

October 25, 2014

City of Portland  
Planning and Sustainability Commission

Dear Members of the Commission,

Regarding property owned by and located at;  
Mark and Irma Gunderson  
5611 SW Brugger St.  
Portland, OR 97219

It has come to our attention that the intent of the City of Portland is to change the zoning of our property from the existing R10 to the rezoned R20.

Currently we own 2 ½ acres that will be affected by this zoning. We bought this property with the intent of developing the land upon our retirement. We plan on retiring in the next 5 years. What this rezoning does is effectively decrease the amount of lots on our property from 11 to 5. Monetarily this is roughly a one million dollar swing in the value of the developed property.

To single out the people on the North side of Brugger St. but not the South and then to not pose the same requirements of the people on the North and South side of SW Nights Bridge Drive is wrong.

We just received our tax statement for 2014 and our taxes have increased almost \$800.00 this year. Yet the city is trying to decrease the value of our property. If the city would like to purchase that portion or our property that is not affected by our house and create a greenway that is an option that would not be welcome but one that could be explored.

To make this change without compensation to property owners is inexcusable and will require an attorneys expertise to recover the loss. We would hope to avoid this confrontation but fear it may be the only avenue we have to recuperate the losses that could be incurred.

Respectfully,



Mark and Irma Gunderson  
5611 SW Brugger St.  
Portland, Oregon 97219  
503-245-0562



October 25, 2014

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

**RE: City of Portland 2035 Comprehensive Plan**

On behalf of the Rose City Astronomers - a non-profit member-organization of over 500 local citizens devoted to public outreach, education and enjoying the wonders of our Universe - our Board of Directors requests that you consider the following comments, recommendations, and revisions to the **2035 Comprehensive Plan Proposed Draft**.

1. We commend the City for including a light pollution policy in the Plan Update. We suggest the following revisions to **Policy 4.28.e**.

*Light pollution. ~~Encourage~~ Require lighting design and encourage lighting practices that reduce the negative impacts of light pollution, including sky glow, glare, energy waste, impacts to public health and safety, disruption of ecosystems, and hazards to wildlife.*

Only through an outdoor lighting ordinance or a building code that specifically addresses effective lighting design can light pollution be meaningfully addressed. While full cut-off lighting is one of the simplest and most effective ways to reduce light pollution, the light wavelength of a fixture is also an important consideration when addressing light pollution. For example, many light bulbs emit a "blue wavelength" of light that is beneficial to humans during the day, but not at night.<sup>1</sup> Associated with this type of lighting is a suite of known and likely detrimental effects to the ecosystem, to the enjoyment of the night sky, to astronomical research, and possibly to human health. Therefore, it is important that the City require lighting design that not only considers energy cost, but that reduces adverse effects as listed above.

In addition to reducing Portland's light 'bubble' (currently visible over a hundred miles away), extensive credible medical research has linked light pollution to an increased risk of human sleep disorders, depression, anxiety, and even cancer.<sup>2</sup> In 2009, The American Medical Association went on record that excessive nighttime lighting has adverse health effects.<sup>3</sup>

2. We encourage the City of Portland to demonstrate that being a sustainable city means an awareness and concern for our environment not only on the ground, but overhead as well. To that end, we suggest that the following goal be added to the Plan Update:

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<sup>1</sup> "Blue light has a dark side." *Harvard Health Letter*, May 2012,

[http://www.health.harvard.edu/newsletters/harvard\\_health\\_letter/2012/may/blue-light-has-a-dark-side/](http://www.health.harvard.edu/newsletters/harvard_health_letter/2012/may/blue-light-has-a-dark-side/)

<sup>2</sup> Chepesiuk, Ron. "Missing the Dark: Health Effects of Light Pollution." *Environmental Health Perspectives*, Volume 117, Number 1, January 2009; Stralf, Kurt, Robert Baan, Yann Grosse, Beatrice Secretan, Fatima El Ghisssasi, Veronique Bouvard, Andrea Altieri, Lamla Benbrahim-Talaa, Vincent Coglian. "Carcinogenicity of shift work, pain, and firefighting." *Lancet Oncology*, Volume 8, Issue 12, pp 1065-1066, 2007.

<sup>3</sup> "Policy recognizing negative effects of excessive light at night." *American Medical Association* press release, June 19, 2012, <http://www.ama-assn.org/ama/pub/news/news/2012-06-19-ama-adopts-new-policies.page>

RE: City of Portland 2035 Comprehensive Plan

**NEW GOAL: A Dark Sky Community**

**Portland's wise use of outdoor lighting promotes public health and safety, reduces energy waste, preserves and protects wildlife and our cultural heritage of the night sky both within and beyond City borders.**

We have the opportunity to be a leader among similar-size metropolitan areas by seeking certification as a *Dark Sky Community* from the International Dark Sky Association. Through such a goal, we can demonstrate how a City can accomplish urban livability and sustainability goals – as well as preserve its cultural heritage of a dark sky.

[See: <http://www.darksky.org/international-dark-sky-places/about-ids-places/communities>]

There is no question that the original Comprehensive Plan of 1980 has shaped the design and character of the City of Portland we live in today – and that the updated vision for Portland in 2035 will be equally influenced by this Comprehensive Plan Update. We urge you to consider and implement the above recommendations, and set in motion a serious plan to reverse our community's contribution to light pollution.

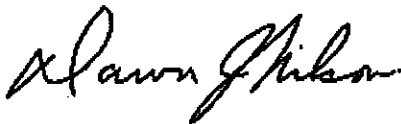
And finally, please reflect on this observation by Don Pettit, a NASA astronaut raised in Silverton, Oregon (where he could see Portland's light bubble) and a graduate of Oregon State University:

*There was a time when smoke stacks showed how affluent your society was, but we look at these now almost with disdain. Lights or light pollution will probably fall in that same category, where now we equate the wealth of a society with how many lights you can burn at night-time. And in the future I predict that affluent societies will still be producing all the light that they need for night-time use, but not so much light that it bleeds into space and spoils our night-time sky.*

Respectfully submitted,



David Nemo, President  
Rose City Astronomers



Dawn J. Nilson  
RCA Director, Dark Sky Preservation  
RCA Liaison, *International Dark Sky Association*

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1945 SE Water Avenue, Portland, OR 97214-3354

Inspire ★ Educate ★ Observe

From: Planning and Sustainability Commission  
Sent: Friday, October 24, 2014 4:23 PM  
To: Kovacs, Madeline; Miller, Derek  
Subject: Fw: Comprehensive Plan Testimony

From: D. Ben Henzel <dbh@henzelpc.com>  
Sent: Friday, October 24, 2014 3:34 PM  
To: Planning and Sustainability Commission  
Subject: Comprehensive Plan Testimony

I tried to use the MapApp to comment, but it would not let me comment without selecting a map feature. None of that makes any sense. I just want to comment, why should I select anything? I typed my comment, then it went missing when I tried to select the map. Technology is so fickle.

So, for the second time, here is my comment.

I own the house at 4606 SW Corbett Avenue, Portland, OR 97239. This house sits on busy Corbett, above I-5, and adjacent to commercial properties and un-kept Department of Transportation surplus property (which they will neither sale or maintain). It is a lovely setting for a residential property and families, especially those with pets and children. I-5 provides plenty of clean fresh air and soothing sounds which define residential neighborhoods.

So, I ask, why is this home an island to itself in a commercial district? Why not plan for the future and zone this property commercial like everything else? Seems logical to me, so I must be missing something.

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

From: Planning and Sustainability Commission  
Sent: Monday, October 27, 2014 10:58 AM  
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](http://www.portlandoregon.gov/bps)

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From: PDX Comp Plan  
Sent: Friday, October 24, 2014 11:36 AM  
To: Planning and Sustainability Commission  
Subject: FW: PSC Comprehensive Plan Testimony

Sara Wright  
p: (503) 823-7728

From: Keith Dieringer [mailto:[dieringer.keith@gmail.com](mailto:dieringer.keith@gmail.com)]  
Sent: Friday, October 24, 2014 11:00 AM  
To: PDX Comp Plan  
Cc: Keith Dieringer; [john@johnrankin.com](mailto:john@johnrankin.com)  
Subject: PSC Comprehensive Plan Testimony

To the Department that changes maps and zoning in the city of  
Portland 10/24/2014

I Keith Dieringer have property at 7315 SE 152nd Avenue Portland, Oregon 97236  
The parcels in this zone I am against being changed to proposed Single 20,000.  
I believe this might be identified as R20 and R20c??  
I want this property to remain at R10 and R10c.  
Reasons identified are:

1. The Cities area improvement charges on what was billed as if R10 subdivision already took place.

2. Asset value for loans already established being severely damaged.

3. Written information of what was highest and best use study by the city of Portland confirming current land usage.

These are some key areas, along with others with history of the area that should be looked at.

Sincerely, Keith Dieringer Phone 503 999-0919

PS: Please keep me informed of changes all the departments are making on private property in my area, along with this latest proposal. Thank You

From: Planning and Sustainability Commission  
Sent: Monday, October 27, 2014 11:01 AM  
To: Kovacs, Madeline  
Subject: FW: Comprehensive Plan Testimony

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

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From: Janet Kuh-Urbach [mailto:[jankuhlurbach@gmail.com](mailto:jankuhlurbach@gmail.com)]  
Sent: Saturday, October 25, 2014 12:55 PM  
To: Planning and Sustainability Commission  
Subject: Comprehensive Plan Testimony

Thank you for the opportunity to voice my opinion to a forum where it may be regarded.

In reviewing the 2035 Comprehensive Plan proposal, I am struck-AGAIN- by the lack of attention to how the increased density along the Barbur Corridor-which in theory, I am all in favor of-will impact the downstream neighbors and ultimately degrade not only our basic access to the homes we pay increasing taxes on, but the safety of children walking to school and the health of Tryon Creek watershed.

I live a block north of Taylor's Ferry at SW 19th Ave where my neighbors and I scramble to find enough urbanite to fill ravines that cut us off from our homes and emergency services caused by the ravages of unmitigated storm water. The increase in amount of flow has been proportional to the infill building, loss of trees, permeable surfaces over the 20 years that I have owned my home. Without attending to what you have already wrought upon us, you are now considering even more construction and density along Barbur at the "headwaters" of our drain.

It is really untenable to do so and ignore what your plans mean for those of us who have tried to maintain, with hand tools and wheelbarrows and gravel basic access to our homes against the ravages of what is increasingly a riverbed-to you known as SW19th Ave. I can't believe that this is even lawful.

In addition, preventing silting and carriage of pollutants and attendant increases in temperature is mandated for the fish in the Tryon Creek watershed-yet you do nothing. This most certainly is a breach-Federal?, State?

Please cast your gaze far enough from your graphically attractive plan to see what the future holds for

the downstream residents –human and non-human alike- today and all the way to 2035.

Jan Kuhl-Urbach, Markham neighborhood resident  
1930 SW Orchid Place, PDX, 97219  
503-329-7408; jankuhlurbach@gmail.com



From: Planning and Sustainability Commission  
Sent: Monday, October 27, 2014 11:05 AM  
To: Kovacs, Madeline  
Subject: FW: Proposed Zoning changes by Planning and Sustainability Commission

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](http://www.portlandoregon.gov/bps)

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From: PDX Comp Plan  
Sent: Monday, October 27, 2014 10:05 AM  
To: Planning and Sustainability Commission  
Subject: FW: Proposed Zoning changes by Planning and Sustainability Commission

From: Greata Beatty [mailto:[greata.beatty@beattygroup.com](mailto:greata.beatty@beattygroup.com)]  
Sent: Friday, October 24, 2014 4:15 PM  
To: PDX Comp Plan  
Cc: Teri Beatty  
Subject: Proposed Zoning changes by Planning and Sustainability Commission

To: Portland Planning and Sustainability Commission  
From: Greata T. Beatty  
Re: Proposed changes to 1308 SW Wyndham Lane and neighboring lot.

This is to advise you that I am strongly opposed to any change in our current zoning law of 10,000 sq feet. I have owned the above properties with my husband since 1971 and purchased them with the understanding that they are devisable should we ever desire to sell them. Our lot is 20,000 sq feet and adjoins a property of 10,000 square feet. The property with our house is .93 acres of which approximately 10,000 sq feet is ideally suited for another house. It adjoins a property of 15,000 sq feet.

For many years, now, I have heard about the struggle to keep the urban boundary from expanding and how important it is build inside of it on every possible site. That evidence is everywhere. In our neighborhood, many homes have been built on 10,000 square feet, some with little or minimum set back from the road. Now, are you telling me that that was all a mistake, and that those who have some of the larger remaining properties must keep them that

way for the sake of the public good?

An environmental overlay was already placed on part of our lot without an notice. Now, we are faced with another challenge to the value of our property. This time by you, supposedly an agency working for the people. Whatever happened to property rights? Do you realize that with larger lots, come larger houses that fewer and fewer people can afford. You are doing a disservice to our community as well as property owners.

Please discard this unfair and inequitable plan.

10/24/2014

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

Dear Commission Members,

My name is Kathie Leck and I have been a homeowner in the Brentwood-Darlington neighborhood since 2009. I live only a few blocks away from the Green Thumb/ Learning Gardens Lab site at 6801 SE 60th. It is one of the reasons why my partner and I chose to live in this neighborhood. How unique to have 12.8 acres of beautiful gardens open to the public for growing food and learning about science, sustainability, and urban farming! Lane Middle School students, Portland State University students, developmentally disabled young adults in the Community Transition Program and others all benefit by the various learning programs offered here. This wonderful place also provides pesticide-free habitat for birds and pollinators. Furthermore, we have many important community events here like the Earth Day celebration, the Harvest Festival, plant sales, and the annual neighborhood clean-up. It is simply a beautiful place in which to decompress from life's pressures and to just enjoy!

The Green Thumb/ Learning Gardens Lab is truly a gem that should be celebrated by Portland, a city that prides itself on sustainability. Instead, I was SHOCKED and DISMAYED to learn that the city planners decided to keep this treasure zoned as **multi-dwelling residential R2A** instead of changing it to the more appropriate Open Space designation. To add insult, the Commission did not even consult with the Brentwood-Darlington Neighborhood Association to ask for input when determining proposed changes for our neighborhood in the Comprehensive Plan.

Honestly, hasn't this neighborhood suffered enough? We pay higher property taxes in proportion to neighborhoods with more amenities in inner Southeast and Northeast Portland and yet we have triple the regional average (approximately 17%) of residents living in poverty. We already have more property zoned as R2A when compared to nearby neighborhoods like Woodstock, Mt. Scott-Arleta, and Eastmoreland. Yet many of our roads are still unpaved and lack sidewalks and, thus, do not support the level of density allowable by the R2A designation. We are now in the midst of having to watch developers chop down our majestic Douglas firs, divide lots, tear down good housing stock and replace all of that with inappropriately large houses that do not fit the character of our neighborhood. Consequently, preserving the Green Thumb/ Learning Gardens Lab by properly zoning it as Open Space is truly an **issue of equity**.

We are all going to have to live with the Comprehensive Plan updates for the next 20 years. Do we really want to see the Green Thumb/ Learning Gardens Lab – a shining example of Portland sustainability and defined as a **community resource** in the 1996 Brentwood-Darlington Neighborhood Plan – DESTROYED by improper zoning? Do we really want to see these acres of trees, flowers, native habitat and lovingly tended food beds and orchards leveled by developers? I don't! So PLEASE recognize the historic use of this wonderful place and re-zone it as Open Space.

Sincerely,  
Kathie Leck  
7131 SE 64<sup>th</sup> AVE  
Portland, OR 97206



# Oregon

John A. Kitzhaber, MD., Governor

## Department of Transportation

Region 1 Headquarters  
123 NW Flanders Street  
Portland, Oregon 97209  
(503) 731.8200  
FAX (503) 731.8531

October 24, 2014

Portland Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland Or 97201

The Oregon Department of Transportation has appreciated the opportunity to participate in the development of the City's Comprehensive Plan and Transportation System Plan by attending the Networks Policy Expert Group (PEG), Transportation System Plan Expert Group, and the Portland/ODOT/Metro/DLCD Comprehensive Plan Coordination Meetings over the last 2+ years. During that time, our staff has provided direction regarding compliance with the Oregon Highway Plan (OHP), Transportation Planning Rule, and Regional Transportation Functional Plan; safety data; analysis of transportation modeling results; suggestions for how to address identified safety and capacity problem areas on State Highways; and professional advice regarding transportation project prioritization. City staff is still in the process of finalizing TSP and Mixed Use Zoning recommendations, and we will continue to engage in that process.

Meanwhile, draft Comprehensive Plan (CP) designations have been released for public review. ODOT is generally supportive of the direction the City is taking in this Comprehensive Plan Update, as well as the proposed CP designations. We do, however, prefer a different Comprehensive Plan designation along Powell Boulevard, a State Highway, from the Ross-Island Bridge to Foster Road, and in the vicinity of SE 122<sup>nd</sup> Ave. ODOT recommends designating land along Powell Blvd. as a Civic Corridor, not a Town Center, a designation which allows for transit-supportive development, walkability, and implementation of the safety and streetscape improvements agreed upon in the adopted Inner Powell Blvd. Streetscape Plan and Outer Powell Blvd. Right-of-Way Implementation Plan, while better reflecting the mobility function of the roadway as an important east-west connection. Be assured that ODOT supports community development goals along Powell Blvd. – we are leading a NEPA process along Outer Powell that will lead to implementation of a 3-lane cross-section with full bicycle and pedestrian facilities.

### Background:

Powell Blvd from the Ross Island Bridge to Foster Blvd was identified during the TSP development as not meeting Regional Transportation Plan and Oregon Highway Plan mobility standards under current zoning. While it is difficult to predict future conditions because the Mixed Use Zoning designations to implement the new Comprehensive Plan designations have not been determined yet, preliminary results show that congestion gets worse in the future under the proposed Town Center Comprehensive Plan designation. This segment of Powell includes multiple top 5% SPIS sites, meaning it has severe safety problems.

In our conversations with City staff about how to handle identified mobility and safety problems on State Highways, we identified a range of approaches: identify projects to address the problem, defer to another study or plan, develop alternative mobility standards consistent with OHP Action 1F3, and/or do not intensify land uses and associated increased vehicle trips.

In discussing ODOT's objections with City staff, we were told that the designation is the result of an exercise of drawing a line of 1 mile outside the current Central City boundaries and assigning a Town Center designation to all Main Street and Corridors within that radius, without consideration for variations in land use or transportation context. Again, ODOT believes that a Civic Corridor designation is more consistent with the vehicle volumes and speeds, number of travel lanes, vehicle, freight, and transit functions, and ownership of Powell Blvd, each of which are very different from the other Corridors within the proposed Town Center: Division, Hawthorne, Belmont, Burnside, etc. It is also consistent with the proposed designation of other state facilities in the City.

ODOT requests that the Planning and Sustainability Commission provides direction to City Council and staff that land along Powell Blvd be designated Civic Corridor rather than Town Center. Again, ODOT supports the exciting changes along Powell Blvd. but believes the Civic Corridor designation is the best way to get there.

