risks, such as lung and other cancers from radon gas and radon progeny of which “there is no safe level of radon exposure.” (US EPA) (Refs. 7-14)

Affected organ systems from chloroform include: Cardiovascular (heart and blood vessels); Hepatic (liver); Neurological (nervous system); Renal (urinary system or kidneys); Reproductive (producing children); Developmental (effects during periods when organs are developing). (Refs. 15-16)

Nitrosodimethylamine (NDMA), a drinking water disinfectant byproduct that is broken down by sunlight in open reservoirs, has been classified by the International Agency for Research on Cancer (IARC) as a probable carcinogen for humans (liver cancer). The mechanism by which NDMA produces cancer is well understood to involve biotransformation by liver microsomal enzymes generating the methyl diazonium ion. This reactive metabolite forms DNA adducts, with most evidence pointing to O6-methylguanine as the likely proximal carcinogenic agent. (Ref. 17)

Visionary leaders fought for our Bull Run water source over 100 years ago. **Bull Run source water is federally protected from human entry that is not exposed to industrial, agricultural, or municipal activities.** Portland is fortunate to have very few chemicals in our drinking water. Open reservoirs are efficient in removing the chemicals we don't want to drink or have in our environment. We want chemicals removed because EPA long-term drinking water standards are based only on adults, not considering the extended exposures that increase health risks for younger ages. EPA long-term chemical exposure risk levels are based on 70 kg / +154 lb. adults, not children. (Ref. 18)

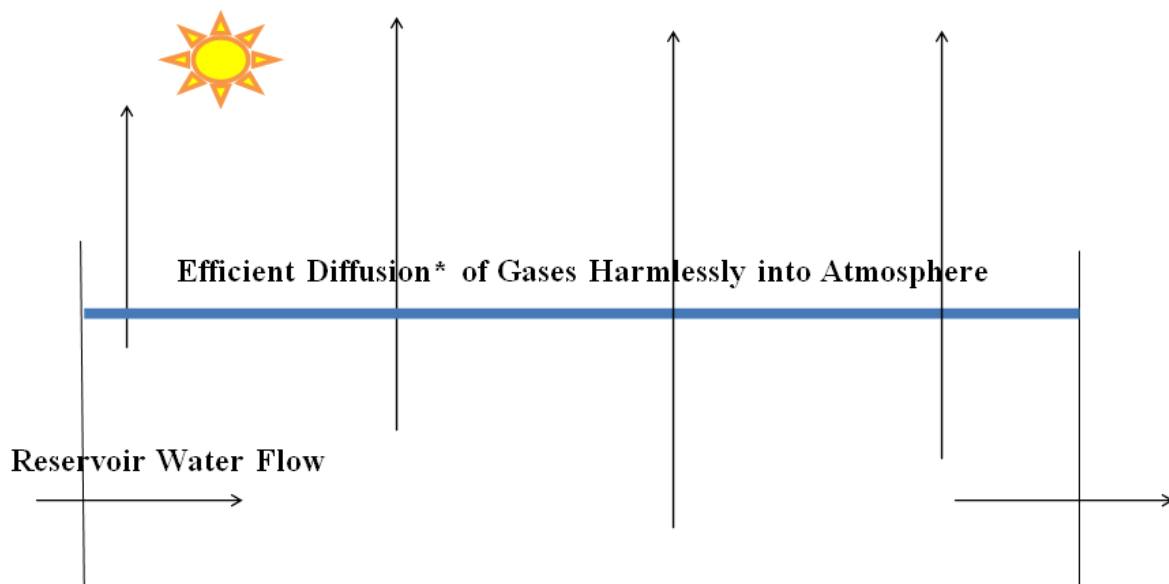
Portland's open reservoirs operate as unique barriers and provide superior efficiencies impeding the movement of toxic and carcinogenic gases and chemicals into the distribution system by utilizing the following scientific principles:

- Atmospheric volatilization of toxic, carcinogenic gases – Radon
- Atmospheric volatilization, Trihalomethanes, (THM) – Chloroform
- Aerobic microbial biodegradation – Haloacetic acids, (HAA5), Stage 2 DBP
- Natural oxygenation – Increases presence of helpful aerobic microorganisms
- Aerobic bacteria – 18x increased oxidative activity v. anaerobic bacteria
- Direct sunlight – Degrades carcinogenic N-nitrosodimethylamine (NDMA)
- Direct sunlight – Inhibits nitrification bacteria and the buildup of nitrites, nitrates and nitrosamines from ammonia disinfection
- Direct sunlight – Oxygen/photons, natural disinfection from oxides

Removing Portland's open reservoirs raises the threat to public health from increased exposure to toxic and carcinogenic chemicals. (Ref. 19)

Portland water users benefit from the environmentally sustainable and effective open air reservoir processes that remove or impede movement of toxic and carcinogenic gases and chemicals from our drinking water system. The “Precautionary Principle” (see Glossary) – the public health policy adopted by Portland City Council in 2006 – applies directly to decisions affecting Portland’s water reservoirs. Open reservoirs provide an efficient method of eliminating unwanted drinking water gases such as radon-222 and chloroform through the process of *atmospheric volatilization*. Open reservoirs provide a natural, cost effective, and healthy solution to a recognized public health problem.

Reasons Open Reservoirs Function So Well: Open reservoirs act as a natural barrier to toxic and carcinogenic chemicals, harmlessly releasing them before they enter the drinking water distribution system.



Highly efficient open reservoir chemical movement from water (high gas concentration) to air (low gas concentration) provides the desired natural and harmless removal of chloroform and radon gases from open reservoirs. Open reservoirs keep toxic gases out of water used in homes, schools, and workplaces.



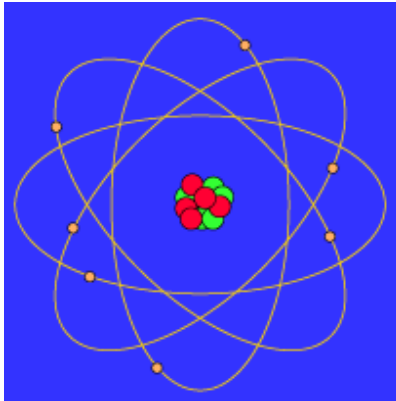
Mt. Tabor Reservoir 6. Open reservoir water oxygenation from fountain and waterfall aeration also removes toxic and carcinogenic gases such as radon and chloroform. Gases escape efficiently through diffusion – the movement of particles from high concentration to lower concentration. Diffusion is enhanced by wind and natural convection in water wave action.



Mt. Tabor Reservoir 5. Open reservoir drinking water inlet: waterfall agitating action aerates water providing oxygen, promotes water movement, while removing unwanted gases. Open reservoir sunlight also provides a public health barrier, using a natural, sustainable, gravity fed carbon-free process delivering safe and healthy water.

IV. FINDINGS: PROBLEMS VS. BENEFITS

A. Radon – Concentration vs. Dissipation



Covered reservoirs are inefficient in allowing escape of radioactive radon and other toxic gases. Open reservoir atmospheric volatilization provides efficient escape of toxic and carcinogenic gases.

Portland's open reservoirs can efficiently vaporize /diffuse radioactive radon-222 gas to the atmosphere using natural aeration. Due to a high Henry's Law constant, radon can leave water on contact with air when agitated. Radioactive radon gas is a serious and widely underestimated health risk that is naturally occurring in soil and groundwater. Portland's drinking water radon gas originates from the Columbia South Shore Well field. Because it is not chemically reactive with most materials it will move freely as a gas and can move substantial distances from its point of origin. Ingestion of radon through drinking water can also contribute to internal organ illness such as stomach cancer once it is absorbed into the blood stream.

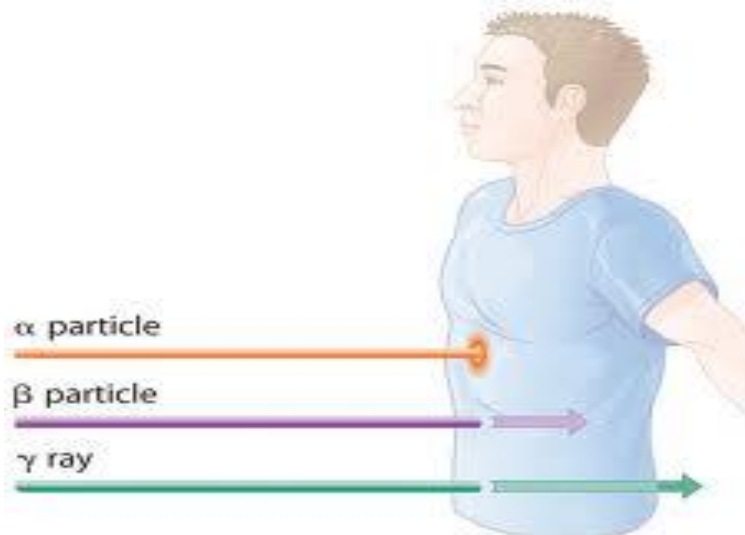
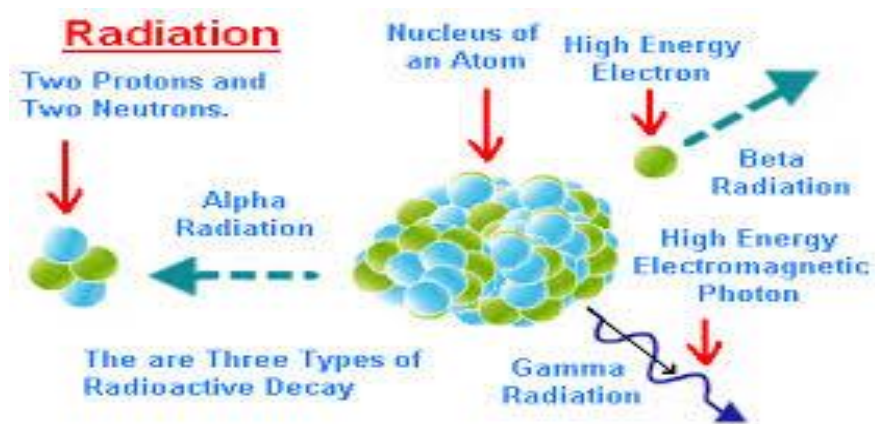
EPA acknowledges there is *no safe level of radon exposure*, regardless of the source, air or water. The cancer risk of radon in water is higher than cancer risk from any other drinking water contaminant. Radon from drinking water can end up in the air of buildings in several different ways: **substantial radioactive water aerosols** can be created from showering, clothes washing, dishwashing, flushing toilets, and bathing.

Radon is the second leading cause of lung cancer and contributes to +20,000 deaths each year. Radioactive alpha emitting radon gas also decays into radioactive atoms such as daughter progeny *polonium*, *lead*, and *bismuth*. These atoms can get trapped in the lungs when you breathe also emitting alpha, beta, and gamma particles continuing to release bursts of energy-damaging cells. This energy can genetically damage lung, blood, and other tissues' DNA. Over time these atomic exposures can lead to lung and other types of cancer. Because *children have a much higher respiration rate than adults more radon can be inhaled*. EPA danger levels **underestimate** increased risk of radioactive particle inhalation and public health impact expectation in children.

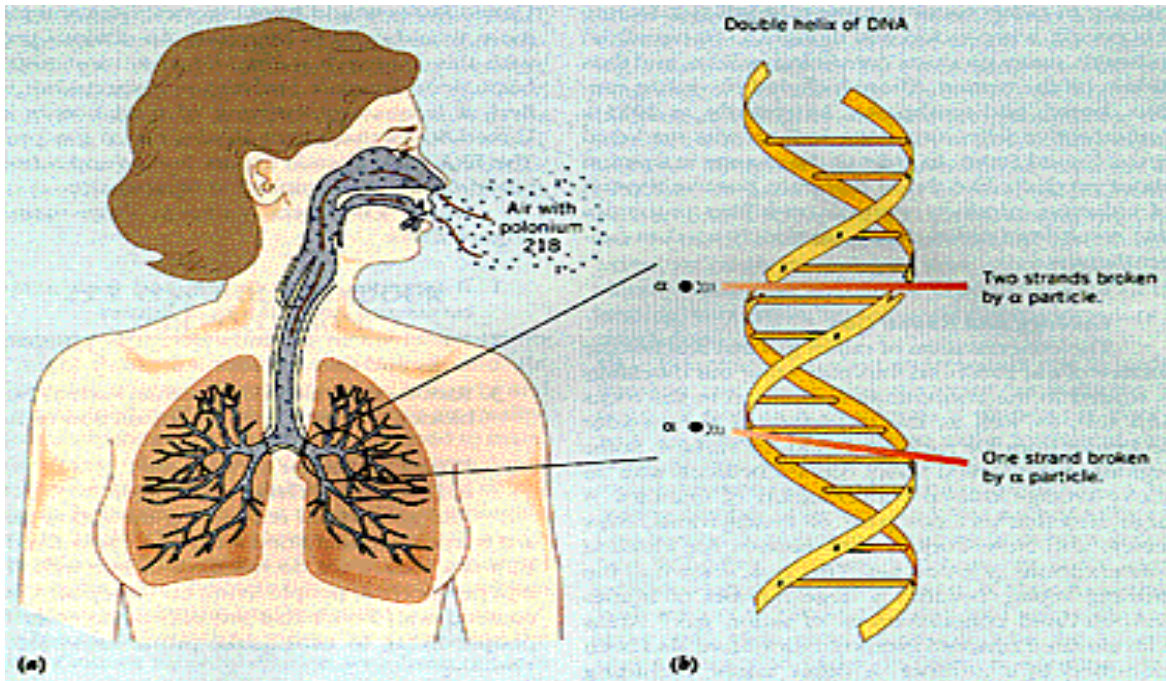
Radon-222 Decay Process contains radioactive isotopes emitting all 3 types: Alpha, Beta, and Gamma particles

- Radon 222 – alpha particles and few gamma particles
- Polonium 218 – alpha decay
- Lead 214 – beta particles and gamma particles
- Bismuth 214 – beta particles and gamma particles
- Polonium 214 – alpha particles and few gamma particles
- Lead 210 – 22-year half-life so first 5 are basis for effect (Ref. 20)

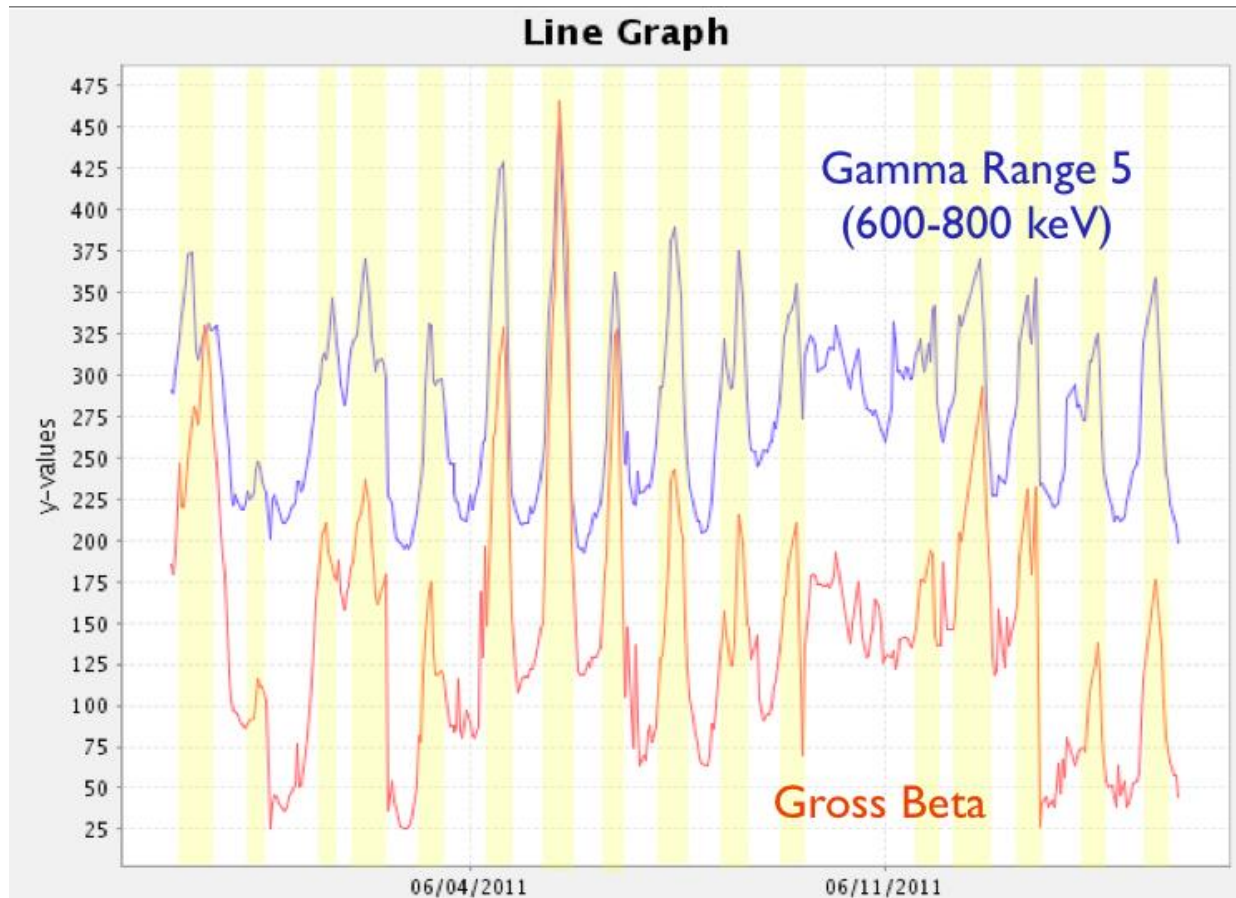
Radon Isotopes And Decay Particles – Three (3) types of radioactive radon decay particle energy and negative impact on health:



All radon decay particles – alpha, beta and gamma radioactive energy levels – can initiate negative health effects. Alpha particles, i.e., polonium, can penetrate cellular DNA promoting tissue damage and cancers. Beta and gamma particles have *much* higher energy levels that promote greater tissue damage resulting in *increased* health risks.



Radon- alpha particles penetrating cell DNA ending in tissue damage and cancers



Concurrent radioactive beta β and gamma Γ activity from radon 222 progeny

Data from the Oregon Department of Health and Human Services show more than 25% of the homes tested in Multnomah County exceed the soil origin *indoor air* action level of 4pCi / liter due to geological conditions. The Portland Water Bureau wrongly downplays the high public health risk of *any* level of radon in our drinking water by not acknowledging subsequent inhalation.

In a closed drinking water system without open reservoirs the risk of aerosolized radon inhalation from drinking water increases substantially. *Any* level of radon exposure from water would contribute to the total cumulative effect of inhalation risk associated with radioactive indoor air. A 1000 sq. foot house with a 4 pCi / of radon has nearly 2 million atoms in the air decaying every minute in *addition* to the decay atoms of the radioactive progeny such as polonium, etc. (USGS)

One single atom / alpha/ beta/ gamma particle can begin the cancer process when inhaled.

Homes in the zip codes 97210- 97213 in north and northeast Portland are especially at risk, and there are many other areas in the city. ***Open air reservoirs provide the most efficient and sustainable radioactive radon risk mitigation process through volatilization.*** The open reservoirs use the laws of chemistry and physics; utilizing diffusion up the water column, water agitation at the inlet, wind action promoting diffusion, leading to natural and harmless volatilization free of electricity. (EPA radon map)

The City of Portland Columbia South Shore Well fields (CSSW) produce radon 222 in excess of 300 pCi /L, exceeding the EPA action level. The Portland Water Bureau will tell the community the radon levels are diluted to 10% during summer usage. However if we incur turbidity events excluding Bull Run water we will be using CSSW water with radon 222 gas exceeding recommended levels. This does not include the cancer causing radioactive progeny atoms such as bismuth, polonium, lead, etc., from radon 222 decay. (Ref. 21)

EPA and Drinking Water Radon

EPA does not regulate radon in drinking water. The health concern with radon in drinking water is also associated with everyday household uses that can transfer radon to indoor air throughout the house along with the many radioactive decay isotopes. Radon in water can be released into the air when water is used for showering, laundry, washing dishes, toilet use, and other household activities. Some researchers have estimated that 1 pCi /L of airborne radon will result from the normal use of a water supply containing 10,000 pCi /L. This number is only an average and ***subject to variation***. The amount of radon transferred from water to air is a function of:

- The waterborne radon level;
- The amount of water used;
- The type of water use activity, e.g. shower (high transfer) vs. running water in a sink (low transfer); and
- The water and air temperatures (as the temperature of the water increases, radon transfer increases).

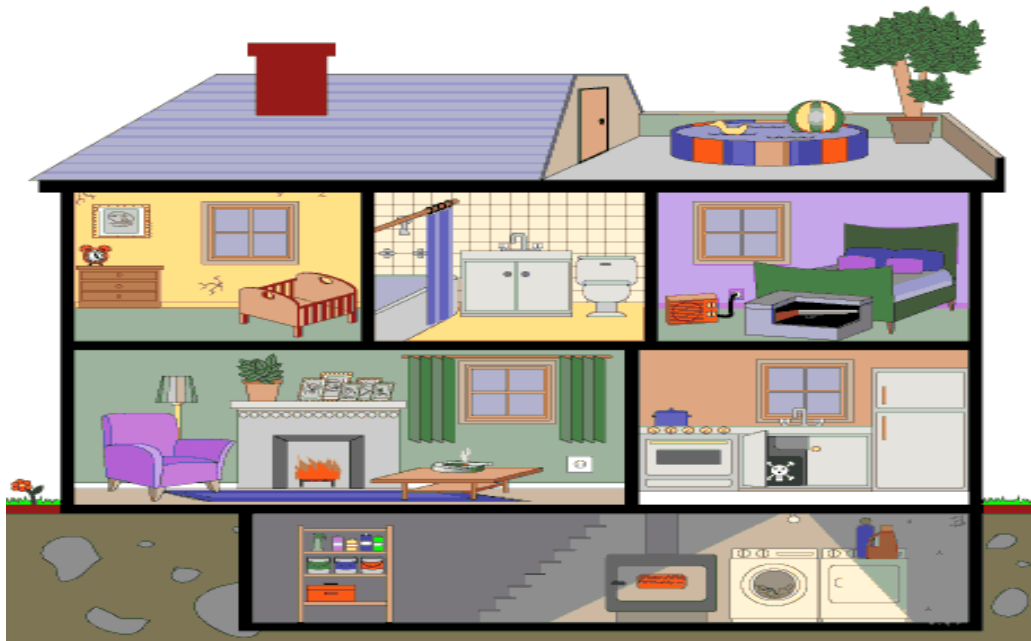
Because radon 222 is an unregulated EPA radioactive contaminant in drinking water, the Portland Water Bureau did not include it in our Water Quality Report in 2013. In past years we

have seen drinking water radon levels from the Columbia South Shore Well field above 350 pCi/L. The Portland Water Bureau continually yet incorrectly states that radon is a non-issue at these levels, yet EPA says “*there is no safe level of radon*”. (EPA)

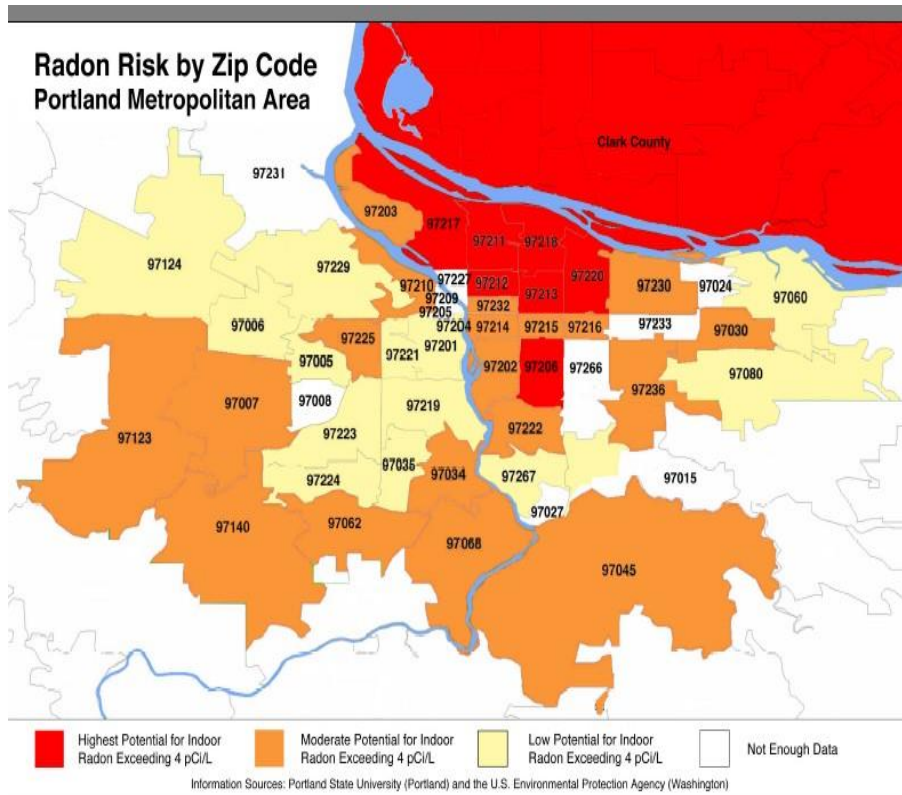
Even at small levels of radon, the cumulative effect of continuous household multiple water uses profoundly impacts the ultimate level of radon and daughter radioactive particles accumulating daily and weekly. Radon needs to be removed from our drinking water even if EPA has not completed a final radon drinking water rule.

National Academy of Sciences (NAS) conclusions are assumptions based on estimates that underestimate the overall public health effect. If the NAS study was acceptable as scientific fact, why was it not adopted by EPA as the standard for the final EPA Radon regulation? EPA says radon is the most cancer causing contaminant, yet there is **no** EPA Radon drinking water regulation.

Open reservoirs will harmlessly and efficiently vent the radon and other gases into the atmosphere. Covered reservoirs are not designed for such activity of radon removal. So we begin to see what the effect of even conservatively estimated exposures will present from our closed water system and covered reservoirs.



Radon and other drinking water gases can enter your entire home, school, and workplace through the shower, toilet, washing machine, and faucets. Open reservoirs act as a barrier allowing gases to harmlessly vent into atmosphere before entering distribution system downstream.



Portland metropolitan radioactive radon-222 areas of risk. (US EPA)



Radon -222 is a gas with a half-life of about 4 days. However, the radon 222 decay products are isotopes of *solid elements* and will quickly attach themselves to molecules of water and other atmospheric gases. These, in turn, attach to dust particles. If inhaled, the decay products, whether attached to aerosol particles or 'unattached', will largely be deposited on the surface of the respiratory tract and, because of their short half-lives (↓half an hour), will begin to decay there.

Projection Estimate: Drinking Water Radon-222 Exposure in Closed System During Bull Run Turbidity Event

Radioactive decay process for radon-222 from Portland CSSW drinking water

- Radon-222 decays / 1000 sq. foot house with 4pCi radon = 2,000,000/min (USGS)
- In one hour there would be 120,000,000/hour radon 222 radioactive decays not including progeny.
- PWB CSSW >300 pCi / L radon x .0001 water transfer/air variable = .03 pCi /L (EPA)
 - 1 pCi/L air = 500,000 radon decays/ minute
 - 500,000 x .03 = 15,000 radon decays / minute

Decay time for daughter progeny

- Estimated radioactive decays in ~ one hour with continuous .03 pCi /L exposure
- Radon-222- 60 min. x 15,000 decay/min = 900,000 decay
- Polonium 218- 3minutes
- Lead 214- 29 minutes
- Bismuth 214- ~11 minute
- Polonium 214- <1 second
- Lead 210- 22 years

Estimated Household Impact from Continuous Decay of Radon 222 and Radioactive Decay Chain Progeny Over One-Hour Period

Minutes	RADON 222 α	POLONIUM 218 α	LEAD 214 β Γ	BISMUTH 214 β Γ	POLONIUM 214 α	LEAD 210
1	15kdirect >	15k				
2	15k	15k				
3	15k	15k 3 min >	15k			
4	15k	15k	15k			
5	15k	15k	15k			
6	15k	15k	15k			
7	15k	15k	15k			
8	15k	15k	15k			
9	15k	15k	15k			
10	15k	15k	15k			
11	15k	15k	15k			
12	15k	15k	15k			
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28	15k	15k	15k			
29	15k	15k	15k			
30	15k	15k	15k			
31	15k	15k	15k			
32	15k	15k	15K29min>	15k		
33	15k	15k	15k	15k		
34	15k	15k	15k	15k		
35	15k	15k	15k	15k		
36	15k	15k	15k	15k		
37	15k	15k	15k	15k		
38	15k	15k	15k	15k		
39	15k	15k	15k	15k		
40	15k	15k	15k	15k		
41	15k	15k	15k	15k		
42	15k	15k	15k	15k		
43	15k	15k	15k	15k11min>	15k x 60/min	Stable
44	15k	15k	15k	15k	15k	
45	15k	15k	15k	15k	15k	
46	15k	15k	15k	15k	15k	
47	15k	15k	15k	15k	15k	
48	15k	15k	15k	15k	15k	
49	15k	15k	15k	15k	15k	
50	15k	15k	15k	15k	15k	
51	15k	15k	15k	15k	15k	
52	15k	15k	15k	15k	15k	
53	15k	15k	15k	15k	15k	
54	15k	15k	15k	15k	15k	
55	15k	15k	15k	15k	15k	
56	15k	15k	15k	15k	15k	
57	15k	15k	15k	15k	15k	
58	15k	15k	15k	15k	15k	
59	15k	15k	15k	15k	15k	
60 min	15k	15k	15k	15k	15k	
	~ 900,000	~ 900,000	~ 855,000	~ 420,000	~ 15,200,000	<u>Decays</u>

Hour = ~18,275,000

Public Health Risks from Showering With Radon-Rich Water

- ~70% of radioactive radon 222 gas is released in shower aerosol into household
- Percentage measurements of radioactive radon 222 gas becoming aerosol from shower heads at different water temperature
- Aerosol dynamics of radon in water before and after shower eventually decaying into radioactive daughter progeny

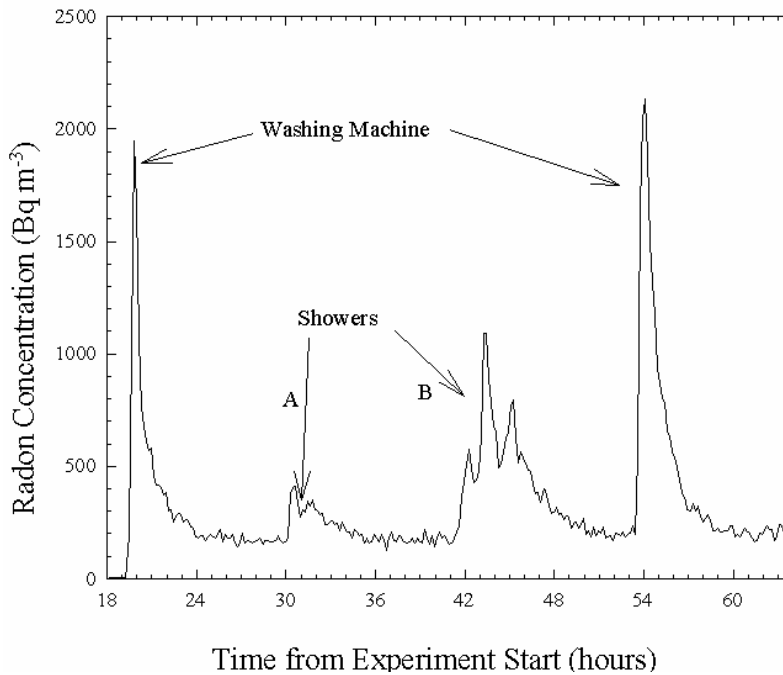
- One of the potentially important sources of short-term exposure is the emanation (discharge) of radon from water during showering and the subsequent in-growth of the radon decay products that continue to produce radioactive materials shower after shower.

TABLE 1. Laboratory Measured Emanation Fraction

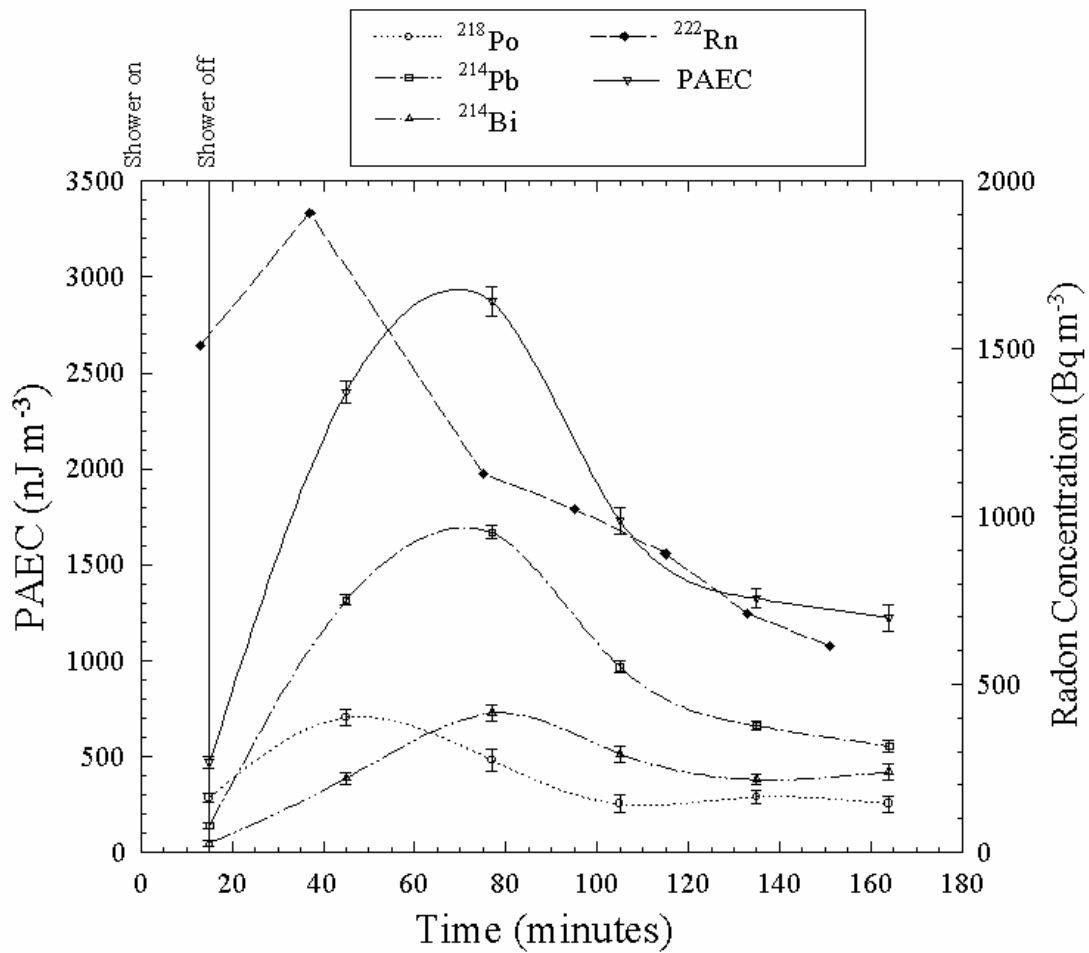
shower head	water temp (°C)	²²² Rn in water concn before shower (kBq m ⁻³)	²²² Rn in water concn after shower (kBq m ⁻³)	emanation (%)
head 1	32	374	108	71
	32	773	233	70
	21	375	124	67
	21	207	58	72
head 2	32	254	69	73

*Errors in these values are approximately ±2%.