We appreciate this opportunity to comment,



Kirsten Pennington  
Policy and Development Manager, ODOT Region 1

CC: Eric Engstrom  
Attachment: Comp. Plan Policy Chapter 3 Excerpts

## COMPREHENSIVE PLAN POLICY CHAPTER 3 EXCERPTS

### Town Centers

Town Centers are located throughout Portland to serve broad parts of the City. They are typically anchored by employment centers or institutions, featuring a wide range of commercial and community services, and have a wide range of housing options. Development in town centers is intended to be mid-rise in scale. Mid-rise development includes buildings from 5 to 20 stories in height, but most frequently ranging from 5 to 6 stories.

Policy 3.26 Role of Town Centers: Enhance Town Centers as successful places that serve the needs of surrounding neighborhoods and a wider area and contain higher concentrations of employment, institutions, commercial and community services, and a wide range of housing options.

Policy 3.28 Transportation: Improve Town Centers as multimodal transportation hubs that optimize access from the broad area of the city they serve and are linked to the region's high capacity transit system.

### Corridors

Corridors, like centers, are places are areas where Portland will grow and change over the next 25 years. They are busy, active streets with redevelopment potential. They are close to neighborhoods and are places with transit, stores, housing, and employers. They need to be planned, designed, and improved to be places that benefit and become successful additions to surrounding neighborhoods. The largest places of focused activity and density along these corridors are designated as centers. There are 3 types of street corridors: Civic Corridors, Neighborhood Corridors, and Freight Corridors.

Policy 3.34 Growth and Mobility: Coordinate transportation and land use strategies along corridors to accommodate growth and mobility needs for people of all ages and abilities.

Policy 3.35 Connections: Improve corridors as multimodal connections providing transit, pedestrian, bicycle, and motor vehicle access and that serve the freight needs of centers and neighborhood business districts.

Policy 3.36 Design: Encourage street design that balances the important transportation functions of corridors with their roles as the setting for commercial activity and residential living.

### 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. Mid-rise development includes buildings from 5 to 10 stories in height, but most frequently ranging from 5 to 6 stories.

Abundant trees and high quality landscaping beautify Civic Corridors and offset the impacts of their large paved areas. These corridors exemplify the benefits of green infrastructure by cleaning and soaking up stormwater runoff and minimizing urban heat island effects, while also being enjoyable

places to live, work, and gather. Civic corridors are safe for all types of transportation. Civic Corridor policies apply to the roadway, the public realm of the street, and the buildings that line the street.

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 that are models of ecologically-sensitive urban design.

Policy 3.39 Design to be great places: Encourage public street and sidewalk improvements along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe and attractive pedestrian environment, and contribute to creating quality living environments for residents.

Policy 3.40 Mobility Corridors: Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way or on nearby parallel routes.

Policy 3.41 Freight: Maintain freight mobility, freight access, and freight capacity on Civic Corridors that are also Major or Priority Truck Streets.

From: Planning and Sustainability Commission  
Sent: Thursday, October 23, 2014 9:28 AM  
To: Kovacs, Madeline  
Subject: FW: Comprehensive Plan Testimony

First for the 11/04 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](http://www.portlandoregon.gov/bps)

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From: Eric Peterson [mailto:[taggartblacksmith@gmail.com](mailto:taggartblacksmith@gmail.com)]  
Sent: Wednesday, October 22, 2014 4:54 PM  
To: Planning and Sustainability Commission  
Cc: Stockton, Marty  
Subject: Comprehensive Plan Testimony

RE: Comprehensive Plan Testimony  
2025 SE Taggart St. Portland, OR 97202  
Multnomah County Account No: R110558  
AUERS ADD, BLOCK 1, E 10' OF LOT 3&4, W 42' OF LOT 5&6

Dear Planning & Sustainability Commission:

The comprehensive plan is fine, I support it. The zoning map designates my property as R2.5. I request it goes to a mixed use zoning as proposed by the comprehensive plan.

Thank you,

Eric Peterson  
2025 SE Taggart St.  
Portland, OR 97202  
(503) 312-0169



From: Planning and Sustainability Commission  
Sent: Thursday, October 23, 2014 1:20 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  
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From: PDX Comp Plan  
Sent: Thursday, October 23, 2014 12:41 PM  
To: Planning and Sustainability Commission  
Subject: FW: PSC Comprehensive Plan Testimony

Sara Wright  
p: (503) 823-7728

From: Bruce Nicholson [mailto:[bnicholson@bhhsnw.com](mailto:bnicholson@bhhsnw.com)]  
Sent: Wednesday, October 22, 2014 2:14 PM  
To: PDX Comp Plan  
Subject: PSC Comprehensive Plan Testimony

Gentlemen,

We wish to voice an objection to reclassifying the designation of our existing home property from Low Density Single-Dwelling (R10) to Limited Single-Dwelling (R20). This objection also applies to all of the existing homes in our area. This will effectively force our home to become a non-conforming use in the new R20 zone. It will severely reduce the value due to the limitations put on future remodeling or additions compared to the current conforming use. And it may require an additional burden and expense of periodic applications to continue the non-conforming use.

These homes are established residences with developed infrastructure of sewers, water and streets. Trying to reduce the density in this neighborhood will do little except allow the City to reclaim land without due compensation. Possibly applying this lower density to undeveloped areas could make sense but, not to established neighborhoods. And, if we understand the literature correctly, existing sub-standard lots could be built on anyway in most cases.

Examining health and safety issues one would see there is an increase in safety with the increase in density as proven by the Neighborhood Watch programs. Separated and isolated homes are less secure from burglary and vandalism. And we fail to see how this density reduction will reduce natural hazard risks. We think these issues are best addressed in the zoning overlays.

Sincerely,

Bruce and Tami Nicholson  
9240 SW 18th Place  
Portland, OR 97219

Bruce Nicholson  
Broker, LEED Green Associate  
9600 SW Barnes Road, Suite 100  
Portland, OR 97225  
bnicholson@bhhsnw.com  
Cell (503) 970-0002  
Fax (503) 626-5682

[www.bhhsnwcommercial.com](http://www.bhhsnwcommercial.com)

October 22, 2014

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, Oregon 97201-5380

RE: 2153 SW Main

I support the Mixed Use Dispersed designation on the office building where I have rented by office for the last twenty years. I love the neighborhood, the redwoods trees, the historic buildings, well-kept properties, and the proximity to Washington Park, downtown and Northwest Portland. The King Hill historic district is a rich mixture of residents and business in thoughtfully restored Victorian structures.

The change in designation will preserve a Victorian historic structure in the King's Hill Historic District at a significant corner of SW King and Main. The building was lawfully converted from its previous residential use to an office use in 1965 (almost fifty years ago) through a building permit. The building was irrevocable converted and now has no kitchen or other faculties required of a residential building. The structure cannot be converted back due to current building codes and property values. The structure would be torn down and replaced with a modern expensive house.

SW Main acts as a separation between the residential use to the south and the office uses to the north. The property is on the north side of SW Main Street. The area is stable and has had this land use configuration for almost fifty years (half a century). The office buildings have lawns and landscaping facing the houses. The offices are generally occupied during the day and week and the houses at night and weekend.

This rich mixture of uses creates a positive sense of place.

Sincerely,



Peter Finley Fry

October 22, 2014

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, Oregon 97201-5380

RE: Portland Nursery  
9000 SE Division  
5050 SE Stark

Urban agriculture and the enhancement the urban ecology are two of the most critical challenges and opportunities facing our cities. People are returning to urban areas and intensifying activities. A healthy ecology within requires an intensification of nature as well.

Portland Nursery is a unique asset and cannot be replicated within the dense urban fabric because of Portland's zoning and property ownership patterns.

My letter speaks to both the Division and Stark Street nurseries. As a personal note, I grew up as a very small child in a nursery in Palo Alto, California with my step grandfather Nicki who was a nurseryman emigrated from England.

#### **DIVISION**

The staff proposal is an excellent beginning. The nursery would like to expand. Our property deemed unnecessary for expansion should be designated for a higher residential density than the staff proposed for two reasons.

- (1) Proximity to the light rail and proposed high volume transit from Gresham to Portland.
- (2) The property is under a single ownership near a mixed use corridor and provides density without destabilizing single family neighborhoods.

#### **STARK**

The Stark Street nursery property is problematic. The nursery exists in a tight residential setting. The nursery provides canopy, a private park like setting, close access for neighbors to acquire unique plants, and an alternative to corporate provision of a much more limited selection of seeds, gardening equipment, plants, shrubs, and trees.

The nursery needs to grow, restore, and improve without constant land use approvals and the associated extreme costs and time delays.

We propose a Comprehensive Plan designation that would result in the Neighborhood Commercial like zone for the entire property.

October 22, 2014

Staff has proposed a split zone on the property that violates the city's policy to not split zone a property and makes the nursery a non-conforming use.

The split zoning creates a situation where the residential property behind the commercial zone (to the south) can never be developed without destroying the nursery. The residential area is landlocked with house to the east and west, a school to the south and the nursery to the north. The only access is a twenty foot right-of-way to Stark Street. An new and/or expanded street would need to be built through what is now the nursery.

Staff has handicapped the property for fear that the nursery would go away and a large commercial invader would replace the nursery. The Portland Nursery will never go away because the nursery is at the center of the market where no new nurseries will ever exist. The policy and desire of Portland's citizens is to improve the ecology, not degrade it.

No commercial use would want to locate in a tight residential fabric with only one frontage. Commercial uses need two frontages as is illustrated by Walgreens on Belmont and Cesar Chaves and Fred Meyer on Hawthorne and Cesar Chaves.

The fear of an unforeseen consequence is unfounded and would be blocked by the City of Portland in the very unlikely event that it would be attempted.

Sincerely



Peter Finley Fry

Cc Marty Stockton, Planner  
Bureau of Planning and Sustainability

DAVE & DIXIE JOHNSTON  
0550 S.W. Palatine Hill Rd.  
Portland, Oregon 97219  
(503) 636-0959

PLANNING BUREAU

October 22, 2014

2014 OCT 24 A 10:11

Portland Planning and Sustainability Commission,  
1900 S.W. 4th Avenue,  
Portland, Oregon 97201-5380

Commissioners:

Re: Proposed Comprehensive Plan

We have worked with land use in our neighborhood association for many years and studied the Proposed Comprehensive Plan at length. We are also serving on the advisory group for the Campus Institutional Zoning Update Project.

We believe the following are needed:

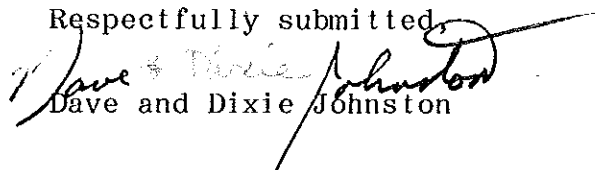
- o Extend the time for comments for at least 90 days beyond the final hearing set for Nov. 4, 2014 and consider further hearings. This will allow further study and understanding of the Proposed Draft and more constructive comments.
- o Rename Proposed Policies 2.13 to 2.16 to "Citizen Involvement" to continue to emphasize the importance of citizen input. Add "Neighborhood Associations as geographically defined and composed of local residents shall be Portland's acknowledged citizen involvement program and be the primary vehicle for community input in Land Use Decisions."

The Proposed Draft seems to downplay the role of citizens and local neighborhoods.

- o Include the wording from proposed policy 4.28 "... limit and mitigate impacts, such as odor, noise, glare, air pollutants, and vibration..." in the specific criteria for approval of campus activities. In Policy 10.5 above "20 Institutional Campus" zone add the heading "Education and Medical Institutions" and delete the wording "Neighborhood-serving commercial uses and other services" from that section.

We believe this is needed to better protect the surrounding areas. We also believe colleges and schools should be focused on education and medical centers on health care and not on creating employment as such or providing commercial services to the surrounding areas. We also note that most institutions are tax exempt, and commercial uses and other services that might be allowed would compete unfairly with local businesses which pay taxes.

Respectfully submitted,

  
Dave and Dixie Johnston

From: Planning and Sustainability Commission  
Sent: Tuesday, October 21, 2014 1:39 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](http://www.portlandoregon.gov/bps)

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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.

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From: Linda Mlynski [mailto:[LMlynski@realtytrust.com](mailto:LMlynski@realtytrust.com)]  
Sent: Tuesday, October 21, 2014 1:33 PM  
To: Planning and Sustainability Commission  
Subject: PSC Comprehensive Plan Testimony

Dear representatives:

The comprehensive plan designation of the single family properties on Caruthers Street between Cesar Chavez and 35th place should be amended from the CU designation to R5 to match the current uses of these properties. This is the only part of the entire Richmond neighborhood where this situation exists. These blocks have been intensely impacted by the construction of the Richmond Flats project at 37th & Division. Please do not allow the commercial development of SE Division to creep into the residential blocks and ruin and peace & quiet we have left.

I live at 3728 SE Caruthers Street.

Thank you -

Linda Mlynski  
Broker  
Realty Trust Group  
5015 SE Hawthorne Blvd.  
Portland, OR 97215  
503 708 5600  
[lmlynski@realtytrust.com](mailto:lmlynski@realtytrust.com)  
[www.lindamlynski.com](http://www.lindamlynski.com)

From: Planning and Sustainability Commission  
Sent: Tuesday, October 21, 2014 5:30 PM  
To: Kovacs, Madeline  
Subject: FW: 2035 Plan Testimony

Julie Ocken  
City of Portland  
Bureau of Planning and Sustainability  
1900 SW 4th Ave, Suite 7100  
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From: Bruce Campbell [mailto:[campbell1849@comcast.net](mailto:campbell1849@comcast.net)]  
Sent: Tuesday, October 21, 2014 5:28 PM  
To: Planning and Sustainability Commission  
Subject: 2035 Plan Testimony

The 2035 Plan contains many commendable elements. Everyone wants to protect the environment while “growing” the economy. The core of this plan contains several contradictory and troubling elements, however. The 2035 Plan wishes to ensure commercial/industrial land for the development of 140,000 new jobs so that Portland will stay “competitive as a major West Coast trade gateway for goods traveling between the Columbia River Basin and the Pacific Rim.” At the same time, the plan expresses a hope for “a climate-ready community” and “a shift away from coal, oil, and natural gas.”

If the writers of this document are seriously concerned about climate change, they need to rethink their knee jerk boosterism for industrial development. Everyone favors jobs, but not when economic growth equates with sacrificing the environment and the health and safety of future generations. Fighting climate change is not compatible with the 2035 Plan’s notions of creating “an overall supportive business environment.” This stratagem is equivalent to inviting the fox into the chicken coop, buying more chickens, and inviting the fox to return. The public keeps paying for the chickens and the fox gets fatter and fatter.

Specifically, the 2035 Plan wishes to turn the Columbia Slough’s diverse but suffering biological community into a sacrifice zone. Golf Courses, such as the Colwood and Broadmoor, are on the industrial butcher’s block. The City has identified the Middle Columbia Slough as a sanctuary for numerous flora and fauna. The City has also emphasized that the Columbia Slough’s water needs zealous protection. The City has cataloged the Columbia Slough’s numerous endangered and threatened species. The public record emphasizes that this much-abused area is fragile, stressed, neglected, and requires environmental protection. Yet the 2035 Plan offers scant protection to the Columbia Slough’s non-human population.

Historically, the Columbia Slough has been an industrial dumping ground for countless toxic chemicals, resulting in a long-term carcinogenic cocktail that affects water, native plants,



wildlife, and humans. The Columbia Slough is a witch's brew of mercury, chlordane, selenium, arsenic, chromium, DDT, and PCBs. Industrial polluters have never been held accountable for their desecration of natural resources, yet the City's 2035 Plan wishes to reward corporate interests with even more land to despoil. In a city that "works," this lapse of ethical responsibility beggars the imagination. Promoting environmental vandalism is not commensurate with putting the brakes on climate change.

A moratorium needs to be placed on any more Columbia Slough industrial development. Bioswales and bicycle paths are offered up by the 2035 Plan, but this is just putting lipstick on the pig. Environmentally-precious land is still being sacrificed to the heedless developers who drive the engine of climate change. The Columbia Slough has been assaulted and defiled enough already. The City argues that the State of Oregon requires more urban land for industrial development. With little effort, any person can verify the profusion of extant Columbia Slough industrial properties. Many of these properties are vacant or underutilized. Creating more industrial property lacks economic or ecological sense; it constitutes a love letter to private business interests that leaves the public out in the cold.

Gifting Columbia Slough land to industry violates the public trust and gives the lie to the City's own documented statements about protecting the environmental integrity of water, air, and biologically diverse habitats. Progress is best defined by protecting the silver-haired bat, Northern red-legged frog, and tricolored blackbird—not by smashing them flat with a gigantic, city-sponsored carbon footprint. If the writers of the 2035 Plan sincerely wish to combat climate change, then the Columbia Slough needs to be protected aggressively from any kind of industrial encroachment. A "sustainable future" means protecting the Columbia Slough's green spaces with intelligent foresight, and a deeper commitment to environmental science. The health of Portland's citizens depends upon our civic leaders to take "the road not taken."

Bruce Campbell  
3261 NE Holland Ct.  
Portland, Oregon 97211

**Age-Friendly Portland Advisory Council Comments & Suggestions**  
**Portland Comprehensive Plan Revision**  
**October 21, 2014**



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

Post Office Box 751                      503-725-3952 tel  
Portland, Oregon 97207-0751        503-725-5100 fax  
ioainfo@pdx.edu

October 21, 2014

Dear Planning and Sustainability Commission:

Please find attached the Age-Friendly Portland Advisory Council's comments regarding the City of Portland's 2035 Comprehensive Plan Proposed Draft. Our Council, after reviewing the document, feels that the City of Portland – including the Bureau of Planning and Sustainability (BPS), the Planning and Sustainability Commission (PSC), and City Council – have been successful in utilizing an “age-friendly lens” in the current iteration of the Comprehensive Plan revisions and the wider activities carried out in Portland. We expect that the key strategies that emerged from the Portland Plan and the policy that is part of the current Comprehensive Plan will move Portland toward becoming a community for all ages in the near and long term.

However, we suggest that the advances that have been made to date are not forgotten and that additional efforts are made that create a Portland that is healthy, vibrant, inclusive, and just place for people of all ages and abilities. In fact, we urge BPS, PSC and City Council to embrace the Age-Friendly Portland initiative in an attempt to make Portland a model age-friendly community. In particular, the Action Plan for an Age-Friendly Portland offers guidance for implementation efforts related to the Comprehensive Plan (e.g., policy approaches for age-friendly housing, active transportation for an aging population). As the City refines zoning and building codes, regulations, and incentives, keep in mind that more than 40% of all of the households added to Portland from 2015-2035 will include a person aged 65 and older.

Our window of opportunity for preparing for population is rapidly shrinking and this revision of the Comprehensive Plan is the last before Portland (and the region, state and nation) face a rapid and unprecedented aging of its population. Please consider the attached recommendations with the foresight that planning in a sustainable manner must include planning for a markedly older population.

Sincerely,

Handwritten signature of Margaret B. Neal in black ink.