Household – Aerosol of Radon 222 Gas Exposures from Everyday Activities

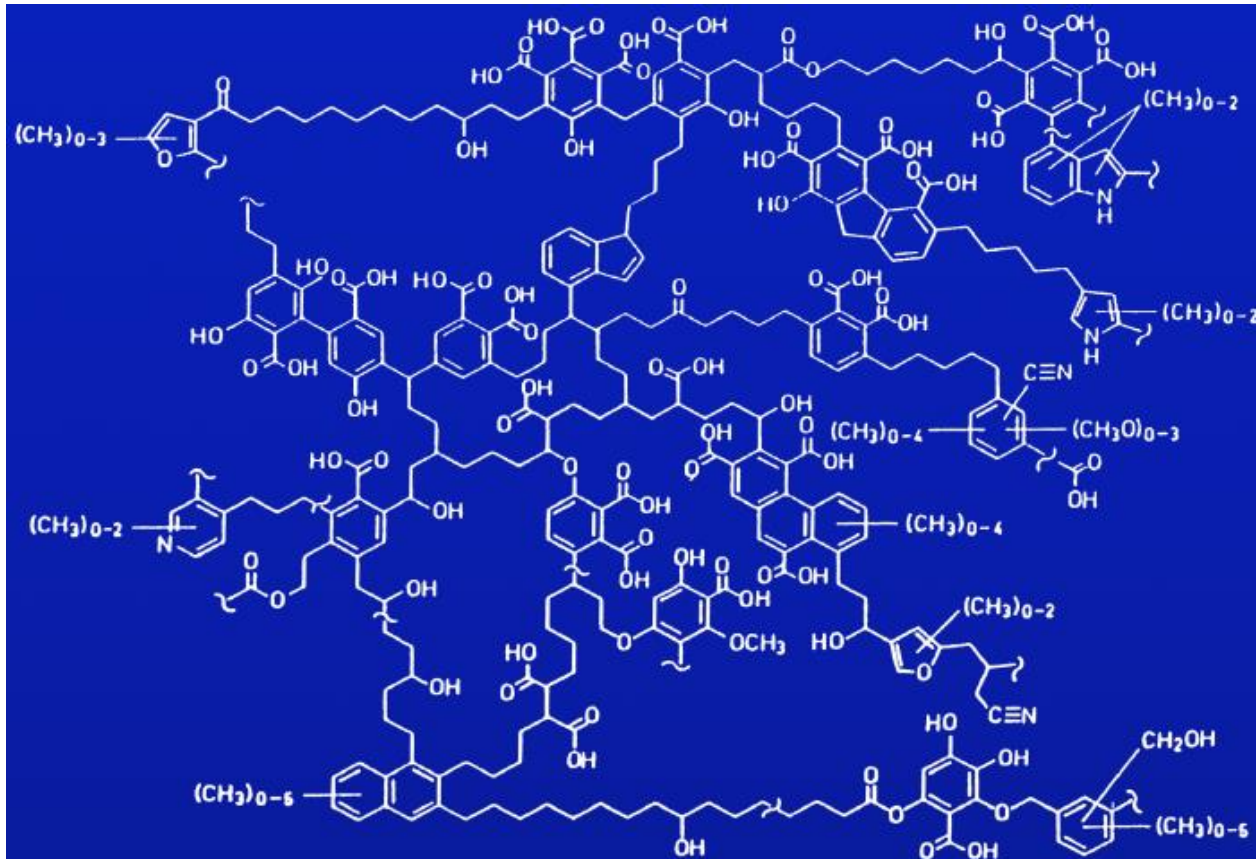


Spikes of radon 222 gas filled drinking water entering home from closed system that did not allow radioactive gas escape, i.e., covered reservoirs.



Drinking water- aerosol of radioactive radon decay. Radioactive radon decay appeared later as expected establishing an aerosol presence over a long time period. (PAEC – potential alpha energy concentration) (Ref. 22)

B. Chloroform Formation – Concentration vs. Dissipation



Structure of acidic natural organic material (NOM) reacts with chlorine generating disinfection by-products such as chloroform. Chlorine alone added at Bull Run Headworks in the Bull Run Management Unit watershed for hours of disinfection exposure.

Elimination of Disinfection Byproducts Produced By Chlorine

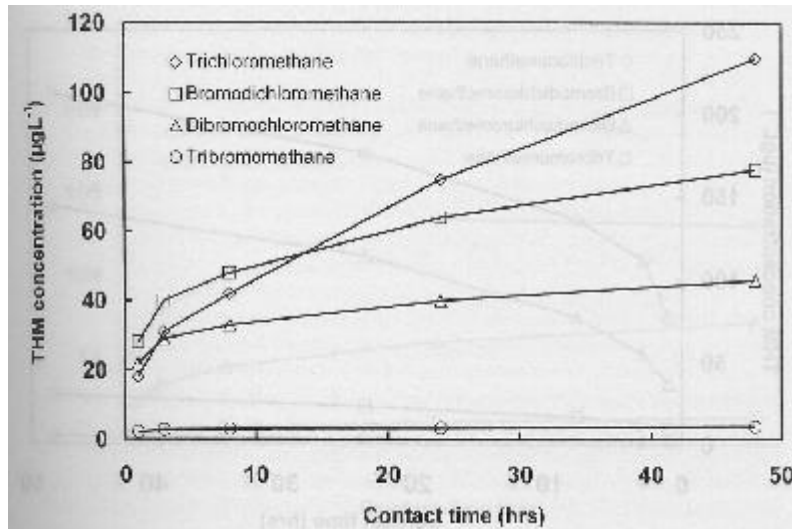
TTHM –Trihalomethanes

Trihalomethanes were among the first disinfection byproducts to be discovered in chlorinated water. These EPA regulated chemical substances are one of many types formed during the disinfection process. The EPA regulated Stage 2 DBP chemicals such as trihalomethanes and haloacetic acids are tested by Portland every three months. TTHM's can be divided into four different classes:

- Trichloromethane (chloroform, CHCl_3)
- Bromine dichloromethane (BDCM, CHBrCl_2) (no bromines in system)
- Chlorine dibromomethane (CDBM CHBr_2Cl)
- Tribromomethane (TBM CHBr_3)

These chemicals contain chlorine and bromine but are not in a reaction with methane. These reactions originate with NOM such as humic acid. Chloroform is a commonly occurring trihalomethane and the principle DBP, making it the most important chemical of this group to

remove from our drinking water. One of the important chemical properties of chloroform's environmental fate is its ability to volatilize, easily passing into air as a gas. Open air reservoirs naturally provide volatilization, enhanced through the fountain spray effect as seen in reservoir 6 and water fall/ agitation used in other reservoirs. Open air reservoir actions efficiently vaporize this unwanted toxic gas where it is then harmlessly broken down by sunlight. (Refs. 23-25)



Chloroform (trichloromethane) production v. contact time. Chloroform gas content increases with increase in organic material contact time. PWB distribution system has been poorly maintained leading to increase in biofilm/sediment reactions resulting in greater chloroform gas generation. Open air reservoirs allow increases in chloroform to vaporize before entering distribution.

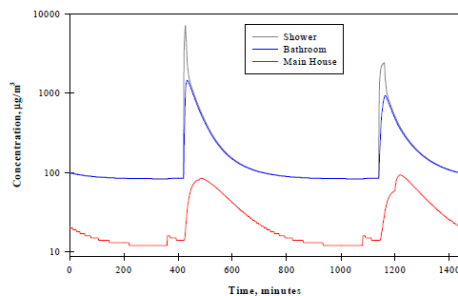


Covered reservoirs distribute toxic and carcinogenic contaminants into homes daily

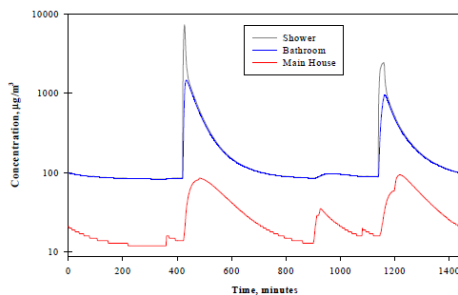
Reasons for open reservoirs and unwanted chemicals

“Some people who drink water containing haloacetic acids in excess of the MCL over many years may have an increased risk of getting cancer. Some people who drink water containing trihalomethanes in excess of the MCL over many years may experience problems with their liver, kidneys, or central nervous system, and may have an increased risk of getting cancer.” (EPA)

The following diagrams demonstrate how chloroform can increase – in a home supplied with water from a covered reservoir system – through drinking water aerosols formed through evaporation or routine activities such as showering, bathing, washing clothes, and cleaning. Because of the high Henry’s Law constant, inhalation can provide the greatest public health risk by absorption in the human respiratory system including the surface of the lung. The primary factor that determines the relative magnitude of deposition in different regions of the respiratory tract (nose, airways, and alveolar) is the particle size distribution of the aerosol. Another potential source of exposure from aerosols is via dermal sorption when the aerosols are deposited on the exposed skin surface during different water use activities. Open reservoirs can reduce or eliminate THM chloroform gases using efficient open air reservoir volatilization before entering homes, schools, and work places.



a: Concentration Profile of Chloroform – Washing Machine Off



b: Concentration Profile of Chloroform – Washing Machine On

(a.) Concentration of household drinking water chloroform: shower, bath room, main house. Washing Machine OFF

(b.) Concentration of drinking water chloroform increasing: shower (top), bathroom (middle), main house with washing machine ON (bottom) (Ref. 26)

Waterfall effects of an open reservoir promote volatilization of gases before they enter your home.

Water use in homes contributes considerably to levels of chloroform in indoor air and total exposure. Toxic and carcinogenic chloroform can enter your body in four ways: as you breathe, eat food, drink water, and it easily passes through your skin as you take a bath or shower. Chloroform can cross the placenta and is also found in breast milk. When chloroform crosses the placenta in humans, it can result in concentrations in fetal blood that are greater than maternal blood concentrations.

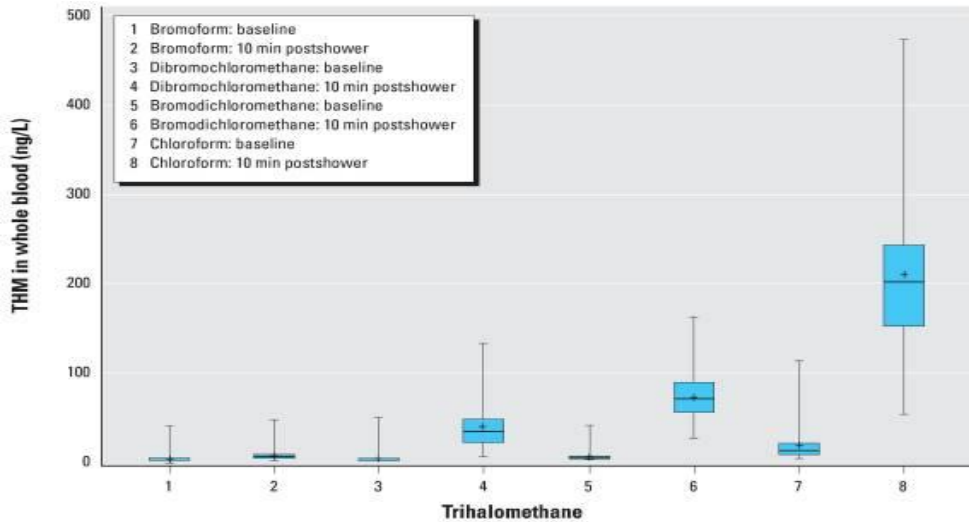
An epidemiological study indicated an association between chloroform concentrations in drinking water and intrauterine growth retardation. Concentrations of chloroform in indoor air were higher than those in ambient outdoor air owing primarily to volatilization during water use. When the shower water is hot enough for it to vaporize, inhalation of even more chloroform will occur. Ongoing and continuous exposures to chloroform – such as showering from the inefficiently vented closed reservoir water system – can allow for increased toxicity. Studies in people and in animals show that after you breathe air or consume food that contains chloroform it can quickly enter your bloodstream from your lungs or intestines.

Chloroform is carried by the blood to all parts of your body, such as the nervous system, fat, liver, and kidneys. Indoor air exposure to the volatile THMs such as chloroform is particularly important with houses having low rates of ventilation and high rates of showering and bathing. Chloroform is a California Proposition 65 carcinogen. (Refs. 27-30)

Open Reservoir Atmospheric Volatilization – Total Trihalomethanes (TTHM)

THM concentrations were important predictors of blood THM concentrations immediately after showering. Chloroform concentrations in the shower stall air are the most important predictor in determining blood concentrations after the shower.

Chloroform can be degraded photo-chemically by sunlight and evaporates easily utilizing the open reservoir air surface/ water partial pressure differences in promoting atmospheric volatilization. The open reservoirs provide significant opportunities to efficiently volatilize toxic and carcinogenic THMs. In a closed system such as a covered reservoir, such sunlight degradation and atmospheric volatilization does not occur.



High chloroform blood level saturation from shower shown at 7 & 8. (Ref. 31)

More EPA Regulated Disinfection By-Products Generated from Chlorine and Chloramine

Haloacetic Acids – HAA₅

The five most common are

- Monochloroacetic acid (MCAA) ClCH₂COOH
- Dichloroacetic acid (DCAA) Cl₂CHCOOH
- Trichloroacetic acid (TCAA) Cl₃CCOOH
- Monobromoacetic acid (MBAA) BrCH₂COOH
- Dibromoacetic acid (DBAA) Br₂CHCOOH

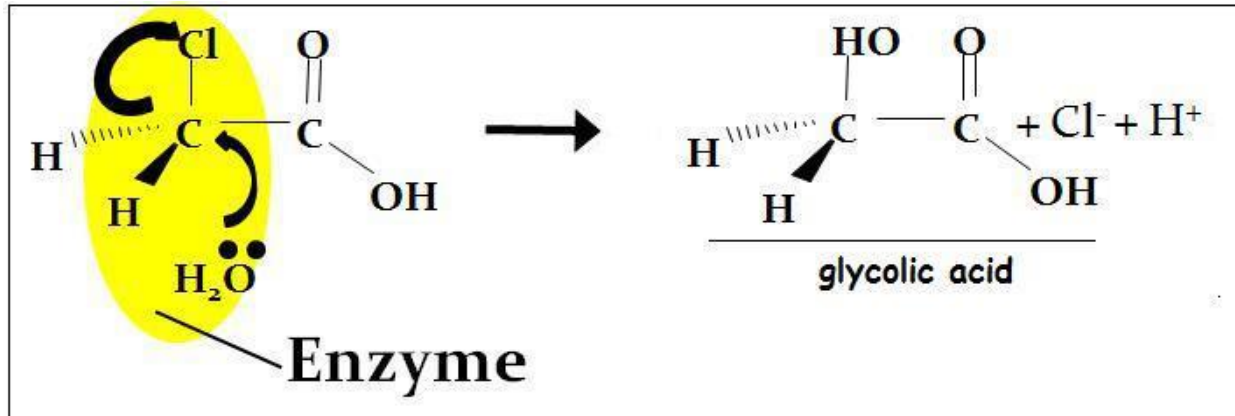
In addition to trihalomethanes (THM), haloacetic acids HAA₅ are a class of disinfection byproducts produced by chlorine and chloramine chemical reactions with natural organic material in the water. These disinfection byproducts are also regulated by EPA because of public health concerns. Loss of HAA₅'s in water distribution systems has been frequently attributed to biodegradation. Experimental *aerobic* biodegradation rates have shown to be rapid. Oxygen loving aerobic bacteria are associated with the biodegradation and removal of the HAA₅'s toxic and carcinogenic disinfection byproducts. Aerobic bacteria have a beneficial role in suppressing the concentrations in tap water. They are integral part of the efficient HAA₅ removal in drinking water such as open reservoir system. (Refs. 32-35)



Oxygen loving aerobic bacteria in our open reservoirs can biodegrade and remove HAA₅ from water

HAA₅ are the second most prominent class of EPA regulated drinking water halogenated disinfection byproducts and are water soluble. HAA₅ chemicals such as DCAA and TCAA present a toxic and potentially hepatocarcinogenic public health hazard that can be expected to be detected in chlorinated drinking water distribution systems. Genotoxicity, reproductive toxicity, embryo toxicity, neurotoxicity and immunotoxicity of DCAA have also been reported. The presence of DCAA and TCAA increases the toxicity of chloroform in female animal studies. (Refs. 36-38)

Microbial removal of these HAA₅'s increases water quality and health.



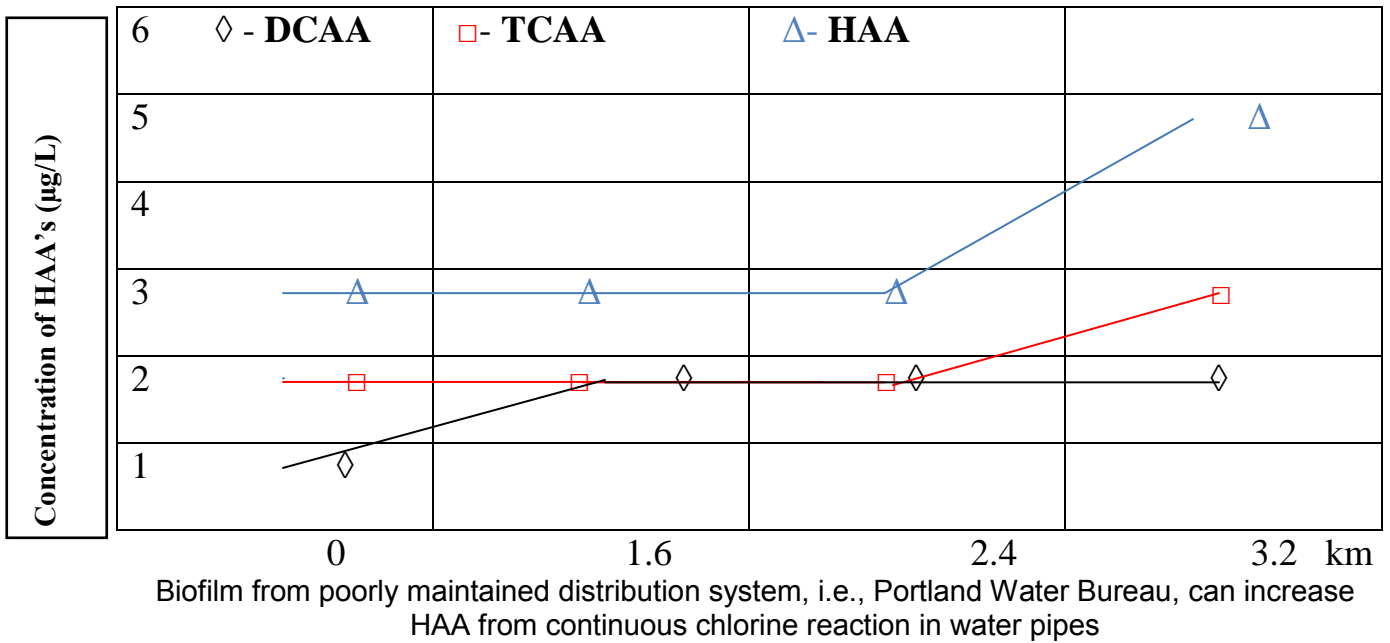
Potential bacterial biodegradation pathway of MCAA. Glycolic acid is then in the general metabolism, and may be photodegraded by sunlight, stopping the HAA from being able to biopersist or bioaccumulate in the environment. (Refs. 39-40)

Summary of how open reservoirs provide support removing HAA₅

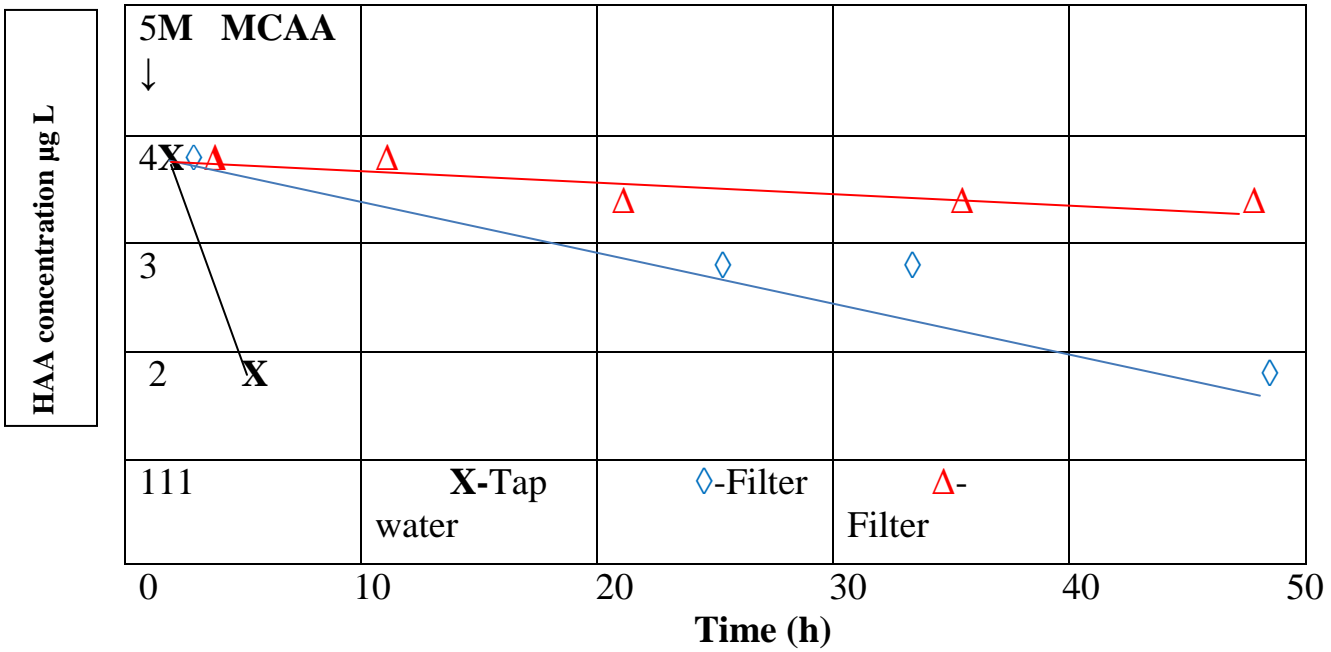
- The open reservoirs can provide a natural and sustainable aerobic biodegradation process of the unwanted HAA₅
- Different bacteria are known to aerobically degrade HAA₅ either co-metabolically or as a sole carbon and energy source
- Because HAA₅ are biodegradable compounds they can utilize the enhanced efficiency of *aerobic* microorganisms as a benefit for the open reservoir drinking water quality

- Aerobic microorganisms are 18 times more efficient in metabolizing chemical compounds than the *anaerobic* microorganisms, found in closed and covered reservoirs
- Oxygen loving aerobic microorganisms degrading HAA₅ act as another desirable public health barrier found in the open reservoirs
- Photolysis/ sunlight can provide additional degradation pathways for HAA₅ in natural waters
- Open reservoirs support peroxide formation in aerobic biodegradation as a mechanism for reduction HAA₅ in surface waters before entering distribution systems
- **Aerobic biodegradation in open reservoirs provides superior public health benefits to the anaerobic conditions of covered and closed reservoirs**

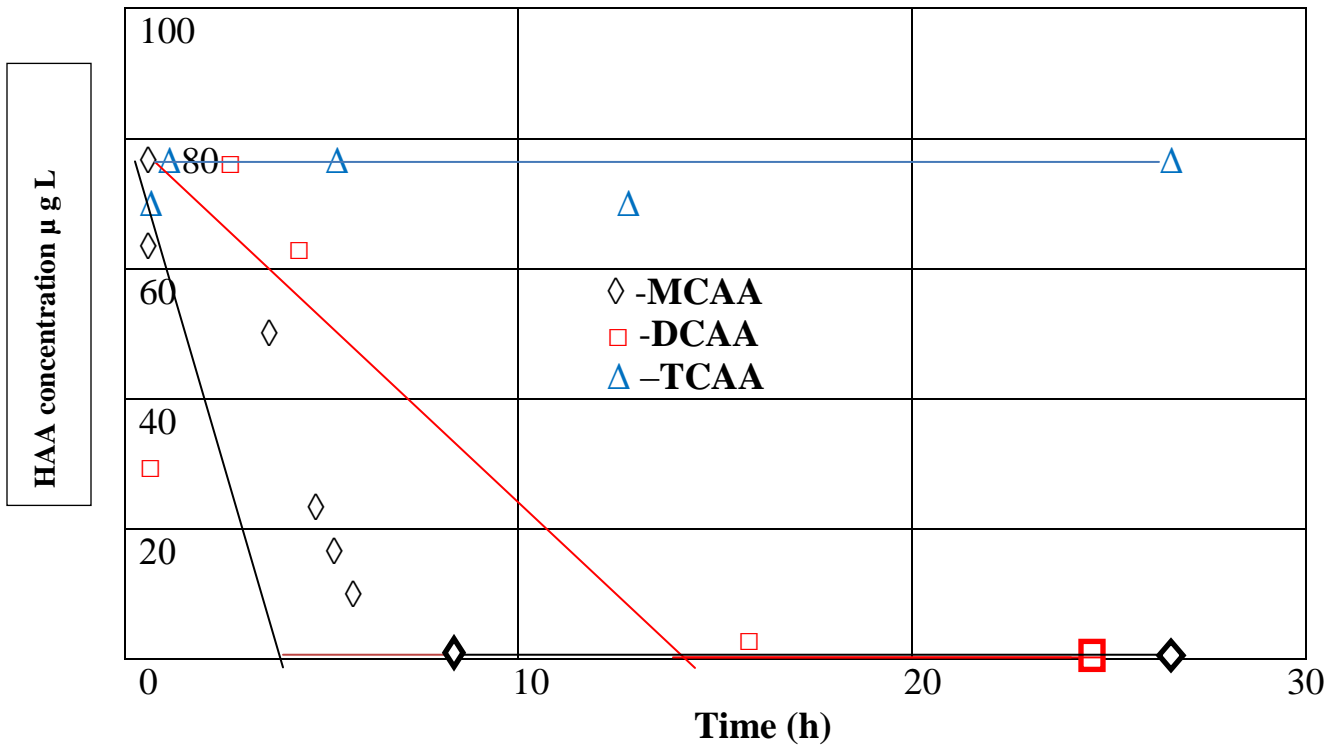
Haloacetic Acids Increase in Poorly Maintained Distribution System



Aerobic Microbial Degradation of Haloacetic Acids - HAA's



HAA Biodegradation by Selected Isolates-R2A DR8 Pseudomonas Tap Water



HAA Biodegradation - R2A-DR11 Aquabacterium sp. Tap Water
Isolation of HAA degrading bacteria from drinking water using complex media (Ref. 41)

C. Other Disinfection Chemicals – Higher vs. Lower Use

EPA Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage2DBP)

The Bull Run drinking water system was designed by highly accomplished engineers who incorporated the brilliant scientific and public health principles established within fundamental laws of chemistry and physics. As a continued reminder our Bull Run drinking water system was designed with **three critical public health barriers**:

- Portland is truly fortunate to have the federally protected closed to human entry Bull Run Management Unit as our first public health **barrier**, providing safe drinking water free of municipal, industrial, and agricultural sewage exposure that are the primary sources of US surface drinking water contamination.
- The second **barrier** is simple chlorine/ammonia as a disinfection process that provides protection against waterborne disease causing microorganisms.
- Portland's open reservoirs provide a crucial third **barrier** by removing unwanted gases, chemicals, and disinfection byproducts (DBP) using natural sustainable aerobic processes before entering our major distribution system. Open reservoir removal of toxic and carcinogenic chemical DBP take place through the following processes:
 - Volatilization efficiency -Biodegradation-microbial
 - Aerobic activity/oxygenation -Photolysis/sunlight -Water agitation

We Need Open Reservoirs to Address the Environmental Chemical Challenges of the Future

The **EPA Stage 2 Disinfectant Byproduct Rule** is intended to reduce potential cancer, reproductive, and developmental health risks from disinfection byproducts which form when disinfectants are used to control microbial pathogens. Our open reservoirs not only currently meet EPA LT2 needs but are also needed to enhance the removal of the EPA regulated trihalomethanes (TTHM), haloacetic acids (HAA₅), as well as other toxic chemicals before these can enter our homes, schools, and workplaces. Natural aerobic atmospheric volatilization of gases and biodegradation of DBP chemicals from open reservoirs diminish the related potential health risks and can provide more efficient public health protection than covered reservoirs can offer. Long-term EPA drinking water standards do not include children but are based on 70 kg /+154 lb. **adults**. Further DBP chemical removal enhanced by our open reservoirs is needed to decrease public health risk for children, pets, as well as adults.

Only 11 DBPs Regulated in U.S.

DBP	MCL (µg/L)
Total THMs	80
5 Haloacetic acids	60
Bromate	10
Chlorite	1000

Toxic and carcinogenic disinfection byproducts regulated by EPA Stage 2DBP

List of EPA's 11 regulated DBP's – sampled only 4 times / year

Total Tri Halo Methanes (TTHM's)

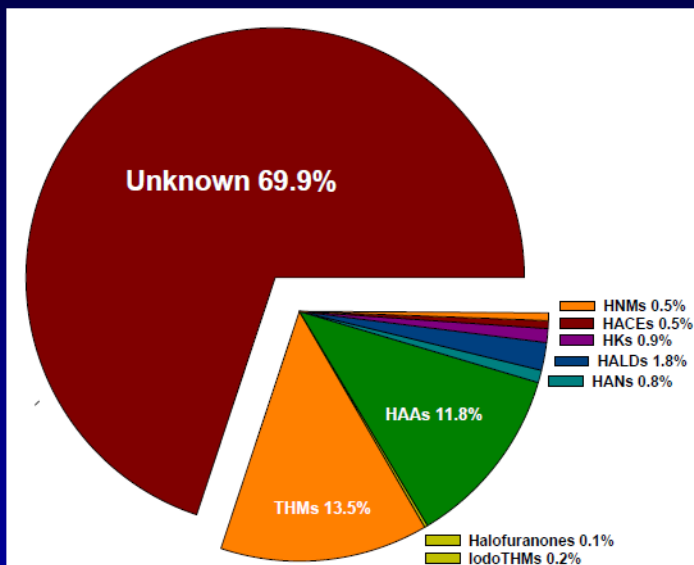
- Chloroform – most prevalent
- Bromoform
- Bromodichloromethane
- Dibromochloromethane

Halacetic acids (HAA's)

- Monochloro
- Dichloro
- Trichloro
- Monobromo
- Dibromo
- Bromine-
- Chlorite-

In addition, many disinfectant byproducts are not known or well-studied. Open reservoirs can reduce/remove many toxic and carcinogenic chemicals before being inhaled, ingested, and absorbed through skin exposures.

But, more than 50% still not known....



(US EPA)

>600 DBPs Identified

Halogenated DBPs

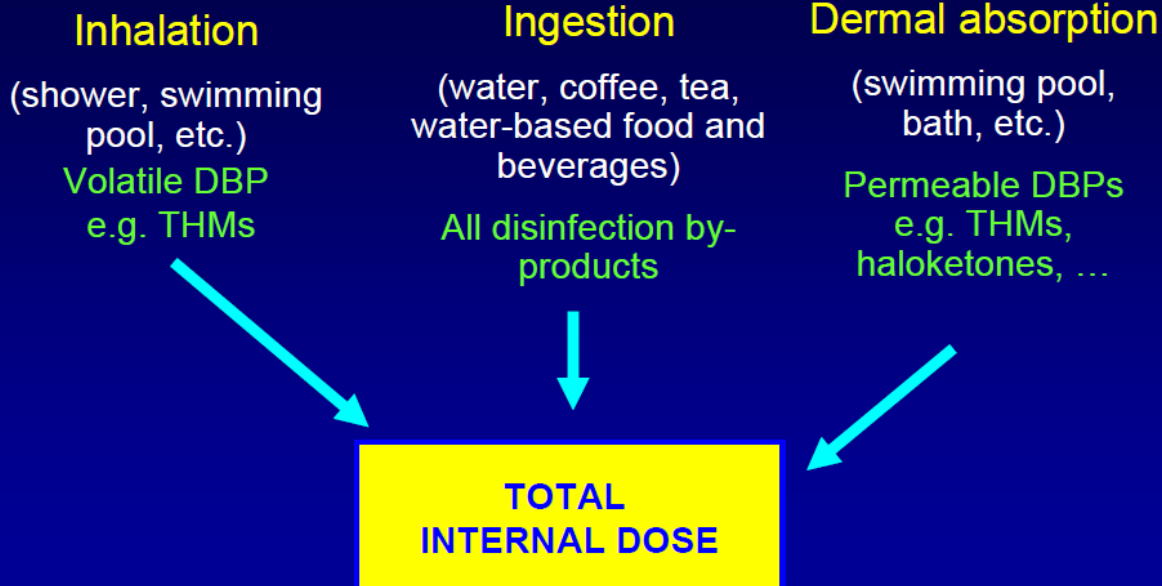
- Halomethanes
- Haloacids
- Haloaldehydes
- Haloketones
- Halonitriles
- Haloamides
- Halonitromethanes
- Halofuranones (e.g., MX)
- Oxyhalides (e.g., bromate)
- Many others

Non-halogenated DBPs

- Nitrosamines
- Aldehydes
- Ketones
- Carboxylic acids
- Others

(US EPA)

Exposure routes



(US EPA)

Route of exposure is important....

- Can get 2X exposure from 10 min shower compared to drinking 2L of tap water (inhalation)
- Some DBPs dermally absorbed
- Evidence of increased bladder cancer with swimming in indoor pools (inhalation, dermal): Villanueva et al., *Am. J. Epidemiol.* 2007, 165, 148-156.

(US EPA)

- **Haloamides** (up to 14 ppb; highly genotoxic) may be increased with **chloramination**
- **Halofuranones** (up to 2.4 ppb for total MX analogues; genotoxic, carcinogenic); **chloramination** can also form
- **Haloacetonitriles** (up to 41 ppb; ~10% of THM4; genotoxic cytotoxic); may be increased with **chloramination**
- **Nitrosamines** (up to 180 ppt; probable human carcinogens) increased with **chloramination**

Emerging Chloramination Disinfection By-Products (US EPA)

But, all of this toxicity testing is for separate, individual DBPs...

DBPs
are really present as MIXTURES



>300 DBPs probably present in glass of water

(US EPA)

D. Nitrification – Presence vs. Absence

Nitrification is a microbial process by which reduced nitrogen compounds (primarily ammonia) are sequentially oxidized (broken down) to nitrite and nitrate. Ammonia can be present in drinking water through either naturally-occurring processes or through the addition of ammonia to the already present chlorine, during the secondary disinfection process to form chloramines. Drinking water chloramines provide the greatest source of nitrogen which under certain conditions can be used to produce the nitrites/nitrates eventually leading to nitrosamines.

Ultraviolet light depletes free chlorine, whereas chloramines seem to be quite stable in sunlight. Although monochloramine can degrade *slowly* when exposed to the atmosphere at varying rates depending on the amount of sunlight, wind, and temperature, the nitrifiers (bacteria) are very sensitive to near UV, visual, and fluorescent light. Consequently, nitrification episodes in distribution systems occur in the dark (in covered reservoirs, pipelines, taps, etc.) Because of exposure to sunlight, nitrification has not been generated in open reservoirs. (Refs. 42-44)

The nitrification process is primarily accomplished by two groups of autotrophic (self feeding) nitrifying bacteria.

Step 1- Nitrosomonas sp. oxidizing ammonia → nitrite



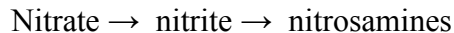
Step 2- Nitrobacter sp. oxidizing nitrite → nitrate



The two groups of bacteria commonly found in aquatic environments can break down ammonia into nitrite and nitrate. The presence of nitrite in a water supply is undesirable because of health concerns such as methemoglobinemia where nitrogen replaces oxygen in red blood cells. Nitrite can also accelerate the decomposition of monochloramine and interfere with chlorine and chlorine residual measurements.

Increased chlorine demand and decay change the disinfectant residual (concentration levels) as it travels through the distribution system as monochloramine. Ammonia concentrations naturally increase as the chlorine concentration decreases through this process. ***Sunlight in open reservoirs inhibits nitrification bacteria from oxidizing ammonia to nitrite and nitrate.*** Application of chlorine at the reservoir outlet binds to the ammonia efficiently and cost-effectively increasing chloramine residual downstream in the distribution system. ***The absence of sunlight and the dark environment in closed and covered reservoirs allows microbial nitrification activity to continue oxidizing ammonia into unwanted nitrite and nitrate, etc.*** Nitrification issues have been documented in Los Angeles covered reservoirs such as Garvey and Orange County.

N-nitrosodimethylamine (NDMA) important nitrogenous chemical reaction-



Chlorine and chloramine can react with organic nitrogen material that can contain precursors to NDMA. NDMA is routinely detected in drinking water utilities. NDMA detection may vary during seasonal changes due to differences in organic material levels. Water quality data from surface water sampling demonstrated that NDMA is significantly broken down in surface water due to ultraviolet degradation from exposure to sunlight. Based on the data, a half-life of 2.2 hours in surface water was estimated for NDMA.

Photo degradation (sunlight) is the main process for removing NDMA from the aquatic environment, yet NDMA can persist in the absence of sunlight such as in a closed and covered reservoir. From a covered reservoir the toxic NDMA continues on into the drinking water distribution system to be consumed in our homes, schools and businesses. (Refs. 45-46)

N-Nitrosodimethylamine (NDMA) is a member of a family of extremely potent carcinogens, the *N*-nitrosamines. Their cancer potencies are much higher than those of THM's. Concerns about NDMA mainly focused on the presence of NDMA in foods and drinking water. NDMA has produced liver tumors and parenchymal cell tumors when administered orally. **NDMA acts as a transplacental carcinogen and has been found in breast milk.** NDMA can be inhaled, and absorbed through the skin. Increases in lung, liver, and kidney tumors have been observed after inhalation exposure. NDMA is structurally related to known carcinogens and can be mutagenic in microorganisms. (Refs. 47-50)

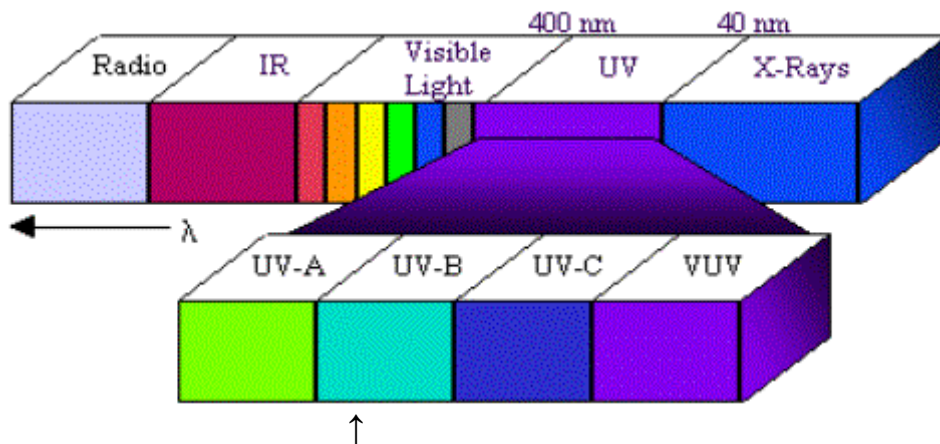


“Blue Baby” syndrome from nitrification of drinking water. Nitrate poisoning where red blood cells have decreased oxygen, resulting in *methemoglobinemia*

E. Oxygenation – Absence vs. Presence

Oxygen introduced at the open reservoirs' fountains and waterfall inlets saturates the water and provides many public health benefits. Oxygenation provides a secure environment for helpful aerobic bacteria, reduces unwanted anaerobic bacteria, and provides a natural source for disinfection precursors such as oxides and peroxides. Oxygen enriched water naturally enhances aerobic bacteria metabolism, yielding a superior efficiency in chemical biodegradation than anaerobic bacteria metabolism found in covered reservoirs. Closed and covered reservoirs do not provide these advantages.

F. Light Disinfection – Broad Spectrum Sunlight



Natural broad spectrum sunlight benefits in open reservoirs. The many wavelengths of natural sun light provide well established disinfection properties that artificial UV used in drinking water treatment cannot. Arrow at UV-B shows the artificial UV radiation 254 nm wavelength used for drinking water facilities. The single wavelength 254 nm provides significantly less energy to break down microorganisms than does natural sunlight.

Natural disinfection from sunlight is well known. Sunlight is among the most potent abiotic factors in the inactivation or killing of bacteria and other microorganisms in water. Sunlight imparts a broad and effective spectrum of photon wavelength exposures that include: gamma, x-ray, ultraviolet, visual, infrared. Sunlight photolytically (breaks apart) reacts with and disrupts microorganism chemical structures. Additionally our open reservoirs incorporate efficient oxygenation of water at the fountains and the inlet waterfalls, synergistically enhancing microbial disinfection. This is achieved when sunlight photons react with oxygen-based molecules forming free radicals and oxides such as peroxide. These chemicals also react with microbial structures providing a sustainable and natural disinfection effect. Covered and closed reservoirs cannot provide the natural disinfection benefits of sunlight.

The condition of oocysts is very important in determining the risk of infection. Oocysts are exposed to many conditions in the environment that can reduce their infectivity before entering the distribution system. The length of time post shedding, water temperature, and the amount of

ultraviolet UV exposure from sunlight can effectively reduce oocyst infectivity. Although oocysts are considered environmentally resistant they exhibit considerable loss of infectivity as environmental temperature increases. Above 50⁰F loss of infectivity increases. In addition, surface waters are exposed to natural UV irradiation in sunlight which may damage oocyst DNA therefore inhibiting DNA replication and reducing infectivity. Due to specific gravity influences, many organisms such as Cryptosporidium, Giardia, etc., exist at the top of the water column surface where UV sunlight can easily render them harmless. (Refs. 51-53)

G. Public Health Record of Closed Reservoirs

From 1949-1969 the American Water Works Association, American Public Health Association, and U.S. Public Health Service proposed covering reservoirs *even though there were no historical or current public health problems with open reservoirs*. While these organizations were covering reservoirs for alleged public health reasons, closed reservoirs were being built and maintained with materials such as *lead-based paints and petroleum-based coatings* on the interior of these reservoirs. As early as 1904 lead-based paints were recognized as toxic. Since the 1920's *benzene*, a component of petroleum-based coatings, has been known to cause cancer. Thus, these materials have been widely known and recognized for decades as toxic and carcinogenic while in direct contact with drinking water. These toxic and carcinogenic chemicals can still be found and used with closed reservoir structures placing drinking water and public health at risk. (Ref. 54)

Although the covered reservoir storage facility is normally an enclosed structure, numerous access points can become entry points for debris and contaminants. Consumer deaths from closed reservoirs are historically well-documented from these points of entry.

These contaminant pathways include roof top access hatches, sidewall joints, vent and overflow piping, roof cracks, and workmanship inconsistencies.

The most common problems reported from inspectors in covered reservoirs:

- No bug screens on vents and overflows
- Cathodic systems not adjusted or operating properly
- Unlocked access hatches
- Presence of lead paint (interior and exterior) and the presence of unapproved paints

Common coating problems reported by tank inspectors relating to water quality:

- Chemical leaching from incompletely cured coating
- Corrosion product buildup from excessive interior corrosion
- Turbidity events from bottom sediments
- Unknown chemical leaching from non-approved coatings and lead leaching from lead-based interior coatings

Points of public health concern:

- Disinfectant decay – nitrification facilitation from dark environment
- Chemical contaminants – toxic and carcinogenic coatings

- DBP retention – lack of atmospheric volatility
- DBP retention – lack of sunlight
- Tastes and odors – anaerobic flora metabolites
- Sedimentation / biofilm – less-frequent cleaning schedule +5 years
- Microbial contaminants – known source of many consumer deaths
- Roof leakage and contamination cement seams (Seattle)
- Roof leakage and benzene from rubberized asphalt degrading (Seattle)
- Accumulation of toxic filtration media remaining in seldom-cleaned tanks



Unhealthy accumulation of post-filter media in drinking water: aluminum sulfate (alum) in seldom-cleaned covered reservoir. (Ref. 58)

Microbial case studies

Covered reservoir storage facilities have been identified in microbial drinking waterborne disease deaths and outbreaks:

- In 1993 Salmonella typhimurium was identified in a Gideon, Missouri, outbreak from bird contamination in a covered municipal water storage tank. Pigeon droppings from the roof area carried into the openings of a closed tank were identified as the etiological agent. Seven persons died, and hundreds became ill.
- Also in 1993, a Campylobacter jejuni outbreak in Minnesota from a drinking water storage tower. Fecal coliform were also found.
- In 2008, Salmonella typhimurium caused another death and hundreds of illnesses from a covered drinking water reservoir in Alamosa, Colorado. Contaminants identified from bird access unobserved in covered reservoir.



Covered Alamosa, Colorado reservoir where Salmonella bacteria from prolonged bird roosting exposures were not visible or detected, causing illness and death

Concerns from Questionable Water Engineering Judgment Decisions: Past and Current Covered Reservoir Surfaces Coated with Toxic Materials

Coating materials are used to prevent hydrostatic (water) moisture migration in concrete tanks, pH changes, and corrosion of steel storage tanks. Coatings used in finished water storage facilities were selected because of their structure protection and ease of application. The common use of coal tars, greases, waxes, and lead paints as interior tank coatings was accepted by engineers. These products contributed significant toxic chemical exposure to the drinking water. Grease coatings can differ in their composition from vegetable to petroleum and can provide food for bacteria resulting in disinfection problems along with taste and odor issues in finished water.

Toxic chemical case studies:

- Petroleum grease applied in 1925 in a Florida storage tank interior caused odor, taste, disinfectant, and slime problems. In 1988 the grease was reapplied. The grease was removed in 1996 and a polyamide epoxy was applied.
- East Bay Municipal Utility District used hot-mopped coal tar as their interior coating material for tanks through the 1960's. Hot-mopped coal tar is still seen today in operating water tanks at other utilities.
- Structural and building designs continue to be problematic in closed and covered reservoirs. Cracks in the ceiling of the new 2009 Seattle reservoirs can allow for intrusions of contaminated water and be problematic, regardless of the rubberized asphalt

barrier replacement. The new toxic and carcinogenic material placed over cracks in the reservoir ceiling is a petroleum based asphalt/benzene material. Microorganisms can break down the petroleum-based carbon substrate releasing benzene and other toxins into reservoir ceiling cracks and water.

There are newer coating applications such as aluminum, polyurethane, and chlorinated rubber. Leaching of organic contaminants from flat steel panels can occur with various coatings including vinyl, chlorinated rubber, epoxy, asphalt, and coal tar, etc. Coal tar coating and lining can still be found, and is used in California as a coating material. Elevated levels of alkyl benzenes and polycyclic aromatic hydrocarbons (PAH's) have been reported in coal tar bituminous coatings. In tanks that remain in use, organics can be leached into drinking water, especially if there is not enough curing time after coating application.

Additional closed reservoir chemical problems occur from reduced disinfectant residual and sedimentation. Debris can enter any closed reservoir system. Cleaning schedules in closed reservoirs are recommended to be ~5 years. A case study of three elevated tanks in Brookfield, Wisconsin, documented cleaning intervals of 15 years for one closed reservoir, and 7-year cleaning intervals for the other two closed reservoir tanks. Sediment of 28 inches was found in the 15-year tank and 4-12 inches of sediment in the other two tanks. Extremely high bacteria counts were found in all tanks. (Refs. 55-58)



Deceased rat on layers of sediment in a covered reservoir. Common entry points for rodents, cats, and birds in covered reservoirs are hatch or access openings, vent pipes, structural cracks, and overflow pipes. (Ref. 58)

H. Public Health Record of Portland's Open Reservoirs and Bull Run Watershed

Provided below are recent and supportive open reservoir engineering assessments and scientifically supported answers for the community's understanding of the public health benefits of open reservoirs.

Condition of open reservoirs at Mt. Tabor Park – 2009 Report

The Mt. Tabor Park Reservoirs' structures and buildings are considered nationally significant as part of an early design for a city's open water storage system. The system is historically significant for its initial construction and subsequent additions involving monumental civic undertakings, for the exemplification of early concrete engineering construction technology, and for its architectural design. As recognition of their historic significance, the buildings, structures, and site were nominated to the National Register of Historic Places and received designation as the Mt. Tabor Park Reservoirs Historic District on January 15, 2004. Generally, those features within the district boundary that date from the initial construction in 1894 through construction and additions dating to 1951 are considered historic contributing.

As viewed from a historic resource perspective, the Mt. Tabor Park Reservoirs Historic District are, for the most part, in good condition. The structures and buildings were carefully designed and were built for durability and low maintenance. Those considerations have allowed the structures to age gracefully. The facilities are currently used on a daily basis.

Very few original construction components have been lost or removed. There have been minor modifications to the facilities to allow continued operation. In many cases, these alterations, such as new electronic measuring or pipe controls, supplement the historic resources instead of replacing them. The most significant deterioration is found at the oldest facility, Reservoir No. 1, where the decorative concrete finishes on the site wall and gate house are deteriorated. Some components have been recently renovated, such as painting of the wrought iron fencing assembly located around Reservoirs No. 1 and No. 5. Other components, such as roofing, are currently in serviceable condition but will need to be replaced shortly. Still other features may be advised to be replaced for restoration purposes. (Ref. 59)

The general summary of the facilities being in good condition reflects the strong construction and engineering principles of 100 years ago. Attending to deferred maintenance and some cosmetic intervention of our open reservoirs will provide many more years of reliable safe and healthy drinking water for all.



History

The City of Portland has five open reservoirs for drinking water. Three of the reservoirs are located at Mt. Tabor Park and two are located in Washington Park. Reservoir 1 at Mt. Tabor Park and Reservoirs 3 and 4 at Washington Park were all completed in 1894. Reservoirs 5 and 6 at Mt. Tabor Park were completed in 1911. All of the reservoirs are of concrete construction and reflected the best thinking of the 1890's and early 1900's from an advanced engineering perspective and from the perspective of managing a public water supply. The engineering and construction principles of our open reservoirs were ahead of their time using advanced technologies that provide safe and healthy drinking water for us today. Ernest Ransome provided specialized cold twisted metal rebar rods and innovative reinforced concrete to build the open reservoirs that have lasted over a century and will last decades longer when properly maintained.

Ernest Ransome's engineering skills that were applied to our open reservoirs are further recognized from innovative construction in the San Francisco Bay area. Ransome's two experimental buildings at Stanford University survived the 1906 San Francisco earthquake essentially without damage while the university's newer, conventional brick structures literally crumbled around them. The published analysis of Ransome's two buildings by fellow engineer John B. Leonard did much to advance the safety of buildings in post-1906 San Francisco and nationwide.

The movement to covered reservoirs came after 1946 when new jobs were needed for returning veterans. The U.S. Public Health Service and American Public Health Association made the recommendation for covered reservoirs based on health benefits that contradict earlier acknowledgements of open reservoir health benefits. (Dr. M. J. Rosenau, 1902 Harvard School of Public Health).

Covered reservoirs have security and contamination issues. Open reservoirs are cleaned 2x/year. Covered reservoirs have not provided the public health benefits open reservoirs provide. Covered

reservoirs are cleaned every five (5) years or longer allowing for sedimentation, increased disinfectant demand and disinfectant byproduct formation, and microbial issues.

“Although the storage facility is normally an enclosed (covered) structure, numerous access points can become entry points for debris and contaminants. These pathways may include roof top access hatches and appurtenances, sidewall joints, vent and overflow piping.” (EPA) (Ref. 55)

“Microbial contamination from birds or insects is a major water quality problem in storage tanks (covered reservoirs). One tank inspection firm that inspects 60 to 75 tanks each year in Missouri and southern Illinois reports that 20 to 25 percent of tanks inspected have serious sanitary defects; and eighty to ninety percent of these tanks have various minor flaws that could lead to sanitary problems (Zelch 2002). Most of these sanitary defects stem from design problems with roof hatch systems and vents that do not provide a watertight seal. Older cathodic protection systems of the hanging type also did not provide a tight seal. When standing inside the tank, daylight can be seen around these fixtures. The gaps allow spiders, bird droppings, and other contaminants to enter the tank. (Zelch 2002) reports a trend of positive total coliform bacteria occurrences in the fall due to water turnover in tanks. Colder water enters a tank containing warm water, causing the water in the tank to turn over. The warm water that has aged in the tank all summer is discharged to the system and is often suspected as the cause of total coliform occurrences.” (EPA) (Ref. 55)

The premise of covered reservoirs reducing risk has proven to be widely unfounded. Toxic and carcinogenic materials have been widely used in and on covered reservoirs. These materials are NOT used on open reservoirs.

Portland open reservoirs have not had any deaths or public health outbreaks from chemicals or microorganisms. One alleged outbreak of waterborne Giardia illness in Portland took place in 1954. However, “failure to isolate *G. lamblia* from suspect water strongly influenced investigators to reject drinking water as the possible vehicle of infection.” (Ref. 60)

Water samples from the Oregon Health Authority remain within EPA standards. Viruses, Cryptosporidium, and Giardia have not been identified in Portland’s open reservoirs. Algae are not a public health issue in our open reservoirs and are limited in growth from the nitrogen and phosphorous fertilizers originating from the Columbia South Shore Well field water. Bull Run water has minimal levels because there is no agricultural chemical exposure.

V. CONCLUSION

KGW News: *“So will a closed system prevent future boil alerts?”*

David G. Shaff, Portland Water Bureau Administrator: *“It can still happen.”*

–May 25, 2014

The public health benefits of open reservoirs at Mt. Tabor Park and Washington Park are profound. Citizens of Portland have adopted and agreed to the EPA Administrators’ “LT2 Rule” position: “Science will determine the ultimate outcome” and “We’re just trying to get at the public health impacts and if there’s a better way to do that we’ll be wide open to it” of our open reservoirs. This has been historically illustrated by the City of Portland’s Open Reservoir Independent Review Panel 2004 majority vote that supported retaining the open reservoirs. **The open reservoirs provide a complex ecological tapestry of benefits showing many levels of scientific interactions that must occur to retain the public health of our community.** Sunlight, water aeration, and oxygen-loving microorganisms create an ecosystem that keeps our drinking water safe and healthy.

The Portland Water Bureau just this month placed the third of three “boil water” alerts allegedly based on the bacterium Escherichia coli, blaming it on the open reservoirs. Because of a decade-long record of water distribution system deferred maintenance water quality concerns – as acknowledged by City of Portland Auditor reports – and along with a consistent breach of acceptable microbiological water sampling protocol, there can be no expectation the reservoirs are a true source of contamination. The ongoing deferred maintenance problems – cross-connection, backflow, low pressure zones, flushing taking place upstream in SE Portland, pipe breaks, biofilm and sediment build up. etc. – are more likely to have been the source of the alleged contamination event, not the open reservoirs.



Example of water pipeline biofilm & sediment accumulation from years of Portland Water Bureau deferred maintenance and system neglect as source of alleged contamination resulting in “boil-water” notice on May 23, 2014

Additionally the PWB water sampling process has no scientific basis and breaches acceptable microbiological “aseptic technique” protocol. Probability of water contamination when sampling without gloves as a barrier is extremely high and unacceptable, leading to rejection of water sample results. Hand sanitizers are not appropriate in public use situations because they do not remove dirt and organic material that can hide contaminants. (CDC 2002)



Unacceptable water sampling procedure used by the Portland Water Bureau. Sample should be rejected as there is high contamination risk due to no gloves as barrier and water stream splash



EPA water sampling procedure using gloves as contaminant barrier and controlled flow

During the last century open reservoirs throughout the United States have provided a long and well documented history of safe drinking water. Microbiological scientists in the 1800's and 1900's such as Louis Pasteur and physician John Snow furthered the understanding of healthy drinking water by unraveling the relationship between identifiable microorganisms and disease. They determined that separation of fresh drinking water from water filled with sewage is important for public health.

One of the many Bull Run system benefits is providing safe drinking water free of sewage in contrast to the previous Portland source, the increasingly contaminated Willamette River. Consistent with our open reservoirs, scientists of the 19th and early 20th centuries recognized the many benefits of sunlight in promoting public health. European scientists discovered by chance that sunlight could kill bacteria. Media grown without sunlight exposure became cloudy from organism growth, while media grown with sunlight remained clear because of organism mortality. Later experiments from the 1900's confirmed that the presence of oxygen as well as sunlight is critical to this destructive microbial process. Soon it was accepted by the scientific community: "sunlight and fresh air are the enemies of disease".

A decade of experience under the 1986 Safe Drinking Water Act revealed several areas where responsible, science-based flexibilities and a better prioritization of effort could improve protection of public health compared to the one-size-fits-all approach of the 1986 statute.

(EPA 1996) As an example 1996 SDWA, Portland's open reservoirs' existence is not to be based on a "one size fits all" EPA regulation, but on their historical public health value and recognition of future chemical and microbial challenges they have successfully overcome for more than 100 years.

The central reason for maintaining Portland's open reservoirs is that they are best for public health. There is a recognized scientific need to reduce/eliminate environmental toxic and carcinogenic chemicals that have no place in drinking water. **Portland can already meet EPA microbiological standards without the corollary health hazards resulting from covered reservoirs.**

Citizens of Portland and other local Bull Run customers are addressing their concerns about added exposures of toxic and carcinogenic chemicals in their drinking water. EPA regulates 11 disinfection byproducts and now has identified +600 more chemicals present in drinking water that are of concern but are not regulated.

The open reservoirs provide the most important and critical public health benefit of the Bull Run water system. Open reservoirs ***act as a stop sign and thus a barrier to toxic and carcinogenic chemicals*** that would otherwise enter the distribution system ending up in our homes, schools, and work places. We have seen the negative air quality outcome when closed drinking water systems allow toxic aerosol gases such as radon and chloroform exposures into everyday living situations. The shower/bath induced chloroform places the household health at risk because EPA long term toxin standards are not based on children or pregnancy exposures, only adults. There is no safe level of radon and its radioactive progeny exposure in the household air and water.

Covered reservoirs cannot efficiently provide the chemical mitigation public health process of open reservoirs because they are significantly anaerobic (without oxygen), principally enclosed, and in an environment without sunlight. Because of their public health and toxic chemical mitigation shortcomings, ***covered reservoirs act like an express lane for contaminants on their way to the distribution system and into indoor plumbing systems. For the benefit of public health and continued commitment by the City of Portland to the Precautionary Principle, the open reservoirs must be retained and maintained as they are today with the addition of improved security measures.***

While all Americans now carry many synthetic chemicals in their bodies, women often have higher levels of many toxic substances than do men. Some of these chemicals, such as chloroform, have been found in maternal blood, placental tissue, and breast milk samples from pregnant women and mothers who recently gave birth. Thus, chemical contaminants are being passed on to the next generation, both prenatally and during breastfeeding. Some chemicals (e.g., radon) indirectly increase cancer risk because they can be influenced by the effect of carcinogens. Children of all ages are considerably more vulnerable than adults to increased cancer risk and other adverse effects from virtually all harmful environmental exposures. In addition, some toxics have adverse effects not only on those that can be exposed directly (including *in utero*), but on the offspring of exposed individuals.

The Portland Utility Review Board (PURB) in July 2002 voted unanimously to pursue an EPA Waiver from the Long Term 2 Enhanced Surface Water Treatment Rule. That voted position remains in force today. The Portland City Council and Portland Water Bureau to date have not followed up on that mandate. ***Council has only asked EPA “if a waiver was available?” without providing EPA with properly documented scientific evidence or reasoning. Nor has the City of Portland made a formal waiver request.***

“Science will determine ultimate outcome” has been clearly and consistently stated by the EPA regarding case-by-case application of the “LT2 Rule.” Yet the Portland City Council and the Portland Water Bureau have generally ignored the primary scientific public health benefits of open reservoirs as barriers to distribution system toxic chemical contamination. Scientifically supported public health benefit examples could have been easily presented to the Oregon Health Authority (OHA) such as: sunlight UV (AWWARF 3021), nitrification mitigation (EPA 2002), and gas volatilization (radon).

The City of Portland needs to restart the process of working transparently and in good faith with Oregon’s Congressional delegation, the Oregon Health Authority, the Governor’s Office, and citizens of Portland familiar with the science and advocacy administrative experience in keeping the reservoirs open. The scientific information and principles outlined in this document are intended to provide the foundation for that effort.

Portland’s open reservoirs utilize the principles of chemistry, physics, and microbiology to support a safe and healthy drinking water outcome that covered reservoirs cannot meet. Contemporary science is building on the new way of thinking that reduction and elimination of drinking water environmental chemical exposure is the new future of open reservoirs to provide the best outcomes for drinking water and public health.

A. Final Thought

**Joe Meyer of KBOO Radio on May 10, 2011, interviewed
Dr. Gary Oxman, highly-respected Multnomah County Public
Health Director (retired 2013), about Portland's open reservoirs**

Q. What about Portland's current water?

Dr. Oxman: "I think Portland's water is superb. We have a wonderful water source in Bull Run watershed. Well designed system and responsibly run system and we have excellent water."

Q. Are there any known public health issues today?

Dr. Oxman: "No there really aren't. If you are talking, are there diseases caused by our water – environmental diseases, chemical diseases, bacterial diseases, microbial diseases – no we have not been aware of or detected any diseases or sign of illness associated with our water system."

Q. If Portland does cover reservoirs will you expect fewer illnesses?

Dr. Oxman: "We are not detecting any illnesses associated with water in Portland. *No I would not expect we would get fewer illnesses after covering reservoirs.*"
(emphasis added)

Q. Anything else to say?

Dr. Oxman: "Great drinking water system here in Portland. Levels of citizen involvement that we have in the debates, of what the directions are a very positive thing. What we need to do as a community is to come together and debate the issues honestly, debate them openly, a lot of different factors that will influence the decisions that our policy makers will make. Council and other elected officials, and I think we need to be an active part of that process, part of the gift we can give to future generations here in Portland."

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58. Alberta Operators Seminar, Treated Water Reservoirs – The Neglected Facility, 2002
59. Cascade Design Professionals, Mount Tabor Reservoirs Historic Structures Report– Reservoirs 1,5,6,7, Executive Summary, May 2009
60. American Journal of Public Health, Vol. 69 No.8, August 1979

VII. APPENDICES

Appendix 1

Excerpts from City of Portland Auditor's Reports re: Portland Water Bureau

Documenting neglected maintenance and poor management that risk public health and unnecessarily increase costs

For complete copies of these reports see: City of Portland Auditor, Audit Report Index by year – <http://www.portlandonline.com/Auditor/Index.cfm?c=27096>

1.1 “Portland’s Water Distribution System: Maintenance Program Needs Improvement” Office of the City Auditor, Portland, Oregon, August 2004 – Report #299

“Water mains are flushed and replaced infrequently, valves receive minimal exercising and maintenance, and meters are repaired and replaced slowly. In addition, the backlog of needed repairs has grown. Although water quality and reliability have not yet been adversely affected, we believe continued decline in the maintenance of the water distribution system assets could negatively affect water service performance in the future.”

“The Bureau lacks a clear and comprehensive maintenance plan, complete and reliable information on the nature and condition of its assets, and adequate methods to organize and schedule maintenance work.”

“The AWWA indicates that periodic flushing of main water lines is needed to remove bacteriological growth, sediment, and corrosion, to improve flow, and to introduce fresh water with higher chlorine residual. The most effective form of flushing is unidirectional flushing, which entails comprehensive flushing of large areas of pipe in order to systematically cleanse the pipes of debris. The Bureau’s ability to perform unidirectional flushing is also hampered because the Bureau does not regularly exercise and maintain valves and does not have a complete and accurate inventory of valve status and location.”

“The feet of mains replaced dropped from 46,500 to 9,800 feet, a 79 percent decline. If main replacement continues at the same rate as the past five years, it will take the Bureau over 400 years to replace all the City’s 2,000 miles of water mains.”

“Fire hydrants, water meters, water valves being paved over and all being neglected by Portland Water Bureau maintenance”

“A recently completed analysis of outstanding work orders by Construction and Support supervisors indicates the work order backlog may currently represent in excess of 26,000 hours of needed repairs and maintenance.”

1.2 “Spending utility ratepayer money: Not always linked to services, decision process inconsistent”

Office of the City Auditor, Portland, Oregon, March 2011 – Report #398

“The City of Portland operates water and sewer utilities, and is required by City Charter to spend ratepayer money from water and sewer operations on these utilities. Recent concerns about the use of utility ratepayer money for non-utility purposes led us to conduct this audit. Our objectives were to determine whether utility ratepayer money is used for non-utility purposes, and whether the decision making process and uses of ratepayer money are transparent to the public. The audit scope included utility ratepayer money spent by the Bureau of Environmental Services (which operates the sewer system) and the Water Bureau.”

“Most City spending of ratepayer money was both related to providing a utility service and approved through the complete public budget process. However, we identified other examples where this was not the case. We found that ratepayer money spent by the City falls into three categories:

1. Ratepayer money spent for purposes directly linked to providing water and sewer services that also followed the City’s complete financial planning and budget process.
2. Ratepayer money spent for purposes not directly linked to providing water and sewer services, but followed the City’s complete financial planning and budget process.
3. Ratepayer money spent for purposes not directly linked to providing water and sewer services, and did not follow the City’s complete financial planning and budget process.”

“The items to consider when making decisions regarding the spending of ratepayer money are whether the utility charges are just and equitable and based on reasonable cost-of-service principles, whether the revenue is spent on utility service related purposes, and whether the utility system is operated in an efficient and effective manner.”

1.3 “Portland Water Bureau: Further advances in asset management would benefit ratepayers”

Office of the City Auditor, Portland, Oregon, June 2012 – Report #405

“Water users depend on Portland Water Bureau assets – pipelines, pump stations, tanks, and other equipment that supply homes and businesses with clean water. These physical assets are valued at \$7 billion. The Bureau supplies ~100 million gallons of water a day. Asset failures such as pipe breaks could result in health emergencies and significant repair costs.”

“City policy requires bureaus to maintain assets in good working order to minimize future costs of maintaining and replacing them, especially to avoid costly deferred maintenance.”

We found that the Bureau has developed an overarching data management strategy, but has not yet implemented key tasks to meet general Bureau needs nor to meet specialized asset management needs. For many years the Bureau has known about its data limitations. These limitations impact the data quality used for decision-making, and the efficiency of its business processes.”

“Improving data management depends on leadership, dedicated technical resources, and assigning responsibility for making data management improvements.”

“We found that although the Bureau has defined its service levels, it is not using essential service levels systematically in budgeting.”

“The Bureau has not gotten agreement from representative customers that the identified service levels are appropriate for decision making. In addition, many of its 27 defined service levels do not clearly express which service is delivered, and some are not clear about what is actually measured.”

“Without plans decisions are made on a case by case basis by individual managers and the Bureau may not perform asset maintenance repair and replacement at the best times to save costs.”

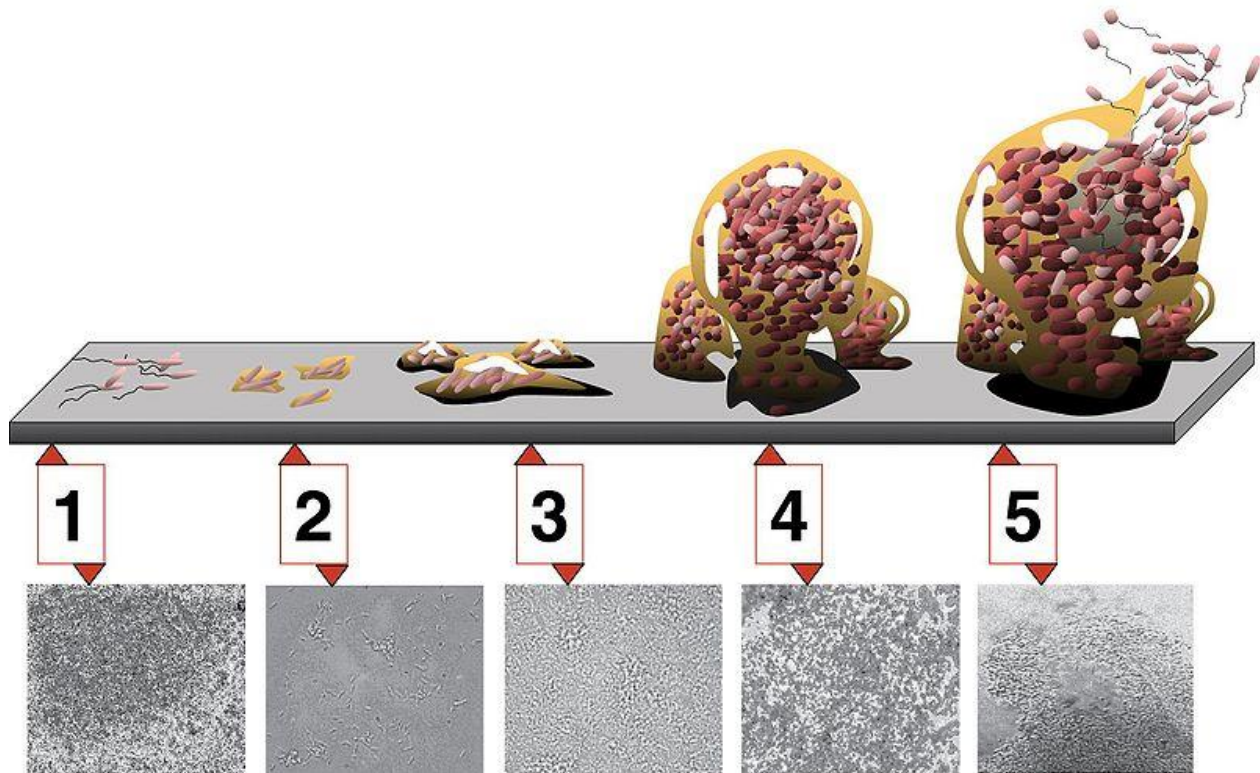
“We also found that even when the Bureau had plans for asset groups, the extent of implementing the plans was unclear. Plans were partly implemented, but lacked elements needed for accountability.”