Handwritten signature of Alan DeLaTorre in black ink.

Margaret B. Neal, Ph.D. and Alan DeLaTorre, Ph.D  
Co-Chairs – Age-Friendly Portland Advisory Council

cc: Age-Friendly Portland Advisory Council

**Age-Friendly Portland Advisory Council Comments & Suggestions**  
**Portland Comprehensive Plan Revision**  
**October 21, 2014**

**Background:** Researchers at the Institute on Aging (IOA) at Portland State University and members of Portland’s Age-Friendly Advisory Council (AF Council) have reviewed the City of Portland’s 2035 Comprehensive Plan Proposed Draft (2014)<sup>i</sup> and offer the following comments and suggestions for the next draft of the Comprehensive Plan (the “Recommended Draft”). These comments and suggestions have been shaped using an aging and equity “lens” so that implementation of the Comprehensive Plan can help Portland to become a community for all ages. Furthermore, these comments and suggestions attempt to align the Comprehensive Plan update with the Action Plan for an Age-Friendly Portland (2013),<sup>ii</sup> which was created as a requirement for Portland’s membership in the World Health Organization Global Network of Age-Friendly Cities and Communities and which was detailed as a 5-year action (Action Item #103) in the Portland Plan’s Health Connected City goal (2012, p. 83).

**Public Testimony:** These comments and suggestions will be accompanied with testimony to the Planning and Sustainability Commission on October 28, 2014.

**General Suggestion 1: Additional Analysis of the Projected Household Growth by Age of Householders is Needed.** The Comprehensive Plan Proposed Draft (2014) highlights household growth in the City of Portland, specifically detailing that 120,000 new households are expected by 2035 (p. I-5). IOA researchers have examined data from Metro and the Office of Economic Analysis (Oregon) and have determined that 40-45 percent of these new households will include people who are aged 65+. These estimates suggest that additional analysis and preparation are needed to understand the implications of household growth in light of the age composition of the new households. We understand that new analyses are not timely for the current iteration of the Comprehensive Plan review; however, such analyses are extremely important for informing the implementation of policies, including those focused on accessible, affordable, and age-friendly housing. The IOA recommends the City conduct additional research regarding aging households.

Metro’s forecasts of households by age provide some guidance regarding the numbers and geographic distribution of older households; however, it is not clear that these “scenarios” adequately forecast the future growth in households that include people who are aged 65+. This is particularly important when planning for the where older households are anticipated to live (e.g., single- vs. multi-family housing).

Examining trends from 2015-25 – in the next ten years – IOA research has shown that households that included people aged 70-74 and 75-79 will have the highest rates of growth compared with all other age groups. Moreover, from 2025-2035, households with someone aged 80+ will grow at a higher rate than will all other households except those with people aged 40-44. Because the incidence of disabilities increased from age 70+, there are implications for the types of housing people in these age groups will need. In addition, housing costs become more of a concern for older adults living on fixed incomes. Although the development of various types of Neighborhood Centers may provide opportunities for services that are important to older persons, these centers may well price up or drive out single-family housing, inadvertently encouraging seniors to relocate and disrupting their social networks of support; additionally, multi-family and senior housing may be priced up driving older households to new communities.

**Age-Friendly Portland Advisory Council Comments & Suggestions**  
**Portland Comprehensive Plan Revision**  
**October 21, 2014**

**General Suggestion 2: The Strategies Outlined in the Portland, Comprehensive, and Age-Friendly Plans Should be Integrated.** The Portland Plan, adopted in 2012 by the City of Portland, set four shared strategies to guide the City’s and other government’s actions in Portland over the next 25 years (see below); the Comprehensive Plan has been described as an implementing tool of the Portland Plan.<sup>iii</sup> Ten actions were also detailed in the Portland Plan that intended to make Portland a more physically accessible and age-friendly city and the Action Plan for an Age-Friendly Portland also detailed numerous actions that should be implemented to make Portland more age friendly. The following suggestions connect the Portland Plan (including the 10 action areas for “Creating a Portland for All Generations”), the Action Plan for an Age-Friendly Portland, and the revision of the City’s Comprehensive Plan:

- (1) *A Framework for Equity*: Portlanders vary in their needs and abilities, and the projected increase in the proportion of older adults and the increases in the number of people who require supportive environments make age-friendly environments – physical, social, and service – of great importance with respect to equity.
- (2) *Thriving Educated Youth*: Portland’s future depends greatly on the health, well-being, and the success of its youth. From a life course perspective, the early stages of life have a critical impact on individuals and society as Portlanders develop over time. The physical infrastructure needed for learning must be accessible for people with a range of abilities and adaptable to meet the needs of current and future generations, including for younger and older people within educational settings, and community members of all ages in need of places to gather and engage.
- (3) *Economic Prosperity and Affordability*: Older adults have tremendous financial and social assets and thus present opportunities for economic development and workforce development that can aid Portland’s future. While Portland is attracting young “creatives,” it is also drawing college-educated migrants aged 40 years and older at higher rate than other large metropolitan areas in the U.S. (Note: more research is needed to understand net migration patterns for this demographic group).<sup>iv</sup> Infrastructure that attracts new residents and tourists (e.g., public information, accessible environments) needs to be inclusive for those across the age and ability spectrums. With respect to economic prosperity, Portland must look to couple policies and programs that further broad economic development goals and job creation with affordable housing, transportation, and services that advance economic well-being across socio-economic groups.
- (4) *Healthy Connected City*: As our population ages and becomes more diverse, having a healthy, connected city, which includes thriving and accessible centers and corridors, becomes increasingly important. Active transportation options, accessible outdoor spaces and buildings, and housing types that meet the needs of people of all ages and abilities, are needed to facilitate social interaction and inclusion, foster contact between the generations and enhance safety.

**Age-Friendly Portland Advisory Council Comments & Suggestions**  
**Portland Comprehensive Plan Revision**  
**October 21, 2014**

**General Suggestion 3: Examples of Age-Friendly Policies and Approaches that Should be Utilized Moving Forward**

Chapter 1

- Page GP3-9: Policy 3.15: Design of centers to meet the needs of street users of all ages and abilities is critically important for future generations.

Chapter 3

- Page GP3-7: Policy 3.4: Use of citywide design and development for “people of all ages and abilities” is critically important for future generations.

Chapter 4

- Page GP4-6: Policy 4.4: Pedestrian-oriented design for a range of users is critically important for future generations.

Chapter 5

- Page GP5-7: Policy 5.7: Physically-accessible housing is critically important for future generations.
- Page GP5-8: Policy 5.17: Aging in Place. We agree that facilitating opportunities for aging in place is critically important for future generations and that this policy is central to creating an age-friendly Portland. It is important to note that when aging in one’s current home is not possible, aging in one’s community should be an option.

**Suggestions Pertaining to the Seven Key Directions of the 2035 Comprehensive Plan:**

- Page I-9: In the overview of the seven key directions, the concepts of accessibility and age-friendliness should be included.
  - In Key Direction 1, “Create complete neighborhoods,” we suggest adding “and help to create an accessible community for all ages” at the conclusion of the first sentence (“Grow and invest in well-designed centers and corridors that support healthy living *and help to create an accessible community for all ages.*”)
- Key Direction 1: Create Complete Neighborhoods. We applaud the use of images of older adults and people with disabilities, as well as the use of language such as “roll” to describe people using personal mobility devices such as wheel chairs or walkers. We urge care in characterizing all older adults and people with disabilities as “frail” or as within one functional category. The older populations are diverse and include active, non-mobility-impaired groups, in addition to frail older adults.
- Key Direction 5: Provide Reliable Infrastructure to Equitably Serve All Parts of the City. Older adults should also be a part of the equity approach. On page I-28, we urge the inclusion of older adults in the discussion of the consequences of gentrification and displacement (i.e., “These consequences include involuntary displacement of lower income households and a change in the *age*, ethnic and racial make-up of a neighborhood’s residents and businesses”).

**Age-Friendly Portland Advisory Council Comments & Suggestions**  
**Portland Comprehensive Plan Revision**  
**October 21, 2014**

**Comprehensive Plan Update: Urban Design Direction: Concept-Objectives-Framework: 9.10.2014:**<sup>v</sup> The Urban Design Direction document compiles and summarizes key urban design components of Portland’s Comprehensive Plan. Below are several suggestions that should be considered for future implementation of age-friendly policies and programs:

- Continue to highlight the following as the language is critical to successful messaging in the future: “Complete communities that offer a range of well-designed housing options and costs are the best way to support a diverse, resilient, and *age-friendly city*” (p. 5).
- The City Greenways language offers a strong example of age-friendly language: “City Greenways are a citywide network of trails and green, park-like corridors linking major centers, destinations, the rivers and other large open spaces...they help to promote active living, both for recreation and transportation, for *people of all ages and abilities*” (p. 31).

**Additional Suggestions:**

Chapter 1

- Page GP1-5: The section on Human Health” should add the phrase “*throughout the human life course*” as follows: “**Human Health.** Encourage land use decisions that avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives *throughout the human life course.*”

Chapter 3

- Page GP3-9: Policy 3.11 – Housing in centers. We suggest adding: “*and prioritize accessible/universally-designed housing within a quarter-mile of the Town Center core*” as follows: “**Housing in centers.** Provide housing capacity for enough population to support a broad range of commercial services, focusing higher-density housing within a half-mile of the Town Center core *and prioritize accessible/universally-designed housing within a quarter-mile of the Town Center core.*”
- Page GP3-10: Regional Center – Gateway: Development and redevelopment in Gateway should be looked to as an opportunity to pilot accessible and universally-design environments, including high-density housing that meets the needs of older adults and people with a range of disabilities, as well as universally-designed public places. We suggest amending Policy 3.22 as follows: “**Role of Gateway.** Encourage growth and investment in Gateway to enhance its role as East Portland’s center of employment, commercial and public services *while facilitating opportunities to creative innovative, universally-design environments that can become best practices for sustainable and accessible environments throughout Portland.*”
- Page GP3-11: Policy 3.31: We suggest adding the following text to the end of the policy statement: “*Accessible/universally-designed housing for older adults and people with disabilities should be provided within a quarter-mile of the Town Center core.*”
- Pages GP3-26 & GP3-27: Figures 3-2 and 3-3 are mistitled (Figure 3-2 Centers is actually the corridors, and Figure 3-3 is actually the centers).

**Age-Friendly Portland Advisory Council Comments & Suggestions**  
**Portland Comprehensive Plan Revision**  
**October 21, 2014**

Chapter 5

- Page GP5-7: Policy 5.8: Accessible design for all. We suggest adding the following text to the end of the policy statement: “*and other standards for accessibility and usability (e.g., for visitable housing, specialized design for deaf and hard of hearing and/or blind and low-vision communities).*”

Chapter 9

- Page GP9-1: In the fourth bullet point, we suggest defining “vulnerable road users” (i.e., add “*including cyclists, pedestrians, and mobility-impaired people.*”
- Page GP9-5: Goal 9.E: Positive health outcomes. We suggest adding the following text to the end of the policy language: “The transportation system promotes positive health outcomes and minimizes negative impacts for all Portlanders by supporting active transportation, physical activity, and community and individual health *across the life course.*”
- Page GP9-7: Policy 9.6 Transportation hierarchy for people movement. Special needs transit is not considered. The hierarchy should include a high-level tier for “*Special accommodations.*”
- Page GP9-11: Policy 9.37 Portland International Airport. Consider inserting the term “age-friendly” in the text as follows: “**Portland International Airport.** Maintain the Portland International Airport as an important, *age-friendly* regional, national, and international transportation hub serving the bi-state economy.”

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<sup>i</sup> City of Portland (2014). 2035 Comprehensive Plan Proposed Draft. City of Portland, Bureau of Planning and Sustainability. Retrieved from <http://www.portlandoregon.gov/bps/57352>

<sup>ii</sup> Age-Friendly Portland Advisory Council (2013). Age-Friendly Portland Action Plan. Retrieved from <http://agefriendlyportland.org/article/age-friendly-portland-action-plan/>

<sup>iii</sup> City of Portland (2012). The Portland Plan. Retrieved from <http://www.portlandonline.com/portlandplan/index.cfm?c=56527&>

<sup>iv</sup> Jurjevich, J., & Schrock, G. (2012). *Is Portland really the place where young people go to retire? Migration patterns of Portland's young and college-educated, 1980–2010.* Portland, OR: Portland State University. Retrieved from <http://mkn.research.pdx.edu/wp-content/uploads/2012/09/JurjevichSchrockMigrationReport1.pdf>

<sup>v</sup> City of Portland (2014). Urban Design Direction: Concept – Objectives – Framework. Retrieved from <http://www.portlandoregon.gov/bps/article/497442>

**Date:** October 21, 2014  
**To:** Planning and Sustainability Commission  
**From:** Portland Design Commission  
**Subject:** Responses to Briefing on the 2035 Comprehensive Plan Proposed

The Design Commission was recently briefed on the 2035 Comprehensive Plan Proposed Draft at our September 18, 2014 meeting by staff members from the Bureau of Planning and Sustainability. The Commission appreciates these opportunities to ask questions and offer advice on important policy documents such as the Comprehensive Plan. Since it is not possible for the entire Commission to attend a Planning and Sustainability Commission hearing about the Comprehensive Plan Draft prior to the next phase of plan development, we have outlined our suggested changes to the current document in this letter, including broad suggestions regarding content and specific suggestions regarding edits and amending potential omissions. We feel that it is important to address the following items at this time to ensure adequate protection of Portland's historic and cultural resources:

The following are our more broad comments about the general content and tone of the draft document:

**1. Strengthen our connection to the Willamette and Columbia Rivers.**

The Willamette River is a critical feature in the city and needs to be integrated throughout the Comprehensive Plan so that it is a benefit to the City on multiple levels. For example:

- What are we doing with Ross Island, Hardtack Island, East Island, Toe Island, Oaks Park, Sellwood Riverfront Park, and the greenway? How can we bring people to the river in ways that are both enlivening and environmentally sound?
- Our marinas should be incorporated into the center of the city and public activities should be pushed to, and into, the water's edge.
- As we integrate Milwaukie into the city via the Lightrail, how will we activate that entire river frontage along that route within Portland's boundaries?
- The majority of the city still believes that the Willamette is a polluted river only being used by factories. It isn't. It is getting cleaner and cleaner, as noted in this letter:  
[http://homespunwebsites.com/site/1228the/Willamette\\_River\\_Water\\_Quality\\_Letter\\_Dean\\_Marriott\\_BES.pdf](http://homespunwebsites.com/site/1228the/Willamette_River_Water_Quality_Letter_Dean_Marriott_BES.pdf)
- Much of our discussion in the Comprehensive Plan focuses on the Willamette, but what about the Columbia? What are our hopes and dreams for this edge of our city? While the subject is something of an infrastructural third-rail today, what do we, as a city, really aspire to when it comes to the inevitable repair or replacement of the Interstate Bridge?

**2. Embrace campuses and institutions of learning as vital elements of urban fabric.**

Another major focus of our discussion of the Comprehensive Plan revolved around the integration of learning institutions into our future plans. Portland



has a laudable reputation when it comes to planning. At one time, we also had an enviable public school system, but their status as stellar bedrocks of our neighborhoods has been in jeopardy for years.

While many of the issues facing our public schools rest squarely outside the Bureau of Planning and Sustainability's sphere of influence, we believe there are some areas where city government can demonstrate creative thinking about educational institutions and potentially forge alliances with the school district and public universities to truly knit them into our city. Many of us send our children to them, we choose them as our default disaster centers, and we collectively depend on them for a better future, yet they are all sitting around the city on somewhat lonely and disconnected parcels. How could we knit them more deeply into our fabric? These institutions, so vital to our community health, should be a cornerstone of our future plans.

**3. The neighborhoods around us are changing rapidly as we plan. Are we keeping up?**

The Design Commission is looking for specificity from the Bureau of Planning and Sustainability on how the Comprehensive Plan, which will not be adopted for awhile, is going to address development currently underway, some of it desirable and some of it not. Our concern is that the city is playing catch-up with significant changes in areas such as the Williams-Vancouver corridor and along SE Division Street. For instance, the Williams-Vancouver corridor is experiencing rapid development today and could be categorized even now as a Neighborhood Center and may even become as significant as a Regional Center, but is not given this name in the current document. There is also some confusion in the plan document between Neighborhood Centers and Civic Corridors. These labels and how they are applied on the maps may not reflect what is actually happening or what is desired in the future, and could be made more distinct.

**4. Give special consideration for large parcel development opportunities.**

The Design Commission suggests that unique and unified large sites such as university campuses, large office parks, hospitals, schools, and the central post office site be given special attention within the plan. For example, should the US Postal Service move its headquarters from the Pearl to the airport, the city will be presented with a unique opportunity and a host of challenges. These large, "once in a generation" opportunities can serve multiple community needs, but they deserve forethought. What happens to these sites in the future? What is the new paradigm for these types of institutions? How do they function? What are they doing for the City and the neighborhood? Can they offer creative solutions to common urban nuisances (burying / sharing of parking, living machines and other shared facilities, etc).

**5. Acknowledge our role and impact in a bigger region**

Connections to nearby cities could also be included in the Comprehensive Plan Policies and Goals. Perhaps a page of the Plan document is dedicated could be dedicated to building connections to Astoria, St. Helens, St. Johns, Lake Oswego, Oregon City, Scappoose, and Seaside for example. This could include trails, bike trails, retail corridors, or an exploration of re-establishing or

reinterpreting the interurban streetcar lines that once connected Portland to the towns in our region.

**6. Offer an honest assessment of what’s possible when it comes to down-zoning under Oregon’s current land use laws.**

In our hearing, we asked a direct question about how realistic it would be for the Comprehensive Plan to indicate opportunities for down-zoning given the realities of Measure 49. While we appreciate the desire to offer hope to neighborhoods who want to “right-size the zoning in their districts, we wonder if it is truly possible to make zoning density changes without creating the specter of “takings” under our land use rules.

Overall, we are concerned that the Comprehensive Plan draft, in an attempt to please many stakeholders, has set up some tensions that are nearly impossible to reconcile in some cases. In other cases, the language and approach strikes us as a very safe rendition of “more of the same.” We want to see Portland continue to innovate when it comes to planning a city for the future – and we don’t think we see that in the Comprehensive Plan yet.

We recommend the following edits and suggestions to Chapters 3 and Chapter 4 of the Comprehensive Plan draft:

- **Policy 3.14.** Art is already required in infrastructure projects and we want to allow it in development.
- **Policy 4.8 GP 4-6.** Be very careful in the wording of the privacy and solar access policy. As written now, it is in direct contrast with most other city goals. Acknowledge that buildings cast shadows. This policy is in direct conflict with development goals.
- **Policy 4.8 GP 4-7.** Again, be very careful with this wording. We need more height in the city core overall to keep pressure off the Urban Growth Boundary. Wording is important around eco-districts as well. These districts make less and less sense because the building code is already making buildings extremely efficient and decreasing this need.
- **Policy 4.25.** We do not need to encourage art at public places as it is already required.
- **Policy 4.32 GP4-10.** We need a better vision for undergrounding utilities in districts. Utilities need to be integrated into the conversation. Overhead utility lines have a huge impact on the quality of life in neighborhoods
- **Policy 4.38.** Add language to the effect that demolition of historic resources is “discouraged” or “not the preferred course of action”. The City should encourage retaining the resource until other alternatives to demolition can be explored.
- **I-21, I-31, I-37.** Another area of concern for the Design Commission is parking throughout the city. There needs to be a more creative solution to how we deal with parking. The Commission strongly feels that we do not need more parking. People are not moving to Portland because we have ample parking. One idea is to have shared parking areas or structures and multi-duty spaces that serve different needs during the day, evening, and on weekends.