“City of Portland Auditor’s Office recommends that Commissioner in Charge direct the Portland Water Bureau to:

- Deploy resources, formalize leadership, and develop accountability structures to implement a data management approach that meets the Bureau’s asset management needs.
- Identify and clarify the essential required service levels, obtain confirmation from representative customers so that required service levels can be more useful in decisions about resource allocation, and apply service levels as budget criteria.
- Document management decisions and directions for action in Asset Management Plans to increase accountability and the likelihood of implementing the plans to benefit customers. Consider an overall asset management plan or other means of clarifying management policy and providing guidance for decision making.
- Incorporate an accountability framework throughout the Bureau to increase the likelihood of successfully meeting its objectives.”

Appendix 2

Portland Water Bureau Deferred Maintenance Leads to Biofilm Buildup and Puts Public Health At Risk



Process of water pipe biofilm development: 1. Attachment – 2. Permanent Attachment – 3. Maturation1 – 4. Maturation2 – 5. Dispersal of Microbes into Water System

✓ **What is biofilm in a drinking water pipe?**

Biofilm is a thin coating containing biologically active agents such as a slimy film of bacteria sticking to a surface of a structure. Biofilm has the consistency of an egg white. Some microorganisms may be primary pathogens that cause disease in healthy individuals or may be opportunistic that may affect immunocompromised individuals. (1) (2)

✓ **How does water pipe biofilm impact water quality?**

Biofilms can negatively impact water quality by increasing in size as a result of neglected water system maintenance. Colonies of biofilm bacteria continue to grow giving them protection from disinfectants such as chlorine and ammonia. Construction projects or changes in water pressure during a fire event can result in pieces of biofilm breaking off and contaminating the water system. Biofilms can also retain sediments harboring disease causing microorganisms adding to health risks if pipes are not scheduled for proper maintenance.

✓ **How does biofilm get into pipes and stay there?**

Biofilm microorganisms are present and found everywhere in a water system from the watershed to the faucet. They are part of a natural ecosystem and food chain structure except when water pipes are not properly managed.

✓ **Why do we want it removed routinely?**

Once microbial colonization of the pipe surface begins, the biofilm grows between a combination of cell division and recruitment. The microorganisms multiply and begin to draw other microorganisms into biofilm. We want to manage the biofilm volume and public health risk by routine flushing so biofilm build up does not interfere with water flow, microorganism build up, and disinfectant breakdown. City of Portland Auditor reports indicate Portland Water Bureau does not currently meet industry standards for distribution system maintenance. (3)

✓ **How does pipeline biofilm impact relate to covered reservoirs?**

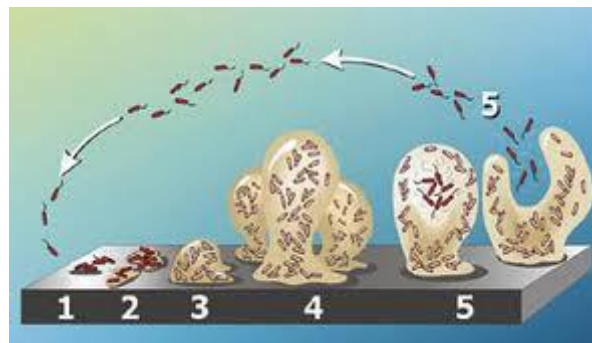
Poorly maintained water systems like Portland's have natural buildup of biofilm. As the biofilm increases because of prolonged PWB deferred maintenance chlorine demand increases leading to chloramine break down resulting in free ammonia. The free ammonia then begins to be metabolized by nitrifying bacteria leading to nitrification. Drinking water chloramine nitrification episodes in distribution systems occur in the dark (**in covered reservoirs, pipelines, taps, etc.**) leading to unwanted nitrate, nitrites, and NDMA toxic and carcinogenic chemicals. (4)

✓ **How does pipeline biofilm relate to open reservoirs?**

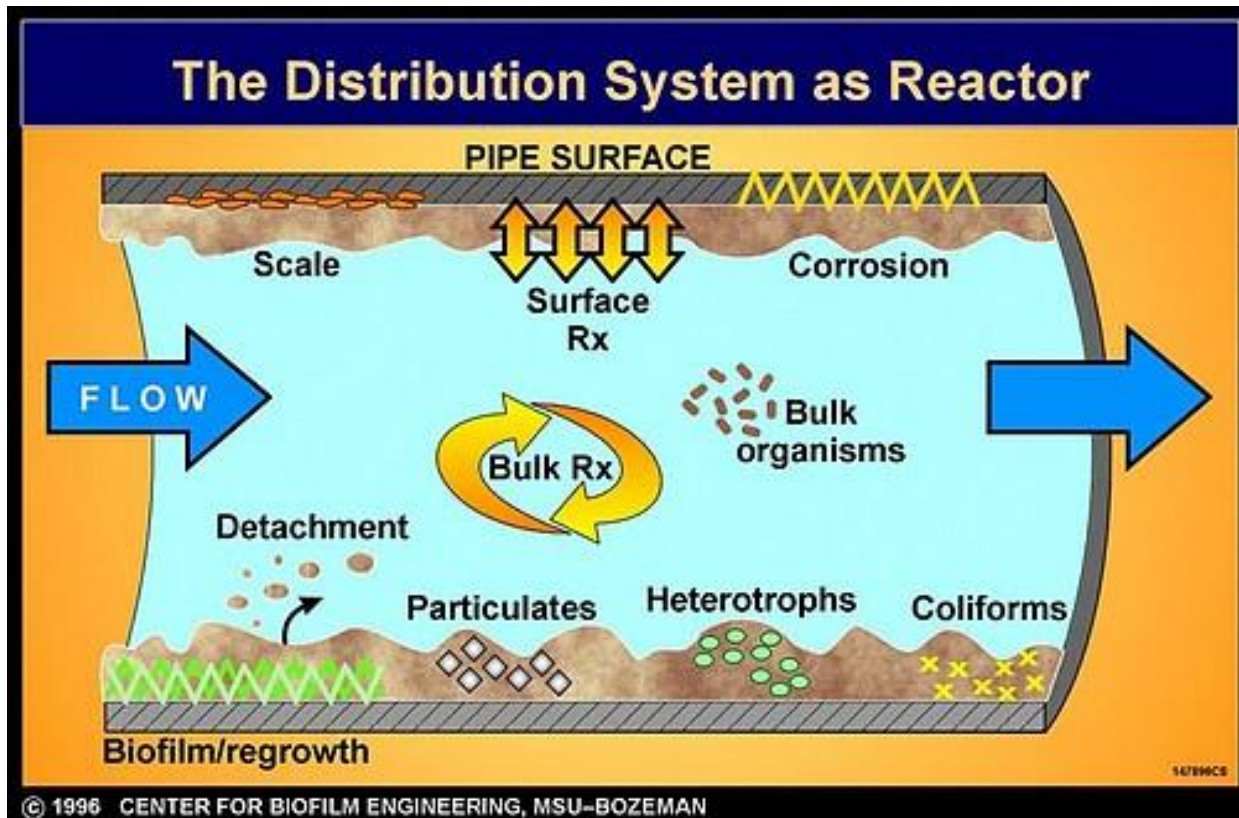
Because the open reservoirs have sunshine exposure that inhibits the bacterial nitrification process there is no relationship to the covered reservoir public health deficiencies. The sunshine also helps break down the unwanted toxic and carcinogenic chemicals; nitrates, nitrites, and NDMA that were generated in the dark pipes.

Notes:

1. Farlex Medical Dictionary, 2014
2. EPA, Health Risks from Microbial Growth and Biofilms, 2002
3. City of Portland Auditor, Portland Water Bureau Reports
4. EPA, Nitrification, 2002



Expansion of biofilm bacteria throughout unmaintained pipe system



Biofilm build up harbors disease causing microorganisms as was seen in the Fall 2013 fecal contamination event throughout the Portland drinking water system. The news story was reported by journalist Carla Castaño, KOIN 6 CBS. Illustration shows biofilm bacteria and other microorganism build up and sediment buildup on inside of water distribution system pipes



Appearance of biofilm buildup in water distribution pipes due to neglected flushing



Neglected pipe. Portland Water Bureau maintenance management has been below industry standards for more than a decade. Biofilm slime can exert a great demand for chlorine which further puts water quality and public health at risk.



Scheduled routine flushing of system can remove microorganisms. Above is an example of properly maintained water pipe that has been routinely flushed.

Appendix 3

News Report: Portland's Covered Reservoir Construction, ca. 2012–Present



Carla Castaño, journalist from KOIN 6 News, reported in February 2014 that the Powell Butte Reservoir has more than 1,000 cracks leaking thousands of gallons of water each day. Using emails from the Portland Water Bureau obtained through a public information request, KOIN 6 also learned the reservoir is four months behind schedule

Excerpts from the KOIN 6 News broadcast, “Powell Butte Reservoir failing leak tests” – Feb. 26, 2014 – <http://koin.com/2014/02/26/powell-butte-reservoir-failing-leak-tests/>

“It appears our reservoir leaking is increasing. We are at roughly 200,000 gallons per 24-hour day in the east and 80,000 gallons per day in the west,” project manager Jim Hall wrote in one email. Hall agreed to speak with KOIN 6 News — until he spoke with the Portland Water Bureau.”

“PWB has requested that all interview requests be coordinated through Tim Hall of the P-W-B,” he wrote Wednesday.”

“[Official PWB spokesman Tim] Hall spoke briefly with KOIN 6 News, but declined an interview. He released this statement:”

“ ‘Working with our contractor to find and seal these hair-width cracks is a normal and expected activity, and one of the final steps before the reservoir is put into service.’ ”

“Design and engineering groups who worked on reservoirs in this area told KOIN 6 News 1,200 cracks sounds like a high number and could be a design flaw. However, they also declined on-camera interviews.”

“PWB said they are not over budget on the project and said they were behind schedule due to the unexpected rain.”

“The Portland Water Bureau plans to have this reservoir online by March.”

Appendix 4

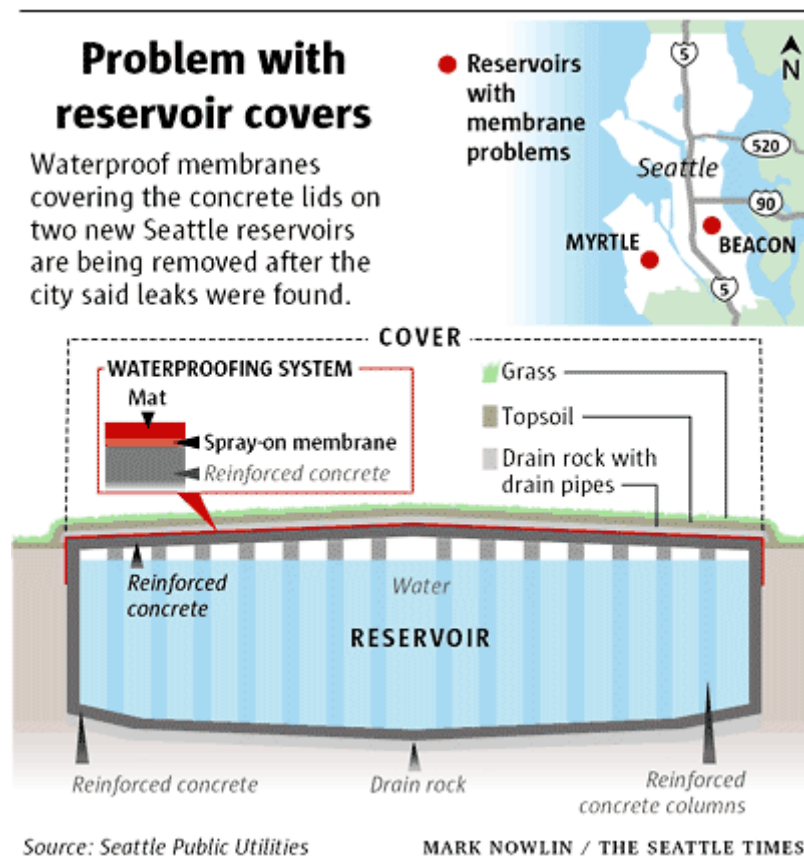
News Reports: Seattle Covered Reservoirs, ca. 2009–Present

Construction concerns from poor planning and workmanship

4.1 “Major do-over for two Seattle reservoirs” – July 17, 2009

http://seattletimes.com/html/localnews/2009485902_reservoir17m.html

“As Carlos Balansay stood inside the cavernous new underground reservoir that would soon hold 50 million gallons of drinking water, the last thing the construction manager expected to see was water, dripping from a roof that was supposed to be watertight. The drops, first detected last August, have triggered a massive do-over project involving the removal of waterproof coating applied to Beacon Hill’s new covered reservoir. A second new reservoir, in West Seattle, had the same orange coating applied to its concrete cover, and it, too, is being blasted off with pressure washers.”



–Water proof membranes were removed and replaced with rubberized asphalt, a petrochemical that contains toxic and carcinogenic chemicals such as benzene.

–Microorganisms over time begin to biodegrade petrochemicals into smaller components that can enter drinking water through cracks.

4.2 “Hundreds of waterproofing leaks found at Myrtle, Beacon Reservoirs; ‘membranes’ now being dug up and redone” – July 13, 2009

<http://westseattleblog.com/2009/07/wsb-exclusive-hundreds-of-waterproofing-leaks-found-at-myrtle-beacon-reservoirs-membranes-now-being-dug-up-and-redone/>



“West Seattle Blog has learned that Seattle Public Utilities has ordered waterproofing work dug up and redone at two newly covered city reservoirs — Myrtle Reservoir here in West Seattle (photo) and Beacon Hill Reservoir — because of hundreds of leaks discovered in the ‘membranes’ applied to both projects.”

4.3 “Questions over whether 4 buried reservoirs can withstand quake” – Nov. 16, 2012

http://seattletimes.com/html/localnews/2019692615_reservoirs16m.html



“Four years after discovering leaks in what were supposed to be waterproof reservoir covers, the city is investigating whether four new underground reservoirs were adequately built to withstand earthquakes.”

Appendix 5

Correcting the Record: Annotated Portland Water Bureau documents

5.1 Excerpt from Portland Water Bureau Letter to the Oregon Health Authority RE: Public Health Risk Evaluation, Feb. 10, 2012

The established standard for all EPA drinking water utility decisions for years has been: “Science will determine the ultimate outcome.” It is the benchmark for administering a waiver from the EPA “LT2 Rule”. Yet in the case of Portland Water Bureau communications to the Oregon Health Authority to retain the open reservoirs, the relevant scientific approach to chemistry and microbiology has been consistently omitted or misstated.

In one such letter to the OHA, PWB was ostensibly making the case for the safe and reliable public health record of Portland’s open reservoirs. Yet in a closing summary the PWB contradicts itself and undermines its own case with an incorrect disclaimer about the testing method used to detect microorganisms in the water samples.

Independent verification shows that AWWARF staff used a rigorous, inclusive testing method (EPA 1623 HV 1000) along with HCT 8 cell cultures during Portland’s year-long “American Water Works Association Research Foundation 3021 Study” (AWWARF 3021) from 2008-09. The “HV 1000” modification of EPA’s 1623 testing protocol refers to high-volume (1000-liter) samples that provide a *more* accurate assessment than standard 1623 testing. Therefore the disclaimer, shown in bold in the excerpt below, is erroneous.

Portland’s AWWARF 3021 sponsored study verified zero (0) *Cryptosporidium* over a year-long testing period. Additionally, NO *Cryptosporidium* oocysts and *Giardia* oocysts were detected in any samples taken in 1994/1995 from Reservoir 6 and Reservoir 4 (PWB 1/28/10).

Excerpt from the PWB’s 2/10/12 letter to OHA, with misleading disclaimer highlighted in bold:

The current observable risk to public health is low. This conclusion is supported by the following:

- No waterborne disease outbreaks in PWB’s service area since inspections began – One criterion for maintaining a water supplier’s unfiltered status is evidence that the water source “has not been the source of a waterborne disease outbreak.” This criterion has been verified each year by the State of Oregon Drinking Water Program for the Bull Run source since 1991, the effective date of the Surface Water Treatment Rule.
- A disease surveillance system sensitive enough to identify outbreaks – Oregon’s disease surveillance, investigation, and reporting system has been used as a benchmark of excellence for foodborne outbreaks. The protocols, structures and reporting that make Oregon well-known for foodborne investigations are identical to those used for waterborne illness. Despite the challenges inherent in cryptosporidiosis surveillance, the systems in Oregon are sensitive enough to identify local outbreaks. For example, a 1998 outbreak was traced to a swimming pool in Multnomah

County. No cryptosporidiosis outbreaks in Multnomah County have ever been attributed to PWB drinking water as a source.

- Expert opinion is that the water system presents a low risk for cryptosporidiosis – A 2011 public health expert panel 10 examined the available data on cryptosporidiosis within the service area. The panel concluded that the data show no indication of an endemic disease burden due to Cryptosporidium from the water system and that no cryptosporidiosis outbreaks have ever been attributed to the Portland water supply.
- Record of safe operations – Because there is no sewage exposure in Bull Run, Portland has an outstanding record of safe operations. Yearly watershed inspections conducted by the State of Oregon since 1992 have also rated the water supply system as being in good operating condition. To ensure the continued safety of the system, many water quality parameters are monitored at the source and throughout the distribution system far more frequently than is mandated by law. In the event of a total coliform or E. coli detection, PWB has a rigorous response plan that includes a plan for notification, protocols for actions at the reservoir and in the distribution system, record-keeping, and follow-up actions.
- Water quality data collected from two of Portland’s uncovered reservoirs indicated no presence of pathogenic Cryptosporidium – 36 water samples totaling 7,000 liters were collected from Reservoirs 4 and 5 between June 2008 and April 2009 as part of Water Research Foundation study 3021. **The testing method employed was not EPA Method 1623 and was instead designed to detect only the presence of infectious Cryptosporidium.** (emphasis added) Zero infectious oocysts were detected in the 36 samples.

5.2 Transcript of Very Important Letter from Friends of the Reservoirs to Portland City Council, Jan. 17, 2010

Mayor Sam Adams and City Commissioners
1120 SW Fifth Ave.
Portland, Oregon 97204-1926

RE: SDWA Open Reservoir Alternative Compliance

Dear Mayor Sam Adams and City Commissioners,

On December 16, 2009 EPA replied [1] to Commissioner Leonard’s November 2009 request for clarification regarding the reservoir Variance application process. In this reply the EPA contends that the Variance provided for by Congress within the Safe Drinking Water Act (SDWA) is not available for the open reservoirs.

Ten months ago in March 2009 EPA responded in the same manner to New York City, another city seeking to retain their large Hillview open reservoir. New York was not deterred by EPA’s response [2] and New York’s legal team advised the Portland Water Bureau that the EPA’s interpretation of the variance applicability is in fact wrong. We agree EPA is wrong. The SDWA clearly authorizes EPA to grant a variance from the LT2 “cover or treat” Cryptosporidium “treatment technique” requirement.

New York's Department of Environmental Quality spent more than a year compiling data, 161 pages, to support the retention of its Hillview reservoir. Unfortunately, during that same period of time the Portland Water Bureau focused a majority of its resources on developing and implementing fast-tracked reservoir burial projects, doing so without any public involvement.

New York City's extensive undeterred efforts to preserve their open reservoir provide a clear blueprint for action by the City of Portland. The community expectation is that the City makes a serious effort to secure the available SWDA reservoir variance, an effort evidenced in part by a Water Bureau work product. A single late-date letter to the EPA regarding a reservoir variance is not enough.

The Friends of the Reservoirs offer the following advice:

- Stop approving consultant contracts. The plan filed with the EPA in March 2009 gives YOU, City Council the power to alter the plan or the pace at which it is implemented. As noted in the fine print, the reservoir burial plan is contingent upon City Council approval of individual projects; it can be renegotiated with the EPA if the City Council does not approve the current schedule for any particular project within it.
- Require the Portland Water Bureau to prepare a detailed report documenting relevant scientific data in support of a reservoir variance.
- Seek an extension or deferral from the EPA from the burial projects. Community stakeholders have long recommended this action for both the open reservoirs and the source water requirement.
- Engage the assistance of the City Attorney and/or outside counsel Foley Hoag.
- Seek further assistance from Senator Jeff Merkley who has demonstrated his support for retention of the open reservoirs.
- Submit the data to the EPA or state of Oregon if the state has assumed Primacy for the regulation; in 2006 the state legislature unanimously approved and the Governor signed into law a state provision for variances with the full knowledge that Portland would be seeking such a variance for its open reservoirs.
- Do not rule out legislation. The opportunity for further Congressional intervention is not only possible but also likely in light of the acknowledged flaws with EPA's source water variance plan [3].

The American Water Works Association Research Foundation 3021 study preliminary report addresses the flaws of EPA's LT2. This report is discussed in the Friends of the Reservoirs September 2, 2009 letter to City Council.

In an internal EPA memo (3/31/09) addressing the reservoir applicable SDWA variance provision EPA's legal counsel states "The alternative treatment technique is available but not approvable because the only alternative EPA is aware of is a risk mitigation plan ... (emphasis added)" EPA states that it wants to be consistent in its denial. Scientific data is an "approvable" way of demonstrating that our open reservoirs pose no greater risk to public health than covering or additionally treating [4].

The goal of the rule is to reduce disease incidence associated with Cryptosporidium and other disease-causing microorganisms in drinking water through "treatment techniques".

Scientific data from the recent American Water Works Association Research Association Foundation study AWWARF 3021 testing large volumes of water at the outlets of Portland's open reservoirs demonstrated that there are zero infectious Cryptosporidium in our open reservoirs. Burying, covering, or additionally treating the open reservoirs will not reduce the level of infectious Crptosporidium to below Zero. Portland's Total Coliform Rule data meets EPA standards. Our reservoirs are not subject to surface water runoff; they are cleaned twice a year.

As Commissioner Saltzman said last July about LT2, "this is a regulation in search of a problem... we should continue to pursue all alternative options beyond a large capital project."

Given the extensive scientific data in support of retaining Portland's open reservoirs, the broad-based community support for retaining our open reservoirs, the exorbitant cost of burial (\$403million, \$800 million with debt service) and the new public health risks [5] associated with covered reservoirs, it is incumbent on the City to push back and push back hard.

Sincerely,

Floy Jones
On behalf of The Friends of the Reservoirs

Cc Interested parties

[1] On January 12 during a Council session the community was told that a reply from the EPA on a reservoir variance had not been received; then on January 13 the Water Bureau issued a press release advising of the December 16 EPA response indicating that the original letter was somehow lost.

[2] Based on extensive review of water-quality data and other information collected by the Department of Environmental Protection, New York believes they can make the requisite showings required by the variance from the reservoir cover or additionally treat requirement. Portland's data is superior to that of New York. Portland can make the requisite showing that our open reservoirs have not caused Cryptosporidium or other drinking water related disease.

[3] EPA moved the goal post twice on the source water variance plan, which consumed more than 17 months. If EPA refuses to accept the new science that supports genotyping, confirming

whether any oocyst is harmful (dead or alive, “viability of the oocyst), and insists on sampling away from our source water out in the tributaries then further federal intervention will be necessary.

[4] While EPA has documented public health illness and deaths only with buried and covered storage, EPA failed to establish the general level of contamination in buried and covered storage thus EPA cannot factually state that buried and covered storage is more protective than open storage. See EPA white paper
http://www.epa.gov/safewater/disinfection/tcr/pdfs/whitepaper_tcr_storage.pdf

[5] EPA in its own white paper acknowledges that cancer-causing nitrification could be an unintended consequence of its LT2 reservoir requirement. Nitrification occurs in the absence of sunlight in chloraminated systems, see section 3.2 Absence of sunlight, pg.11
http://www.epa.gov/ogwdw000/disinfection/tcr/pdfs/whitepaper_tcr_nitrification.pdf

5.3 Transcript of Letter from Portland Water Bureau to the Oregon Health Authority, Aug. 23, 2011

Mr. David Leland, Program Manager
Oregon Health Authority Drinking Water Program
P.O. Box 14450
Portland, OR 97293-0450

Dear Mr. Leland:

Last Friday in a letter from Administrator Lisa Jackson, the EPA reversed its longstanding refusal to review the requirements of the federal LT2 rule as they pertain to uncovered finished drinking water reservoirs. The reversal came in response to a July 20th request from Senator Chuck Schumer to the agency.

In the letter, the EPA states:

“...as part of the Agency’s Final Plan for Periodic Retrospective Review of Regulations, as well as the Safe Drinking Water Act (SDWA), the Agency will review the LT2 rule. In doing so, EPA will reassess and analyze new data and information regarding occurrence, treatment, analytical methods, health effects, and risk from viruses, Giardia, and Cryptosporidium to evaluate whether there are new or additional ways to manage risk while assuring equivalent or improved public health protection.”

In light of this significant and unanticipated change in federal drinking water policy, the City requests an indefinite suspension in Portland’s uncovered drinking water reservoir compliance schedule during EPA’s review of the federal LT2 rule. It is critical to the City to remain in regulatory compliance with the LT2 rule during EPA’s review and it therefore seeks written approval from the Oregon Health Authority Drinking Water Program of Portland’s request for a suspension of the City’s state approved schedule.

While it is uncertain what opportunities for alternative compliance may emerge from EPA's review, the City may choose not to proceed with its current plans for constructing additional storage at Kelly Butte until the implications of EPA's review and any subsequent changes in the federal LT2 rule are known.

Once the EPA's review is complete and Portland is given the opportunity to explore any alternative compliance methods that may become available, the City will propose a detailed amended schedule for compliance with the rule.

Please do not hesitate to contact me to discuss this matter further.

Sincerely,

David. G. Shaff
Administrator

5.4 Q&A: Refutation of Incorrect Portland Water Bureau Positions

Q1. *Why is Portland required to discontinue using the open reservoirs at Mt. Tabor Park and Washington Park?*

PWB Position – In 2006 the Environmental Protection Agency finalized the Long Term 2 Enhanced Surface Water Treatment Rule (LT2). The rule requires that water utilities discontinue the use of open finished water reservoirs or treat the water as it exits the reservoir for Cryptosporidium, Giardia, and viruses.

Correction – Since the 2004 comment period, 2006 final rule, and 2012 LT2 review, the EPA regulation has been challenged by water utilities such as New York City because it is scientifically unsupported. The EPA regulation is currently being reviewed for another two years, yet Portland City Council continues to unnecessarily fast-track closure of the safe and healthy water from the open reservoirs. City Council has replaced one reservoir with a covered reservoir that is poorly engineered and constructed that leaked millions of gallons of water per week. Cryptosporidium, viruses, and Giardia have never been detected in Portland's open reservoirs and water samples for bacteria support the safety of the water supply. Portland City Council has not referenced the public health science provided by citizens and documented in scientific literature in making its decisions about the open reservoirs.

Q2. *What about getting the "waiver" people are talking about?*

PWB Position – There is no such thing as a "waiver." When advocates speak of getting a "waiver" they are talking about legislative action by Congress to amend the federal Safe Drinking Water Act and exempt Portland from the rule which would then have to be signed by the President in order to become law. Commissioner Randy Leonard did ask our Congressional

representatives about the likelihood of obtaining legislative action on behalf of Portland and was told there was no support in Congress for such an amendment.

Correction – The “waiver” option always exists with EPA. It is a simple agreement between the EPA and the water utility. Portland has been under a “waiver” from EPA for decades under the Filtration Avoidance Determination – it is a waiver from filtering in effect today. The current situation regarding a waiver for Portland’s open reservoirs is that City Council has never presented the scientific argument and formal request to EPA, as they have been repeatedly asked by advocates to do. If the “waiver” does not exist, then why are the New York City mayor, their Council and Congressional delegation asking for an EPA Waiver to keep their open reservoir? The waiver option definitely exists and is available to Portland if City Council will simply coordinate with the Oregon Health Authority to formally ask EPA for it. A waiver is the only permanent solution – Portland City Council needs to adopt the 2004 decision of Open Reservoir Independent Review Panel’s majority vote outlining the well-defined scientific basis, asking for the EPA Waiver we so justifiably deserve.

Q3. *Does covered storage increase risks of gas buildup in the reservoirs?*

PWB Position – No. All reservoirs, covered or uncovered, have an air gap above the water surface that is vented into the atmosphere. For nearly 30 years, almost every customer of the Portland Water Bureau has consumed drinking water that has been stored in a covered reservoir or tank, and the water quality consistently meets or exceeds that of the open reservoirs.

Closed reservoirs, because they continue to have air exchange above the water surface, allow venting to occur. Screened vents in closed reservoirs are sized to ensure adequate air flow through the reservoir to prevent pressurization and also prevent “off-gas” buildup. Air quality has not been a problem at any of the Water Bureau’s many closed reservoirs and tanks. The Water Bureau inspects and maintains vents and reservoir access points on a regular basis to prevent intrusions from animals, birds, or humans. Additionally, the State Drinking Water Program performs inspections at these sites every three years.

Correction – Another PWB answer that is false and has little scientific basis. Gas build-up such as methane in covered reservoirs has caused death from inhalation. Because covered reservoirs are so poorly maintained – being cleaned from 5-25 years – anaerobic (oxygen absent) bacteria in sediments and debris generate toxic gases. The open reservoirs acting as a barrier to toxic chemicals provide 100% efficiency and volatilization/vaporization of gases before they enter schools, homes, and businesses. Covered reservoirs cannot provide the same efficiencies in removing gasses. The vents of covered reservoirs are mostly allowing air IN to the reservoir to allow a smooth flow of water to the outlet and not allowing vacuum interference of water flow. Contrast in air efficiencies is shown by Open v. Powell Butte 2 inefficiency. For example: open reservoir at Mt. Tabor 6 is 100% efficient with open air and fountains. Powell Butte 2 at 5 acres ~ 218,000 sq. ft. with small vents at ~ 80 sq. feet opening is ~ .00037% of outside air communication venting footage efficiency.

Because of aeration, the quality of Portland’s drinking water is excellent from open reservoirs. Changing to a covered drinking water system quickly degrades water quality with unwanted toxic and carcinogenic chemicals.

Q4. *Is radon an issue in Portland drinking water that will be affected by eliminating open drinking water storage?*

PWB Position – No. Radon is not detectable in Portland’s main supply, the Bull Run watershed, which contributes on average over 97% of the total water supply. Radon gas naturally occurs in the western United States from underground rock formations. Portland has detectable amounts of radon in its water system from the Columbia South Shore Well Field which is used for emergency backup and to augment the Bull Run source to provide summer supply and constitutes an average of approximately 3% of the total water supply. However, these amounts do not cause the drinking water to exceed the proposed rule for radon.

Correction – Radon in drinking water at any level is very serious. EPA states “there is no safe level of radon, any exposure poses some risk of cancer.”(EPA 2013) Portland receives radioactive radon water from Columbia South Shore Well field every year during maintenance or supplemental needs. CSSW can be used for emergencies at any time. Radon exposure for unknown periods of time can be expected to add public health risk entering homes, schools and work places. Radon in drinking water is not regulated by EPA. PWB does not have to disclose it exists in our water, but it is still there anyway producing radioactive materials we breathe and drink. That is why we need to retain open reservoirs for active ventilation and removal of radon gas before it enters homes, schools, and workplaces. EPA acknowledges radon to be the highest cancer causing risk of any drinking water contaminant. (EPA 1998)

Q5. *What is nitrification, and are closed reservoirs a risk in Portland’s system?*

PWB Position – Nitrification is a biochemical process that in excess can interfere with the disinfection process in drinking water systems. The conditions within Portland’s open finished drinking water reservoirs are more conducive to causing nitrification than the conditions within closed reservoirs. In Portland’s drinking water system, the first step of the nitrification process – decomposition of chloramine disinfectant – is accelerated by loss of chlorine residual as drinking water passes through the open reservoirs. Exposure of chloraminated water over a large surface area to wind and sunlight and airborne pollutants such as pollen, dust, and animal waste has a significant role in this decomposition of the chloramines. Closed water storage facilities (i.e. tanks or covered reservoirs) do typically have the type of bacteria which are capable of feeding on ammonia and contributing to nitrification. However, without significant availability of ammonia from chloramine decomposition, or high temperatures, it is difficult for such bacteria to multiply and interfere with disinfection.

Correction – According to EPA, “consequently, nitrification episodes in distribution systems occur in the dark, i.e., in covered reservoirs, pipelines, taps, etc.”(EPA 2002)

Open reservoirs inhibit nitrification, not encourage it; thus the explanation from PWB is far from truthful or accurate. Because PWB has neglected and deferred pipeline system maintenance, buildup of biofilm and sedimentation has increased the chlorine demand part of the chloramine molecule. This leads to ammonia/nitrogen exposures in the dark resulting in nitrification, as EPA has already acknowledged. Sunlight from open reservoirs disrupts the microbial nitrification process seen in the pipes and covered reservoirs. Unwanted nitrogen based chemicals like NDMA, nitrite, nitrate, etc. are also broken down by sunlight.

Q6. *What role does sunlight play in disinfection of drinking water in open reservoirs?*

PWB Position – Exposure to sunlight raises water temperatures and encourages the growth of algae and bacteria, which has been a recurring problem at open reservoirs. Sunlight can also contribute to an increase in disinfection byproducts, loss of chlorine, reduction of pH (which can cause corrosion in home plumbing), increased total coliform production, and taste and odor issues. Additionally, elevated water temperatures in the open reservoirs increases nitrification and growth of total coliforms. In highly controlled settings, processes similar to sunlight are used to provide water treatment; however, natural sunlight is not strong enough to provide demonstrable improvement in water quality. The exposure to sunlight actually has a greater number of negatives than positives. Sunlight is not a controllable treatment method, and cannot be relied upon to adequately disinfect drinking water.

Correction – Sunlight has been recognized over the centuries as an important and valuable asset to drinking water safety and health referred to as “solar disinfection”. The natural disinfection premise of open reservoirs was built on this principle. Algae and bacteria are growth based on the nutrients present such as nitrogen and phosphorous coming up from CSSW, not sunlight. Chloramine is a stronger molecule than chlorine and lasts longer in sunlight. (WHO 2004) Sunlight breaks down disinfection byproducts and other unwanted chemicals. Sunlight adds to the oxygenated water creating oxides for natural microbial control much on the principle of hydrogen peroxides. Algae are naturally present and remove acidic chemicals helping make water pH balanced. PWB’s position does not align with fundamental principles of microbiology, physics, or chemistry.

“In addition surface waters are exposed to natural UV irradiation in sunlight which may damage oocyst (Cryptosporidium) DNA thereby inhibiting DNA replication and reducing infectivity.” (AWWA RF 3021 2008)

Q7. *Why have waterborne disease outbreaks been associated with closed drinking water reservoirs?*

PWB Position – Portland has never had a disease outbreak caused by its closed storage reservoirs. Closed reservoirs that have had waterborne outbreaks have been in systems that experienced operational or mechanical failures and which have typically been infiltrated by animals. Open reservoirs, on the other hand, with their large water surface areas are much more vulnerable to animals entering, swimming, defecating, or dying in them. It is fairly common for Portland Water Bureau maintenance workers to find dead animals, excrement, and other contaminants in the open reservoirs – this water goes directly to the customers’ tap without further treatment. Many of the documented outbreaks associated with closed reservoirs have been tracked to animals that have made their way into closed reservoirs. Animals are able to enter a closed reservoir through a broken or missing screen on its vent or overflow. Due to the screening of vents and overflow piping, evidence of animal access has never been discovered in our closed storage tanks. In Oregon, the State Drinking Water Program reviews the function of vent screens and overflows. The Water Bureau inspects and maintains vent screens and access points to its closed reservoirs and tanks on a monthly basis.

Correction – Portland’s open reservoirs have never had a microbiological, chemical, or disease issue resulting in illness or death. Portland Water Bureau has never been able to demonstrate the debris they claim to find has a chain of custody originating from the open reservoirs. All we see is material placed on a tarp in the area outside the open reservoirs. Portland’s open reservoirs have never had a negative impact on water quality as shown by no Cryptosporidium, viruses, or Giardia. Water samples for bacteria meet EPA and Oregon Health Authority standards. Covered reservoirs in Portland have had vandalism and dangerous chemicals thrown in them. As an example, the covered reservoir at the top of Mt. Tabor had hydrochloric acid and other debris dropped in it on May 28, 2012. This incident was never reported by Portland Water Bureau to the public.. Other covered reservoirs in Missouri and Colorado have had deaths from bacteria. Unlike the covered reservoirs, other open reservoirs across the United States do not have public health detriments either. Open reservoirs continue to provide safe and healthy drinking water for the citizens of Portland.

Q8. *What about rubberized asphalt coatings leaching into the water on a new reservoir?*

PWB Position – The new reservoirs planned at Powell Butte and Kelly Butte will be built of reinforced concrete. No rubberized asphalt coatings will be placed inside the reservoirs next to the drinking water. However, it is standard practice to apply waterproofing to the exterior of concrete structures of this type.

Correction – Rubberized asphalt is a toxic petrochemical based sealant used on concrete reservoir roofs and elsewhere on the covered reservoirs. As we have seen in the Powell Butte 2 construction, there are problems with hundreds of cracks in the roof and elsewhere. Applying the rubberized asphalt compound becomes a public health problem when it can permeate through cracks in the concrete. The caps are sealed with hot mopped coal tar that is also petrochemical based and has polycyclic aromatic hydrocarbon (PAH) cancer causing component. Rubberized asphalt has a benzene component that may be released through microbial degradation of the petrochemicals, thus reaching the drinking water through the many cracks in concrete.

These toxic component health issues are overlooked or dismissed by those who are decision makers in constructing these poorly planned and developed covered reservoirs. Standard practice in construction has little value to those who are at risk for toxic and carcinogenic chemical health issues. Rubberized asphalt is listed in California Proposition 65 as a cancer causing agent.

Q9. *Wouldn't it be cheaper to maintain the open reservoirs than build covered storage?*

PWB Position – The open reservoirs range from 100 to 117 years old. While they may look fine when full, they are in poor condition. The concrete is deteriorated, with cracks and chunks missing, the lining panels have eroded, and the steel pipes and valves are corroding. In the last 10 years \$40 million dollars have been spent on reservoir maintenance, and the costs continue to climb. Perhaps most importantly, the reservoirs and pipes are not structurally sound enough to withstand an earthquake, and would be unusable for water storage at a time when they would be most needed. It has been estimated that the reservoirs would need over \$125 million dollars in improvements to seismically reinforce them. This would still not meet the EPA’s regulatory requirement to cover them or treat the water exiting them.

Correction – The public health benefits of the open reservoirs far outweigh the minor costs to restore and maintain them. Regular architectural and engineering reports from 1990 to 2009 confirm their condition as good with a small amount of restoration needed. The reservoirs are built soundly and have withstood earthquake activities. We reviewed the earthquake discussion during the 2004 Open Reservoir Independent Review Panel and it was confirmed that earthquakes are not a structural issue. There is no scientific or engineering reason the reservoirs cannot last many decades longer for our public health benefits. The PWB has unnecessarily spent hundreds of millions of dollars more than it would cost to maintain the open reservoirs to build covered reservoirs we do not need because water usage is declining. The engineering of Portland’s open reservoirs was ahead of its time and has been shown to remain structurally solid.

Q10. *What was the AwwaRF Project 3021 sampling at Portland’s open reservoirs and how does it relate to the requirements of the LT2 rule or a Variance for Open Reservoirs?*

PWB Position – In 2008 and 2009 the Portland Water Bureau participated in the Water Research Foundation (WaterRF) Project 3021, Detection of Infectious Cryptosporidium in Water. The purpose of the WaterRF project was to “examine conventionally filtered surface water for the presence of infectious Cryptosporidium using both cell culture techniques and molecular methods,” and “attempt to repeat a recent study that reported a risk of infectious Cryptosporidium in filtered drinking water so that a scientifically sound consensus may be reached.”

The Water Bureau’s sample volumes ranged from 83.5 liters to 305.6 liters, for a total volume of about 7,000 liters during the study. Eighteen samples were collected approximately twice per month from June 2008 to April 2009. The results of the study were that no infectious Cryptosporidium oocysts were detected in any of the Water Bureau’s samples. Additionally, no infectious oocysts were detected for any utility participating in this study.

EPA has indicated that variances are not available for the open reservoir requirements of LT2. Even if a variance to the open reservoir requirements of LT2 were available, the WaterRF study would not be adequate to achieve a variance.

The WaterRF study does not document the absence of Cryptosporidium and other public health risks in the open reservoirs. It simply shows that no infectious oocysts were detected in any of Portland’s samples collected on 18 occasions. Given the literature that addresses the potential for direct microbial and chemical contamination and other forms of water quality degradation associated with 5 open finished water reservoirs, the data from the WaterRF study would not be considered convincing evidence for EPA, public health officials, or the scientific community in general.

Furthermore, the WaterRF study would not suffice as an adequate variance application (if one were available) for the following reasons:

1. The Water Bureau’s sampling frequency and total number of samples from this study is insufficient compared to what EPA requested for the source water variance.
2. The Water Bureau’s sampling location was only from Reservoir 4 (and occasionally from Reservoir 5) and not representative of all open reservoirs.
3. The WaterRF project did not use EPA Method 1623 for analysis. Method 1623 is required for LT2 monitoring.

4. LT2 samples must be analyzed by an EPA approved laboratory. The laboratory in the Texas Agrilife Research center used in the WaterRF study is not an EPA approved laboratory for Cryptosporidium.
5. The WaterRF research project did not sample for Giardia or viruses. The LT2 rule states that public water systems “using uncovered finished water storage facilities must either cover the storage facility or treat the storage facility discharge to achieve inactivation and/or removal of 4-log virus, 3-log Giardia lamblia, and 2-log Cryptosporidium.” The open reservoir requirements of the LT2 rule are not solely concerned with Cryptosporidium.

Correction – In 2008 and 2009 the Portland Water Bureau participated in the American Water Works Association Research Foundation (AwwaRF) Project 3021 “Detection of Infectious Cryptosporidium in Water.”

The Portland Water Bureau sampled 7000 liters at the outlet of Portland’s open reservoirs with zero detects of cryptosporidium while utilizing a sampling method superior to that recommended by the EPA.

The EPA’s 1623 HV sampling method has been widely criticized by municipalities and national professional associations because the agency’s approved sampling method fails to distinguish between harmless and harmful Cryptosporidium, dead or alive Cryptosporidium, and between infectious and noninfectious varieties.

In a 2008 conference presentation AwwaRF 3021 researchers made this statement regarding the current EPA sampling method, “The detection of non-infectious oocysts or oocysts belonging to a species that is not infectious to humans could cause unwarranted concern for a contaminant that may not be significant public health risk.”

Portland was one of 19 utilities participating in the study and, according to the study researchers; all utilities including Portland already meet the goal of the LT2 rule based on the statistically significant sampling. The goal of the LT2 rule is to reduce the level of disease in the community.

Both the Safe Drinking Water Act and Oregon state law provide for a reservoir “treatment technique” variance. It has long been recommended by community stakeholders that the Portland Water Bureau follow NYC’s lead with regard to pursuing a reservoirs variance: collect and submit the AwwaRF 3021 cryptosporidium data (zero detects) along with Giardia and other necessary data to the State as part of a reservoir variance application.

Public health officials agree that there will be no measurable public health benefit from additionally “treating or covering” Portland’s open reservoirs. The State Drinking Water Program now has primacy over the rule but can only consider a reservoir variance application if one is submitted. The City Council should act to ensure that the PWB applies for such a variance.* (*This statement was obtained from the Friends of the Reservoirs. The documents from the AWWA RF 3021 study have been read and agree with their position.)



"LT2 Rule" Waiver Supporters at Portland City Hall, Earth Day 2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 19 2011

The Honorable Charles E. Schumer
United States Senate
Washington, D.C. 20510

THE ADMINISTRATOR

Dear Senator Schumer,

Thank you for the phone call and the letter on July 20th regarding the construction of a cover at the Hillview Reservoir site in Yonkers, NY. While protection of the public's health from waterborne parasites and diseases such as *Cryptosporidium* must be foremost, I agree with you that we should and can find cost-effective ways of achieving these public health protections. For this reason, EPA will initiate a review process for the regulation requiring covers on reservoirs such as Hillview.

The requirement that public water systems that store treated water in reservoirs, such as Hillview, either cover the reservoir or treat water leaving the reservoir to inactivate viruses, *Giardia*, and *Cryptosporidium* comes from EPA's Federal Long Term 2 Enhanced Surface Water Treatment (LT2) Rule, which was finalized in 2006, in the previous Administration.

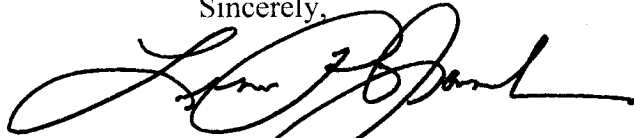
This requirement, issued under the authority of the Safe Drinking Water Act, applies to all public water systems, regardless of what treatment or filtration methods are used, because the requirements address open reservoirs that store drinking water that has already been treated and is intended to be distributed directly to consumers without further treatment. The uncovered finished water reservoir requirement is intended to protect against the potential for re-contamination of treated water with disease causing organisms, specifically *Cryptosporidium*, *Giardia*, and viruses.

However, as you have mentioned, different reservoirs around the country have different specific conditions and protections that may have a bearing on the public health benefits of the LT2 coverage requirement. Hillview may be an example of a reservoir with specific structural and other characteristics that warrant further review of the need to mandate a reservoir cover.

As such, as part of the Agency's Final Plan for Periodic Retrospective Review of Regulations, as well as the Safe Drinking Water Act (SDWA), the Agency will review the LT2 rule. In doing so, EPA will re-assess and analyze new data and information regarding occurrence, treatment, analytical methods, health effects, and risk from viruses, *Giardia*, and *Cryptosporidium* to evaluate whether there are new or additional ways to manage risk while assuring equivalent or improved public health protection. As we conduct our review we intend to consider innovative approaches for public water systems, including those employed at the Hillview Reservoir, while meeting the SDWA requirement to maintain or improve public health protection for drinking water. EPA will proceed expeditiously on our review of the LT2 rule. Our current agreement with the City of New York does not require construction of the cover until 2028 – well after the review of the rule will be completed. Science will drive our ultimate decision and EPA looks forward to continuing to work with New York City and other stakeholders as we move forward in this process.

Thank you for your leadership on this and many other issues. If you have additional questions, please feel free to contact me, or your staff can contact Sven-Erik Kaiser (202) 566-2753 in EPA's Office of Congressional Relations.

Sincerely,



Lisa P. Jackson

To: Portland Planning and Sustainability Commission
November 4, 2014

I have the following comments regarding the Proposed Draft of the Comprehensive Plan:

1. OHSU and VA Medical Center campuses should not be changed to Mixed Use zoning. Mixed Use zoning allows too many uses not related to institutional uses. The goals and policies of the Marquam Hill Plan should remain unchanged for the near future, but eventually there will be need to update it; Mixed Use would open the door to uses that would attract more vehicle trips through the neighborhood and on Terwilliger Parkway that will be much more difficult to control if not associated with one or two large institutions. It has never been the intention of the Marquam Hill Plan to open up the medical campuses to non-institutional employment or commercial enterprises nor should that be allowed without a rigorous planning process. Instead, the zoning designation should be changed to Institutional/Campus given what we know so far about what that zoning will be like. OHSU and the VA Medical Center were originally Conditional Uses in an R1 zone but were changed to EX as part of the Marquam Hill Plan. I oppose EX zoning for the same reasons that I oppose Mixed Use zoning: that it would allow uses that are not consistent with the primary mission of medical and educational institutions. Why is every other medical and educational facility in Portland being proposed to change to Institutional/Campus but not OHSU and the VAMC? Why is OHSU and the Marquam Hill Plan being held up as the model for a new Institutional/Campus zone but they are not being changed to that zone themselves?

2. I am very concerned about Policy 1.15, which states 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 of this plan.” While that may seem logical in the context of a Comprehensive Plan update, it actually creates uncertainty and suspicion with regard to existing area plans that many stakeholders have come to know and rely on.

We need to be assured that all components of the Terwilliger Parkway Corridor Plan, the Terwilliger Parkway Design Guidelines, the Marquam Hill Plan, and the Marquam Hill Design Guidelines will remain in full force exactly as written and not be superseded by new Comprehensive Plan goals and policies. The existing plans and guidelines were developed through rigorous planning processes that involved all stakeholders and must not be superseded unless the Bureau of Planning engages the same stakeholders to discuss exactly how the new goals and policies will change existing plans.

3. The Portland Parks & Recreation owned property (Tax ID R327753) between the gas station at 2800 SW Sam Jackson Park Rd. and Terwilliger Blvd. should be changed to Open Space zoning, not Mixed Use. It was originally part of Terwilliger Parkway and should eventually return to park use. We should not perpetuate a past bad decision to convert park property to commercial use. The PP&R owned parking lot at the Chart House restaurant (5700 SW Terwilliger Parkway) is also used for private parking but is zoned OS; if it works for one it should work for the other.

4. I support positions taken by SW Neighborhoods Inc. and Multnomah NA regarding the need to extend the comment period deadline beyond March 15th, the role of Neighborhood Associations, and opposing proposed Corner Lot zoning.

Sincerely,

Anton Vetterlein
430 SW Hamilton St.
Portland, Oregon, 97239
antonvett@comcast.net

2010 --- 7209 SW Third Avenue | Portland Oregon | 97219



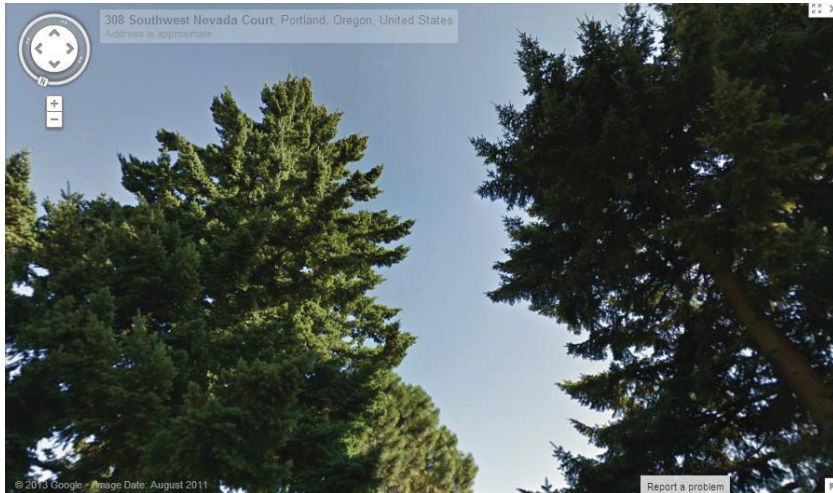
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Ord. 187832 Vol. 2.3.G, page 16572

QUALITY? “Vintage” Homes Northwest



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Home



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Ord. 187832 Vol. 2.3.G, page 16573

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Ord. 187832 Vol. 2.3.G, page 16574

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Ord. 187832 Vol. 2.3.G, page 16575

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Ord. 187832 Vol. 2.3.G, page 16576

100% out of character with 100+ year old neighborhood



Collateral Damage: “Vintage” Homes NW



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Ord. 187832 Vol. 2.3.G, page 16579

Collateral Damage: My Neighborhood



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Collateral Damage: My Neighborhood



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Collateral Damage: My Neighborhood



2014 -- 7209 SW Third Avenue | Portland Oregon | 97219

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Ord. 187832 Vol. 2.3.G, page 16582

Collateral Damage: My Neighborhood

Can't the city do better? Don't the citizens – the existing character – the quality of life, the environment for the other critters we share this place we call home, and pay hefty taxes for such protections – **deserve better?**



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November 4, 2014

City of Portland Mayor and Portland City Commissioners
City of Portland
1221 SW 4th Avenue, Room 340
Portland, OR 97204

Planning and Sustainability Commissioners
Bureau of Planning and Sustainability
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Draft Comprehensive Plan

Dear Mayor and Commissioners:

I am writing on behalf of the Yakama Nation to express our concern with the City of Portland's draft Comprehensive Plan proposal to develop 300 acres on West Hayden Island (WHI) for marine industrial terminals.

During the West Hayden Island (WHI) proposed annexation process, beginning in 2009 until 2013, Yakama Nation staff participated in regular meetings regarding development concepts, special studies, and mitigation plans. Commissioned studies related to the annexation process clearly indicated that the development of WHI would have high environmental impacts, considerable adverse community impacts and questionable economic benefits. The environmental costs of developing West Hayden Island ran counter to the responsible and sustainable development practices for which the City of Portland is noted.

At the end of the process, and after careful consideration of all the aspects of the annexation proposal, the Yakama Nation reached a determination that industrial development (including mitigation) of WHI is at odds with regional salmon recovery efforts; we are on the record as being opposed to the annexation of WHI for industrial development. At the end of the process, the Port of Portland withdrew its proposal.

The Yakama Nation is disheartened to see WHI identified yet again for industrial development as part of the City's draft comprehensive plan. **The Yakama Nation continues to oppose the designation of WHI for industrial development.**

Development of WHI will cause irreparable damage to an important natural resource feature in the lower Columbia River. Furthermore, this action will set the stage for development that adversely affects Yakama Nation's Treaty-reserved fishery resources and our vision for restoring the health and productivity of the Columbia River. Accordingly, we continue to oppose this action on the basis that it is contrary to the interests and efforts of the Yakama Nation to preserve, protect, and enhance Treaty trust resources and fishing rights.

No two acres of land are exactly alike, careful consideration should be given to the appropriateness of development of specific areas. Some areas are more appropriate for development, while others are important for providing biodiversity and wildlife habitat, water quality, or ecosystem functionality. WHI is clearly an area to be conserved and protected.

I urge you to honor the Yakama Nation's treaty reserved rights by considering a new vision to honor, protect, and restore West Hayden Island.

If you would like to discuss this matter in more detail, please have your staff contact Rose Longoria, the Regional Superfund Coordinator for Yakama Nation Fisheries. Ms. Longoria can be reached at 509-865-5121 x6563 or rose@yakamafish-nsn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Ward", written in a cursive style.

Paul Ward
Manager
Yakama Nation Fisheries

JOHN A. RANKIN, LLC.
Attorney/Consultant
26715 SW Baker Road
Sherwood, Oregon 97140
(503) 625-9710 / Fax (503) 625-9709
email: john@johnrankin.com

November 4, 2014

VIA EMAIL AND FAX ONLY

Ms. Susan Anderson, Director
Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201
Email: psc@portlandoregon.gov
Ph: 503-833-7700
Fx: 503-823-7800

Re: Written Testimony – Planning and Sustainability Hearing – November 4, 2014
Property Owner – Keith and Elizabeth Dieringer
Subject Property – 1S2E24BD – Tax Lots 300, 1100 and 2700.
Situs Address – 7315 SE 152nd Avenue, Portland, Oregon 97236
Proposed Comprehensive Plan Amendment – SE Barbara Welch Road Area.

Dear Director Anderson and PSC Members:

Please accept this letter as our written testimony for placement in the record of the November 4, 2014 Public Hearing on the proposed Comprehensive Plan Amendment (PAPA) in the SE Barbara Welch Road Area which appears to affect the above the described property.

On behalf of our clients, Keith and Elizabeth Dieringer, owners of the above noted three tax lots included in the address shown above, we respectfully request that you remove all of their properties consisting of approximately 6.4 acres (as shown on the attached map) from the PAPA proposed for the SE Barbara Welch Road area which for the following reasons and findings:

1. The PAPA as proposed would actually downzone the Dieringer properties from its current Plan designation of “Low Density Single-Family” with zoning of “R-10 (minimum lot size of 10,000 square feet) to the proposed “Single – Dwelling 20,000” with zoning of R-20 (minimum lot size of 20,000 square feet), resulting in a 50% reduction in the number of future lots and homesites that could be

developed on the Dieringer property and a nearly 50% reduction in fair market value on the development market.

2. In 2007, the City of Portland approved the "SE 152nd Avenue – LID" which included the Dieringer property in its boundary. The level of the Dieringer's assessment established by the City was based on the Office of Transportation's "highest and best use" calculation that the Dieringer property would be developed into twenty-two lots at some time in the future.
3. The Dieringers were required to pay over \$110,000 in individual assessment on those future twenty-two lots or over \$5,000 per future lot.
4. The proposed PAPA will reduce the potential number of lots that can be developed on the Dieringer to approximately eleven lots, which results in the following impacts:
 - a. A 100% increase on the per lot LID assessment from \$5,000 to \$10,000 per lot, thereby increasing the individual lot encumbrance and reducing marketability.
 - b. An approximately 50% reduction in the fair market value of the Dieringer property for development – from \$1,100,000 (22 lots at \$50,000 each raw land) to \$550,000 (11 lots at \$50,000) resulting in a loss of over \$500,000 to the Dieringers.
 - c. Adverse impacts on the Dieringer's existing loans by significantly increasing the current loan to value ratio and potentially jeopardizing the current loans.
5. Finally, Oregon's land use statutes provide just compensation for unfair burdens caused by land use regulations. ORS 195.300ff.1 As established above, if the City of Portland enacts the PAPA and applies it to the Dieringer properties to restrict its residential use, then the City must pay the Dieringers just compensation for the reduction in fair market value.

Therefore, the Dieringers respectfully request that you remove their properties from consideration for inclusion in the PAPA. Thank you for your time and consideration. If you have any questions or need additional information, please call or email me.

Very truly yours,

1 195.305 Compensation for restriction of use of real property due to land use regulation. (1) If a public entity enacts one or more land use regulations that restrict the residential use of private real property or a farming or forest practice and that reduce the fair market value of the property, then the owner of the property shall be entitled to just compensation from the public entity that enacted the land use regulation or regulations as provided in ORS 195.310 to 195.314.



JOHN A. RANKIN

JAR/bhs

Encl: As noted above.

Pc: Clients

November 4, 2014

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VIA E-MAIL (PDXCOMPPLAN@PORTLANDOREGON.GOV)

Portland Planning and Sustainability Commission
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: PSC Comprehensive Plan Testimony, related to 2035 Comprehensive Plan (July 2014 Draft) Goals and Policies

Dear Portland Planning and Sustainability Commission:

This office represents Schnitzer Steel Industries, Inc. (“Schnitzer”). This testimony is directed at the Goals and Policies of the July 2014 draft 2035 Comprehensive Plan (the “comp plan”), and we request that it be included in the record. Please provide us notice of the PSC’s recommendation and the City Council’s decision on the comp plan.

Schnitzer owns and operates an approximately 101 acre port and related metals recycling facility at 12005 N. Burgard Way, which is located on the north reach of the Willamette River. Schnitzer has closely followed the City of Portland’s periodic review tasks, particularly as they relate to Portland’s working harbor. Schnitzer’s comments on the comp plan are directed at ensuring that the City can comply with Goal 9 by accommodating the projected demand for developable employment lands with site characteristics and corresponding job opportunities in the working harbor, and that the working harbor remains economically viable. Given the working harbor’s importance in trade statewide, and as a source of jobs for under-represented communities and family wage jobs, we hope that the PSC and City share Schnitzer’s desire for a comp plan that will support a thriving working harbor.

A summary of Schnitzer’s concerns with the current draft of the comp plan is below. Solutions to our concerns are detailed in the attached is redline version of Chapters 6 and 7 of the comp plan. Our suggested revisions to the draft comp plan recalibrate the lack of balance in the comprehensive plan and emphasize that in order for the City to prosper, it must be economically viable to retain and grow jobs, and an adequate supply of land with appropriate site characteristics must be available.

1. Lack of Balance in the Comp Plan

When read in isolation, Chapter 6: Economic Development is supportive of prosperity, which is one of the comp plan’s four “key values” (GP1-2) and encouraging job growth, which is one of seven key directions in the comp plan (I-9). However, when the entirety of the comp plan is analyzed, there is a disproportionate emphasis on the Goals and Policies in Chapter 7:

Environment and Watershed Health, which creates an inappropriate policy conflict adverse to the continued viability of the working harbor. Stated otherwise, a comp plan with these policy conflicts will not achieve the Guiding Principle of prosperity,¹ the Goals and Policies in Chapter 6, or Goal 9's requirement that the City provide an adequate supply of sites of suitable sizes, types, locations and service levels for a variety of industrial uses, consistent with the EOA. See Goal 9 and ORS 197.712. These inconsistencies in the current draft of the comp plan also raise Goal 2 compliance issues.

A comparison of the verbs used in Chapters 6 and 7 is an example of how economic development is undermined by the comp plan. Verb choice in comp plan goals and policies is meaningful. For example, "require" means to "compel, demand something," whereas "consider" means to "think about, take into account." See Appendix A: Glossary. The policies in Chapter 7 are predominately mandatory actions ("protect") whereas Chapter 6 are largely aspirational ("encourage"). As such, the Chapter 7 polices of mandatory implementation would necessarily control.

The abundant use of "protect" in Chapter 7 is particularly troubling. The comp plan Glossary defines "protect or maintain" as "keep what you have; conserve; maintain; preserve." The Court of Appeals and LUBA have interpreted the term "protect" to mean that the only impacts to a "protected" resource that are permitted are *de minimus* or insignificant. D.C. Riverkeeper v. Clatsop County, 238 Or. App. 439 (2010). In other words, Portland's existing e-zone regulatory scheme that allows some impacts to resources if those impacts are avoided, minimized and mitigated would be inconsistent with a comp plan policy that requires "protection." The Court of Appeals also reasoned that when a comp plan policy requires protection, it cannot be "balanced" with other comp plan policies that encourage competing outcomes to allow limited impact to resources. The cited case relates to Goal interpretation and local regulations implementing Goals, and the reasoning would be applied to the comp plan's use of the verb "protect." Accordingly, as currently drafted, the comp plan would prohibit development, and jobs, on sweeping expanses of land. For example, Policy 7.1 provides "Environmental quality. Protect air, water, and soil quality and associated benefits to public and ecological health and safety." As written, Policy 7.1 applies to all air, water and soil in the City, and calls for it to be protected, which means there can be only *de minimus* impacts to air, water and soil Citywide. Even more devastating to the working harbor are Policy 7.43, which requires the preservation and enhancement of all existing river banks in the Willamette and Policy 7.46, which requires the protection and enhancement of all grasslands, beaches, floodplain, wetlands and other wildlife habitat. Neither Policy 7.43 nor Policy 7.46 consider the significance, function or value of the resource or whether it is even inventoried, and the policies do not consider the needs of water-dependent or water-related uses and opportunities for mitigation.

¹ The economic prosperity Guiding Principle provides, "encourage land use decisions that support a low-carbon economy and foster employment growth, competitiveness, and equitability-distributed household prosperity." GPI-5.

Not only does the prolific use of “protect” in the comp plan stifle job preservation and creation, it is inconsistent with Goal 5. Specifically, Chapter 7 does not always link the “protect” requirement to an identified Goal 5 resource on an adopted Natural Resources Inventory (“NRI”). Regulating resources, especially to the extent that impacts are prohibited through a “protect” designation, that are not designated as significant violates Goal 5. For example, Policy 7.1 (quoted above) indiscriminately “protects” all air, water and soil qualities, regardless of whether the resource is significant or on an adopted NRI. Policies 7.43, 7.46 and others in Chapter 7 have the same defect.

The issues in Chapter 7 can be resolved if the term “protect” is replaced with verbs that allow more discretion, such as “conserve,” “encourage,” “reduce,” “limit,” “strive” or “consider.”

2. The Working Harbor Needs Predictability, an Improved Regulatory Climate and Certainty About Superfund

Portland’s economic competitiveness, particularly in the working harbor, is negatively impacted by regulatory schemes; particularly ones that are redundant to or in contradiction of state and federal regulations. While Policy 1.5 “Consistency with state and federal regulations” and Goal 6.B “Development” are gestures toward avoiding the detrimental effects of uncoordinated regulations, other goals and policies encourage potentially duplicative regulation. For example, Policy 7.4 requires the protection of the quantity, quality and function of significant natural resources, many of which are already subject to state and federal environmental protection regulations.

The relative competitiveness of industrial sites, particularly river dependent ones, is critically important to business. However, Policy 6.16 (Regionally-competitive development sites) suggests that sites only need to be competitive in the region. River-dependent and river-related sites need to be competitive globally, not just regionally. Additionally, while incentives and other assistance are important tools for improving competitiveness, Policy 6.16 should be broadened to recognize that City-imposed regulations (particularly ones that duplicate state and federal regulations) can contribute to Portland sites not being competitive.

Avoiding duplicative regulations is particularly important in the working harbor, which is included in the Portland Harbor Superfund Site. The existing federal and state Superfund regulations create uncertainty, expense and added discretionary review processes. Industrial uses in the harbor cannot tolerate additional regulatory burdens, such as those included in the River Plan and encouraged by the comp plan. We strongly support the inclusion of a Superfund-specific policy in the comp plan, Policy 6.40 (Portland Harbor Superfund). Policy 6.40 appropriately recognizes the importance of the cleaning up the Harbor to the City’s future land supply. While Policy 6.40 is a step in the right direction, we encourage the City to include specific Superfund action items, such as expressly exempting remediation activities from City

regulation, City recognition of Superfund-related mitigation and/or remediation when land use processes require mitigation, and funding prioritization

Many of Schnitzer's concerns could be addressed by including the concept of "economic viability" in the comp plan. The term "economically viable" further refines the concept of what is "practical" for development. The term means that a redevelopment or development objectives of a specific project are achievable in the Portland market, considering factors such as cost, time and predictability. Because jobs do not survive in a climate which is not economically viable climate, we request that the City include economic viability as a concept in the comprehensive plan.

3. The Importance of Site Characteristics

For water-dependent and water-related uses, it is not just the quantity of available land that matters; the quality is critical. These qualities include site characteristics that are necessary for trade, including river and rail access, and proximity to the interstate. While Policy 6.36 (Prime industrial land retention) is an important means to preserve prime industrial land from quasi-judicial map amendments, it needs to be strengthened. Specifically, Policy 6.36(a) should be broadened prevent the conversion of prime industrial land due to legislative map or text amendments. If conversion of prime industrial land is unavoidable, then the loss of land must be fully mitigated with comparable acreage with appropriate site characteristics. Without these changes, it appears as if habitat corridors depicted on Figures 3-5 and 3-6 will be introduced into prime industrial areas, which will reduce the supply of industrial land with needed site characteristics, contrary to Goal 9. Policy 7.43's (River bank conditions) requirement to preserve existing river banks and rehabilitate developed banks, Policy 7.47's (Riparian corridors) support for increasing the width and quality of vegetative buffers along the Willamette River and Policy 7.18's (Habitat connectivity) direction to weave habitat into new development without recognition of the use's functional needs are other examples of converting industrial land.

4. There Must Be Accountability for Job-Capacity Creating Policies

We expect that the land deficit identified in the EOA will be satisfied, in part, by making existing land more productive. We are supportive of this approach, where appropriate, such as increasing employment densities in the Central Eastside. However, job densification will not address the identified need for inherently land-intensive jobs that have site specific needs, such as water-dependent and water-related uses. Policies that are the basis for an assumption of increased land supply must have a more direct connection to the assumed outcome so that accountability is ensured. For example, if we assume that by 2035, 40% of brownfield acreage will be redeveloped, then Policy 6.39 (Industrial brownfield development) should include a metric for measuring success, and remedial steps that will be taken if the assumed outcomes are not achieved. Additionally, Policy 7.29 (Brownfield remediation) appears to erode Policy 6.39 because brownfield remediation will be promoted and facilitated if it incorporates ecological site

design and resource enhancement. In other words, cleaning up the brownfield pursuant to state and federal regulations is not enough; additional ecological lift must also be provided. Such an additive requirement would increase the cost of brownfield remediation, which is an obstacle to creating job capacity on brownfield land.

Policy 6.48 (Golf course reuse and redevelopment) is another example. To the extent that golf course conversion is relied upon for land supply assumptions, the policy must ensure that there is a connection between the quantity of land that the City assumes will redevelop, and the City's actions. The golf course reuse and redevelopment policy (Policy 6.48) currently limits the City's obligation to only "facilitating" golf course redevelopment.

Finally, to the extent that the City intends on relying upon brownfield sites to accommodate needed jobs, such as the Time-Oil site, Policy 7.46 (Sensitive habitats) appears to foreclose those opportunities.

5. The Link Between the Working Harbor and Equity Issues Should be Strengthened

We welcome that Policy 6.27 (Income self-sufficiency) links the land supply with job opportunities for less-educated people. However, the policy should go farther and link these jobs to the employment geographies that provide most of these job opportunities -- the Portland Harbor and Columbia Corridor. Additionally, the equity policies should be strengthened. For example, Policy 6.27 (Income self-sufficiency) suggests that City regulatory actions could impact job opportunities for less-educated people, but only requires "evaluation" of these regulatory plans. "Evaluation" only requires an analysis of the issue. To be meaningful, the equity policies should be strengthened so that regulations with negative impacts on job opportunities for underrepresented communities are avoided.

Thank you for the opportunity to provide preliminary feedback. We look forward to an ongoing collaborative process so that the comp plan can achieve all of the City's Guiding Principles.

Very truly yours,



FOR:

Dana L. Krawczuk

DLK:dlk

Enclosures

Cc: Schnitzer Steel Industries (via email) (with encs.)

Chapter 6: Economic Development

What is this chapter about?

The goals and policies in this chapter convey the City's intent to:

- Provide land supply to support job growth, and to expand the use of tools, such as brownfield redevelopment, to increase efficient use of land.
- Expand economic opportunity and improve economic equity for Portland's growing population through sustained business growth.
- Support traded sector growth, expand exports and retain Portland's position as an innovative industrial and commercial center and a West Coast trade gateway.
- Provide land use policies to support the growth and vitality of business districts.
- Create an environment that encourages innovation and entrepreneurship, builds on local strengths for business success and growth, and offers businesses a functional and attractive place to locate.

Why is this important?

A healthy economy provides opportunities for people to achieve their full potential and it is the foundation of a livable city. A healthy economy supports the creation of living wage jobs for our growing and increasingly diverse population. It supports a growing tax base for public services. It also improves health and educational outcomes. People with stable jobs and reliable incomes have resources to meet their basic needs, which contributes to their physical and mental health, and to the educational and economic success of youth.