Finally, we note that The Park Blocks should be shown as green corridors/open spaces on the maps.

These conclude the Portland Design Commission comments on the latest draft of the 2035 Comprehensive Plan. Thank you for taking these into consideration as this document develops.

A handwritten signature in black ink, appearing to read "Guenevere Millius". The signature is fluid and cursive, with a large initial "G" and "M".

---

*Guenevere Millius, Chair of Design Commission*

*October 21, 2014*

---

*Date*

From: Planning and Sustainability Commission  
Sent: Monday, October 20, 2014 3:51 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](http://www.portlandoregon.gov/bps)

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From: kyle kilgore [mailto:kgkilgore@gmail.com]  
Sent: Monday, October 20, 2014 3:48 PM  
To: Planning and Sustainability Commission; Stockton, Marty  
Subject: PSC Comprehensive Plan Testimony

October 20, 2014

To Whom it May Concern,

Please consider the following our official testimony regarding the PPSC Comprehensive Plan Designation, specifically the proposed rezoning amendment for the single-family, residential properties south of SE Caruthers Street, between SE Cesar Chavez Blvd. and SE 35th Place:

We kindly request that the zoning of these properties not be amended to 'Mixed Use-Urban Center' as is currently being proposed. Rather, we request that the aforementioned properties remain an R-5 designation as part of the new Long-Range Comprehensive Plan. Along with several of our like-minded neighbors, we are seeking to maintain the current R-5 designation of these residential properties in an effort to limit the potentially negative impacts that commercial over-development could pose to this great neighborhood.

Thanks very much for your consideration.

Best Regards,

Kyle Kilgore & Shani McElroy

Owners and Residents of:

2415 SE 38th Ave  
Portland, OR 97214

**Portland Commission  
On Disability**

**October 20, 2014**

Executive Committee

Joe VanderVeer  
*Chair*

Lavaun Heaster  
*Vice Chair*

Jan Campbell  
*Chair Emeritus*

Travis Wall

Susanne Stahl

Kristi Jamison

Steven Brown

These comments represent the views of the Portland Commission on Disability (PCoD) and the Accessibility in the Built Environment Subcommittee (ABE) as they pertain to the City of Portland's 2035 Comprehensive Plan Proposed Draft (2014).<sup>i</sup> PCoD and ABE would like to acknowledge the City's integration of a disability perspective into the Portland Plan and would like to reiterate the importance of the Planning and Sustainability Commission's (PSC) recommendations that planners and policymakers continue to advance disability-friendly policies and programs as the revised Comprehensive Plan is implemented.

**Public Testimony:** These comments will accompany verbal testimony to PSC on October 28, 2014.

**Integrated Strategies: How the Comprehensive Plan Should Address Disability for Portland:** The Portland Plan detailed 10 actions that would help make Portland a more physically accessible and age-friendly city that were intended to be implemented in the revision of the City's Comprehensive Plan.<sup>ii</sup> The following disability-related strategies should continue to be considered in order to further the quality of life and well-being of Portland's Disability Community, as well as that for all of Portland's citizens:

- (1) *A Framework for Equity:* The Disability Community in Portland has been and should continue to be understood from an equity perspective such as that detailed in the Comprehensive Plan Proposed Draft: "when everyone has access to the opportunities necessary to satisfy their essential needs, advance their well-being, and achieve their full potential."
- (2) *Thriving Educated Youth:* Access to educational instruction infrastructure and programs should be done in a manner that incorporates universal design principles and addresses the spectrum of disabilities, including those that are physical, cognitive, mental, sensory, emotional, and developmental.

- (3) *Economic Prosperity and Affordability*: The Disability Community must be provided opportunities for affordable and accessible housing, transportation, and services, as well as employment (re: City of Portland as a Model Employer). People with disabilities possess tremendous assets and offers opportunities for strengthen out workforce and economic development possibilities.
- (4) *Healthy Connected City*: The need for a healthy, connected city, which includes thriving and accessible centers and corridors, will become increasingly important to the Disability Community. Active transportation, accessible outdoors spaces, and buildings, and housing that meet the needs of people across the age and ability spectrums is needed. Furthermore, our city must foster engagement, interdependence, respect, and social inclusion.

### **Suggestions for Specific Language Changes:**

- **Seven Key Directions to Achieve the Vision:**
  - **Page I-9:** An explicit mention of the word “accessibility” and/or “people of all ages and abilities” is needed in key direction 1, 5, and/or 7
- **Chapter 1: The Plan and Guiding Principles**
  - **Guiding Principles (Page GP1-5):** The section on “human health” should include reference to “for those of all ages and abilities.”
- **Chapter 3: Urban Form**
  - **Policy 3.4: All ages and abilities (Page GP3-7):** Use of citywide design and development for “people of all ages and abilities” is critically important for future generations.
  - **Policy 3.11: Housing in centers (Page GP3-9):** Accessible/universally-designed housing should be prioritized with a quarter-mile of the Town Center core.
  - **Policy 3.15: Accessibility (Page GP3-9):** Design of centers to meet the needs of street users of all ages and abilities is critically important for future generations.
  - **Regional Center – Gateway (Page GP3-10):** Development and redevelopment in Gateway should be looked to as an opportunity to pilot accessible and universally-design environments, including high-density housing that meets the needs of older adults and people with a range of disabilities, as well as universally-designed public places.
  - **Policy 3.31: Housing (Page GP3-11):** Special consideration within a quarter-mile should be made for older adults and people with disabilities.
- **Chapter 4: Design and Development**
  - **Policy 4.4: Pedestrian-oriented design (Page GP4-6):** Pedestrian-oriented design for a range of users is critically important for people of all ages and abilities.
  - **Policy 4.12: Adaptable neighborhoods (Page GP4-6):** Adaptable neighborhoods should detail the need for changing functional ability over time to allow for aging in place/community.

- **Chapter 5: Housing**
  - **Policy 5.7: Physically accessible housing (Page GP5-7):** Physically-accessible housing is critically important for future generations.
  - **Policy 5.8: Accessible design for all (Page GP5-7):** Accessible design for all should use universal design principles; however, other accessible and “useable” standards exist and should also be considered, when and where appropriate (e.g., visitable housing, specialized design for deaf and hard of hearing and/or blind and low-vision communities).
  - **Policy 5.17: Aging in Place (Page GP5-8):** Facilitating opportunities for aging in place is critically important for future generations; however, aging in one’s home is not always the best option and better neighborhood housing options are needed.
  
- **Chapter 9: Transportation**
  - **Goal and policy intent (Page GP9-1, bullet point 4):** There is a need to be more explicit about “vulnerable road users” by detailing cyclists, pedestrians, and mobility-impaired people.
  - **Goal 9.E: Positive Health Outcomes (Page GP9-5):** At the end of the goal, add “for those across the life course.”
  - **Policy 9.6: Transportation hierarchy for people movement (Page GP9-7):** Transportation hierarchy for people movement: Consider that the hierarchy should include a higher tier for “Special accommodations”

<sup>i</sup> City of Portland (2014). 2035 Comprehensive Plan Proposed Draft. City of Portland, Bureau of Planning and Sustainability. Retrieved from <http://www.portlandoregon.gov/bps/57352>

<sup>ii</sup> City of Portland (2012). The Portland Plan. Retrieved from <http://www.portlandonline.com/portlandplan/index.cfm?c=56527&>





October 20, 2014

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

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

Dear Planning and Sustainability Commissioners,

On October 6, 2014, the board of Southeast Uplift (SEUL), the coalition that represents the twenty neighborhoods of Southeast Portland, voted in favor of petitioning 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 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.

Regarding the current zoning of the site, SEUL does 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.

Please 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.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. McCullough', with a long horizontal flourish extending to the right.

Robert McCullough  
President  
South East Uplift

503-771-5090  
[robert@mresearch.com](mailto:robert@mresearch.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  
Jacob Sherman, Board Chair, Brentwood-Darlington Neighborhood Association

From: Planning and Sustainability Commission  
Sent: Monday, October 20, 2014 9:58 AM  
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](http://www.portlandoregon.gov/bps)

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From: PDX Comp Plan  
Sent: Monday, October 20, 2014 9:23 AM  
To: Planning and Sustainability Commission  
Subject: FW: PSC Comprehensive Plan Testimony

Sara Wright  
p: (503) 823-7728

From: Rob F [<mailto:biofilter@gmail.com>]  
Sent: Sunday, October 19, 2014 4:19 PM  
To: PDX Comp Plan  
Subject: PSC Comprehensive Plan Testimony

What makes Portland one of the world's very best cities to live in? It combines urban density with great public transportation infrastructure and emphasizes green spaces and the preservation of historic places not just as a matter of practice but as codified in public policy and code. I live in the alphabet district in the inner northwest. I am alarmed to see the proposed new 2035 comp plan is only going to "encourage preservation" when the current plan explicitly "protect(s) potentially significant historic structures" - development is an inevitable and sometimes beneficial necessity in any neighborhood, but preserving the character of what makes Portland's many unique neighborhoods charming is an essential part of this process. No one will do this if the city of Portland itself does not.

In the city's zeal to be more developer friendly, don't race to weaken language that is at the heart of what has allowed Portland to become the city that so many of us love and want to live in.  
Rob Fullmer  
1812 NW Hoyt St

MEMO

To: Portland Planning and Sustainability Commission

FROM: WPP Board

RE: City of Portland Comprehensive Plan Update

October 18, 2014

The WPPNA is appreciative of the insights made by SWNI concerning the City of Portland Comprehensive Plan. On the whole, the WPP Board is in agreement with the suggestions and concerns voiced by SWNI. However, because West Portland Park will be particularly impacted by the proposed Crossroads Town Center Development (CTCD) there are a number of issues that we would like to share with SWNI in hopes that these will be added to its roster of comments concerning the Comprehensive Plan. These are as follows:

1. Our neighborhood currently has a level of density that is neighborly and appropriate, even if the existing infrastructure (pedestrian and bike routes, storm water conveyance, access to public parks) is not. If any additional density is added through the development of the Barbur Blvd. corridor or the West Portland/Crossroads Town Center then the existing infrastructure needs to be improved and upgraded BEFORE any additional capacity is added. This will ensure that neighborhood feel, quality of life, and use of necessary services remain at a supportable level.
2. West Portland Park, along with the adjacent neighborhoods of Ashcreek and Crestwood, will carry the majority of the burden of housing a major town center development, even though the benefits of such a Center will be available and used by the greater SW region. As a result, there should be a vehicle for additional community input from those “burdened” neighborhoods in the planning and development process, along with a sense of priority funding for infrastructure improvements that will support and carry the new development: parks, bike routes, trails and sidewalks. Asking a neighborhood to carry the burden of a town center without providing services to maintain its feel and quality of life is unfair and goes against the values of the plan.

3. To ensure that the development of a town center is supportable by the neighborhood the following elements need to be put into the Comprehensive Plan's language:
  - Clear delineation of boundaries
  - A zoning plan that recognizes the edge to the neighborhood and allows for appropriate transitions between Town Center and surrounding residential areas.
  - Design standards that ensure that the development fits within the existing neighborhood aesthetic.
  - A traffic and parking plan that preserves the integrity of the neighborhood while adding capacity for the new development and that requires property developers to provide parking for their patrons and residents on site, as opposed to spilling over into existing neighborhoods.

Collins View Neighborhood Association  
Samantha Walker, Chair  
743 SW Maplecree Court  
Portland, OR 97219  
October 18, 2014

RECEIVED  
#1 AWARD BUREAU  
2014 OCT 24 A 10:10

Portland Planning and Sustainability Commission  
1900 SW 4th Avenue  
Portland, OR 97201-5380

Commissioners:

As a result of our meeting on October 1, 2014, Collins View Neighborhood Association (CVNA) board members submit the following suggestions regarding the Comprehensive Plan Proposed Draft.

- We request that the Bureau of Planning and Sustainability provide the details for the new mixed-use zoning designations and the new campus institutional zoning and that the Commission extend the hearings of the Plan or that the record of the hearings be left open for at least 90 days following the release of the provisions of these definitions. It is impossible to understand and assess the impacts of the proposed new zoning without the details of that zoning being available.
- We request a more specific definition of “community involvement” with regard to land use and other issues. Something such as “Neighborhood Associations, as geographically defined and composed of local residents, shall be Portland’s acknowledged citizen involvement program and be the primary vehicle for community input for land use and other decisions.”
- We request that verbiage in Policy 10.5.20, Institutional Campus, be altered to eliminate or de-emphasize the commercial aspect of these proposed campuses. We believe that institutions should be focused on their role: colleges and schools on education, hospitals on medical care, etc, as opposed to highlighting their roles as employers and commercial centers. We also note that most institutions are tax exempt and commercial use would only serve to unfairly compete with local businesses in the immediate area.

Respectfully submitted,



Samantha Walker  
CVNA Chair

From: Planning and Sustainability Commission  
Sent: Friday, October 17, 2014 12:03 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  
503-823-6041  
[www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)

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From: Ryan Takas [mailto:[ryantakas@gmail.com](mailto:ryantakas@gmail.com)]  
Sent: Friday, October 17, 2014 12:00 PM  
To: Planning and Sustainability Commission  
Subject: Re: Comprehensive Plan Testimony

Certainly, my address is:

Ryan Takas  
537 N Ivy St  
Portland, OR  
97227

Thanks for the quick reply!

sincerely,  
ryan takas

On Fri, Oct 17, 2014 at 11:51 AM, Planning and Sustainability Commission  
<[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)> wrote:

Hello Ryan,

Thank you for your comments to the Planning and Sustainability Commission. So that we can include them in the record, can you please email me your mailing address as is required for public testimony?

Thanks,  
julie

Julie Ocken

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

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From: Ryan Takas [mailto:ryantakas@gmail.com]  
Sent: Friday, October 17, 2014 11:46 AM  
To: Planning and Sustainability Commission  
Subject: Comprehensive Plan Testimony

Greetings,

As a resident of Boise-Eliot since 1999, I have seen a lot of change in the neighborhood. I have lived at several different sites throughout my years here until purchasing my home by Boise Eliot School in 2002.

One of the places I lived was on Skidmore between Mississippi and I-5 turn off. There are only a few properties that are on Skidmore that are residential, with the rest already being mixed use or commercial. Of those properties that are residential, only 2 of them actually face Skidmore.

In my time living at one of those properties, I found the street to be busy and noisy. The interstate being right there also greatly increases the noise and pollution the residents are exposed to. There is a lot of foot traffic between the Max stop on Interstate and the main Mississippi commercial area. All in all I found the road to be more suited to small scale commercial endeavors rather than residential. I could easily see Skidmore becoming the obvious connector between the Mississippi and Interstate commercial areas - dotted with properties 1-2 stories high with retail, coffee shops and cafes.

I would like to request that the Board consider making Skidmore Ave, between Mississippi and Interstate a mixed use zone rather than only residential.

It makes a lot of sense with regards to connecting two major commercial areas as well as makes sense based on the sheer residential liveability of that stretch of road.

Thank you for your consideration.

sincerely,  
ryan takas



From: Planning and Sustainability Commission  
Sent: Friday, October 17, 2014 10:35 AM  
To: Kovacs, Madeline; Stark, Nan  
Subject: FW: Comprehensive Plan Testimony

Madeline, this is testimony... but I'm including Nan on this message b/c he is asking a question too that I'm hoping you can help answer for him.

Thanks!

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](http://www.portlandoregon.gov/bps)

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From: joe entler [mailto:[jlentl4@gmail.com](mailto:jlentl4@gmail.com)]  
Sent: Friday, October 17, 2014 10:21 AM  
To: Planning and Sustainability Commission  
Cc: Kelly Battley  
Subject: Comprehensive Plan Testimony

I live at 301 NE Morris St and would like to provide testimony for proposed changes to the "density map" for the Elliot neighborhood.

I am VERY MUCH in favor of reducing the density level in the neighborhood as soon as possible. I think the current proposal is to move the density level from a 2 to a 2.5. I would actually like to see all of the side streets in Elliot go to a 5 because it should be restricted to only single family homes except for the "major corridors" but it sounds like a 2.5 will at least be a step in the right direction.

I am especially concerned about the empty lot next to our house and fear that there will be some sort of high density project allowed on that lot. Can you verify what the options are for someone if the current owner sells that lot?

Do you have any contact info for the owner of that lot as I would like to reach out to them and find out what their plans are for selling the lot. Feel free to call me if you want

Thanks !

--

Joe Entler



From: Planning and Sustainability Commission  
Sent: Friday, October 17, 2014 11:03 AM  
To: Kovacs, Madeline  
Subject: FW: Testimony IN SUPPORT of Proposed Comprehensive Plan Map 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](http://www.portlandoregon.gov/bps)

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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: David Leibbrandt [mailto:[leibbrandtdw@yahoo.com](mailto:leibbrandtdw@yahoo.com)]  
Sent: Friday, October 17, 2014 11:00 AM  
To: Planning and Sustainability Commission  
Cc: Joyce Lear  
Subject: Testimony IN SUPPORT of Proposed Comprehensive Plan Map Change

This letter regards the Plan change notice that we recently received in the mail and is offered IN SUPPORT OF THE PROPOSED PLAN MAP CHANGE.

My wife and I have lived at 2118 SW Luradel Street for the past 25 years. We originally moved to this area because of its unique character. The many large sloping lots located next to natural wooded areas dedicated as Environmental Zone, provide room for organic gardens, they protect valuable stream ways and they provide critical habitat and corridors for wildlife live and move freely within the urban environ. We believe the preservation of the current natural open space present in this area is important to the long term planning goals of the City.

Thank you.

David Leibbrandt and Joyce Lear  
2118 SW Luradel Street  
Portland, OR 97219

Sent from the iPhone of David Leibbrandt.

From: Planning and Sustainability Commission  
Sent: Thursday, October 16, 2014 1:31 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  
503-823-6041  
[www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)

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From: Lisa Marie White [mailto:[lisamariewhitepdx@gmail.com](mailto:lisamariewhitepdx@gmail.com)]  
Sent: Thursday, October 16, 2014 12:51 PM  
To: Transportation System Plan; Planning and Sustainability Commission  
Subject: Comprehensive Plan Testimony

Hello!  
I wanted to submit a comment in exuberant support of the current transportation mode hierarchy (Policy 7.6: Green and Active Transportation Hierarchy). The only change I support is the strengthening of the hierarchy via the addition of "Safety" as the #1 ranking, as it effects all modes and is in line with our city's dedication to vision zero.

The hierarchy helps ensure access and safe mobility for our most vulnerable road users - a topic incredibly personally relevant to me. I deal daily with permanent injuries and financial disarray left over from a car-bike crash on NE Going St., where a car ran a stop sign into me. A close friend of mine is still fighting for her mobility following severe injuries sustained in a car-pedestrian crash on NE MLK Blvd - the car hitting her as she crossed the street in a designated crosswalk.

As medical practitioners, both of us have found it difficult to experience role reversal - accepting care as patients rather than providing it to those in need. We've both made the best of our situations, I've stayed positive, and I do whatever I can to prevent others from experiencing the same or worse hardships. I believe our streets matter, I believe in what our transportation system can be, and I believe we all ought to be a part of the discussion.

I am so appreciative of your work to protect vulnerable road users, and I am asking that you continue that commitment by upholding the hierarchy. It does more than direct funds - it helps save lives.

Thank you again, and keep up the good work!

Lisa Marie White  
6919 N Mississippi Ave  
Portland, OR 97217

From: Planning and Sustainability Commission  
Sent: Friday, October 17, 2014 9:52 AM  
To: Kovacs, Madeline  
Subject: FW: Comp 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](http://www.portlandoregon.gov/bps)

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From: Gibran Ramos [mailto:[gibran.ramos@gmail.com](mailto:gibran.ramos@gmail.com)]  
Sent: Friday, October 17, 2014 9:50 AM  
To: Planning and Sustainability Commission  
Subject: RE: Comp Plan testimony

4415 SE 16th Ave, Portland, OR 97202.  
On Oct 17, 2014 9:45 AM, "Planning and Sustainability Commission"

<[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)> wrote:

Hello Gibran,

Thank you for your comments to the Planning and Sustainability Commission. So that we can include them in the record, can you please email me your mailing address as is required for public testimony?

Thanks,

julie

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

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From: Gibran Ramos [mailto:gibran.ramos@gmail.com]  
Sent: Thursday, October 16, 2014 5:29 PM  
To: Planning and Sustainability Commission  
Subject: Comp Plan testimony

To Whom it may concern:

I would like to see bike corridors connect at all places. A very good example of a discontinuous bike corridor is travelling West off of the Hawthorne bridge onto SW Main Street. The designated bike corridor ends on SW Main St. after passing SW 3rd Ave. This may be the busiest section of bicycling in downtown Portland as cars, buses, and commercial vehicles all move through the same section of city blocks on Main St often well past SW Broadway. I personally continue up Main all the way to SW 12th.

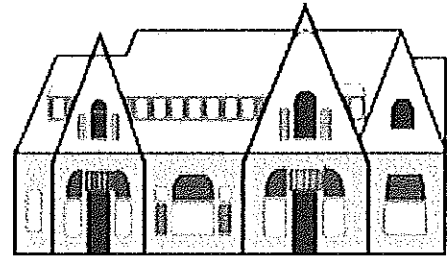
As a bicyclist who rides this route every workday, it feels very claustrophobic and also a harrowing experience as vehicles and bicyclists are moving, sometimes inches away from each other. A particularly narrow spot is around the Elk Statue on SW Main (between SW 3rd and 4th).

I would like to see completion of bike corridors at all sections as a priority on the Comprehensive Plan so that we can continue to increase the amount of bicycle commuters. Here is a link on the stalling of per capital bike commuters in Portland for the fifth year in a row: <http://bikeportland.org/2013/09/19/census-portland-biking-stalls-for-fifth-year-while-other-cities-climb-94248>

Thank you,  
Gibran K. Ramos  
City of Portland Citizen

# BEAUMONT-WILSHIRE

## Neighborhood Association Portland, Oregon



16 October 2014

To Whom It May Concern:

At the general membership meeting of the Beaumont-Wilshire Neighborhood Association on Oct. 13, 2014 (which included ten members of the board, a quorum is reached at 8 board members), the association approved two items related to the proposed comprehensive plan and would like the items entered into the record and considered as formal comment on the plan.

1. Beaumont-Wilshire Neighborhood Association requests that the Bureau of Planning and Sustainability provide the definitions for the new mixed-use zoning designations and that the Planning and Sustainability Commission either extend the hearings for the Comprehensive Plan or keep the hearings record open for at least 90 days following the release of these definitions. 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.
2. Beaumont-Wilshire Neighborhood Association asks that the allowable height of buildings along Northeast Fremont between 41st and 57th avenues be limited to 33 feet.

For questions related to the meeting or the vote, feel free to contact President John Sandie at 219-508-4162 or [sandiefam@gmail.com](mailto:sandiefam@gmail.com) (3425 NE Fremont St., 97212).

Respectfully submitted by

*Handwritten signature*

*Beaumont-Wilshire board member 3017 NE 45th  
97212  
503 257 2419*





**SIMPSON & COMPANY**  
A PROFESSIONAL CORPORATION  
CERTIFIED PUBLIC ACCOUNTANTS

October 16, 2014

Portland Planning and Sustainability Commission  
Comprehensive Plan Update  
1900 SE 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201

To Whom It May Concern:

This letter is to express full support of the proposed comprehensive plan designation change from “High Density Single-Dwelling” to “Mixed Use – Dispersed” along Main Street between King Avenue and St Clair Avenue.

My firm, Simpson & Company, P.C. has been an integral part of the neighborhood since 1979, renting office space at the Rhododendron House, 2165 SW Main Street. Simpson & Company, P.C. is a Professional Accounting firm that has served the Portland area since its inception. We have had numerous clients from within the neighborhood. The firm is made up of 5 professionals, all of which earn a family wage.

My firm has no retail component, has relatively few visitors, with the advent of the internet, interaction between clients and staff has become increasingly virtual reducing traffic and parking demands. By maintaining standard business hours, we do not compete with residential parking or that of the Providence Park stadium during events. We have been, and are an integral part of the neighborhood.

The Rhododendron House and the surrounding historic neighborhood is part of Simpson & Company’s identity. The current zoning has created a cloud of uncertainty for our continued presence in the neighborhood. While it is our strongest desire to remain in the neighborhood, to keep our options open, in 2013 we opened a satellite office in Vancouver on Officers Row within the Historic Fort Vancouver.

The proposed changes in the comprehensive plan would result in no physical change to the current use. When approved, the designation will be good for my business by removing the uncertainty of my being able to remain in the neighborhood, allowing me to better plan how to meet my firms future needs. Please approve the comprehensive plan designation change from “High Density Single-Dwelling” to “Mixed Use – Dispersed” along Main Street between King Avenue and St Clair Avenue.

Respectfully,

Lisa Joerin, CPA

# RHODODENDRON HOUSE LTD.

2165 S.W. MAIN STREET  
PORTLAND, OREGON 97205  
(503) 222-3673

October 16, 2014

Portland Planning and Sustainability Commission  
Comprehensive Plan Update  
1900 SE 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201

To Whom It May Concern:

This testimony is to express full support of the proposed zone change from "Residential 5,000 (R5)" to "Office Commercial 1 (CO1)" along Main Street between King Avenue and St Clair Avenue.

Rhododendron House, Ltd. has owned the building, known as the Rhododendron House, at 2165 SW Main Street since 1985. For decades, this office building has been utilized by a variety of professionals such as certified public accountants, investment advisors, consultants, medical professionals, and lawyers. The building has been in use as an office since 1985 and has become a part of the community and function of the neighborhood.

The proposed changes to zoning would result in no physical change and character to the current use and provides for the efficient use of the building. The building and its tenants have a low impact on the neighborhood. Onsite parking provides for the majority of the tenants needs. Nearby residents have even been known to use the office parking outside of normal business hours. While the impact is low, the tenants provide professional family wage jobs and services available to the local neighborhood residents. These professionals in turn seek other services in the community helping to make it vibrant and sustainable.

The zone change would be positive for Rhododendron House, Ltd, by providing clarity on the buildings continued viability. Please approve the zone change from "Residential 5,000 (R5)" to "Office Commercial 1 (CO1)" along Main Street between King Avenue and St Clair Avenue. We are looking forward to decades more of providing jobs, and services as part of a complete neighborhood.

Respectfully,



Lisa Joerin POA for  
Jacqueline Simpson  
2165 SW Main Street  
Rhododendron House, Ltd.

From: Planning and Sustainability Commission  
Sent: Friday, October 17, 2014 9:47 AM  
To: Kovacs, Madeline  
Subject: FW: Comp 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](http://www.portlandoregon.gov/bps)

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

From: Jim Labbe [mailto:[jlabb@urbanfauna.org](mailto:jlabb@urbanfauna.org)]  
Sent: Thursday, October 16, 2014 8:29 PM  
To: Planning and Sustainability Commission  
Subject: Comp Plan testimony

Three Comp Plan ideas:

1. Liberalize Zoning along Neighborhood Greenways: Liberalize the zoning along neighborhood greenways to allow limited commercial uses along these bike and pedestrian corridors in order to make them more vibrant mix-use destinations. Addressed potential conflicts with residential uses through performance standards to address potential noise or light impacts, while still allowing a greater diversity of uses along the neighborhood greenways.

The allowance of some commercial uses could be conditioned by making improvements to the greenway, specifically improvements that would make it more green (trees and landscaping) and or otherwise more pedestrian friendly.

2.) Scale System Development charges to unit size to remove the disincentives building smaller dwelling units.

3.) Liberalize zoning within one quarter mile of active recreation parks in order to expand percentage of the population with good park access.

Jim Labbe

6325 N. Albina #2

Portland, OR 97217



Oct 15-2014

Attention Marty Stackton  
+ City of Portland Planning Commission

Dear Marty —

Thank you for answering my  
question on the proposed Comprehensive  
plan concerning my property zoning

I am requesting my property at  
8110 S.E Madison Street to be  
Residential at Portland, Ore - 97215-  
-3025

NOT Commercial —

Thank you  
James E. Haberman  
8110 S.E Madison St  
Portland, Ore 97215-3025

Phone

503-252-5480

Sealing Registered

Original copy

From: Planning and Sustainability Commission  
Sent: Wednesday, October 15, 2014 3:50 PM  
To: Kovacs, Madeline; Stark, Nan  
Subject: FW: Proposed Comprehensive Plan Map Change

Madeline, more testimony!

Nan, not sure if there is anything you can/want to follow up with them about... but I'll add it to the PSC record regardless.

Thanks,  
julie

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

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From: Shields Rooney [mailto:[shieldsrooney@yahoo.com](mailto:shieldsrooney@yahoo.com)]  
Sent: Wednesday, October 15, 2014 3:46 PM  
To: Planning and Sustainability Commission  
Subject: Proposed Comprehensive Plan Map Change

To: Planning and Sustainability Commission  
From Claire Shields & Michael Rooney  
Owners of 301-307 NE Monroe Street, Portland, Oregon 97212

We write regarding the proposed change to the comprehensive plan map for the neighborhood around and including our property at 301-307 NE Monroe Street. Our four unit building (fourplex) was built as a fourplex. It stands as originally built. Because the layout of the building, separate gas, electric ect, it would be a property which might be able to be sold as "condos" should the city allow that at a future time. The way the building is zoned is how it is used now (ie we are not "grandfathered" in). If the proposed plan goes into effect our building would be an exception in the neighborhood and we feel that it might limit our ability to sell it as condos in the future.

We would like to "Op out" of the proposed changes. We ask this because we feel like our building would be grandfathered in even though it was built as it stands now. It was built in 1910 and was built to be used for 4 dwellings, each like each other.

Could you please let us know if there are further steps we can take to op out of the proposed changes. Thank you for your consideration and for any help you can provide to us in this process.

Sincerely,  
Claire Shields and Mike Rooney  
Property Address: 301-307 NE Monroe, Portland OR 97212  
Mailing Address: 272 Greenbriar Place, Ashland OR 97520

From: Planning and Sustainability Commission  
Sent: Thursday, October 16, 2014 1:15 PM  
To: Kovacs, Madeline  
Subject: FW: Comp plan 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](http://www.portlandoregon.gov/bps)

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

From: Taz Loomans [mailto:[bloomingrock@gmail.com](mailto:bloomingrock@gmail.com)]  
Sent: Wednesday, October 15, 2014 7:55 PM  
To: Planning and Sustainability Commission  
Subject: Comp plan comment

1. Strengthen transportation hierarchy towards safety for the most vulnerable users.
2. Include bicycle infrastructure on commercial corridors.
3. Keep mixed use at 8 stories max

Thank you!

Tazmine Loomans  
1304 SE 36th Ave. Apt. 5  
Portland, OR 97214

Sent from my iPhone



From: Planning and Sustainability Commission  
Sent: Thursday, October 16, 2014 1:15 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  
503-823-6041  
[www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)

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From: Joseph Shields [mailto:[shields\\_joseph@hotmail.com](mailto:shields_joseph@hotmail.com)]  
Sent: Wednesday, October 15, 2014 8:22 PM  
To: Planning and Sustainability Commission  
Subject: Comprehensive Plan Testimony

Hello I would like to see my property at 15949 SE Powell Blvd. in Portland 97236 zoned as R2 to allow more units to be built there. The land across Powell is R2.

Joe Shields [joe\\_shields@portlandstate.org](mailto:joe_shields@portlandstate.org)

Dear Portland Planning & Sustainability Commission,

Our neighborhood greenways should evolve to become bicycle- and pedestrian- oriented mixed-use neighborhood centers, and as such, should be allowed to include limited amounts of neighborhood-serving retail uses in the future.

Comment on the Comprehensive Plan Map:

Currently, no change in zoning is proposed along the neighborhood greenways. Instead, neighborhood greenways should be rezoned, in all or at specified nodes, to Mixed Use – Neighborhood and Mixed Use – Dispersed.

The focus should be to liberalize the zoning along neighborhood greenways to allow limited commercial uses along these bike and pedestrian corridors. Since it seems to be difficult for the City to support human-centered bicycle oriented city-scape along many major commercial corridors, the neighborhood greenways must evolve to become more mixed-use corridors.

Many neighborhood greenway corridors are existing residential streets, so there may be some resistance to the insertion of commercial uses. These could be addressed through performance standards to address potential noise or light conflicts, while allowing a greater diversity of uses along the neighborhood greenways.

Given that these are neighborhood “greenways,” the insertion of commercial uses could be conditioned on owners adding green infrastructure improvements to the greenway, specifically improvements that would increase the shaded area provided by the tree canopy (street trees and landscaping) and add to the community space dedicated to pedestrians.

---

The recent wave of home demolitions in the City of Portland has left many residents scratching their heads and looking for solutions. One concern often expressed is that many of the demolitions are simply to replace a smaller, older, more affordable home with a new, larger, more expensive home. For adjacent neighbors, it is difficult to understand what benefit is being received by anybody but the developer: no additional housing units are being created, so pressure on the Urban Growth Boundary is not reduced. The price of the unit in question is actually sharply increased, so the shortage of affordable housing units is actually made worse. In short, it's hard to see how this trend actually helps the city or the region achieve any of our broader planning goals, aside from raising revenue.

Based on a series of recent discussions, and acknowledging that the wave of home demolitions will not be stopped, it is the consensus of the Concordia Neighborhood Association's Land Use & Transportation Committee that the following solution should be implemented as a part of the Comprehensive Plan update process to ensure that at least some of the demolitions will be followed by projects that do actually contribute towards meeting some of our broader community planning goals:

Within walking distance of Frequent Service transit routes (however the City chooses to define this -- 1/8, 1/4, 1/2 or 1-mile crow-fly or network buffer of frequent service transit routes or stops), there

should be a new overlay zone created that allows for a residential property containing up to 5 separate residential housing units in a structure that otherwise conforms to the building envelope and setback provisions of its zoning designation (i.e. in an R5 zone, one main dwelling structure per each 5,000 sq ft lot, with required front, side and rear setbacks). The intended purpose of this overlay would be to allow for new residential structures to be constructed containing a number of "flats," i.e. 2-4 story residential structures that look like houses where each floor is a separate housing unit (or a variation where each floor has two units, one on the right and one on the left). This type of structure is the workhorse backbone residential product of places like San Francisco's Mission District, certain areas of Boston, London, and other successful world cities; indeed, Portland has examples of this type of structure in inner SE and the NW Alphabet District that were built in the late 19th and early 20th century.

The end result would be that, rather than a demolition to replace a \$250,000 home with a \$700,000 home, the replacement unit could potentially contain three flats averaging \$250,000 each. One affordable unit could thus be replaced by three affordable units, which would help to achieve goals for increasing the supply of affordable housing, and also reduce pressure on the Urban Growth Boundary. The overall cost would be somewhat higher, due to the need to provide additional kitchens, bathrooms, laundry and common facilities, in addition to the additional impact fees that the City would likely require. However, the price per unit would be significantly lower for the finished product.

We would propose that, because this overlay zone would only exist within areas served by high quality transit service, that automobile parking requirements should remain the same as if the structure were a single-family home; but that off-street parking should be provided for bicycles at a rate of a minimum of one secure off-street bicycle parking space per bedroom.

It's possible that some neighborhoods would not want to see this type of unit constructed within their boundaries; as such, perhaps this overlay zone is something that could be rejected within its boundaries by a vote of the board of a neighborhood association. That would allow neighborhoods such as Concordia to allow this type of development in the appropriate areas near high quality transit, while neighborhoods like Laurelhurst and Eastmoreland could vote to reject it in favor of preserving their historic single-family character.

While we would love to find ways to slow down the wave of home demolitions, this proposal would allow us to live with the demolitions with the peace of mind that the replacement structures are at least helping us to achieve our broader community planning goals, bringing in more residents to help support neighborhood businesses, providing for more affordable housing, and reducing pressure on the Urban Growth Boundary.

We recommend that this proposal be studied and that language to implement it be developed and included as a part of this Comprehensive Plan Update process.

**Edit 1:** While the R5 zone is intended for areas near, in, and along centers and corridors with access to frequent transit, this language focuses too much on density rather than form. Especially beginning with this zone and continuing into the higher-density residential zones, Portland should transition to more of a form-based code, one which focuses on minimum site size, maximum lot coverage, setbacks, height, protection of existing mature trees, and other issues relevant to neighborhood livability. The code

should transition away from a strict focus on density, which can often be counter-productive towards achieving other livability-related goals, including affordable housing and achieving the critical mass of neighborhood population required to support the services of commercial centers within a 20-minute walk.

## 6. Single-Dwelling — 5,000

This designation is Portland’s most common pattern of single-dwelling development, particularly in the city’s inner neighborhoods. It is intended for areas near, in, and along centers and corridors where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally have few or very limited development constraints. Single-dwelling *structure* residential will be the primary use. The maximum density is generally 8.7 ~~units~~ *primary structures* per acre, *each structure may have up to two dwelling units per floor*. The corresponding zone is R5.

---

This edit should seek to clarify the role of private development in providing the off-street, secure, sheltered bicycle parking that will be required for Portland to attain its mode-split goals by 2035.