Portland is an innovative employment center in a region with strong economic and export growth. Economic strengths also include a successful Central City and industrial base, a primarily middle-class distribution of jobs that support a diverse community, and livability advantages that attract population growth and talent. However, these strengths mask trends toward declining prosperity for many Portlanders and highlight that economic development must be a higher priority in the coming decades than it has been.

Since 2000, job growth in the city has fallen far short of housing growth. Rising costs of living have outpaced average wages. The share of middle-wage jobs and resulting upward-mobility opportunities for low-income people has declined. Income growth has been concentrated among the top-earning 20 percent of the workforce. In addition, deep income disparities persist for under-represented and under-served populations, such as people of

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color. Research suggests that cities with more equitable economies have stronger economies.

As businesses face an increasingly competitive regional and global marketplace, new directions are needed to sustain job growth and improve economic equity. The region's primarily industrial traded sectors that drive regional prosperity will need more investment in workforce education, land supply, freight infrastructure and innovation. Improving economic equity and affordability will depend on making equity a more central part of City policy and investments.

New land development approaches are needed to improve local competitiveness in regional and global markets, including more brownfield redevelopment, regulatory certainty, low-cost office development and institutional zoning. Land use programs must address the increasingly blurred lines between commercial, industrial and create services sectors. Citywide neighborhood prosperity will depend on new approaches to concentrated commercial growth in centers, neighborhood revitalization, flexibility, affordability and small business growth. And business climate improvements are needed to keep regulatory burdens and fees competitive in the regional and global marketplace.

The world economy is a dynamic system. Portland's economy will continue to change in response to technology, social change and global trends. Zoning and land use must respond to these changes. This kind of local economic innovation will be key to Portland being a player in development of the future economy.

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Goals

Goal 6.A: Prosperity

Portland has vigorous economic growth and a healthy, diverse economy that supports prosperity and equitable access to employment opportunities for an increasingly diverse population. A strong economy that is keeping up with population growth and attracting resources and talent can:

- Create opportunity for people to achieve their full potential.
- Improve public health.
- Support a healthy environment.
- Support the fiscal well-being of the city.

Goal 6.B: Development

Portland supports an attractive environment for industrial, commercial, and institutional job growth and development by 1) maintaining an adequate land supply; 2) a local development review system that is nimble, predictable, and fair; and 3) high-quality public facilities and services.

Goal 6.C: Business district vitality

Portland implements land use policy and investments to:

- Ensure that commercial, institutional, and industrial districts support business retention and expansion.
- Encourage the growth of districts that support productive and creative synergies among local businesses.
- Provide convenient access to goods, services, and markets.
- Take advantage of our location and quality of life advantages as a gateway to Oregon and the Columbia River basin.

Policies

Diverse, expanding city economy

Diverse economic growth is central to Portland's long-term prosperity. It provides jobs for a growing population, improved equity, fiscal stability, neighborhood prosperity, and economic resilience. Moreover, Portland is a statewide economic engine with opportunities and benefits that extend beyond city boundaries.

About 140,000 new jobs are expected in the city between 2010 and 2035, which is consistent with local and national 25-year trends. The policies below set explicit economic growth targets, highlight coordination opportunities, and specify benefits that should be sought through economic growth, and call out important local strengths that support economic growth.

- Policy 6.1** **Diverse and expanding economy.** Align plans and investments to maintain the diversity of Portland's economy and status as Oregon's largest job center with growth across all sectors (commercial, industrial, and institutional) and across all parts of the city.
- Policy 6.2** **Employment growth.** Strive to capture at least 25 percent of the seven-county region's employment growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania Counties).
- Policy 6.3** **Fiscally-stable city.** Maintain a high citywide jobs-to-households ratio that supports tax revenue growth at pace with residential demand for municipal services.
- Policy 6.4** **Economic resilience.** Improve Portland's economic resilience to impacts from climate change and natural disasters through a strong local economy and equitable opportunities for prosperity.
- Policy 6.5** **Low-carbon economy.** Align plans and investments with efforts to improve energy efficiency and reduce lifecycle carbon emissions from business operations. Promote employment opportunities associated with energy efficiency projects, waste reduction, production of more durable goods, and recycling.
- Policy 6.6** **Competitive advantages.** Maintain and strengthen the city's comparative economic advantages including access to a high-quality workforce, business diversity, competitive business climate, and multimodal transportation infrastructure.
- Policy 6.7** **Business environment.** Use plans and investments to help create a positive business environment in the city and provide strategic assistance to retain,

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expand, and attract businesses.

- Policy 6.8 Small business development.** Facilitate the success and growth of small businesses and coordinate plans and investments with programs that provide technical and financial assistance to promote sustainable operating practices.
- Policy 6.9 Business innovation.** Encourage innovation, research, development, and commercialization of new technologies, products, and services through responsive regulations and public sector approaches.
- Policy 6.10 Sharing economy.** Encourage mechanisms that enables individuals, corporations, non-profits and government to market, distribute, share and reuse excess capacity in goods and services. This includes peer to peer transactions, crowd funding platforms, and a variety of business models to facilitate borrowing and renting unused resources.
- Policy 6.11 Economic role of livability and ecosystem services.** Conserve and enhance Portland’s cultural, historic, recreational, educational, food-related, and ecosystem assets and services for their contribution to the local economy and their importance for retention and attraction of skilled workers and businesses.

Land development

According to forecasts, Portland will continue to have relatively strong demand for employment land development. However, most of Portland’s land supply for employment growth is on land that has constraints or is already developed.

Statewide Planning Goal 9 – Economic Development requires Portland to provide adequate long-term and short-term land supply for economic development and job growth, consistent with an Economic Opportunities Analysis. Forecasted demand for buildable land by 2035 includes 150 acres in the Central City, 1,350 acres in industrial districts, of which acres is river-dependent, 690 acres in neighborhood business districts, and 370 acres for campus institutions.

New directions to support Portland’s land supply for job growth include policies for adequate long-term and short-term development capacity, a targeted increase in brownfield redevelopment, incentives to maintain competitiveness in regional and global markets, and guidance for streamlining the City’s regulatory climate.

- Policy 6.12 Land supply.** Provide adequate supplies of employment land that are sufficient to meet the long-term and short-term employment growth forecasts, adequate in terms of amounts and types of sites with necessary site characteristics, readily available and economically practical for development.

- Policy 6.13 Land efficiency.** Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land.
- Policy 6.14 Brownfield redevelopment.** Cleanup and redevelop 60 percent of brownfield acreage by 2035. Additional related policies are found in the Industrial and Employment Districts section of this chapter. Require evaluation of percentage of brownfield cleanup and redevelopment every five years. If sufficient cleanup and redevelopment is not occurring, then require additional financial and regulatory incentives for cleanup and redevelopment.
- Policy 6.15 Annexation.** Facilitate a predictable, equitable process for annexation of employment lands within the urban services area as needed to meet the City’s forecasted land needs. See the West Hayden Island policy in the Industrial and Employment Districts section below.
- Policy 6.16 Regionally-competitive development sites.** Improve the regional and global competitiveness of the vacant and underutilized sites located in Portland’s employment areas through the use of incentives and regional and state assistance for needed infrastructure and site readiness improvements and avoiding City regulations that diminish these objectives.
- Policy 6.17 Regulatory climate.** Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:
- 6.17.a.** Assess and monitor cumulative regulatory costs to ensure that Portland is financially competitive with other comparable cities.
 - 6.17.b.** Promote certainty for new development through appropriate allowed uses and “clear and objective” standards to permit typical development types without a discretionary review.
 - 6.17.c.** Allow discretionary-review as a way to facilitate flexible and innovative approaches to meet requirements.
 - 6.17.d.** Design and monitor development review processes to avoid unnecessary delays.
 - 6.17.e.** Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and avoid duplicative regulations and procedures when City policies can be achieved through other means.
- Policy 6.18 Short-term land supply.** Provide for a competitive supply of development-

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ready sites, with different site sizes and types, to meet five-year demand for employment growth in the Central City, industrial areas, campus institutions, and neighborhood business districts.

Policy 6.19 Evaluate land needs. Update the Economic Opportunities Analysis and short-term land supply strategies every 5 to 7 years.

Policy 6.20 Corporate headquarters. Provide land opportunities in suitable locations for development of corporate headquarters campuses.

Traded sector competitiveness

Global trends have put increasing pressure on regions to strengthen their competitiveness for traded-sector growth, which drives regional prosperity. Traded sectors are local businesses of all sizes that export goods and services and compete in markets outside of the region, bringing income and jobs into the region. These sectors have become more vulnerable and dynamic in the shifting global marketplace, as they reinvent their supply and distribution lines and concentrate activity in lower cost or higher productivity locations.

The following policies call for focusing limited resources on strategic traded sector specializations with growth prospects. This region's growing export activity is concentrated in high tech and advanced manufacturing, where job growth has been modest but output growth continues to outpace the service sectors. Other growing export specializations include software, apparel, clean-tech, freight-hub distribution, and creative services. While these growing specializations are expected to shift over time with market changes, connecting existing and emerging local business with global markets helps bring new resources into the region.

Policy 6.21 Traded sector competitiveness. Align plans and investments with efforts to improve the city and regional business environment for traded sector and export growth. Participate in regional and statewide initiatives.

Policy 6.22 Clusters. Align plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters.

Policy 6.23 Trade and freight hub. Encourage investment in transportation systems and services that will retain and expand Portland's competitive position as a West Coast trade gateway and freight distribution hub.

Policy 6.24 Import substitution. Encourage local goods production and service delivery that substitute for imports and help keep the money Portlanders earn in the local economy.

Policy 6.25 Business opportunities in urban innovation. Strive to have Portland's built environment, businesses, and infrastructure systems showcase examples of

best practices of innovation and sustainability, provided that the sustainability measures are competitive and economically viable.

Policy 6.26 Traded sector diversity. Encourage partnerships to foster the growth, small business vitality, and diversity of traded sectors.

Equitable household prosperity

National and local trends reveal growing inequities in economic opportunity. Income growth has been concentrated among the top-earning 20 percent of the workforce as disproportionate barriers to upward mobility persist for people of color and people with disabilities. Since 2000, slower job growth and the decline of middle-wage jobs have further widened economic insecurity, increased unemployment, and reduced upward-mobility opportunities for the working poor. Rising inequality threatens the long-term stability of our economy.

In response, the Portland Plan set a high bar for improving economic equity, targeting increased levels of income self-sufficiency from 77 percent of county households to 90 percent by 2035. The new policy directions below support expanded employment, and housing opportunities to increase middle-class prosperity, improve job growth in East Portland, and coordinate efforts to overcome poverty and disparities.

- Policy 6.27** **Income self-sufficiency.** The Portland Harbor and Columbia Corridor have historically provided self-sufficient wage level jobs for underrepresented communities. Improve access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities, particularly in the Portland Harbor and Columbia Corridor, to support and expand opportunities in Portland for middle and high wage jobs that do not require a 4-year college degree. ~~Evaluate~~ Require that plans and investments ~~for their~~ have a positive impact on middle and high wage job creation and retention.
- Policy 6.28** **East Portland job growth.** Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.
- Policy 6.29** **Poverty reduction.** Encourage investment in and alignment of poverty-reduction efforts that address economic development, land use, transportation, housing, social services, public health, community development, and workforce development.
- Policy 6.30** **Disparity reduction.** Encourage investment in and alignment of public efforts to reduce racial, ethnic, and disability-related disparities in income and employment opportunity, including by ensuring that new regulations maintain and enhance employment opportunities for these underrepresented communities.
- Policy 6.31** **Minority-owned, woman-owned and emerging small business (MWESB) assistance.** Ensure that plans and investments improve access to contracting opportunities for minority-owned, woman-owned, and emerging small businesses.

Transportation, public facilities, and economic development

Transportation and other public facilities and services play critical roles in ensuring an adequate land supply for job growth, strengthening competitive location advantages, and providing better access to employment opportunities. See the Public Facilities and Transportation chapters for related policies on prosperity objectives, leveraging private investment, and freight mobility.

Central City

Central City is the region's and the state's high density employment center. While it is primarily an office district for professional and business services, finance, information, and government, it's also a key location for the entertainment, tourism, small industry, and education sectors. See the Central City 2035 plan for the land use and development policies for this part of the city's economy. The following policies provide overall direction for the Central City's continued employment growth, competitive roles in the region, and land use in the Central City industrial districts.

Policy 6.32 Central City. Maintain the Central City's regional share of employment and continue its growth as the unique center of both the city and the region for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

Policy 6.33 Central City industrial districts. Protect and facilitate the long-term success of Central City industrial districts, while supporting their evolution into places with a broad mix of businesses with high employment densities.

Industrial and Employment Districts

Portland is the core of the region's-state's distribution and diverse manufacturing economy, including the state's (and the Columbia River Basin's) largest seaport, rail hub, and airport. Established "industrial sanctuaries" meet the needs of manufacturing and distribution firms for medium to large sites, and are buffered from housing. Other types of employment areas include flex space developments, incubator districts for emerging local businesses, industrial headquarters offices, and dispersed neighborhood employment areas. The businesses in these districts are a primary source of Portland's middle-wage jobs, upward mobility opportunities, and traded sector activity (See Figure 6-1).

Looking forward to 2035, new strategies are needed to expand capacity for employment growth while also meeting environmental and other objectives. The policies below call for new tools to maintain economic viability, accelerate brownfield redevelopment, make freight investments that expand market access and industrial land intensification, more effectively protect prime industrial land, and strategically expand industrial and flexible neighborhood employment areas.

- Policy 6.34 Industrial land.** Provide industrial land that encourages industrial business retention, growth, economic viability and traded sector competitiveness as a West Coast trade and freight hub, a regional center of diverse manufacturing, and a widely accessible base of family-wage jobs, particularly for under-served and under-represented people. Avoid regulations that diminish these objectives.
- Policy 6.35 Industrial sanctuaries.** Protect industrial land as industrial sanctuaries identified on the Comprehensive Plan Map primarily for manufacturing and distribution uses and to encourage the growth of industrial activities in the city.
- Policy 6.36 Prime industrial land retention.** Protect the multimodal freight-hub industrial districts at Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1) that is prioritized for long-term retention:
- 6.36.a.** Strictly limit quasi-judicial and legislative Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.
- 6.36.b.** 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.
- 6.36.c.** Identify how regulations affect the capacity, affordability, and viability of industrial uses, and minimize those impacts.
- 6.36.d.** Prohibit the net loss of prime industrial land capacity by requiring any ~~Strive to offset the~~ reduction of development capacity and acreage to be fully mitigated as needed, with additional prime industrial capacity that includes ~~consideration of~~ comparable and appropriate site characteristics.
- Policy 6.37 Harbor access lands.** Strictly limit use of harbor access lands to river- or rail-dependent or related industrial land uses due to the unique and necessary infrastructure and site characteristics of harbor access lands for river-dependent industrial uses.
- Policy 6.38 Industrial land use intensification.** Encourage reinvestment and intensification of industrial land use, as measured by output and throughput per acre.
- Policy 6.39 Industrial brownfield redevelopment.** Provide incentives, technical assistance and direct support to overcome financial-feasibility gaps to enable

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remediation and redevelopment of brownfields for industrial growth. Given the importance of brownfield redevelopment to the City's industrial land supply and the financial burden faced in redevelopment of brownfields for industrial uses, new City regulations on brownfields shall be minimized to the maximum extent practicable.

Policy 6.40 **Portland Harbor Superfund Site.** Take a leadership role in prompt resolution and cleanup of the Portland Harbor Superfund Site and redevelopment of associated brownfields. Encourage-Strive for the most a science-based and cost-effective cleanup solution, so as to not economically burden Portland ratepayers or businesses, while still being protective of human health and the environment, and that facilitates re-use of land for river- or rail-dependent or related industrial uses. Implementation measures to facilitate efficient redevelopment in the Portland Harbor Superfund Site shall include:

- Prioritizing Superfund sites when making transportation and other capital investment decisions.
- Exempt Superfund remediation actions from City review, and instead rely exclusively upon state and federal regulations.
- Offset City environmental mitigation requirements for Superfund mitigation and/or remediation actions completed as part of Superfund cleanup, regardless of whether performed under state or federal oversight.

Policy 6.41 **West Hayden Island.** Provide for the future annexation of West Hayden Island for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or other implementation agreement that ensures mitigation of impacts and provision of public benefits. The annexation ordinance, future zoning, plan districts, and intergovernmental agreements will be used to:

- Allow no more than 300 acres for future deep water marine terminal and infrastructure development.
- Permanently protect and enhance at least 500 acres as open space, to be managed primarily for the benefit of the regional ecosystem.

Policy 6.42 **Multimodal freight corridors.** Encourage freight-oriented industrial development to locate where it can maximize the use of and support reinvestment in multimodal freight corridors.

Policy 6.43 **Dispersed employment areas.** Provide small, dispersed employment areas for a flexible and affordable mix of office, creative services, small scale manufacturing, traded sector and distribution, and other small-format light industrial and commercial uses with access to nearby freeways or truck streets.

Policy 6.44 **Impact analysis.** Evaluate and monitor the impacts on industrial land capacity that may result from land use plans, regulations, public land acquisition, public facility development, and other public actions. Should the

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impact threaten the economic viability, predictability, or operational practability of industrial uses, require regulatory amendments that minimize those negative impacts.

Policy 6.45 **Clean, safe, and green.** Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitating adoption of market feasible new technology and design.

Policy 6.46 **Industrial growth and watershed health.** Facilitate concurrent strategies to protect and improve economically viable industrial capacity and watershed health in the Portland Harbor and Columbia Corridor areas.

Policy 6.47 **District expansion.** Provide opportunities for expansion of industrial areas based on evaluation of forecasted need and the ability to meet environmental, social, economic, and other goals.

- Policy 6.48** **Golf course reuse and redevelopment.** Facilitate a mix of industrial, natural resource, and public open space uses on privately owned golf course sites in the Columbia Corridor that become available for reuse.
- Policy 6.49** **Residential and commercial reuse.** Facilitate compatible industrial or employment redevelopment on residential or commercial sites that become available for reuse if the site is in or near prime industrial areas, and near a freeway or on a freight street.
- Policy 6.50** **Public facilities and land acquisition.** Limit the use of prime industrial land for parks or other non-industrial public facilities.
- Policy 56.51** **Mitigation banks.** Facilitate industrial site development by promoting and allowing environmental mitigation banks that serve industrial land uses on prime industrial land.
- Policy 6.52** **Neighborhood buffers.** Maintain and enhance major natural areas, open spaces, and constructed features as boundaries and buffers for the Portland Harbor and Columbia Corridor industrial areas, without encroaching into or negatively impacting the operations of, the Portland Harbor and Columbia Corridor industrial areas.

Campus institutions

Health care and education sectors are concentrated in large hospital, college, higher education and high school campuses (see Figure 6-2) as well as dispersed smaller facilities. Major institutions are large employers with campuses that vary from pastoral expanses to more concentrated urban grounds. Health care and education are projected to be the city's leading job growth sectors, adding more than 50,000 new jobs by 2035 at campus institutions and in other commercial areas. Rapid growth of campus institutions is a national trend, and best practices offer opportunities to plan effectively for this campus growth, and reduce neighborhood impacts. Examples of new directions in the policies below include designation of major campuses as employment land, regulatory improvements, and transportation-related improvements.

- Policy 6.53** **Campus institutions.** Provide for the stability and growth of Portland's major campus institutions (see Figure 6-2: Campus Institutions) as essential service providers, centers of innovation, workforce development resources, and major employers.
- Policy 6.54** **Campus land use.** Provide for major campus institutions as a type of employment land, allowing uses typically associated with health care and higher education institutions.
- Policy 6.55** **Development impacts.** Protect the livability of surrounding neighborhoods

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through adequate infrastructure and campus development standards that foster suitable density and attractive campus design.

Policy 6.56 Community amenities and services. Encourage campus development that provides amenities and services to surrounding neighborhoods, emphasizing the role of campuses as centers of community activity.

Policy 6.57 Campus edges. Provide for context-sensitive, transitional uses and development at the edges of campus institutions to enhance their integration into surrounding neighborhoods, including mixed-use and neighborhood-serving commercial uses where appropriate.

Policy 6.58 Satellite facilities. Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality.

Neighborhood business districts

Neighborhood business districts are mixed-use corridors and centers outside of the Central City (see Figure 6-3: Neighborhood Business Districts). Home to retail and related businesses that typically serve customers on-site, they are commonly interspersed with multi-family housing. Many of these districts are experiencing significant growth and change, providing synergistic locations for concentrated housing and commercial growth in “complete neighborhoods” with convenient access to services.

Neighborhood business districts also provide major economic benefits by keeping local dollars circulating within Portland, providing goods and services to nearby residents, defining neighborhood character, supporting small business vitality, and accounting for about one-fourth of all jobs in the city. Neighborhood business districts are especially important to Portland because we are a city mainly made up of small business.

New directions to support these multi-functional places include:

- A framework of new centers and civic corridors well served by pedestrian, bicycle, and transit systems.
- Focused public investments that attract concentrated growth and improve equity, and community-based economic development initiatives that broaden access to jobs and prosperity.
- Opportunities for affordable commercial space and affordable housing.

- Policy 6.59** **Neighborhood business districts.** Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3).
- Policy 6.60** **District function.** Enhance the function of neighborhood business districts as a foundation of neighborhood livability.
- Policy 6.61** **Small, independent businesses.** Facilitate the retention and growth of small and locally-owned businesses.
- Policy 6.62** **Home based business.** Encourage low-impact home based businesses in residential areas.
- Policy 6.63** **Neighborhood-serving business.** Provide for neighborhood business districts and small commercial nodes in areas between centers to expand local access to goods and services. Allow nodes of small-scale neighborhood serving commercial uses in large planned developments and as a ground floor use in high density residential areas.
- Policy 6.64** **Investment priority.** Prioritize commercial revitalization investments in neighborhoods that serve communities with limited access to goods and services.
- Policy 6.65** **Involuntary commercial displacement.** Evaluate plans and investments for their impact on existing businesses.
- 6.66.a.** Limit involuntary commercial displacement in areas at risk of gentrification and incorporate tools to reduce the cost burden of rapid neighborhood change on vulnerable small business owners.
- 6.66.b.** Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.
- Policy 6.66** **Temporary and informal markets and structures.** Acknowledge and support the role that temporary markets (farmers markets, craft markets, flea markets, etc.) and other temporary or mobile vending structures play in enabling startup business activity. Also acknowledge that temporary uses are assumed to be replaced ultimately by more permanent development and uses.

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Policy 6.67 **Community economic development.** Encourage collaborative approaches to align land use and neighborhood economic development for residents and business owners to better connect and compete in the regional economy.

6.68.a. Encourage broad-based community coalitions to implement land use and economic development objectives and programs.

6.68.b. Enhance opportunities for cooperation and partnerships between public and private entities that promote economic vitality in communities most disconnected from the regional economy.

6.68.c. Encourage cooperative efforts by area businesses, business associations, and neighborhood associations to work together on commercial revitalization efforts, sustainability initiatives, and transportation demand management.

Policy 6.68 **Centers.** Encourage concentrations of commercial services and employment opportunities in centers.

6.68.a. Encourage a broad range of neighborhood commercial services in centers to help residents and others in the area meet daily needs and/or serve as neighborhood gathering places.

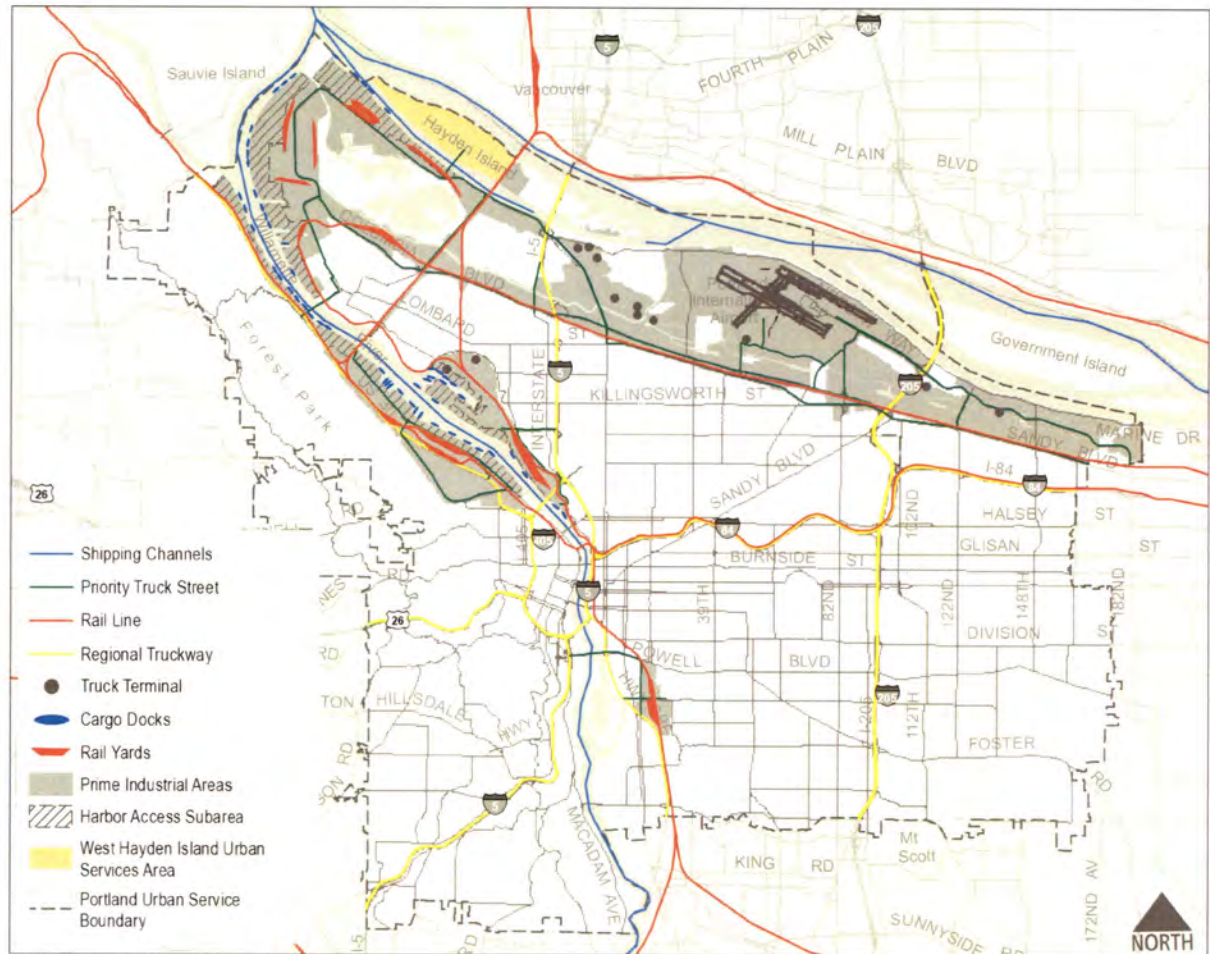
6.68.b. Encourage the development and retention of grocery stores and local markets as essential elements of centers.

6.68.c. Enhance opportunities for services and activities in centers that are responsive to the needs of the populations and cultural groups of the surrounding area.

6.68.d. Require that ground-level building spaces in core areas of centers accommodate commercial or other street-activating uses and services.

6.68.e. Encourage employment opportunities as a key function of centers, including connections between centers, institutions, and other major employers to reinforce their roles as vibrant centers of activity.

Figure 6-1. Industrial and Employment Districts



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Figure 6-2. Campus Institutions

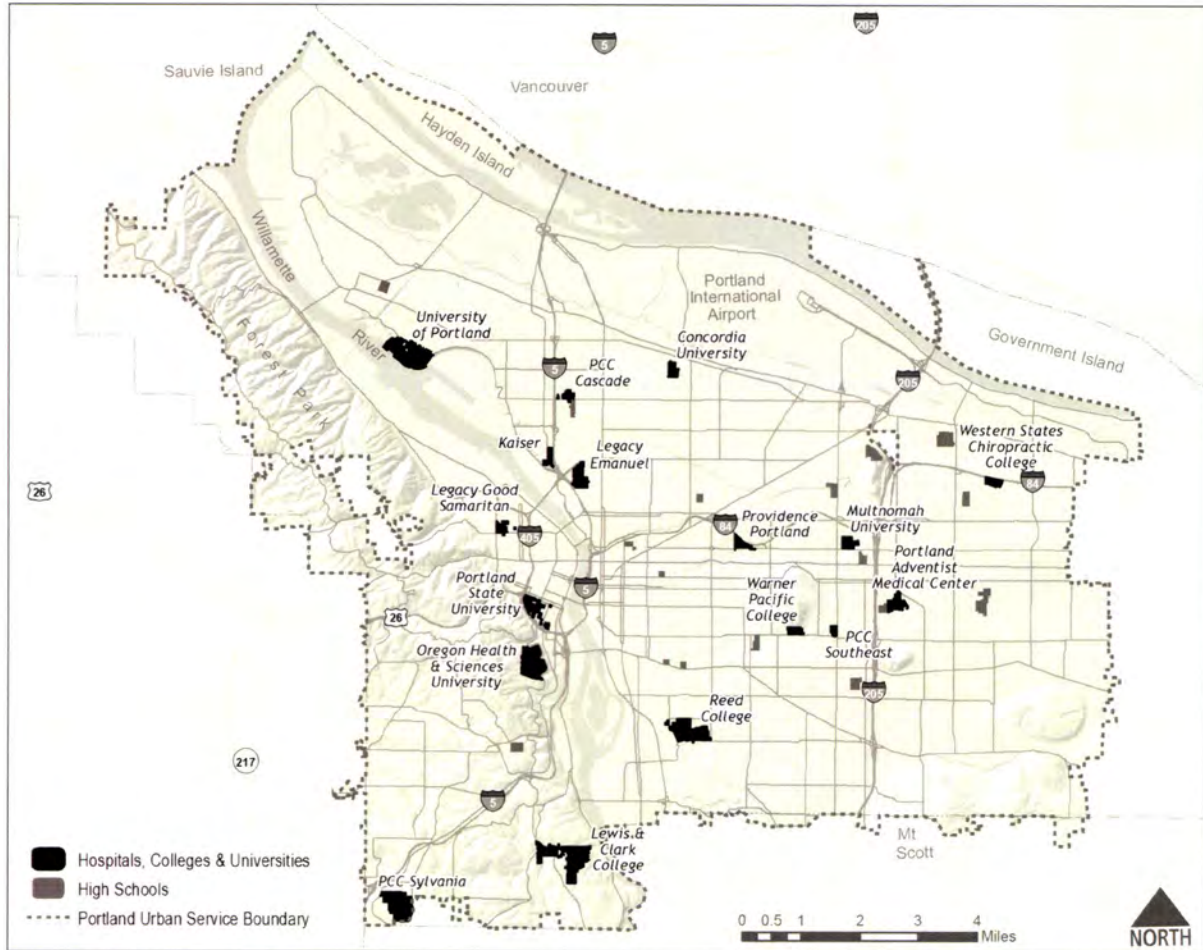
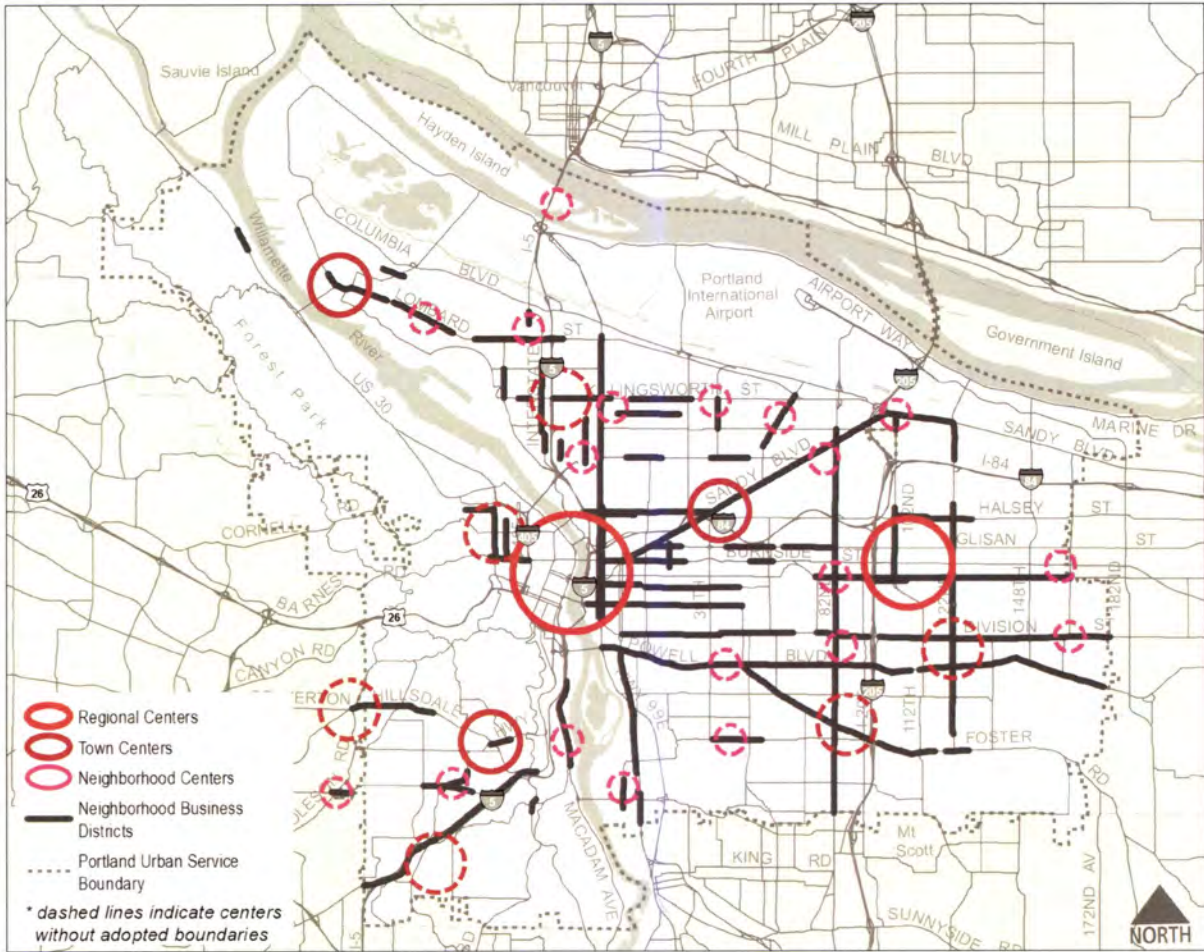


Figure 6-3. Neighborhood Business Districts



Chapter 7: Environment and Watershed Health

What is this chapter about?

The goals and policies in this chapter convey the City's intent to:

- Recognize the economic, health, and intrinsic values of nature, and the importance of community stewardship.
- ~~Preserve Maintain natural resources and~~ the beneficial functions and services ~~they~~ provided by inventoried natural resources.
- Improve air quality and watershed health, including hydrology, water quality, fish and wildlife habitat, and biodiversity.
- Recognize the city's impact on global climate change, and opportunities to reduce carbon emissions.
- Recognize the importance of a healthy urban forest and natural systems in reducing the impacts of natural hazards, such as landslides and flooding, and in adapting to climate change.
- ~~Prevent Mitigate~~ incremental environmental degradation including the spread of invasive species, loss of habitat, and adverse impacts of additional impervious surfaces.
- Ensure that environmental ~~protection plans programs~~ and regulations reflect current data, science, ~~and evaluation do not negatively of impacts to~~ under-served and under-represented communities, and avoid duplicative regulations and procedures.
- Advance good decisions and adaptive management through better data collection.
- Provide guidance that addresses the distinct ecological issues of specific watersheds.
- Ensure that plans and investments are coordinated and balanced with relevant policies from other City plans such as the Portland Watershed Management Plan, Urban Forest Management Plan, Climate Action Plan, and Natural Hazard Mitigation Plan, as well as economic development policies and plans.