**Edit 2:** Policy 9.53: Bicycle parking is a critical issue, especially as the pervasive issue of bicycle theft refuses to go away. Adequate off-street, covered, secure bicycle parking should thus be required at all new developments, both residential and for employment-related uses. Off-street bicycle parking is much easier to provide than off-street automobile parking, so this requirement should be much less onerous than the off-street automobile parking requirements of the 20<sup>th</sup> century.

**Bicycle parking.** Promote the development of new bicycle parking facilities, including dedicated bike parking in the public right-of-way. Provide sufficient bicycle parking at High-Capacity Transit stations to enhance bicycle connection opportunities. *Require provision of adequate off-street bicycle parking for new developments.*

---

This is a minor edit, intended to amplify the effectiveness of this policy.

**Edit 1:** Policy 9.52: In order for the City to meet some of the goals mentioned elsewhere in this document, real estate that is currently dedicated to vehicle storage will need to find a higher and better use in the future, no matter where it is located – on street or off street. This policy should clarify that it applies to both situations.

**Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space, *both on and off street.*

---

The airport is currently a major source of regional air pollution. These emissions must be eliminated or mitigated as much as possible, as a matter of policy.

**Edit 2:** Policy 9.37: The air pollution plume from Portland International Airport currently extends deep into the residential neighborhoods of NE Portland, in a manner that is unacceptable for the long-term health of residents. The City should thus seek a long-term goal of zero emissions from the Portland Airport, and work with partners there to achieve that goal. Future technological advances, including hydrogen fueled aircraft, could allow this to become a reality within the life of the Comprehensive Plan.

**Portland International Airport.** Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy. *Seek ways to reduce airport air pollution emissions.*

---

We must seek to electrify the regional rail network, to expand capacity to allow passenger and freight rail to expand within the same corridors, and to reduce the negative impact of those rail facilities on sensitive areas such as our waterfront.

**Edit 1:** Policy 9.35: While growing and modernizing the regional freight rail network is certainly a laudable goal, the City should be more specific about the sought improvements: electrify the system, and create additional capacity to allow freight to peacefully co-operate with passenger rail expansion on the same corridors. Other goals may include seeking to move some freight rail yard operations away from the river, where they may no longer represent the best and highest use of those lands (as has already happened at the north end of the Pearl District.)

**Freight rail network.** Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network, *including electrification and double-tracking to accommodate passenger rail growth where feasible.*

---

We must reduce and seek to eliminate air pollution emissions from the traded sectors of our economy.

**Edit 2:** Policy 9.32: While it is important for Portland to maintain its role as a multimodal freight hub, the technologies currently involved are some of the dirtiest sources of air pollution in the entire region, and their pollution plume extends deep into adjacent residential neighborhoods. The City, at the very least as a matter of risk management, should therefore seek to enforce a zero emission goal on the multimodal freight hub portions of the economy. This could involve electrifying the entire regional freight rail network, transitioning trucks to hybrid biodiesel/electric vehicles, and other technological paths that could not only lead to reduced emissions but also reduced operating costs and additional jobs in the local green economy.

**Multimodal system and hub.** Maintain Portland's role as a multimodal hub for global and regional movement of goods. Enhance Portland's network of multimodal freight corridors. *Seek ways to achieve zero emissions from freight movement.*

---

We should seek to connect Portland to its hinterlands via an electric passenger rail system of the highest quality, akin to those found throughout Europe, Japan and other developed nations seeking to reduce emissions and their carbon footprint while providing attractive ways to travel without requiring the use of the automobile for longer-distance trips.

**Edit 1:** Policy 9.29: The City should seek stronger, carbon-neutral passenger transportation connections to more of its hinterlands. Electric interurban/intercity passenger rail service should be planned to connect Portland to Eugene (and points south), the Oregon Coast including Astoria to Tillamook (and possibly points south), the Columbia Gorge including Hood River and the Dalles (and possibly points east), as well as points to the north, including Vancouver (WA), Olympia, Seattle, and Vancouver, BC.

**Intercity passenger service.** Coordinate planning and project development to *create/expand electric rail* intercity passenger transportation services in the Willamette Valley, and from Portland to Seattle and Vancouver, BC, *and from Portland to nearby cities including Hood River, the Dalles, and destinations on the Oregon Coast including Astoria to Tillamook.*

---

Our goals for bicycle transportation must seek to attain the highest levels of performance. We should not sell ourselves short. Quite literally. Our goal should be to make bicycle riding more attractive than driving for all trips, *five* miles or less -- not just three.

**Edit 1:** Policy 9.21: The City of Portland is aiming too low with this policy. If the City truly seeks to gain bicycle mode share deep into the double-digits, it should seek to make bicycling more attractive than driving for most trips of approximately *five* miles or less. This radius allows most of inner Portland to find trips to and from downtown to be more attractive trips by bicycle than by auto. This doesn't seem to be a difficult standard to achieve, as long as the City is willing to make the choices required to devote the necessary portions of the ROW to bicycles, especially on the main arterials that connect downtown to the neighborhoods, and within downtown.

**Bicycle transportation.** Create conditions that make bicycling more attractive than driving for most trips of approximately ~~three~~ *five* miles or less.

---

The City should be maximizing its production of sustainable energy.

**Edit 1:** New Policy, perhaps 8.105? The City should be actively seeking to produce sustainable energy on buildings, facilities, and lands that it owns or controls. The current power portfolio of the City's power sources is weighted currently very heavily to fossil fuels; one way to make this portfolio more renewable is for the City itself to begin generating more sustainable energy. Doing so could have direct financial, environmental, and economic benefits for the City.

**Production.** *Maximize opportunities to produce sustainable energy within the city, especially on city-owned facilities, through solar, wind, hydro, geothermal and other renewable energy production technologies.*

---

It's important to preserve links (and potential links) in our citywide bicycle and pedestrian network.

**Edit 1:** Policy 9.15: The existing language in this policy seems to support removing links from the transportation network. Rarely, aside from cul-de-sacs that don't actually front on properties with driveways, would it be possible to find links in the transportation network that couldn't possibly be used, even by bicyclists or pedestrians. This language should thus not refer to street "segments" but instead to street "areas." It is eminently practical to seek to shrink the transportation footprint by reducing the amount of street rights-of-way (ROW) that is paved and dedicated to vehicle movement. Portions of the ROW can easily be converted to use by non-auto modes, as greenspace, as bioswales, and/or as community space. This policy should support those sorts of activities, not the removal of potential links in the transportation network, especially those which may already by their nature be more suited to pedestrians and bicycles than other vehicles.

**Repurposing street space.** Encourage repurposing street ~~segments~~ *areas* that are not critical for transportation connectivity to other community purposes.

---

Part of an effective community policing strategy must be to ensure that the police themselves, through their facilities, are also good neighbors. Police (and other public) facilities thus must be supportive of planning goals for their locations, and must cede groundfloor street-facing space to sidewalk-oriented retail when they occupy real estate in centers and corridors.

**Edit 1:** Policy 8.86. Many police facilities in Portland are not necessarily a positive influence on their immediate surroundings, due to blank walls facing sidewalks, the creation of dead zones in retail strips, and the use of large amounts of land that is thus not available for infill housing, office, or retail purposes. The City should thus have a policy of "do no harm to surrounding neighborhoods" that seeks to better integrate its police facilities into their immediate urban environment.

**Police facilities.** Improve and maintain police facilities to allow police personnel to efficiently and effectively respond to public safety needs and serve designated land uses. *Ensure that police facilities are not themselves a blight on a neighborhood, by seeking to integrate facilities with other uses and functions, especially those that activate the pedestrian zone on adjacent sidewalks.*

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We must ensure that the City and other water customers dependent on Bull Run are ensured of an adequate supply of the highest-quality drinking water, even during drought years where reduced snowpack and summertime droughts that extend into autumn combine with extreme high temperatures to maximize the load on water supply facilities. The City must thus seek to maximize its drinking water storage capacity, through construction of new capacity as well as preservation of existing historic reservoirs.

**Edit 1:** Policy 8.66. Many residents are concerned that, with the closure and proposed closure of many of the City's open-air water reservoirs, that the door is being closed on water storage capacity that could be crucial in the future as climate change brings longer, drier summertime drought conditions to our

region. The City should, as a matter of policy, ensure that it has adequate water storage capacity to allow adequate supply even during the most long-lasting, extreme drought conditions, without having to resort to groundwater pumping (which should only be a strategy of very last resort).

**Storage.** Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability, *even during extended drought periods.*

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Graywater has huge potential to reduce the need for water consumption for landscape irrigation during summer months. It also can reduce the volume of wastewater requiring treatment during those time periods. It should thus be encouraged by the City at every opportunity, in partnership with other organizations that can help to implement a "graywater-safe" product labeling scheme and a public education program about how to responsibly use graywater systems.

**Edit 1:** Policy 8.49. Graywater, or the re-use of water from kitchen, laundry, sinks, showers, baths, and most other domestic wastewater sources except toilets, has a huge potential to reduce water consumption in Portland during the dry season. It should be specifically encouraged as City Policy, encoded in the Comprehensive Plan. The City should cooperate with other partners to develop a graywater program that educates property owners as to the responsible installation, maintenance and operation of graywater systems, including what substances and products can and cannot be used in conjunction with an active graywater system.

**Pollution prevention.** Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical and that reduce the amount of pollution entering the sanitary system. *Encourage the development of on-site graywater systems for landscape irrigation during the dry season (or for other re-use purposes if treated on-site).*

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Right Of Way (ROW) vacations should not be taken lightly; these events should only happen as a matter of last resort, and even then, other solutions should be preferable.

**Edit 2:** Policy 8.43. Because the word "need" can be taken different ways by different people, it should be clarified: if a particular ROW does or could serve as a link in the local pedestrian/bicycle network, then pedestrian/bicycle facilities shall be required.

**Right-of-way vacations.** Adopt and maintain City code that identifies when street vacations are appropriate. That code should:

- Maintain existing rights-of-way unless there is no existing or future need for them.
  - Require pedestrian or bicycle facilities, if ~~needed~~ *the ROW serves or could serve as a connection in the neighborhood pedestrian and/or bicycle network.*
-



Utility underground is not just a quality of life issue, a visual aesthetic issue, or a safety issue. It is an issue of resiliency. As residents of this city know too well, our above-ground utilities are far too vulnerable to extreme weather events. Ideally, the city would have a goal of complete undergrounding of all utilities by 2035, to maximize resilience to the stronger storms that are expected as global climate chaos intensifies.

**Edit 1:** Policy 8.42. This policy is all well and good, but it's a bit vague and could have more teeth. For a variety of reasons, including resiliency, undergrounding would be a good city-wide policy, but it won't happen without effort. Requiring undergrounding, and having a policy to accomplish it block-by-block whenever the street is opened, would make it feasible to actually accomplish this goal within our lifetimes.

**Undergrounding.** ~~Encourage~~ *Require* undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in Centers and along corridors where multi-story development is allowed. *Work with utilities to achieve undergrounding whenever the street is opened.*

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The City must seek to attain the highest levels of environmental responsibility, especially for its own operations, if it seeks to be a world leader in municipal sustainability. This is an achievable goal, but concrete strategies must be specified.

**Edit 1:** Policy 8.29. This goal is very vague, and needs to have stronger language with specific goals. An achievable policy goal would be net-zero carbon emissions from City vehicles and properties, especially by the plan's target year of 2035. Setting such a goal would place Portland at the vanguard of cities willing to do something tangible about climate change; it would also come with a host of co-benefits for Portlanders, including better public health outcomes.

**Resource efficiency.** Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses. *Public facilities will have net zero carbon emissions from fleets, buildings, and other emissions sources.*

---

The habitat connections between Forest Park and the Willamette River are almost all completely missing. One by one, they must be restored; where creeks currently travel in pipes underground, they must be daylighted and allowed to connect to the river via natural environments that make them accessible to salmonids once again.

**Edit 2:** Policy 7.49. Forest Park's habitat can be enhanced not just by projects within its boundaries, but also through projects that better connect it to other habitat corridors. Daylighting streams from Forest Park to the Willamette can be an effective strategy to better integrate Forest Park with other nearby habitat areas. Balch Creek, Thurman Creek, Alder Creek, Yeon Creek, Rocking Chair/Munger/Saltzman Creek, Maple Creek, Doane Creek, Pull Out Creek, Hardesty Creek, Springville Creek, Hoge Creek, Linnton Creek, Be Free Creek, Bus Stop Creek, Newton Creek, Marina Way Creek, Harborton Creek, and Miller Creek all drain from Forest Park in to the Willamette River and Multnomah Channel, and would benefit from daylighting projects.

**Forest Park.** Enhance Forest Park as an anchor habitat and recreational resource. *Daylight creeks from Forest Park to the Willamette River and Multnomah Channel.*

---

Daylighting creeks where they currently flow in pipes underground must become a common strategy in the City's toolbox for re-connecting fragmented habitat of all types.

**Edit 1:** Policy 7.48. Daylighting can be an effective strategy to not just connect streams to rivers, but also to connect upland to lowland habitats along new (restored) habitat corridors.

**Connected upland and river habitats.** Enhance habitat quality and connectivity between the Willamette riverfront and upland natural resource areas. *Daylight creeks through urban areas; use these creeks as the centers of habitat corridors.*

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Stream habitat connectivity within the City must be repaired by daylighting those creeks that are currently placed in pipes underground, preventing fish (especially salmon) from accessing them where they meet the river.

**Edit 1:** Policy 7.42. This policy is currently a bit vague as to what solutions should be on the table to "improve stream connectivity." It should be much more specific: the strategy that needs to be pursued is to daylight those streams that have intact habitat in their headwaters, but which travel through culverts before joining the Willamette (or being lost in the underground stormwater system entirely). Daylighting must become the official policy of the City of Portland and the preferred strategy to deal with all such waterways over which the City has jurisdiction.

**Stream connectivity.** Improve stream connectivity between the Willamette River and its tributaries. *Work to daylight those streams with intact upland habitats that are culverted prior to joining the Willamette.*

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We must seek to repair the damage done by previous generations, not just seek to prevent additional harm from being done by our or the following generations. This principle is especially applicable to the issue of habitat fragmentation.

**Edit 1:** Policy 7.18. It's laudable that the City is advancing a habitat connectivity policy. However, given that we are now moving forward from more than a century and a half of urbanization, it seems that preventing more habitat fragmentation is less of an issue than actively seeking ways to repair existing fragmentation by creating new (rebuilding historic) wildlife corridors across the city.

**Habitat connectivity.** Ensure that plans and investments are consistent with and advance efforts to improve terrestrial and aquatic habitat connectivity for fish and wildlife by:

- Preventing habitat fragmentation; *working to repair existing fragmentation.*

- Improving habitat quality.
  - Weaving habitat into sites as new development occurs.
  - Enhancing or creating habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas.
- 

Organic food must move from being a matter of market choice to a matter required by government. One step in that direction is for the City of Portland to support new businesses providing organic food to our walkable neighborhoods, as a matter of policy.

**Edit 1:** Policy 6.68b. Given all the new information that we are learning on a near-daily basis about the dangers of conventional, non-certified-organic agriculture, including the related risks of cancer and other diseases, the City must specifically seek not just any grocery stores, but grocery stores that specifically focus on providing certified organic food.

**6.68.b.** Encourage the development and retention of *certified organic* grocery stores and local markets as essential elements of centers.

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Over and over again, single-family homes are being constructed instead of sidewalk-oriented neighborhood retail within our neighborhood commercial areas. This happens because it is allowed, and because residential housing developers are looking for every opportunity to construct the blueprints they already own for single-family homes for upper-income households. The City must put a stop to this sort of development in order to protect the integrity of our neighborhood retail corridors.

**Edit 1:** Policy 6.59. Some language should be inserted here to clarify that, indeed, for neighborhood business districts to survive and thrive, they must be districts for business. Space must thus be allocated specifically for supportive uses, and new single-family (or other) development that does not acknowledge the need to provide this space, especially on the ground floor, must be prohibited.

**Neighborhood business districts.** Provide for the growth, economic equity, and vitality of neighborhood business districts (Figure 6-3). *Eliminate “by right” single family development in commercial or mixed use zones; require all new development to provide ground-floor space for uses (such as retail) that support the retail-oriented pedestrian environment within neighborhood business districts.*

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Air emissions from the traded sectors are a problem that is dangerous to the health of those who are least able to protect themselves, including the very young and the very old. The responsibility thus falls to the rest of us to look out for them, and to seek ways to reduce or eliminate things like air pollution from freight movement that can have a large negative impact on residents of adjacent neighborhoods.

**Edit 1:** Policy 6.23. While it is good for the economy for Portland to be a trade and freight hub, it is bad for the environment and for the health of the population. As such, the City needs to establish a goal to

move towards zero emissions for the traded sectors and freight/goods movement. Setting this goal now will allow predictability for businesses in the future, so they can work with the City to achieve this goal over the course of multiple decades.

**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, *while transitioning towards a goal of zero emissions in this sector.*

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Just a minor edit to correct a typo.

**Edit 1:** Third paragraph. The word “create” should be changed to “creative.”

New land development approaches are needed to improve local competitiveness in regional markets, including more brownfield redevelopment, low-cost office development and institutional zoning. Land use programs must address the increasingly blurred lines between commercial, industrial and creat*ive* services sectors.

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This is a minor, pragmatic edit.

**Edit 1:** Policy 5.30. This policy seems, as written, to be seeking to protect mobile home parks from development, without discussing any valid policy reason to do so. Indeed, mobile home parks can be seen as “land banks”, areas that could be easily redeveloped where appropriate without necessitating home demolitions, per se. Instead, this section should be re-focused to seek to mitigate impacts on park residents if and when parks do close.

**Mobile home parks.** Evaluate plans and investments for potential redevelopment pressures on existing mobile home parks and impacts on park residents. *Work to find affordable housing options for park residents when parks do close.*

---

There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic. People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood, neighbors would rather have the new larger structure that is built following a demolition contain multiple units of affordable housing, rather than one home that is only affordable to highincome households. Each structure could thus contain multiple flats (perhaps three), each affordable to a middle-income household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the Urban Growth Boundary (UGB), increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

Current zoning codes are overly restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units per acre. One reaction to this has been for developers to buy perfectly decent single family homes en masse, so that they can demolish them to build larger luxury homes that command a significantly higher price point. One solution to this issue may be to switch to more of a form-base code for the higher-density single family zones. Rather than focusing on the number of dwelling units, codes should instead focus on the form of development: the height of the structure, the treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units per acre is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building on the lot.

Therefore, we propose that the City create a new policy to allow flats to be built in the single-family zones R5 and R2.5. The new structures, to be built in single family detached zones (R5 and R2.5), would be required to meet all of the height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise be visually similar to single-family homes), but would contain multiple units stacked vertically ("flats"), in zones served by high-quality transit.

**Edit 2:** New policy, perhaps inserted after 5.36? This policy should specifically legalize "flats" in singlefamily neighborhoods (R5 and R2.5 zones), where multiple vertically separated housing units are housed within structures that otherwise appear to be single-family homes and meet all of the zoning regulations for single-family zones except those relating to number of units.

*Encourage the development of flats in single-family neighborhoods, that is, vertically separated multiple housing units within buildings that otherwise resemble single-family homes and comply with single-family zone requirements related to height, setback, lot coverage, and minimum lot size.*

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It's possible that the City could accommodate much larger population growth with merely a small number of policy tweaks, including allowing greater development of "flats" within single-family neighborhoods, and relaxing restrictions on "units per acre" in favor of more form-based codes in areas served by frequent transit service. This edit seeks to at least bring daylight to the issue that the current language in the Comprehensive Plan does not address the increased uncertainty associated with population forecasting in the age of climate change. See the many statements and publications by the United States Joint Chiefs of Staff related to global destabilization related to climate change for more background on the potential extreme relevance of this issue.

**Edit 1:** First paragraph. Within the context of climate refugees and other potential phenomena that could dramatically affect the number of people seeking to move to our city over the coming decades, it should be clarified that these policies may not necessarily address the population growth pressures related to all future scenarios, but are instead tailored to address the needs associated with a specific particular population growth forecast.

About 122,000 new households are expected in Portland between 2010 and 2035, *according to the adopted forecast.*

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This is a minor edit, but it addresses the issue of resiliency within the planning profession: that often, a forecast is accepted as a fact, even though forecasters themselves will tell you that it is merely a chosen midpoint from within a much wider range. We should instead be planning for that whole range, not just the midpoint.

**Edit 1:** First paragraph. The comprehensive plan’s housing chapter is presumably structured to seek to provide for the creation of a certain number of new housing units by 2035. Within the context of climate refugees and other potential phenomena that could dramatically affect the number of people seeking to move to our city over the coming decades, it should be clarified that these policies may not necessarily address the population growth pressures related to all future scenarios, but are instead tailored to address the needs associated with a specific particular population growth forecast.

The purpose of this chapter is to provide policies that will help Portland meet its need for quality, affordable homes for a growing and socioeconomically-diverse population, and to help ensure equitable access to housing. The Comprehensive Plan Map allows for a more-thanadequate supply of housing to meet *the one scenario’s estimate of* future needs. The challenge is to provide housing with a diverse range of unit types and prices in locations that help meet the needs of all, including low-income populations, communities of color, and people of all ages and abilities.

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It is clear that leaving this choice up to the market is a failed approach. We don’t let the market decide whether DDT, lead paint, leaded gasoline, or other unsafe products are safe to use or not. It is time to ban all pesticides, herbicides, fertilizers, and other products that would not be allowed under Oregon Tilth certification, from within city limits. This must become a matter of City policy, starting with this Comprehensive Plan update. This is a matter of human and ecological health.

**Edit 3:** Policy 4.69? Go organic. Our entire city should seek to be managed according to standards that could be certified as organic by Oregon Tilth. A new policy should be created to this effect that reads:

*Within the City of Portland, all lands and buildings shall be managed under a standard that is equivalent to Oregon Tilth certification. This shall include banning within city limits and on all lands owned and/or managed by the city, all pesticides, herbicides, insecticides, fertilizers, etc. that are not approved for use by Oregon Tilth.*

---

The City should specifically be encouraging organic agriculture, organic foods, and organic products wherever possible, for a variety of reasons related to human and ecological health.

**Edit 2:** Policy 4.65. Given the evidence linking conventional agriculture to cancer and other diseases, it is hardly logical to encourage stores selling conventional produce as a part of a “healthy food” strategy. The City should specifically seek grocery stores that sell certified organic food and produce.

**Grocery stores in centers.** Facilitate the development of grocery stores and neighborhoodbased markets offering fresh *certified organic* produce in centers.

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The Urban Heat Island Effect is a real problem in our city; recent reports suggest that, indeed, we may experience a larger differential between the urban heat island and the nighttime temperatures in surrounding rural areas than any other large metropolitan area in the country. This Comprehensive Plan needs to address this issue head-on, by specifically requiring and encouraging a massive expansion of the tree canopy.

**Edit 1:** Policy 4.63. This section on urban heat islands seems to read as if technological fixes are preferred to help reduce the urban heat island effect. The most cost-effective solutions may indeed be the simplest, however: plant more trees. At the very least, a nod in this direction could be added by inserting the word “landscaping” into this list.

**Urban heat islands.** Encourage development, building, *landscaping*, and infrastructure design that reduces urban heat island effects.

---

The Urban Heat Island Effect is a real problem in our city; recent reports suggest that, indeed, we may experience a larger differential between the urban heat island and the nighttime temperatures in surrounding rural areas than any other large metropolitan area in the country. This Comprehensive Plan needs to address this issue head-on, by specifically requiring and encouraging a massive expansion of the tree canopy.

**Edit 1:** Designing with nature. Add a new policy, perhaps here, to specifically encourage/require expansion of the tree canopy in order to reduce the urban heat island effect in Portland.

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Art of all forms should be encouraged in the public realm.

**Edit 1:** Policy 4.46. In addition to requiring public art as a part of public and private development projects, art in the public realm should be encouraged through other means as well.

**Public art and development.** Create incentives for public art as part of public and private development projects. *Encourage art of all mediums in the public realm using a variety of strategies.*

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Graywater is an age-old concept that is rapidly gaining traction as an appropriate and sustainable response to the problem of water scarcity in areas where people seek permaculture and greenery around buildings. While Australia is recognized as a world leader in this realm, Portland will find that it is also an effective strategy for our climate, especially as hotter, dryer summers extend further and further into the autumn months. Graywater from all non-toilet sources within a building can be re-used for

landscape irrigation, as long as all of the products washed down the drain are graywater-safe. A parallel effort should be made to partner with a trusted, respected NGO (such as, perhaps, EcoTrust) to establish a credible "graywater-safe" labeling certification program for products such as detergents, soaps, and other products that routinely are washed down the drain.

**Edit 2:** Policy 4.52. Graywater does not appear to be specifically addressed anywhere in this draft of the Comp Plan, so this may be the most appropriate place to insert a reference to it. Given our increasingly long summertime droughts in Portland, graywater makes sense as a way to re-use water to reduce water consumption for landscape irrigation purposes. It can be used untreated in completely underground applications, or it can be treated and re-used for other purposes.

**Water use efficiency.** Encourage site and building designs that make efficient use of water and manage stormwater as a resource. *Encourage the re-use of graywater from showers, sinks, kitchens, and laundry for landscape irrigation, especially for permaculture.*

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Air pollution from the airport is real, it causes measurably negative health impacts in adjacent residential neighborhoods, and yet it seems to be completely unaddressed in this Plan. This edit seeks to begin to correct that oversight.

**Edit 1:** Perhaps Policy 4.28h? There appears to be no mention of the air quality impacts of the airport, yet maps of the air pollution plume from the airport show that it extends deep into Northeast Portland. The City thus needs to have a policy to reduce, mitigate, and eventually eliminate the air quality impacts from the airport. Certainly, by 2035, this should be an achievable goal. A new policy in this section might be the best way to address this need.

This might seem minor, but it seems important to clarify that taxpayer-funded art is not the only art that's possible within the public realm, and that the City seeks to encourage all forms of art within the public realm.

**Edit 2:** Policy 4.25. Public art sounds like art that is funded by taxpayer dollars. This policy should be modified to make it clear that what is sought is not just art funded or required by the government, but art in the public realm of all types and mediums.

**Public art/Art in the public realm.** Encourage new development and public places to include design elements and public art that contribute to the distinct identities of centers and corridors, and that highlight the history and diverse cultures of neighborhoods. *Encourage art in the public realm of all types and mediums.*

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This is a minor edit, but for the sake of completeness, living walls must be added to the list of ways to integrate natural and green infrastructure into the built environment.

**Edit 1:** Policy 4.21. Add living walls to the list of green infrastructure to seek in centers and corridors.



**Natural features and green infrastructure in centers and corridors.** Integrate natural and green infrastructure, such as street trees, green spaces, ecoroofs, *living walls*, gardens, and vegetated stormwater management systems, into centers and corridors.

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One tried-and true method to buffer residential uses from busy streets, is to insert a commercial use as a buffer in the intervening space. This encourages a healthy streetside commercial pedestrian environment.

**Edit 3:** Policy 4.20. There have been too many instances in recent years of new development on our neighborhood main streets, such as Alberta and Belmont streets, that is purely residential. This creates “dead zones” on these streets. New development should seek to prevent the production of more such “dead zones” by requiring ground-floor uses that are compatible with the intent of a retail mixed-use pedestrian environment.

**Residential uses on busy streets.** Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic. *Prevent new single-use single-family houses on commercial retail streets. Require a ground floor use that contributes to a retail-oriented pedestrian environment, such as ground-floor retail space.*

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We live in a climate that alternates between rain and sun, often. As pedestrians seek to navigate neighborhood center commercial spaces, they may find the environment a bit more welcoming when they are able to duck under the awning of a building to seek shelter from suddenly-changing elements. This should be a requirement of the building code: Awnings above sidewalks in commercial districts.

**Edit 2:** Policy 4.16. Specifically call out awnings as something that should be provided in pedestrian corridors. Too many buildings do not include awnings, probably because modern architecture often fails to recognize their functional value. The code must thus compensate for this architectural fad, and require buildings in centers and corridors to provide awnings.

**Street environment.** Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather. *Buildings should have awnings to provide shade and protection from the rain for pedestrians and other users of sidewalk space.*

---

As Portland seeks to implement its Centers and Corridors approach to planning, it will find that it must move closer and closer to a true Form Based Code to achieve its goals. Part of this strategy will include moving away from density as a strict regulating measure, and towards form-based requirements that relate to scale, character, and other, more varied regulatory descriptors.

**Edit 1:** Policy 4.13. Current zoning codes are too restrictive on development, and often impose artificial limits on density that are based primarily on the number of dwelling units. Rather than focusing on the number of dwelling units, codes should focus on the form of development, the height of the structure, treatment of existing mature trees on the site, the relationship to the street, and the relationship to adjacent structures. Because the number of dwelling units is itself a function of the size of each unit as much as anything else, developers and property owners should be given more freedom to size each unit as they see fit, as long as they meet code requirements for the form of the building.

**Scale and patterns.** Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements. *Remove strict restrictions on dwelling units per structure or per acre in transit zones.*

---

As we seek to battle a wave of demolitions in our single-family neighborhoods, we are often up against developers who use the same blueprints over and over again, regardless of context. Therefore, a house with a front-loaded garage will be built even on a site that has an alley in the back, despite being located in a neighborhood that seeks to re-active neglected alley spaces. The City needs to change its policy to require the use of the alleys for vehicle access to properties in all instances, and to require a variance and neighborhood review in order to NOT use the alley.

**Edit 1:** Policy 4.11. This policy is great, except that it needs to be mandatory in order to be effective where alleys do exist. What the City needs, at this point, is a concerted effort to revitalize its alleys, especially in areas where they have long experienced neglect, to allow them to become viable locations to construct accessory dwelling units and serve other community needs.

**Alleys.** ~~Encourage~~ *Require* the continued use of alleys for parking access, *where they exist*, and expand their use as the location of accessory dwelling units and as multi-purpose community space.

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Neighbors are fed up with the home demolitions epidemic. The promise of our regional grand bargain, of focusing development in centers and corridors while protecting single family neighborhoods, has been broken. Single family homes are being bulldozed all over the city. Neighbors are asking, what do we get from this? Where is the benefit to the neighborhood, to the city, to the region? When asked if, once that house has been bulldozed, they would rather see a single large home built for a high-income household, or a structure built containing two, three, or even four "flats" affordable to median-income households, most neighbors seem to prefer the latter. Now that the bargain has been demonstrably broken, they would prefer to see more affordable housing built using the format of "flats," as this allows for more folks to have access to affordable housing within existing established neighborhoods, thus reducing the pressure on the Urban Growth Boundary and providing more space where regular folks might be able to find housing.

**Edit 2:** Policy 4.12. Create a new policy to allow flats to be built in single-family neighborhoods. There is currently a lot of anger within the neighborhoods of Portland over the home demolition epidemic.

People feel that they are being subjected to the stress of demolitions, of losing affordable housing stock within the neighborhood, without seeing any potential benefit. Currently, affordable homes are being demolished to construct homes that are only affordable to higher-income households, without doing anything to help with the supply of affordable housing. At least within the Concordia neighborhood, neighbors would rather have the new larger structure that is built following a demolition be full of perhaps three flats, each affordable to a middle-income household, rather than one single expensive home. This would aid in the supply of affordable housing within the neighborhood, reduce pressure on the UGB, increase the supply of customers for neighborhood businesses, and generally help to meet community goals and needs.

**Adaptable neighborhoods.** Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages. Allow adaptive reuse of existing buildings and the creation of *detached* accessory dwelling units to serve the changing needs of a household over time. *Allow structures to be built in single family detached zones that meet height, setback, site coverage and minimum lot size requirements for single-family structures (and otherwise are visually similar to single-family homes), but that contain multiple units stacked vertically ("flats"), in zones served by high-quality transit.*

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These edits to the map represent the addition of other logical urban habitat corridors within the City that appear to be missing from the current draft.

**Edit 1:** Figure 3-6. Urban Habitat Corridors. Modify the map to add the following two areas:

- 1) Sullivan's Gulch as a Habitat Corridor (Enhanced).
  - 2) Balch Creek: Daylighting project to the Willamette as a Habitat Corridor (Potential)
- 

This is a minor edit, for the sake of completeness.

**Edit 1:** Policy 3.86. Bicycles should be mentioned in both places in this section where pedestrians are specifically addressed.

**Eastern Neighborhoods active transportation.** Enhance access to centers and other community destinations in Eastern Neighborhoods by ensuring that corridors have safe and accessible pedestrian *and bicycle* facilities and creating additional secondary connections that provide lowstress pedestrian and bicycle access.

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Mature trees are being felled at a rate that is definitely putting the "stumps" back into "stumptown." Over a dozen mature century trees have been felled in the summer of 2014 in the Concordia neighborhood alone, nearly all of them by a single heavy-handed developer who has made a business

model of demolishing homes, clearing the parcel, and building brand-new homes for upper-income households. This policy seeks to at least preserve old-growth trees within our neighborhoods.

**Edit 2:** Policy 3.79. Mature trees merit special consideration here as something that new development should seek to preserve.

**Inner Neighborhoods infill.** Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts' historic development patterns. *Ensure that development preserves and incorporates, rather than removes, mature trees.*

---

Part of preserving the wonderful system of alleys present in some of our neighborhoods, is ensuring that the alleys are used, and thus that property owners have an incentive to maintain and improve their alleys. This edit seeks to address that issue.

**Edit 1:** Policy 3.77. Alleys need special mention within these policies, as they have been neglected by City policy for too many years. New development must use alleys to provide auto access to properties where alleys exist, even if this means making modest improvements to the alleys.

**Inner Neighborhoods street patterns.** Preserve the area's urban fabric of compact blocks and its highly interconnected grid of streets, *including alleys where they exist. Where alleys do exist, do not allow new curb cuts on streets – require property auto access to off-street parking only from the alley, to protect the pedestrian environment on the sidewalk and preserve the neighborhood alley infrastructure.*

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Currently, the City doesn't seem to be actively seeking ways to increase the amount of opportunity sites for residential growth adjacent to our rivers. This edit seeks to address that issue.

**Edit 1:** Policy 3.64. While this policy is laudable for seeking to re-orient communities adjacent to rivers, towards those rivers, it should also specify that additional residential capacity should be found adjacent to rivers to house the growing numbers of people who wish to live next to our waterways.

**River neighborhoods.** Enhance the strong river orientation of residential areas that are located along the Willamette and Columbia Rivers. *Increase capacity to accommodate growing demand to live adjacent to rivers.*

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This edit relates to sustainable ways to address the shortage of industrial lands within the City.

**Edit 1:** Employment areas: Some language needs to be inserted to clarify that, while in the past (since World War 2), our industrial districts have been characterized by single-story buildings on large sites, in

the future they will need to become more like industrial districts of the late 19<sup>th</sup> and early 20<sup>th</sup> century, with multiple-story buildings containing a mix of complementary uses.

**Industrial Districts** – Industrial districts are in the low, flat areas along Portland Harbor and the Columbia Corridor, Oregon’s freight infrastructure hub. The manufacturing and distribution sectors concentrate here. *Though in the past* they typically *have* needed one-story buildings, medium to large sites, and locations buffered from housing, *in the future these areas are expected to become more inclusive of multiple-story buildings containing a mix of complementary uses*. There is also an industrial district in the Central Eastside and smaller industrial areas scattered around the city, mostly adjacent to major transportation hubs.

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City greenways need to be prioritized as spaces for primarily non-automobile modes. Autos should be welcome as guests in these spaces, but primarily for residents, guests, employees and other legitimate visitors to adjacent properties. Diverters should be employed as often as possible to enforce this policy, ideally at a rate of one diverter every two blocks where the grid is complete. This policy should replace the current policy, that does not seek diverters until traffic volumes are high enough that installation of diverters will necessarily cause problems with traffic on parallel routes. A policy that seeks to install diverters in all practical instances will ensure that neighborhood greenways truly become the stressfree, family-friendly environments that current propaganda makes them out to be.

**Edit 1:** City Greenways hierarchy. The city needs to enact a specific policy for neighborhood greenways that specifies that motor vehicles are guests only on these streets, and indeed that they are open to motorized vehicles for local access only. This needs to be implemented by installing traffic diverters every 2-5 blocks along neighborhood greenways (where the grid is intact) that would allow bicycles & pedestrians to continue, but force motorized vehicles to turn and find another route (where a reasonable parallel route exists).

4. Neighborhood greenways are an extensive network of streets with low volumes of *local access only* motor vehicle traffic that are prioritized for bicycles and pedestrians, working in conjunction with the rest of the City Greenways system to extend the system into all neighborhoods.

---

This edit is more of a suggestion, about maximizing rather than missing opportunities.

**Edit 2:** The zoo parking lot should be considered as a location for mixed-use development. As the city seeks to convert surface parking into paid, structured parking, it should consider a parking structure in one corner of the lot next to the Zoo, to allow the rest of the lot to be converted to mixed-use 3-4 story buildings, containing housing and offices above ground-floor retail. One way to express this may be:

Some are locations for employment, or serve major regional destinations such as the Oregon Zoo, *which may in the future be called upon to begin acting more as mixed-use centers than single-use destinations*.

---

This edit is the second on this page that seems to involve some compromised language that no longer makes sense contextually, from an urban design standpoint.

**Edit 2:** With 5-10 story buildings, it's unacceptable to attempt to shunt any mode to a "parallel route." All modes must be accommodated to some degree within the ROW with this level of density. Pedestrians must be able to walk to the front doors of their buildings. Bicyclists must be able to ride to the front doors of ground-floor retail, safely. Cars and trucks must be able to drive down the streets, to read addresses and find destinations. Transit must be able to serve the corridor directly. There's simply no room to shunt any mode to a parallel route in this high-density scenario. Delete the words "or on nearby parallel routes."