Why is this important?

Located at the confluence of two major rivers, between two mountain ranges, and adjacent to some of the most fertile agricultural land in the world, Portland's wealth of natural resources provides an array of ecologically, economically and aesthetically valuable ecosystem services. Our rivers, streams and floodplains convey and store water and provide critical habitat for native fish and aquatic species. Our wetlands, trees, and vegetation clean and cool Portland's air and water, stabilize hillsides, soak up rainwater and provide habitat for an abundance of birds and other wildlife. These resources also trap carbon and reduce urban heat island effects, which are increasingly important given the potential impacts of climate change. These natural resources are key contributors to Portland's identity, reputation and sense of place.

The City has a long-standing commitment to maintaining a high-quality environment; however many of Portland's natural resources have been lost over time or are currently at risk. Urbanization has filled floodplains, contributing to seasonal flooding damage. Stormwater runoff from paved areas and rooftops has eroded our stream channels and polluted our streams, many of which are unable to support healthy fish populations. There is concern that anticipated growth and development will result in substantial tree removal, continued habitat loss, and negative impacts on at-risk plant and animal species.

The City's land use plans and investments have been, and will continue to be, instrumental in helping contribute to improvements in air and water quality over time, and in preserving maintaining natural resources. In addition, the City and community have made substantial investments of time and money to restore our watersheds. The goals and policies in this chapter protect-reflect these investments and help the City meet various regulations to protect-maintain public health and the environment. With thoughtful guidance, we can achieve and sustain healthy watersheds and a healthful environment as the city grows and economy prospers.

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Goals

Goal 7.A: Climate

Carbon emissions are reduced by 50% below 1990 levels.

Goal 7.B: Healthy watersheds and environment

Ecological and ecosystem functions are maintained and watershed conditions have improved over time, in a manner that encourages vigorous economic growth and a healthy, diverse economy.

Goal 7.C: Resilience

Portland's built and natural environments function in complementary ways and are resilient in the face of climate change, and natural hazards.

Goal 7.D: Environmental equity

All Portlanders have access to clean air and water, can experience nature in their daily lives, and benefit from development designed to lessen the impacts of natural hazards and environmental contamination.

Goal 7.E: Community stewardship

Portlanders actively participate in efforts to maintain and improve the environment, including watershed health.

Policies

Planning for natural resources protection

Portland's quality of life depends on maintaining clean air, water, soil, and a healthy environment overall. The policies in this section will preserve and maintain environmental quality by emphasizing protection/maintenance of natural resources and their functions, consistent with widely accepted ecological principles and scientific literature. These policies call for an up-to-date natural resource inventory and actions to protect/maintain air, water, soil, climate, biodiversity, and existing significant natural resource functions and values. They also call for consideration of tradeoffs in developing environmental protection programs/plans and regulations, and for balancing natural resources with economic development and prosperity.

- Policy 7.1** **Environmental quality.** Protect/Maintain air, water, and soil quality and associated benefits to public and ecological health and safety.
- Policy 7.2** **Climate action.** Update and implement the Climate Action Plan to reduce carbon emissions and resilience through policy, regulations, investment, and behavior change.
- Policy 7.3** **Biodiversity.** Maintain self-sustaining populations of native plants, native resident and migratory fish, and wildlife species, including at-risk species and beneficial insects such as pollinators.
- Policy 7.4** **Natural resources protection.** Protect/Maintain the quantity, quality, and functions and values of significant natural resources identified in the City's adopted natural resource inventory, by, depending upon the value of the inventoried resource and conclusions of a Goal 5 ESEE analysis, protecting the resource, allowing development, or limiting development so that adverse impacts to the functions and values of natural resources are avoided, minimized and mitigated. Inventoried natural resources may includeing:
- Rivers, streams, sloughs, and drainageways.
 - Floodplains.
 - Riparian corridors.
 - Wetlands.
 - Groundwater.
 - Native and other beneficial vegetation species and communities.
 - Aquatic and terrestrial habitats, including special habitats or habitats of concern, including large anchor habitats, habitat complexes and corridors, rare and declining habitats such as wetlands, native oak, bottomland hardwood forest, native grassland habitat, shallow water

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habitat, and habitats that support special-status or at-risk plant and wildlife species.

- Other resources identified in adopted natural resource inventories.

Policy 7.5 Natural resource inventory.

Maintain an up-to-date adopted inventory by identifying the location and evaluating the relative quantity, ~~and~~ quality, functions and values of natural resources.

Policy 7.6 Environmental ~~protection programs~~ plans and regulations. Adopt environmental ~~protection~~ plans and regulations that implement the decisions made pursuant to a Goal 5 ESEE analysis, based on the best data and science available and balancing all city policies and goals, that determine whether to allow, limit, or prohibit conflicting uses for specify the significant inventoried natural resource sites to be protected and the types of protections to be applied, based on the best data and science available, and on an evaluation of the potential consequences of allowing conflicting uses.

Policy 7.7 Environmental ~~protection plan and regulation program~~ updates. Improve the effectiveness of environmental ~~protection~~ conservation plans and regulations. Updates will reflect current data and science, ~~consider avoid~~ negative impacts on under-served and under-represented communities, avoid duplicative regulations and procedures and meet ~~multiple all~~ city policies and goals.

Policy 7.8 Land acquisition priorities and coordination. Maintain a prioritized list of natural resource types, target areas, or properties desirable for public acquisition to support long-term maintenance of inventoried natural resource functions and values ~~protection~~, and establish a process for coordinating acquisition with other programs including strategies to maintain employment land capacity, programs to ~~protect~~ maintain water quality, and programs to reduce exposure to flooding hazards.

Protect Maintaining natural resource functions and values in development situations

The following policies provide guidance for land use regulations that address significant inventoried natural resource functions and values ~~where new development is proposed and the natural resource site has been identified as being protected from development or where development should be limited. The following policies do not apply to individual applications for development~~. They will help ensure that the potential adverse impacts of development are well understood, and avoided where practicable. These policies also call for an evaluation of design alternatives to minimize impacts, and mitigation approaches that fully mitigate unavoidable impacts.

- Policy 7.9** **Impact evaluation.** Evaluate the potential adverse impacts of proposed development on significant inventoried natural resources, their functions, and the ecosystem services they provide.

- Policy 7.10** **Regulatory hierarchy: avoid, minimize, mitigate.** Require that the potential adverse impacts of new development on significant inventoried natural resources ~~and their~~ functions first be avoided where practicable, then minimized, then lastly mitigated.

- Policy 7.11** **Mitigation effectiveness.** Encourage practicable mitigation approaches that ~~maximize enhance~~ the intended inventoried natural resource-related benefits functions and are proportional to the impact of development. Require Encourage on-site mitigation unless off-site mitigation within the same watershed will improve mitigation effectiveness.

- Policy 7.12** **State and federal coordination.** Coordinate implementation of these policies to ensure consistency with and avoid redundancy of state and federal permitting authorities.

- Policy 7.13** **Ecosystem services.** Consider the benefits provided by healthy ecosystems that contribute to the livability and economic health of the city.

Improving environmental quality and preventing degradation

The following policies are intended to support improving environmental quality over time as the city grows, while encouraging economic development and prosperity. They provide direction to enhance the condition, capacity, and resilience of Portland’s air and water. They support Portland’s watershed plan goals to restore hydrology, water quality, habitat and biological communities. These policies call for more effectively preventing incremental environmental degradation, including the spread of invasive species, soil loss, habitat fragmentation, and introduction of hazards to wildlife. They support a healthy urban forest and recognize that healthy natural systems reduce natural hazard risks. They also help the City mitigate and adapt to climate change.

Like preventive medicine, preventing additional environmental degradation, including through mitigation for adverse impacts, will be more successful and cost-effective than addressing problems as they increase in severity. These policies will help the City avoid exacerbating adverse and disproportionate impacts on under-served and under-represented communities. ~~While some of the impact areas listed below are regulated by other agencies, the City’s land use plans and investments can help avoid or reduce impacts, while also improving conditions over time.~~ The following policies provide guidance for plans and investments, and do not apply directly to individual applications for development.

- Policy 7.14** **Air quality.** ~~Ensure Encourage that~~ plans and investments ~~are to be~~ consistent with and advance efforts to improve air quality and reduce

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exposure to air toxics, criteria pollutants, and urban heat island effects. Consider air quality related health impacts on all Portlanders, with an emphasis on under-served and under-represented communities.

Policy 7.15 Hydrology. ~~Ensure that~~Encourage plans and investments are-to be consistent with and advance efforts to improve watershed hydrology by achieving more natural flow and enhancing conveyance and storage capacity in rivers, streams, floodplains, wetlands, and groundwater aquifers. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly infiltrating soils and limited public stormwater discharge points, and encourage restoration of degraded hydrologic functions, where practicable.

Policy 7.16 Water quality. ~~Ensure that~~Encourage plans and investments are-to be consistent with and advance efforts to improve water quality in inventoried significant rivers, streams, floodplains, groundwater, and wetlands, including reducing toxics, bacteria, temperature, metals, and sediment pollution. Consider water quality related health impacts on all Portlanders, especially under-served and under-represented communities.

Policy 7.17 **Habitat and biological communities.** ~~Ensure that~~Encourage plans and investments are to be consistent with and advance efforts to improve the diversity, ~~quantity,~~ and quality, of inventoried significant fish and wildlife habitat and habitat corridors, especially rare and declining habitat types and habitats that support at-risk plant and animal species and communities.

Policy 7.18 **Habitat connectivity.** ~~Ensure that~~Encourage plans and investments are to be consistent with and advance efforts to improve the functions and values of inventoried significant terrestrial and aquatic habitat connectivity for fish and wildlife by:

- ~~Preventing~~Avoiding, minimizing and mitigating habitat fragmentation.
- Improving habitat functions and values quality.
- Weaving habitat into sites ~~as~~ new development occurs in a manner that does not negatively impact the functionality of the development.
- Enhancing or creating habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas while not negatively impacting the functionality of adjacent uses.

Policy 7.19 **Urban forest.** ~~Ensure that~~Encourage plans and investments are to be consistent with and advance efforts to improve the quantity, quality, and equitable distribution of Portland’s urban forest:

7.19.a. ~~Require or e~~Encourage preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas as an element of discretionary land use reviews.

7.19.b. Coordinate plans and investments with efforts to improve tree species diversity and age diversity.

7.19.c. Support progress toward meeting City tree canopy targets.

7.19.d. Invest in tree planting and maintenance, especially in low canopy areas, neighborhoods with under-served or under-represented communities, and within and near urban habitat corridors, in a manner that does not negatively impact the functionality of industrial uses.

7.19.e. When development requires mitigation, encourage ~~Require~~ native trees and vegetation in significant natural resource areas.

7.19.f. Encourage planting of native trees and vegetation generally, and especially in urban habitat corridors, in a manner that does not negatively impact the functionality of industrial uses.

7.19.g. Identify priority areas for tree preservation and planting in land use plans.

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Policy 7.20 **Soils.** Coordinate plans and investments with programs that address human-induced soil loss, erosion, contamination, or other impairments to soil quality and function.

- Policy 7.21 Invasive species.** ~~Ensure that~~Encourage plans and investments ~~are to be~~ consistent with and advance efforts to prevent the spread of invasive plants, and support efforts to reduce the impacts of invasive animals and insects.
- Policy 7.22 Natural hazards.** ~~Prevent~~Avoid, minimize and mitigate development-related degradation of natural systems and associated increases in landslide, wildfire, flooding, and earthquake risks, especially as they affect under-served and under-represented communities.
- Policy 7.23 Low-impact development and best practices.** Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure, especially for City-owned, managed, or funded facilities.
- Policy 7.24 Impervious surfaces.** ~~Limit impervious surfaces to~~rReduce impacts on hydrologic function, air and water quality, habitat connectivity, and tree canopy caused by impervious surfaces.
- Policy 7.25 Hazards to wildlife.** Encourage building, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.
- Policy 7.26 Access to nature.** Promote equitable, safe, and well-designed physical and visual access to nature while also ~~protect~~maintaining the functions and values of significant inventoried natural resources, fish, and wildlife, while not negatively impacting the functionality of adjacent uses. Provide access to major natural features consistent with these objectives, including:
- Water bodies, such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.
 - Major topographic features, such as the West Hills, Mt. Tabor, and the East Buttes.
 - Natural areas, such as Forest Park and Oaks Bottom.
- Policy 7.27 Carbon sequestration.** Enhance the capacity of Portland’s urban forest, soils, and water bodies to serve as carbon reserves.
- Policy 7.28 Climate adaptation and resilience.** Enhance the ability of rivers, streams, wetlands, floodplains, urban forest, habitats, and wildlife to temper and adapt to climate-exacerbated flooding, landslides, wildfire, and urban heat island effects.
- Policy 7.29 Brownfield remediation.** Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment ~~that incorporates ecological site design and resource~~ enhancement.

- Policy 7.30 Adaptive management.** Evaluate trends in watershed and environmental health using current monitoring data and information to guide improvements in the effectiveness of City plans, regulations, and infrastructure investments.

- Policy 7.31 Restoration partnerships.** Coordinate plans and investments with other jurisdictions, air and water quality regulators, watershed councils, soil conservation organizations, and community organizations and groups to maximize the benefits and cost-effectiveness of watershed environmental efforts and investments.

- Policy 7.32 Coordinated stormwater management.** Coordinate transportation and stormwater system planning in areas with unimproved or substandard rights of way to improve water quality, pedestrian safety, freight mobility, and enhance neighborhood livability.

- Policy 7.33 Community stewardship.** Encourage voluntary cooperation between property owners, community organizations, and public agencies to restore or re-create habitat on their property, including removing invasive plants and planting native species.

Other policies in Chapters 3, ~~and 4~~ and 7 are essential counterparts to the policies in the section above, and all policies must be balanced.

Aggregate resources

- Policy 7.34 Aggregate resources ~~protection~~.** ~~Protect~~Conserve aggregate resource sites for current and future use, where there are no major conflicts with urban needs, or where these conflicts may be resolved.

- Policy 7.35 Aggregate resource development.** ~~Ensure that~~Encourage development of aggregate resources to ~~minimizes~~ adverse environmental impacts and impacts on adjacent land uses.

- Policy 7.36 Mining site reclamation.** ~~Ensure~~Encourage that reclamation of mining sites that ~~protect~~maintain public health and safety, restore the site to adequate watershed conditions and functions, and is compatible with the surrounding land uses and conditions of nearby land.

Watershed specific policies

The policies above guide planning, actions, and investments citywide. The following policies are intended to augment the citywide Watershed Health and Environment policies, by providing additional guidance relating and responding to the characteristics within each of Portland's distinctive watersheds. They address watershed-specific habitat types, hydrology, water quality issues, and stormwater management challenges. Together, the citywide and watershed-specific policies support the close coordination of watershed health and land use programs, guiding land use planning-related activities and future infrastructure investments. While these watersheds are not entirely within Portland's urban services boundary, Portland's actions can have significant benefits for the watershed as a whole. The following policies do not apply directly to individual applications for development.

Columbia River Watershed

- Policy 7.37** **In-water habitat.** ~~Enhance~~ Encourage in-water habitat for native fish and wildlife, particularly in the Oregon Slough and near-shore environments along the Columbia River in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.38** **Sensitive habitats.** ~~Enhance~~ Encourage native grassland, beach, riverbanks, wetlands and other key habitats for wildlife traveling along the Columbia River migratory corridor, while continuing to manage the levees and floodplain for flood control and in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.39** **Flood ~~protection~~ management coordination.** Coordinate plans and investments with special districts and agencies responsible for managing and maintaining certification of levees along the Columbia River.
- Policy 7.40** **Floodplain ~~protection~~ habitat and restoration.** Promote ~~restoration and protection~~ maintenance of the functions and values of significant inventoried floodplain habitats as a flood protection strategy.

Willamette River Watershed

- Policy 7.41** **Fish habitat.** ~~Provide~~ Encourage adequate intervals of ecologically-functional shallow-water habitat for native fish along the entire length of the Willamette River within the city, and at the confluences of its tributaries, in a manner that does not negatively impact the functionality of water-dependent and water-related uses, including but not limited to ongoing facility maintenance and dredging activities.
- Policy 7.42** **Stream connectivity.** ~~Improve~~ Encourage stream connectivity between the Willamette River and its tributaries.

Policy 7.43 **River bank conditions.** Encourage the maintenance of the functions and values of~~Preserve~~ existing inventoried significant river bank habitat and encourage the enhancement of functions and values ~~rehabilitation~~ of river bank sections that have been significantly altered due to development with more fish and wildlife friendly riverbank conditions, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.

ENVIRONMENT AND WATERSHED HEALTH

- Policy 7.44** South Reach ecological complex. ~~Enhance~~Encourage habitat quality and connections between Ross Island, Oaks Bottom, and riverfront parks and natural areas south of the Central City, to enhance the area as a functioning ecological complex.
- Policy 7.45** Contaminated sites. ~~Ensure that~~Encourage plans and investments that are consistent with and advance programs that facilitate the cost-effective cleanup, reuse, and restoration of the Portland Harbor Superfund site and other contaminated upland sites.
- Policy 7.46** Sensitive habitats. ~~Encourage the maintenance~~Protect and enhancement of the functions and values of inventoried significant native grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key functions and values of significant inventoried habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific flyway and the Willamette River corridor, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.47** Riparian corridors. ~~Encourage~~ increase ~~the width and quality~~functions and values of inventoried significant vegetated riparian buffers along the Willamette River where practicable, in a manner that does not negatively impact the functionality of water-dependent and water-related uses or does not otherwise negatively impact the adequacy of the inventory of employment land.
- Policy 7.48** Connected upland and river habitats. ~~Encourage~~ Enhanced quality of functions and services of significant inventoried habitat ~~quality~~ and connectivity between the Willamette riverfront and inventoried upland natural resource areas, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.49** Forest Park. Enhance Forest Park as an anchor habitat and recreational resource.

Columbia Slough Watershed

- Policy 7.50** Fish passage. ~~Encourage the R~~maintenance of functions and values of significant inventoried ~~stream~~ in-stream habitat and encourage improved fish passage within the Columbia Slough, including for salmonids in the lower slough, in a manner that does not negatively impact the functionality of water-dependent and water-related uses.
- Policy 7.51** Flow constriction removal. Reduce constriction, such as culverts, in the slough channels, to improve the flow of water and water quality.

- Policy 7.52** **Riparian corridors.** Encourage the maintenance of~~increase the~~ width and quality~~functions and values~~ of significant inventoried vegetated riparian buffers along Columbia Slough channels where practicable, while also managing the slough for flood control, and in a manner that does not negatively impact the functionality of water-dependent and water-related use.
- Policy 7.53** **Sensitive habitats.** Encourage the enhancement of the functions and values of significant inventoried native grasslands and wetland habitats in the Columbia Slough, such as those found in the Smith and Bybee Lakes and at the St. Johns Landfill site, to provide habitat for sensitive species, and for wildlife traveling along the Columbia and Willamette river migratory corridors.
- Policy 7.54** **Connected rivers habitats.** Encourage the~~maintenancenhance~~ of the functions and values of significant inventoried upland habitat connections to the Willamette and Columbia rivers, in a manner that does not negatively impact the functionality of water-dependent and water-related use.

ENVIRONMENT AND WATERSHED HEALTH

Policy 7.55 Contaminated sites. ~~Ensure that~~**Encourage** plans and investments ~~that~~ are consistent with and advance programs that facilitate the cleanup, reuse and restoration of contaminated sites that are adjacent, or that discharge stormwater to the Columbia Slough.

Fanno and Tryon Creek Watersheds

Policy 7.56 Stream connectivity. Encourage the daylighting of piped portions of Tryon and Fanno creeks and their tributaries.

Policy 7.57 Riparian and habitat corridors. ~~Protect~~**Encourage the maintenance of the functions and values of inventoried significant and enhance** riparian habitat quality and connectivity along Tryon and Fanno creeks and their tributaries. Enhance connections between riparian areas, parks, anchor habitats, and areas with significant tree canopy. Enhance in-stream and upland habitat connections between Tryon Creek State Natural Area and the Willamette River.

Policy 7.58 Reduced hazard risks. Reduce the risks of landslides and streambank erosion by ~~protect~~**maintain**ing trees and vegetation that absorb stormwater, especially in areas with steep slopes or limited access to stormwater infrastructure.

Johnson Creek Watershed

Policy 7.59 In-stream and riparian habitat. ~~Encourage the maintenance of the functions and values of inventoried significant~~ **Enhance** in-stream and riparian habitat and improve fish passage for salmonids along Johnson Creek and its tributaries.

Policy 7.60 Floodplain restoration. ~~Enhance~~**Encourage the maintenance of the functions and values of inventoried significant f** Johnson Creek floodplain functions to increase flood-storage capacity, improve water quality, and enhance fish and wildlife habitat.

Policy 7.61 Connected floodplains, springs, and wetlands. ~~Encourage the maintenance of the functions and values of inventoried significant~~ **Enhance** hydrologic and habitat connectivity between the Johnson Creek floodplain and its springs and wetlands.

Policy 7.62 Reduced natural hazards. Reduce the risks of landslides, streambank erosion and downstream flooding by ~~protect~~**conserv**ing seeps, springs, trees, vegetation, and soils that absorb stormwater in the East Buttes.

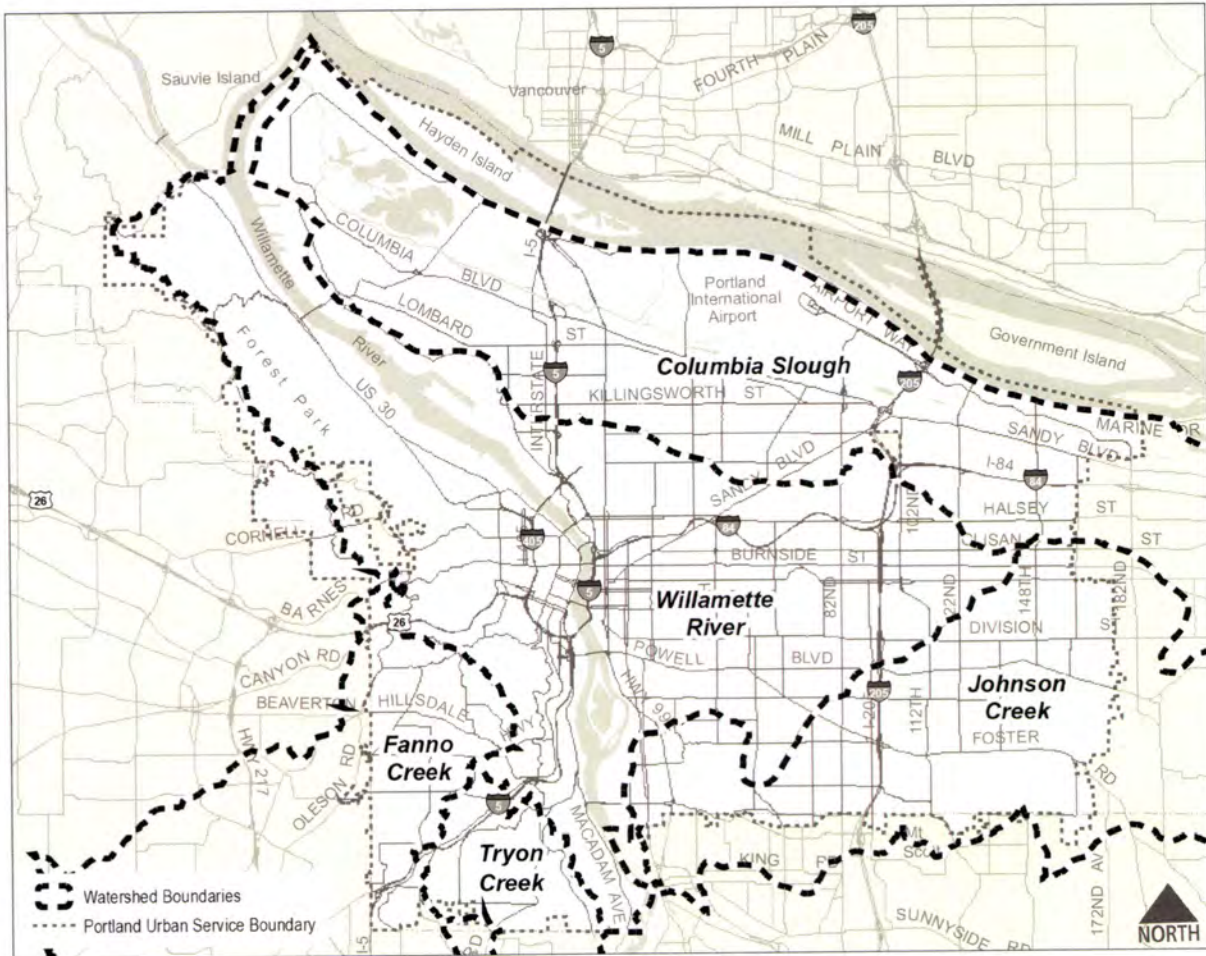
Policy 7.63 Greenspace network. Enhance the network of parks, trails, and natural areas

near the Springwater Corridor Trail and the East Buttes to enhance habitat connectivity and nature-based recreation in East Portland.

For additional policy guidance regarding geographically-specific issues and opportunities, see Chapter 4 —Design and Development.

ENVIRONMENT AND WATERSHED HEALTH

Figure 7-1. Portland's Watersheds



Portland Planning and Sustainability Commission Public Hearing



Date: 11-4-14

Name: James L Dreiling (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 11197 N. Portland Rd

City: Portland Zip: 97230 Phone: 503 247 7680

Email Address and/or Fax No.: None

What agenda item do you wish to comment on? Comprehensive Plan Designation

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

2



Date: 11/9/14

Name: SEAN LOUGHRAN (Please print legibly)

Authorized Spokesperson representing: PORT OF PORTLAND (if applicable)

Address: 7200 NE AIRPORT WAY

City: PORTLAND Zip: 97218 Phone: 503-415-6007

Email Address and/or Fax No.: 3 sean.loughran@portofportland.com

What agenda item do you wish to comment on? COMP PLAN

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

3 ✓

Date: 11/17/14
 Name: Bing Sheldon / Elizabeth Aaby (Please print legibly)
 Authorized Spokesperson representing: NW Cultural Center (if applicable)
 Address: 1819 NW Everett
 City: Portland Zip: 97209 Phone: _____
 Email Address and/or Fax No.: elizabeth.aaby@gmail.com
 What agenda item do you wish to comment on? zone change on Cultural Center Parking Lot
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

4 ✓

Date: 11/24/14
 Name: Gustavo Cruz (Please print legibly)
 Authorized Spokesperson representing: NWDA (if applicable)
 Address: 2224 NW Johnson St.
 City: PLD Zip: 97210 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 5

Date: 11/4/14
 Name: John Bradley (Please print legibly)
 Authorized Spokesperson representing: NWDA (if applicable)
 Address: 2350 NW Johnson St.
 City: PHU Zip: 97210 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 6

Date: 11/4/14
 Name: Sharon Giacasi (Please print legibly)
 Authorized Spokesperson representing: NWDA (if applicable)
 Address: 2217 NW Johnson St.
 City: PHU Zip: 97210 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 7

Date: 11/4/14

Name: to Juliet Hyams (Please print legibly)

Authorized Spokesperson representing: NWDA (if applicable)

Address: 2324 NW Marshall St.

City: Portland Zip: 97210 Phone: _____

Email Address and/or Fax No.: Comp Plan

What agenda item do you wish to comment on? _____

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 8

Date: 11/4/14

Name: Wendy Chuang (Please print legibly)

Authorized Spokesperson representing: NWDA (if applicable)

Address: 1729 NW Irving St.

City: Portland Zip: 97209 Phone: _____

Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? Comp Plan

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing



Date: 11/4/14
 Name: Karen Karlsson (Please print legibly)
 Authorized Spokesperson representing: NWDA (if applicable)
 Address: 1905 NW Northrup St
 City: Portland Zip: 97209 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? ~~NWDA~~ Comp Plan.
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

10

Date: 11/4/14
 Name: Jeanne Harrison (Please print legibly)
 Authorized Spokesperson representing: NWDA (if applicable)
 Address: 837 NW 25th Ave.
 City: Portland Zip: 97210 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp Plan.
 Site Address, if different from above: _____



Portland Planning and Sustainability Commission Public Hearing

11 ✓

Date: 11/4/14
 Name: Philip Selinger (Please print legibly)
 Authorized Spokesperson representing: NWDA (if applicable)
 Address: 2466 NW Thurston Street
 City: Portland Zip: 97210 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

16 ✓

Date: 11/4/2014
 Name: JIM LAUBENTHAL & JOAN LOF (Please print legibly)
 Authorized Spokesperson representing: RIVERSIDE GOLF & COUNTRY CLUB (if applicable)
 Address: 8105 NE 33RD DR
 City: PORTLAND Zip: 97211 Phone: 503 288 6168
 Email Address and/or Fax No.: JLOF@RIVERSIDEGCC.COM
 What agenda item do you wish to comment on? COMP PLAN PROPOSAL FOR OUR PROPERTY
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 13

Date: Nov 4 2014

Name: Carol McCarthy (Please print legibly)

Authorized Spokesperson representing: Self (if applicable)

Address: 4311 SW Freeman St

City: Portland Zip: 97209 Phone: _____

Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? _____

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

12

✓ VIDEO

Date: Nov. 4 2014

Name: James Peterson (Please print legibly)

Authorized Spokesperson representing: Self (if applicable)

Address: 2504 Mult. Blvd

City: Portland Zip: 97219 Phone: _____

Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? _____

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

15



Date: Nov 4 2014
 Name: Bill Kielhorn (Please print legibly)
 Authorized Spokesperson representing: self (if applicable)
 Address: 4311 SW Freeman St.
 City: Portland Zip: 97219 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

14



Date: 11-4-14
 Name: Ellen Gentry (Please print legibly)
 Authorized Spokesperson representing: self (if applicable)
 Address: 4628 SW Carson St
 City: Portland Zip: 97219 Phone: 503-244-1166
 Email Address and/or Fax No.: ellenhouston@30msn.com
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

17



Date: 11/4/14
 Name: TIM HELZER (Please print legibly)
 Authorized Spokesperson representing: Hayden Island (if applicable)
 Address: 220 N. Hayden Bay Drive
 City: Wdy Zip: 97217 Phone: (503) 247-0303
 Email Address and/or Fax No.: helzer@comcast.net
 What agenda item do you wish to comment on? W. Hayden Island
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

18



Date: 11/4/14
 Name: DAVID REDTHUNDER (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 1503 N Hayden IS DR
 City: Portland Zip: 97217 Phone: 503 954 9835
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? G-C-G-M
 Site Address, if different from above: Comprehensive Plan DRAFT

Portland Planning and Sustainability Commission Public Hearing

19

Date: 11-4-14
 Name: Christopher Brown (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 1523 SE Henry St -
 City: Portland Zip: 97202 Phone: 503-239-7035
 Email Address and/or Fax No.: orangeosun@msn.com
 What agenda item do you wish to comment on? Comprehensive Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

20

Date: 11/4/2014
 Name: Susan Egnor (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 3855 SW CONDOR AVE
 City: PORTLAND Zip: 97239 Phone: 503-939-3828
 Email Address and/or Fax No.: stegnor@comcast.net
 What agenda item do you wish to comment on? Comprehensive Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

21



Date: 10/4/14
 Name: Gene Dieringer (Please print legibly)
 Authorized Spokesperson representing: Woodstock Business Dist (if applicable)
 Address: 4138 SE Lambert St.
 City: Portland Zip: OR Phone: 971-570-9012 (cell)
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: Woodstock Blvd.

Portland Planning and Sustainability Commission Public Hearing

22



Date: 11-4-14
 Name: Angie Even (Please print legibly)
 Authorized Spokesperson representing: Woodstock Business District (if applicable)
 Address: 5827 SE 43rd
 City: Portland Zip: 97206 Phone: 503-997-8401
 Email Address and/or Fax No.: woodstockbuilding@gmail.com
 What agenda item do you wish to comment on? Traffic issues
 Site Address, if different from above: N/A

Portland Planning and Sustainability Commission Public Hearing

23



Date: Nov 4, 2014
 Name: Terry Griffiths (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 4128 SE Reedway
 City: Portland Zip: OR Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

24



Date: 11-4-14
 Name: Blythe Olson (Please print legibly)
 Authorized Spokesperson representing: neighbors & self (if applicable)
 Address: 2719 SW Clo Orchard Rd
 City: Portland Zip: OR Phone: @ 503 294-7141
 Email Address and/or Fax No.: blytheolson@gmail.com
 What agenda item do you wish to comment on? comp plan
 Site Address, if different from above: Strokedkins SW Patton Rd property

Portland Planning and Sustainability Commission Public Hearing

25



Date: Nov 4, 2014
 Name: JIM HOWELL (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 3325 NE 45TH
 City: PDX Zip: 97213 Phone: 503-284 7182
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

26



Date: 11.4.2014
 Name: Anton Vetterlein (Please print legibly)
 Authorized Spokesperson representing: Homestead NA (if applicable)
 Address: 430 SW Hamilton St.
 City: PDX Zip: 97239 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comp. Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

27



Date: 10/4/10
 Name: Bob Sallinger (Please print legibly)
 Authorized Spokesperson representing: Audubon Society (if applicable)
 Address: 5151 NW Cornell Row
 City: Portland Zip: 97210 Phone: 503 380-9720
 Email Address and/or Fax No.: bsallinger@audubonportland.org
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

28



Date: 11/11/11
 Name: Joe Leberzeit (Please print legibly)
 Authorized Spokesperson representing: Audubon (if applicable)
 Address: 5151 NW Cornell Row
 City: Portland Zip: 97210 Phone: 503 227-6855
 Email Address and/or Fax No.: Leberzeit@audubonportland.org
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

30



Date: 11/4/14
 Name: Don Rohlf (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 100 SW Terwilliger
 City: Portland Zip: 97219 Phone: 503 768 6707
 Email Address and/or Fax No.: rohrf@clackr.edu
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

29



Date: 11/4/14
 Name: Jim Latta (Please print legibly)
 Authorized Spokesperson representing: Aulibus (if applicable)
 Address: 551 NW Correll Rd
 City: Portland Zip: 97222 Phone: 797-6855
 Email Address and/or Fax No.: JLatta@urbanpartners.org
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

31



Date: 11/04/14
 Name: David Hampton (Please print legibly)
 Authorized Spokesperson representing: East Portland Action Plan (if applicable)
 Address: 302 SE 105th Ave Apt 26
 City: Portland Zip: 97216 Phone: 971-322-6599
 Email Address and/or Fax No.: David.hampton@yahoo.com
 What agenda item do you wish to comment on? Comprehensive Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

32



Date: 11/4/14
 Name: Corky Collier (Please print legibly)
 Authorized Spokesperson representing: Columbia Corridor Ass. (if applicable)
 Address: 6015 NE 80th Ave
 City: Portland Zip: 97230 Phone: 503 241 1838
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? Comprehensive Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

33

Date: Nov 4 2014
 Name: Katie A Larsell (Please print legibly)
 Authorized Spokesperson representing: East Portland Action Plan (if applicable)
 Address: 13831 NE Klickitat Ct
 City: Portland Zip: 97230 Phone: 256-3263
 Email Address and/or Fax No.: Larsell@comcast.net
 What agenda item do you wish to comment on? Comprehensive Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

34

Date: 11-4-14
 Name: Richard Johnson (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 1414 SE OAK STREET
 City: POX Zip: 97214 Phone: 503-233-3876
 Email Address and/or Fax No.: rickjohnson77@comcast.net
 What agenda item do you wish to comment on? Height, R1 to CS 17th-19th
 Site Address, if different from above: on ~~17th~~ SE Morrison

Portland Planning and Sustainability Commission Public Hearing

37

Date: 11-4-14 ✓
 Name: Susan Lindley (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: SE 17th + Alder
 City: Polx Zip: 97214 Phone: _____
 Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? R1 to CS Between SE Merason
 Site Address, if different from above: + Belmont SE 17th - SE 19th
and R5 to R2.5

Portland Planning and Sustainability Commission Public Hearing

36

Date: Nov 4, 2014 ✓
 Name: Tammara De Ridder (Please print legibly)
 Authorized Spokesperson representing: self (if applicable)
 Address: _____
 City: _____ Zip: _____ Phone: _____
 Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

39

Date: 11/11/14 ✓

Name: Claire Coleman-Evans (Please print legibly)

Authorized Spokesperson representing: Mult/Bridle (if applicable)

Address: 6260 SW Hamilton Way

City: Pdx Zip: 97221 Phone: 503-740-7460

Email Address and/or Fax No.: ecclaire27@comcast.net
503-472-4149 with Multnomah -

What agenda item do you wish to comment on? _____

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

40

Date: 04 NOV 14 ✓

Name: WILLIAM MOSS (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 1500 SE DUKE ST

City: PDX Zip: 97202 Phone: 503-233-9233

Email Address and/or Fax No.: willmoss@inbox.com

What agenda item do you wish to comment on? COMMERCIAL IS NEIGHBORHOODS,
SCRIP SELLING

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 41

Date: 11-4-14
 Name: Laura Campos (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 3419 SW 1st Ave
 City: PDX Zip: 97239 Phone: (503) 241-4933
 Email Address and/or Fax No.: midewin@juno.com
 What agenda item do you wish to comment on? EQUITY
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

42

Date: 11/4/14
 Name: Don BAACK (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 6495 SW BURLINGAME
 City: PORTLAND Zip: OR Phone: 246-2088
 Email Address and/or Fax No.: BAACK@Ac Corp
 What agenda item do you wish to comment on? TRAILS & FIRE
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 95

Date: 11-4-2014

Name: Tinsley Honsdorfer (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 1917 NE 13th Ave.

City: Portland Zip: 97212 Phone: 517-392-6662

Email Address and/or Fax No.: honsdorfer@gmail.com

What agenda item do you wish to comment on? _____

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 43

Date: Nov 4th, 2014

Name: Jay Higgins (Please print legibly)

Authorized Spokesperson representing: Trimet (if applicable)

Address: 1800 SW 2nd Ave

City: Portland Zip: 97201 Phone: 503 962 2189

Email Address and/or Fax No.: higginsj@trimet.org

What agenda item do you wish to comment on? Comp Plan Map

Site Address, if different from above: SE 17th Avenue

Portland Planning and Sustainability Commission Public Hearing

44 ✓

Date: November 4, 2014

Name: Mary Ann Schwab (Please print legibly)

Authorized Spokesperson representing: MAS (if applicable)

Address: on record

City: _____ Zip: _____ Phone: _____

Email Address and/or Fax No.: e33 maschwab@gmail.com

What agenda item do you wish to comment on? Comp Plan 2035

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

48 ✓

Date: 11/4

Name: JEANNE GALICK (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 7005 SW VIRGINIA

City: POX Zip: 97219 Phone: 503 2456293

Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? COMP PLAN

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

46

Date: _____
 Name: SCOTT FERNANDEZ (Please print legibly)
 Authorized Spokesperson representing: PUBLIC (if applicable)
 Address: 184 N 665
 City: POA Zip: 97212 Phone: _____
 Email Address and/or Fax No.: SCOTT.FERNANDEZ.PDX@GMAIL.COM
 What agenda item do you wish to comment on? WATER
 Site Address, if different from above: _____

WWW.MALLAM
WAIVER.COM

Portland Planning and Sustainability Commission Public Hearing

47

Date: 11/4/14
 Name: CRAIG BEEBE (Please print legibly)
 Authorized Spokesperson representing: CITY CLUB OF PORTLAND (if applicable)
 Address: _____
 City: Portland Zip: 97207 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? COMP PLAN
 Site Address, if different from above: _____

w/ DAN KEPPLER
 CHRIS TREIBAL

Portland Planning and Sustainability Commission Public Hearing

51



Date: 11/04/2014
 Name: Dr. Andrew Phan (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 6919-6933 82nd Ave. 97266
 City: Portland Zip: 97266 Phone: 503-774-3546
 Email Address and/or Fax No.: trnguyen@no.com cast.net
 What agenda item do you wish to comment on? zoning changes
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

50



Date: Nov 4, 2014
 Name: Ted Labbe (Please print legibly)
 Authorized Spokesperson representing: Deprave (if applicable)
 Address: 6325 N. Albina Ave #7
 City: Portland Zip: 97217 Phone: _____
 Email Address and/or Fax No.: ted.labbe@gmail.com
 What agenda item do you wish to comment on? Comp plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

52
✓

Date: 11/4/2014
Name: Lily Nguyen (Please print legibly)
Authorized Spokesperson representing: _____ (if applicable)
Address: 6919 - 6933 SE 82nd Ave.
City: Portland Zip: 97266 Phone: 503-302-2486
Email Address and/or Fax No.: tiger6200@comcast.net
What agenda item do you wish to comment on? Zoning change from C6 to R2
Site Address, if different from above: _____

6919 SE 82nd Ave.
Portland OR 97266

Portland Planning and Sustainability Commission Public Hearing

49
✓

Date: 11/4/14
Name: Michelle Devlaeminck (Please print legibly)
Authorized Spokesperson representing: _____ (if applicable)
Address: 8724 NE 25
City: Port Zip: 97212 Phone: _____
Email Address and/or Fax No.: _____
What agenda item do you wish to comment on? _____
Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 53

Date: 11/4/14
 Name: Judy Bluehorse Skelton (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 1935 SE Hood
 City: Portland Zip: 97202 Phone: 503 725 5970
 Email Address and/or Fax No.: Judy.Bluehorse@concord.nw
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 55

Date: 11-4-2014
 Name: MARIANNE FITZGERALD (Please print legibly)
 Authorized Spokesperson representing: SOUTHWEST NEIGHBORHOODS (if applicable)
 Address: 10537 SW 64 DR
 City: PDY Zip: 97219 Phone: 503 246 1847
 Email Address and/or Fax No.: fitgerald.marianne@gmail.com
 What agenda item do you wish to comment on? comp plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

56
✓

Date: Nov. 9th, 2014
 Name: Garlynn G. Woodson (Please print legibly)
 Authorized Spokesperson representing: Concordia Neighborhood (if applicable)
 Address: 5267 NE 29th Ave
 City: Portland Zip: 97211 Phone: 503-936-9873
 Email Address and/or Fax No.: garlynn@gmail.com
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

57
✓

Date: 11/4
 Name: Bob Bernstein (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 7415 SE Main
 City: POX Zip: 97213 Phone: 503 233 9671
 Email Address and/or Fax No.: bobbo1946@yahoo.com
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

see # 58268

Date: 11/4
 Name: Justin Burt (Please print legibly) ✓
 Authorized Spokesperson representing: Community Alliance of Tenants (if applicable)
 Address: 2710 NE 14th Ave
 City: _____ Zip: 97212 Phone: 303 460 9702
 Email Address and/or Fax No.: Justin @ Oregon Cat. Org
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

led ✓

Date: 11/4/2014
 Name: Janet Roxburgh (Please print legibly) ✓
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 1503 N Hayden Island Drive
 City: Portland Zip: 97217 Phone: 305 915 7446
 Email Address and/or Fax No.: hummingbirdzoo@yahoo.com
 What agenda item do you wish to comment on? Hayden Island
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

59 ✓

Date: Nov 4, 2014

Name: TOM LIPTAN (Please print legibly)

Authorized Spokesperson representing: Family (if applicable)

Address: 2216 NE 50th Ave

City: Pdx Zip: 97213 Phone: 503 730 7467

Email Address and/or Fax No.: TLIPTAN@MSU.COM

What agenda item do you wish to comment on? Comp plan

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ B3

Date: 11-11-2014

Name: Jeff Geisler (Please print legibly)

Authorized Spokesperson representing: Hayden Island (if applicable)

Address: 11614 N ISLAND COVE LN.

City: PDX Zip: 97212 Phone: 503-936-2425

Email Address and/or Fax No.: jeffgeisler@msu.com

What agenda item do you wish to comment on? GOALS of Comp. PLAN

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

62

Date: 11/4/2014 ✓
 Name: LISA SKUBE (Please print legibly)
 Authorized Spokesperson representing: myself (if applicable)
 Address: 7149 SW 3rd AVE
 City: POX Zip: 97219 Phone: 503-757-8392
 Email Address and/or Fax No.: <PRESERVATION> skubepdx@usm.com
 What agenda item do you wish to comment on? CITY TREES + character of neighborhoods
 Site Address, if different from above:

7209 SW 3rd. POX. 97219
USE CASE ON WHAT NOT TO DO.
DEVELOPMENT / FAIL.

Portland Planning and Sustainability Commission Public Hearing

61

Date: 11/4/2014 ✓
 Name: ALASTAIR ROXBURGH (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 1503 N HAYDEN ISLAND DRIVE
 City: PORTLAND Zip: 97217 Phone: 305-915-7446
 Email Address and/or Fax No.: aroxburgh@ieee.org
 What agenda item do you wish to comment on? HAYDEN ISLAND, LAND INVENTORY
 Site Address, if different from above:

Portland Planning and Sustainability Commission Public Hearing

✓ *WLF*

Date: 11/4/14
 Name: Raihana Ansary (Please print legibly)
 Authorized Spokesperson representing: Portland Business Alliance (if applicable)
 Address: 200 SW Market
 City: Portland, OR Zip: 97202 Phone: (503) 552-6768
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? TSP/Comp Plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

WLF

Date: _____
 Name: Micah Hoskel Hoskel (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 4927 NE Rodney
 City: Port OR Zip: 97211 Phone: _____
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? _____
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 27

Date: 11/4/14
 Name: EDWARD OZERUGA (Please print legibly)
 Authorized Spokesperson representing: Springwater Stables Arena LLC (if applicable)
 Address: 6729 SE 162nd
 City: Portland, OR Zip: 97236 Phone: 503-740-6824
 Email Address and/or Fax No.: PDXHMPRO@GMAIL.COM
 What agenda item do you wish to comment on? Comp Plan Designation for above area.
 Site Address, if different from above: same

Portland Planning and Sustainability Commission Public Hearing

✓ 71

Date: Nov 4th 2014
 Name: Paul van Arden (Please print legibly)
 Authorized Spokesperson representing: SELF + Separately Ellet Land Use Commitee (if applicable)
 Address: 52 NE Fremont St.
 City: Portland Zip: 97212 Phone: _____
 Email Address and/or Fax No.: PVOSSICES@Gmail.com
 What agenda item do you wish to comment on? Down zoning Ellet NEIGH BOORHOOD.
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 22

Date: 10/14
 Name: Willie Lewenson (Please print legibly)
 Authorized Spokesperson representing: Human Access Project (if applicable)
 Address: 2800 NE Edgemoor Place
 City: _____ Zip: 97212 Phone: _____
 Email Address and/or Fax No.: willie@humanaccessproject.com
 What agenda item do you wish to comment on? WHT
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 23

Date: 11/4/14
 Name: Steve Morasch (Please print legibly)
 Authorized Spokesperson representing: US Realty 86 Associates (if applicable)
 Address: 1211 SW Fifth Ave, ste 1900
 City: PDX Zip: 97204 Phone: 503-222-9981
 Email Address and/or Fax No.: smorasch@schwabe.com
 What agenda item do you wish to comment on? Comp Plan
 Site Address, if different from above: 12350 NE Sandy Blvd

Portland Planning and Sustainability Commission Public Hearing

✓ 24

Date: 11/04/2014
 Name: Susan Schuster (Please print legibly)
 Authorized Spokesperson representing: NA (if applicable)
 Address: 1522 SE Clinton St.
 City: Pdx Zip: 97202 Phone: 503 442 0353
 Email Address and/or Fax No.: schuss2009@hotmail.com
 What agenda item do you wish to comment on? comp plan
 Site Address, if different from above: NA

Portland Planning and Sustainability Commission Public Hearing

✓ 25

Date: 11.9.14
 Name: CAPT. PETER WILCOX (Please print legibly)
 Authorized Spokesperson representing: SELF (if applicable)
 Address: 173 NE BUDGETON RD, SLIP 5
 City: PORTLAND Zip: 97211 Phone: 503-490-5907
 Email Address and/or Fax No.: PWILCOX@EASYSOCKET.NET
 What agenda item do you wish to comment on? TRANSPORTATION
 Site Address, if different from above: _____

76

Portland Planning and Sustainability Commission Public Hearing

Date: 11-4-14

Name: Doug Klotz (Please print legibly) ✓

Authorized Spokesperson representing: _____ (if applicable)

Address: 1908 SE 35th Place

City: Portland Zip: 97214 Phone: 503-233-9161

Email Address and/or Fax No.: douguntb@gmail.com

What agenda item do you wish to comment on? Comprehensive Plan

Site Address, if different from above: _____

78

Portland Planning and Sustainability Commission Public Hearing

Date: _____

Name: TERRY CHUN (Please print legibly) ✓

Authorized Spokesperson representing: PORTLAND CHINESE HISTORY MUSEUM (if applicable)

Address: 3056 NE Alameda Terrace

City: PORTLAND Zip: 97212 Phone: 503-288-3819

Email Address and/or Fax No.: chungshy@yahoo.com

What agenda item do you wish to comment on? Historic & Cultural Resources

Site Address, if different from above: 115 S.W. Ash St.

Portland Planning and Sustainability Commission Public Hearing

✓ 79

Date: 11-4-14

Name: Justin Callaway (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 8850 Ne Levee RD Portland OR

City: Portland Zip: 97211 Phone: 503-29777298

Email Address and/or Fax No.: justincallaway@gmail.com

What agenda item do you wish to comment on? East Columbia Planning (SS)

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 80

Date: 11-4-14

Name: ~~XXXXXXXXXXXXXXXXXXXX~~ Elliott Callaway (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 8850 NE Levee RD

City: Portland Zip: Oregon Phone: 503-799-8754

Email Address and/or Fax No.: Callawayelliott1@gmail.com

What agenda item do you wish to comment on? Bus services for my neighborhood, my neighborhood in general. (from my perspective)

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 82

Date: 11-4-14

Name: Jude Callaway (Please print legibly)

Authorized Spokesperson representing: _____ (if applicable)

Address: 8850 NE Lenee RD Portland OR

City: Portland Zip: 97211 Phone: 503-477-7298

Email Address and/or Fax No.: _____

What agenda item do you wish to comment on? Annoying trucking yards!

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

✓ 81

Date: 11/4/2014

Name: Timothy Boyd (Please print legibly)

Authorized Spokesperson representing: PCRI (if applicable)

Address: P.O. Box 12316

City: Portland Zip: 97212 Phone: 971-570-6181

Email Address and/or Fax No.: freedomstrategies@msn.com

What agenda item do you wish to comment on? Housing Equality

Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

83

Date: 11-4-14

Name: LYNN LONGFELLOW (Please print legibly)

Authorized Spokesperson representing: OREGON NIKKEI ENVIRONMENT (if applicable)

Address: 121 NW 2ND AVE.

City: PORTLAND Zip: 97209 Phone: 503-224-1458

Email Address and/or Fax No.: lynn@oregonnikkei.org

What agenda item do you wish to comment on? STREET HEIGHTS

Site Address, if different from above: _____



Portland Planning and Sustainability Commission Public Hearing

85

Date: 11/4/14

Name: KRIS DAY (Please print legibly)

Authorized Spokesperson representing: URBAN FORESTRY COMMISSION (if applicable)

Address: 8715 N FOSS AVE.

City: PORTLAND Zip: 97203 Phone: 971-275-2555

Email Address and/or Fax No.: Krisdayo@gmail.com

What agenda item do you wish to comment on? COMP PLAN

Site Address, if different from above: _____



Portland Planning and Sustainability Commission Public Hearing

84

Date: 11/4/14 ✓
 Name: Mark Bello (Please print legibly)
 Authorized Spokesperson representing: Urban Forestry Commission (if applicable)
 Address: 2446 NE 9th Avenue
 City: Portland OR Zip: 97212 Phone: (503) 823-7810
 Email Address and/or Fax No.: markrichardbello@gmail.com
 What agenda item do you wish to comment on? urban forest policies
 Site Address, if different from above: city wide

if we cannot stay,

Portland Planning and Sustainability Commission Public Hearing

83

Date: Nov 4, 2014 ✓
 Name: Maryl Redisch (Please print legibly)
 Authorized Spokesperson representing: ~~Urban Forestry Commission~~ (if applicable) Urban Forestry Commission
 Address: 1918 SW Penitentiary St.
 City: PDX Zip: 97239 Phone: 503-330-8960
 Email Address and/or Fax No.: marylaredisch@gmail.com
 What agenda item do you wish to comment on? Comp plan
 Site Address, if different from above: _____

Portland Planning and Sustainability Commission Public Hearing

88

Date: 11/4/14
 Name: John Koehler (Please print legibly) ✓
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 147 SE 216th AVE
 City: GRESHAM Zip: OR Phone: 503-465-2292
 Email Address and/or Fax No.: _____
 What agenda item do you wish to comment on? PROPERTIES # 1353, 1409, 1421 NE 112th
 Site Address, if different from above: #645 ON NE 112th

Portland Planning and Sustainability Commission Public Hearing

86

Date: 11/4/14
 Name: Joseph VanLom (Please print legibly) ✓
 Authorized Spokesperson representing: _____ (if applicable)
 Address: _____
 City: _____ Zip: _____ Phone: 503 880 0043
 Email Address and/or Fax No.: vanlom@vanlom.com
 What agenda item do you wish to comment on? #645 on NE 112th
 Site Address, if different from above: 1421, 1409 & 1352 NE 112th

Portland Planning and Sustainability Commission Public Hearing

87

Date: 11/14/14 ✓
 Name: Linda Sanchez (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 11126 NE Halsey St.
 City: Portland Zip: 97220 Phone: 503 880-7223
 Email Address and/or Fax No.: LindaJoSanchez@aol.com
 What agenda item do you wish to comment on? #645 on NE 112th
 Site Address, if different from above: properties at 1353, 1409 & 1421 NE 112

Portland Planning and Sustainability Commission Public Hearing

90

Date: 11-4-2014 ✓
 Name: John Gibbon (Please print legibly)
 Authorized Spokesperson representing: P. U. R. B. (if applicable)
 Address: - 9822 SW Quail Fast Rd.
 City: PODX Zip: 97219 Phone: -503-708-6708
 Email Address and/or Fax No.: JohnGibbon@aol.com
 What agenda item do you wish to comment on? - LSP - ESP
 Site Address, if different from above: -

Portland Planning and Sustainability Commission Public Hearing

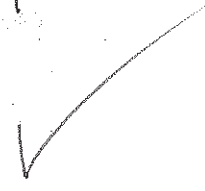
91



Date: 11/4/14
 Name: Michael Harrison (Please print legibly)
 Authorized Spokesperson representing: OHSU (if applicable)
 Address: 2233 SE 53rd Ave
 City: Portland Zip: OR 97215 Phone: 503 381 8559
 Email Address and/or Fax No.: HARMICHA@OHSU.EDU
 What agenda item do you wish to comment on? OHSU comp Plan Designation
 Site Address, if different from above: OHSU - Marquam Hill

Portland Planning and Sustainability Commission Public Hearing

92



Date: 11/4/14
 Name: Laura Wozniak (Please print legibly)
 Authorized Spokesperson representing: _____ (if applicable)
 Address: 7226 SW 29th Ave
 City: _____ Zip: 97219 Phone: 503 312 6176
 Email Address and/or Fax No.: lawoz@comcast.net
 What agenda item do you wish to comment on? GP 10-8
 Site Address, if different from above: _____

Cast

NWDA Transportation Committee Comments on the Proposed Comprehensive Plan
November 4, 2014

The Northwest District Transportation Committee supports the following comments on the proposed Comprehensive Plan.

Our committee believes it is premature to provide input on the transportation-related policies in the proposed Comprehensive Plan because the update of the Transportation System Plan is still in its infancy. Without more detail relating to street classifications and more-specific policies and actions that, presumably, will be part of the TSP update it is hard to know whether the policies before you are appropriate and adequate. Therefore, our comments are predicated on the presumption that the Comp Plan policies will be revised as necessary to be consistent with the TSP.

Our comments are as follows:

Lack of a vision for the next 30 years. The policies are reflective of current practice and don't address the huge changes that will occur in Portland as it continues to grow, become more congested, and as climate changes accelerate. What should the transportation system look like in 30 years? How do we get there?

Policy language is generally weak. The policies use words such as 'encourage', 'promote', 'coordinate', 'improve' and 'support'. These words are ambiguous and leave little hope that anything will be accomplished. An example is Policy 9.59, "Encourage the development of a range of stable funding sources . . ." Why not, "Develop a range"?

Comp Plan designations versus TSP classifications. It is not clear what designations such as Civic Corridor (applied to Burnside) means in relation to its TSP classifications. How will aspirational designations, such as Civic Corridor, be reconciled with the street's existing constrained elements such as inadequate sidewalks?

Regional Coordination is given short shrift in the proposed policies. Increasingly, in NW Portland, we are suffering from large number of commuters accessing our streets from Washington County. We have been in contact with Metro representatives and staff and have basically been told there is nothing they can do; the local jurisdictions need to take the lead in dealing with regional traffic issues. This is not a satisfactory response. The Comp Plan policies should make a strong statement on how to resolve of issues, including classification conflicts across jurisdictions, not just talk about coordination.

Transportation Demand Management should have more emphasis, as the ability to build new traffic capacity is very limited. Currently, TDM is only required of developers via quasi-judicial land use approvals. This applies to a relatively small percentage of development. Both BPS and PBOT need to develop citywide requirements to reduce auto usage across the range of development types and locations.

The proposed Institutional Zones will not be able to address the unique needs of neighborhoods to ensure that large institutions address their transportation impacts. Required TDM measures for institutions are frequently complex and change over time in response to changing circumstances. How will the proposed zones deal with these critical issues and preserve neighborhood livability?

Transit needs are increasing beyond TriMet's ability to provide it. Rather than 'punt' the responsibility for transit provision to TriMet, the city needs to take a more aggressive role in defining the future transit network. Just as developers pay system development charges for street, bike and pedestrian facilities, they should contribute to transit service as well. Also, when transit operations are funded through employee taxes, transit service is reduced during recessions to unacceptable levels that reduce people's ability to get to jobs. The city should be supporting development of a sustainable operating budget for transit service during good times and bad.

Commercialization of the right-of-way. Policy 8.37 allows more use of the right-of-way for commercial uses such as street seats and private utilities that take up valuable space needed for pedestrians, bicycles and even parking. This is a significant expansion of existing policy and ignores the value and need in the right-of-way for more bicycle lanes, wider sidewalks and on-street parking to support economic activity. The northwest district neighborhood has been subjected to this increasing use of the right-of-way for non-transportation purposes and, over time, it has led to overly congested sidewalks.

And speaking of parking, while the proposed parking policies are extensive, Policy 9.50, On-Street Parking, is in direct conflict with Policy 8.37. Parking management is currently reactive when it needs to be pro-active and turn its eyes to other areas of the city outside the Central City before parking problems migrate to more neighborhoods. It took ten years, in the most recent effort, for the City to adopt and begin to implement a parking management plan for NW Portland. Other neighborhoods shouldn't have to wait that long.

Thank you for your consideration.

Jeanne Harrison
Chair, NWDA Transportation Committee
837 NW 25th Avenue
Portland, OR 97210

Planning and Sustainability Commission
Bureau of Planning and Sustainability
1900 SW 4th Ave #7100
Portland, OR 97201

RECEIVED
PLANNING BUREAU
2014 NOV -7 A 10:04

Re: Proposed Draft of the 2035 Comprehensive Plan (CPU)

Date: November 4, 2014

Dear Commissioners,

I bought my Westmoreland home in 1993 and I'm hoping to live in it for at least another twenty years. I am writing to you today because I have an urgent livability concern regarding a proposed zoning change in the draft 2035 CPU. I am unable to attend either of the two public hearings and appreciate being able to register my perspective. For the record, I did attend the SMILE Land Use Committee meeting on October 15, 2014.

I am opposed to having QFC's parking lot status changed from R-5 (Ordinance 33.258.050.A. and 33.258.050.C) to commercial mixed zoning. Property R288102, is located at 6411 SE Milwaukie Avenue (97202) and is currently leased by QFC/Fred Meyer/Kroger, who filed for the variance. My front door faces the parking lot, as I reside at 1535 SE Henry Street (97202).

For a decade, my neighbors and I have attempted to resolve our livability (R5 violations) issues directly with local, and sometimes regional, store managers. It was our group that thought of and requested truck parking only, on the store's Henry Street side. It was our group that thought of and requested fencing to block the recycled materials stored in the parking lot from blowing directly into our yards. We think of ourselves as problem solvers not crazy complainers!

Eventually a Good Neighborhood Agreement (GNA) was created, but never agreed upon by the store. Sadly, when the QFC manager was too busy to meet with us, we found that documented violations resulting in fines seemed to be the most effective communications tool. Examples of what I've documented with neighbor, Joan Coate's assistance include:

- 1) UPS truck completely blocking my driveway while making a delivery to the store. Driver said the store told him not to park in the parking lot. Store manager does not respond to my email and tells another neighbor that it was a driver issue and not a store issue.
- 2) Corona truck is parked facing the wrong side of Henry Street, completely blocking my neighbor's driveway. Photos include QFC employee unloading from the truck, blocking road traffic, and clearly participating with the driver.
- 3) Kroger truck parked in the store's parking lot, left unattended, blocking the sidewalk.

These documented examples are from the last three months alone.

I'd like to make my point here, that if the proposed zoning change is made in the 2035 CPU, these are the very activities that would be going on 24/7.

I didn't file a report about the 300 pound, 18' branch ripped off of my Friends of Trees maple on a beautiful late July day. I didn't report the theft I witnessed because the night manager chose to argue with me that the back door was locked at 10:00 PM, even though I saw it happen at 10:07. I didn't file a report of the semi truck that spent 20 minutes backing up (beep beep) and pulling forward at 5:20 AM, even though I have a video recording of the last 5 minutes. I was afraid the store would say it was a driver issue, not a store issue.

With the proposed zoning change, this is also the sort of business that would be allowed 24/7. It is an unnecessary change because this particular store is one of the most profitable stores that QFC/Fred Meyer/Kroger own. Being a good R-5 neighbor has not caused the store any financial harm over the years.

It also needs to be pointed out that the store knew what they were getting into when they first moved in. QFC/Fred Meyer/Kroger made the proposed changes to this property leased to them and not owned by them. The R-5 zoning was in place from the very beginning, but now they want free rein. It is a completely unnecessary change.

It is important to note that the QFC store has an existing loading dock that is not used as a loading dock. Historically, it has been used for storage. Trucks delivering to QFC then "have to" use the parking lot or our driveways for unloading. This is one of our ongoing GNA issues.

Various public workers have been involved with our neighborhood mediation, city noise violations, and OLCC violations. We are so appreciate their involvement in these land use issues. We are really tired of being the zoning police. As good neighbors, all we want from QFC is to be a good neighbor, even if it takes R-5 zoning to convince them. Please don't take our only compliance tool away from us. Livability is on the line.

Thank you for your consideration.

Sincerely,



Melinda McCrossen

1535 SE Henry Street

Portland OR 97202

pdxmelinda@comcast.net

RECEIVED
PLANNING BUREAU

November 4th, 2014

To the City of Portland, Oregon

2014 NOV - 7 A 10: 04

Regarding mixed use-urban center zoning in the Comprehensive Plan update.

In the West Clinton neighborhood there is an anomaly in the proposed application of the new mixed use-urban center zoning which should be corrected.

I received an August 19th notice that my rental at 1508 SE Clinton St would be rezoned to mixed use urban center. When I went to the internet map site, I was surprised to see the block occupied by both my rentals at 1506 and 1508 SE Clinton was subject to mixed use re-zoning. This is the block bound by SE 15th and 16th and by Clinton and Taggart Streets.

This block has 9 single family homes and a small apartment building. On the Southwest corner there are two small industrial buildings due to the jagged zoning which resulted from the proximity of the railroad. Some of the houses are rentals owned by REACH Community Development.

This area has spent years recovering from the Mount Hood Freeway Corridor and returning to a pleasant neighborhood of mostly single family homes with some townhouses and apartments. There is NO shortage of nearby commercial amenities, markets and restaurants.

I have to ask why of all the blocks was this one block selected for re-zoning. I did an infill project on this site years ago, moving a house slated for demolition onto my site. I like this neighborhood as it is, and do not want to be forced into getting in bed with a developer to build more boxes such as they are building on Division St. Or being left out of the dance and find my rentals boxed in by the blank walls of four story apartments.

Regardless of my parochial interests, I must say that this also looks like bad planning. It is spot zoning at its worst. If the city wants an un-needed urban center in the middle of this residential neighborhood, then it should be larger and focused on changing some of the industrial zoning. I understand the mixed use application to the major intersections. But this one block zoning is an error which I protest.

Erik Funke



1718 SE Mulberry Ave., Portland, OR 97214

503 234 4403

erikfunke@msn.com

November 4, 2014
Bonny McKnight

To the Planning & Sustainability Commission,

Please consider these comments on the proposed update to the Comprehensive Plan:

One of the areas that needs to be more prominent in the Comprehensive Plan which will guide our future is the issue of **noise**. The current plan is essentially silent on this key livability and health issue and the noise code the city continues to use was written in 1976, when the city was far less dense and had about 1/5 of our current population in the same amount of land within our city boundaries.

There are many noise issues that are important but first there needs to be stipulation in the Comprehensive Plan of a noise policy upon which future code and/or development guidelines can be built.

Here are just a few Comprehensive Plan areas that need to be updated for this purpose:

HOUSING

As development in Portland continues to become more dense, and neighbors are living in closer proximity to each other, and mixed uses are encouraged, I ask you to consider the impacts of noise. This is especially important in a number of situations, such as:

- *The higher density Single-dwelling residential zones;

- *Multi-dwelling zones;

- *Mixed-use zones where residential uses abut or are in close proximity to more intense development patterns and uses that can result in noise impacts - for example, noise at times of the day that are at odds with what would be expected in a residential area (late night restaurant activity, night deliveries, etc.

- *Residential uses along transit corridors and in town centers.

- *The Comprehensive Plan will establish the policies, that might then be translated into zoning code regulations, guiding development in Portland. We need a policy that addresses noise and its impact on residential uses, quality of life, livability, etc. and acknowledges that as we become a more dense city, we need to take greater measures to mitigate these increasing impacts, in order to maintain our quality of life.

This policy could then be translated into zoning code requirements for sound insulation in the situations described above. Currently, the zoning code requires sound insulation in certain situations near the airport (33.470). With a new policy addressing noise and noise impacts and the importance of mitigating these impacts, we can potentially get some requirements for noise insulation, appropriate windows, etc. in the zoning code to address the noise impacts in these situations.

The noise issue also pertains to design and development of centers and corridors
(See Goal 4).

Part of the purpose of zoning was to separate uses to prevent or reduce negative impacts, such as noise and activity. As we move more toward offering mixed-use zones, which provide a number of benefits, we can and should do a better job of mitigating the negative noise impacts that result from mixing what previously were considered conflicting uses. For example residential units above commercial space could and should be insulated well from the noise below. Also, commercial corridors that have residential development (or zoning) abutting them should be required to provide sound insulation in their buildings, not just visual screening at the lot line.

NOISE & HEALTH

Studies have shown that there is a negative health impact on people who live in close proximity to high traffic streets, not only from air pollution but from noise. Recent research on this includes “Health Risks of Residents Living Near Major Roads or Freeways by Ann Spake; Health Effects from Noise (Wikipedia); and How The Street You Live On May Harm Your Health from Everydayhealth.com. New data is being gathered and published daily.

*The Comprehensive Plan will establish the policies, that will then be translated into zoning code regulations, guiding development in Portland. Currently, the Zoning Code requires buildings along transit streets to be brought up close to the front lot line along the transit street.

If the proposal is for ground floor residential use, the building should not be brought up so close to the street due to impacts on the residents: a) noise; b) air pollution; and c) lack of privacy. Living in a ground floor unit set right at the front lot line along a transit street residents would not only lose privacy but would also be unable to leave their windows open for security considerations, air quality, and excessive noise reasons.

Essentially, it's a bad idea to have residential units at a zero-lot line along transit streets, or any busy street. Since most of these residents would likely be low income it also becomes an equity issue. These issues also need to be addressed in design and development of centers and corridors.



Maplewood Neighborhood Association

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November 4, 2014

City of Portland - Planning and Sustainability Commission
1900 SW 4th Ave.
Portland, OR 97201-5380

The Maplewood Neighborhood Association submits the following comments regarding the 2035 Comprehensive Plan Update Proposed Draft.

1. Maplewood NA supports the City's partnerships with school districts in siting schools (Policy 8.99) and believes that cooperation should be more integrated into the overall planning process. Maplewood Elementary, West Hills Montessori School and St. John Fisher School serve the families in Maplewood and all require improvements to public infrastructure, such as roads and sidewalks, to provide for safe pedestrian and vehicle access.
2. Policy 8.96 proposes that schools be considered for gathering and aid distribution centers during a natural disaster. This policy should be accompanied by a plan for assessing whether or not a school is adequately constructed to withstand a major earthquake.
3. Maplewood NA supports Policy 8.89 to enhance community preparedness through public facility investments. We believe the Sears Armory on Multnomah Blvd. would be a good choice for such a community safety or emergency management facility.
4. The Maplewood Neighborhood Plan, as adopted by City ordinance in 1997, and updated in 2001, should be listed with other adopted neighborhood plans and incorporated by reference in the 2035 Comprehensive Plan.
5. SW Vermont should be classified as a district collector rather than a neighborhood collector. This street is the designated bicycle route as well as a walking route and is safe for neither use currently. The street serves West Hills Montessori School and St. John Fisher School as well as the SW Community Center and Gabriel Park, and is the only public right-of-way that provides an east-west connection along or through Maplewood.
6. Maplewood NA also supports SWNI's request to extend the public comment period to 120 days after release of the policy language on Institutions and Employment Centers and Multi-use Districts.

Sincerely,

Karen Font Williams, SWNI Board Representative
Maplewood Neighborhood Association