Policy 3.40 **Mobility corridors.** Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way ~~or on nearby parallel routes.~~

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This edit relates to needing to think more holistically about all of the uses that occur on "freight corridors," and how all of the employees, customers, and other users of those uses are expected to achieve mobility to and within those corridors in a future where automobiles represent a minority of all mode share.

**Edit 1:** Freight Corridors must still allow employees and customers to access businesses and other destinations along the corridor safely using all modes, including bicycles and pedestrians, not just trucks and automobiles. This is an equity issue, and one that will become absolutely relevant if the city has any hope of meeting its future mode split targets. One way to change the language to reflect this may be:

Freight Corridors are the primary routes into and through the city that supports Portland as an important West Coast hub and a gateway for international and domestic trade. ~~While the forms of these streets are not expected to change significantly, they are~~ integral to the growth of traded sector businesses such as manufacturing, warehousing and distribution industries. *In some cases, they may need to be upgraded to allow all modes to access destinations along the corridor, including employees and customers using bicycle and pedestrian modes.*

---

This edit seems to involve some compromised language that no longer makes sense contextually, from an urban design standpoint.

**Edit 1:** Be more assertive with the language in the first paragraph on this page. With 5-10 story buildings, there will always be associated pedestrian activity. Delete the words "in some cases." 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.

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This edit seems to just be a typo.

**Page GP3-11:**

**Edit 1:** Make an edit to change the word “Town” to “Neighborhood”:

Neighborhood Centers, Policy 3.31: **Housing.** Provide for a wide range of housing types in Neighborhood Centers, which are intended to generally be larger in scale than the surrounding residential areas, but smaller than Town Centers. There should be sufficient zoning within a halfmile walking distance of a ~~Town~~ *Neighborhood* Center to accommodate 3,500 households.

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Thanks for your careful consideration of this matter.

Sincerely yours,

Garlynn G. Woodsong

5267 NE 29th Ave Portland,

OR 97211

garlynn@gmail.com

503-936-9873



**City of Portland, Oregon**  
**Bureau of Development Services**  
**Office of the Director**

FROM CONCEPT TO CONSTRUCTION

Amanda Fritz, Commissioner  
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**MEMO**

**Date:** October 15, 2014  
**To:** Planning and Sustainability Commission  
**From:** Paul L. Scarlett, Director  
Bureau of Development Services *PLS*  
**CC:** Susan Anderson, Director  
Bureau of Planning and Sustainability  
**Re:** BDS Comments on the Proposed Draft of the *2035 Comprehensive Plan*,  
July 2014

Thank you for the opportunity to review and comment on the Proposed Draft of the City of Portland's Comprehensive Plan update. This document represents a major effort by BPS and many other City bureaus and participants in this collective effort should be commended on producing an ambitious and thorough plan for the City.

Our comments focus on implementation, an area that directly impacts the work of BDS. We have separated our comments into two sections: 1) those that are our primary areas of concern; and 2) additional detailed comments that, if addressed, will improve future implementation efforts.

We look forward to working with the Planning and Sustainability Commission and BPS staff to address our concerns. Please direct questions about these comments to Rebecca Esau on my staff.

**Primary Areas of Concern**

**1. Expectations for changes to community involvement procedures for quasi-judicial land use reviews (Chapter 2)**

There needs to be more specific thought about how Chapter 2, Community Involvement will be implemented in the context of land use reviews. Specific issues are described below.

- Chapter 2 identifies ways of involving the community in land use planning, however much of this is more applicable to legislative planning efforts, as opposed to quasi-judicial reviews. As written, the goals and policies can be interpreted to mean that each of the identified ways of increasing community involvement in planning efforts also applies to quasi-judicial reviews (such as comprehensive plan map amendments), and that if BDS staff does not implement these efforts in the review of the proposal, that potentially the goals or policies are not met. Requirements for community involvement for quasi-judicial reviews (public



notice, site posting, hearings, etc.) are spelled out in the zoning code and are consistent with state law.

We request that language be added that clarifies that these proposed community involvement efforts apply to legislative projects and, as you could consider making them relevant to applicants (not BDS staff) for the sub-set of quasi-judicial reviews that must address the comprehensive plan. For policies that are applicable to land use review applicants, it will be important for the Community Involvement Manual referenced in Policy 2.13 to provide specific direction on expectations for these reviews and appropriate methods to achieve desired outcomes.

- It is unclear based on the goals and policies whether any changes are expected to quasi-judicial review notification and public involvement procedures that are outlined in the zoning code. If changes are anticipated, BDS would appreciate knowing about these changes as soon as possible to comment on feasibility and any impacts on staffing and review fees.

## **2. Criteria for Quasi-Judicial Comprehensive Plan Map Amendments (Policy 10.2.c).**

We have a number of concerns about the proposed approval criteria for Comprehensive Plan Map Amendments as described below.

- First, we are unsure why the criteria for quasi-judicial map changes are listed in the Comprehensive Plan. Approval criteria for other quasi-judicial reviews that implement the Comprehensive Plan are not specifically stated in the Plan. We recommend that this be revised to state that quasi-judicial map amendments must comply with the comprehensive plan and indicate that procedures and specific approval criteria are found in the zoning code. Otherwise, it creates confusion to have two sets of approval criteria for a land use review (one set in the Comprehensive Plan and an additional set in the Zoning Code). Case in point, the approval criteria in the Zoning Code for Comprehensive Plan Map Amendments states the request must “on balance” meet the goals and policies of the Comprehensive Plan. As such, a request for a Comprehensive Plan Map Amendments may not meet all goals and policies but may still be approved. In this draft, given the approval criteria in the Comprehensive Plan are identified under a policy (10.2.c), could it be possible to not meet these “approval criteria” but still approve the requested Comprehensive Plan Map Amendment as on balance all other goals and policies are met? It’s just not a good idea to be putting approval criteria for a quasi-judicial review anywhere but in the Zoning Code.
- As proposed there is quite a bit of redundancy in the approval criteria. They first state that the proposed change must comply with the Comprehensive Plan goals and policies, and then goes on to refer to specific aspects of certain chapters. Detailed concerns are noted below:
  - The 3<sup>rd</sup> bullet requires “reasonable consideration of the Guiding Principles outlined in Chapter 1”. The content of each of the guiding principles is covered several times in other goals and policies throughout the plan, which also must be addressed. To

require use of the guiding principles as an additional approval criterion is redundant. Additionally, the introduction to the guiding principles indicates they apply to “legislative land use decisions”.

- There is also a specific requirement to demonstrate that impacted communities have been effectively included in the decision-making process (4<sup>th</sup> bullet). This issue has already been identified in Chapter 2. Why repeat this requirement here? None of the other goals and policies that are stated in Chapters 1-9 are repeated here as a requirement of a quasi-judicial comprehensive plan map amendment. The same issue applies to the requirement to address transportation facilities (6<sup>th</sup> bullet), which are already addressed in Chapter 6.
- In these cases where specific aspects of Chapters 2 and 6 are referenced in the approval criteria, should we interpret this to mean that these are more important than potential other aspects that may be applicable? Please clarify.
- There is a requirement to find that the requested change “Promotes environmental justice by effectively including impacted communities in the decision-making process as outlined in the Community Involvement Chapter...” (4<sup>th</sup> bullet). Based on the definition of “environmental justice” in the glossary, it is not clear how environmental justice considerations would apply if there are no environmental laws, regulations or policies that apply to the site. If the goal is to involve impacted communities, perhaps the reference to environmental justice is unnecessary and can be removed, and clearer, or defined terms can be used.
- Comprehensive Plan Map Amendments are required to be consistent with any adopted applicable area plans (8<sup>th</sup> bullet). Policy 1.15 indicates that these plans still remain in effect, however the current Comprehensive Plan goals and policies supersede them in cases where there is a conflict. This requires the applicant and planner to review every plan and policy of the area plan and evaluate whether it has been superseded by goals and policies in the Comprehensive Plan. This is a huge task to do as part of each and every quasi-judicial Comprehensive Plan Map Amendment, and opens the door to significant debate amongst the applicant, neighborhood and assigned case planner at the time of land use review. It would be more clear and efficient for all involved, if BPS did this analysis as part of this project. Many neighborhood plans are very old and outdated, and it would be helpful to have them sunset after a specified number of years, if not updated.

### **3. Criteria for Zone Map Amendments (Policy 10.3.b).**

Reference is made to the need to address school district capacity (where a school facility plan exists) as part of the adequacy of services criterion for zoning map amendments. Please define what a school facility plan is, and the key components it would include. Without that clarification, people (applicants and the public) will have different perceptions of what such a plan is.

In addition, it will be important for the school district where the site is located to respond to the question of adequate school capacity. Are school districts aware of this change and prepared to respond to individual land use review cases in a timely way and provide an explanation of how they determined adequacy of school facilities?

**4. Land use designations and corresponding zones (Policy 10.5)**

This policy lists the Comprehensive Plan land use designations and the corresponding zones that implement the designation. There are a number of discrepancies that need to be addressed between the descriptions and Figure 10-1 (see our detailed comments below). It is important for these discrepancies to be addressed to provide clarity for selecting the most appropriate zone for quasi-judicial zoning map amendments, as well as legislative projects.

Some of the new mixed use designations have many corresponding zones – up to nine zones for one Comprehensive Plan designation. The descriptions of the different zones and where they should be applied will need to be very clear and have sufficient detail to provide adequate direction on the most appropriate zone for a particular location.

**Detailed Comments**

We offer the following additional detailed comments for improved clarity in the goals and policies and subsequent implementation.

Page	Goal/Policy	Comment
Multiple	Multiple	The terms “under-served” and “under-represented” are used throughout the Plan. While these terms are defined in the Glossary, the definitions are relatively vague. In defining these terms, it would be helpful to provide more specificity and potentially some examples to help guide both the public and City staff when evaluating these terms. Will resources be provided to help identify these populations and how best to achieve desired outcomes, particularly in the land use/development review arena?
GP4-7	Policy 4.14	Clarify what “respect existing entitlements” means in the context of this policy that encourages new development to complement the scale and character of existing neighborhoods. There seems to be a conflict between these two statements. Clarity is requested. This is an ongoing battle....for example, do applicants have a right to the height and massing allowed by the base zone, or does compatibility trump that? We need some direction and clarity on this issue.
GP4-8	Policy 4.24 (and elsewhere)	Clarify the term “adopted inventories”. Does this mean adopted by the City? Does this then exclude Historic Districts and Historic Landmarks since they are not part of an adopted City inventory? Would it include inventories that could potentially be adopted but

		have no regulatory authority?
GP4-9	Policy 4.26	The reference to “strive to protect light and privacy for adjacent residents” may be overly ambitious, especially in Town Centers/Civic Corridors where the goal is to create denser neighborhoods with larger buildings. It is reasonable to have a policy that softens the transitions, but “protecting” light and privacy may be too strongly stated. Perhaps “strive to minimize (or reduce) impacts on light and privacy”.
GP4-8, GP4-9	Policy 4.27- Policy 4.28. a-g	Use of terms “zoned land”, “uses”, and “areas”. Be sure to pay attention to whether the policy is referring to “zoned land” or “uses”. Are we protecting the use, or the zone? There are many allowed uses that don’t correspond with zones (i.e. residential uses in commercial zones), as well as nonconforming uses (i.e. residential uses in industrial zones). It might be different for each policy, but make sure to be deliberate about word choices. Perhaps avoid using the term “areas” in preference for “zoned land” or “uses”.
GP4-11	Policy 4.36	Remove "where feasible" from this policy. This policy is encouraging historic/cultural resource protection (not requiring), therefore this clarifier is not needed and weakens its intent.
GP4-11	Policy 4.38	Clarify the term "significant" in the context of historic structures.
GP4-11		Consider adding policy direction on nonconforming uses in historic structures. Does the preservation of the structure override the desire to transition to a conforming use? One example is a house in an industrial district.
GP5-6	Policy 5.3 (and elsewhere)	It is unclear whether “Evaluate plans and investments for their impact on housing capacity...” includes specific map amendments and/or development proposals on private property. The phrase “plans and investments” is also used in other sections of the Plan.
GP5-6 5-10	Policy 5.4  Policy 5.36	Clarify that the housing and ownership types listed in these policies could include others as well. Currently, they read as exclusive lists that may not accommodate for future innovation or new terms.
GP5-11	Policy 5.40	Why are we prioritizing multi-dwelling for healthy housing? This appears to de-prioritize addressing health and safety issues with single-dwelling housing.
GP6-9	Policy 6.20	Can further guidance be provided on what a ‘suitable’ location for corporate headquarters campuses would look like? Guidance would be helpful in the context of quasi-judicial requests to change

		the comprehensive plan map and zoning to accommodate such a use.
GP6-16	Neighborhood Business Districts	Please provide a policy on non-conforming uses. Are they intended to go away? Are they intended to remain permanently but have impacts managed?
GP6-17	Policy 6.66	This policy should also address the impacts of these temporary or transitional uses on the surrounding area given they operate without regulation (location of port-a-potties and garbage areas for vending cart pods).
GP8-18	Water Systems	Is there an appropriate policy here on the reservoirs? Are they only functional? Do they have historic, scenic or recreational value?
GP10-7	Policy 10.4	Under "Ensure good administration of land use regulations" include a bullet for striving for consistency in the regulations.
GP10-8	Policy 10.5	Comprehensive Plan land use designations are not shown on the official zoning map (unless different from the current zoning).
GP10-8 thru GP10-14	Policy 10.5	<p>There are a number of discrepancies between the different land use designation descriptions and between the descriptions and Figure 10-1, including:</p> <ul style="list-style-type: none"> <li>- The CX zone is described under the Central Commercial designation as being intended to apply within the Central City and Gateway, yet the CX is also a corresponding zone for Urban Centers, which is described as intended for areas outside Central City.</li> <li>- The EX zone, is identified under the Central Employment designation (intended for Central City and Gateway), but also identified under the Institutional Campus designation. EX is also currently applied outside of the Central City.</li> <li>- A number of the designations list corresponding zones, which aren't reflected in Figure 10-1.</li> </ul>



Concordia Neighborhood Association  
P.O. Box 11194  
Portland, OR 97211

October 15, 2014

Planning & Sustainability Commission  
Bureau of Planning and Sustainability  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201-5380

Re: Comprehensive Plan Testimony

To Whom It May Concern,

The recent wave of home demolitions in the City of Portland has left many residents scratching their heads and looking for solutions. One concern often expressed is that many of the demolitions are simply to replace a smaller, older, more affordable home with a new, larger, more expensive home. For adjacent neighbors, it is difficult to understand what benefit is being received by anybody but the developer: no additional housing units are being created, so pressure on the Urban Growth Boundary is not reduced. The price of the unit in question is actually sharply increased, so the shortage of affordable housing units is actually made worse. In short, it's hard to see how this trend actually helps the city or the region achieve any of our broader planning goals, aside from raising revenue.

Based on a series of recent discussions, and acknowledging that the wave of home demolitions will not be stopped, it is the position of the Concordia Neighborhood Association's Board that the following solution should be implemented as a part of the Comprehensive Plan update process to ensure that at least some of the demolitions will be followed by projects that do actually contribute towards meeting some of our broader community planning goals:

Within walking distance of Frequent Service transit routes (however the City chooses to define this -- 1/8, 1/4, 1/2 or 1-mile crow-fly or network buffer of frequent service transit routes or stops), there should be a new overlay zone created that allows for a residential property containing up to 5 separate residential housing units in a structure that otherwise conforms to the building envelope and setback provisions of its zoning designation (i.e. in an R5 zone, one main dwelling structure per each 5,000 sq ft lot, with required front, side and rear setbacks). The intended purpose of this overlay would be to allow for new residential structures to be constructed containing a number of "flats," i.e. 2-4 story residential structures that look like houses where each floor is a separate housing unit (or a variation where each floor has two units, one on the right and one on the left). This type of structure is the workhorse backbone residential product of places like San Francisco's Mission District, certain areas of Boston, London, and other successful world cities; indeed, Portland has examples of this type of structure in inner SE and the NW Alphabet District that were built in the late 19th and early 20th century.

The end result would be that, rather than a demolition to replace a \$250,000 home with a \$700,000 home, the replacement unit could potentially contain three flats averaging \$250,000 each. One affordable unit could thus be replaced by three affordable units, which would help to achieve goals for increasing the supply of affordable housing, and also reduce pressure on the Urban Growth Boundary. The overall cost would be somewhat higher, due to the need to provide additional kitchens, bathrooms, laundry and

common facilities, in addition to the additional impact fees that the City would likely require. However, the price per unit would be significantly lower for the finished product.

We would propose that, because this overlay zone would only exist within areas served by high quality transit service, that automobile parking requirements should remain the same as if the structure were a single-family home; but that off-street parking should be provided for bicycles at a rate of a minimum of one secure off-street bicycle parking space per bedroom.

It's possible that some neighborhoods would not want to see this type of unit constructed within their boundaries; as such, perhaps this overlay zone is something that could be rejected within its boundaries by a vote of the board of a neighborhood association. That would allow neighborhoods such as Concordia to allow this type of development in the appropriate areas near high quality transit, while neighborhoods like Laurelhurst and Eastmoreland could vote to reject it in favor of preserving their historic single-family character.

While we would love to find ways to slow down the wave of home demolitions, this proposal would allow us to live with the demolitions with the peace of mind that the replacement structures are at least helping us to achieve our broader community planning goals, bringing in more residents to help support neighborhood businesses, providing for more affordable housing, and reducing pressure on the Urban Growth Boundary.

We recommend that this proposal be studied and that language to implement it be developed and included as a part of this Comprehensive Plan Update process.

Thank you.



Daniel Greenstadt  
Chair  
Concordia Neighborhood Association

Comprehensive Plan comment, **main points in bold**  
Margaret E. Davis, 3617 NE 45<sup>th</sup> Ave, Portland, OR 97213

First, let me start with a little story about a recent event in our neighborhood, Beaumont-Wilshire. That's where the city permitted a 4-story 50-unit apartment building without parking on a block that's missing sidewalks on one side, creating traffic hazards and exacerbating an already difficult parking situation for neighborhood businesses and residents. Some years ago, we lost daily bus service, and the line no longer travels downtown. After two trips to the state Land Use Board of Appeals and \$10,000 spent by neighbors, this building still does not meet code. I tell you this story not to embarrass anyone or say "Poor me/us" but to illustrate some of the trust issues that neighbors have with city staff and leadership.

What's missing in the Comp Plan is engagement with original investors/stakeholders, as in neighbors and their associations. Good development comes about through collaboration, not stuffing exploitive buildings down neighbors' throats. **Make neighbor-developer dialogue a required part of growing this city**, and we will see more successful buildings. For example, check out the Marvel 29 project going up in St. Johns; neighbors were engaged from the get-go and everyone will benefit from the project, not just the developer.

What I've seen in my neighborhood and Hollywood is nonholistic consideration of context, and an inability or unwillingness to **provide infrastructure** to match the appetite for development. Neighbors in Hollywood, for example, are having to raise money themselves to pay for a traffic-safety measure necessitated by all the new residents there treating a neighborhood street (NE 37th) as a freeway on-ramp. It makes you wonder, **Where do the Systems Development Charges go?**

Finally, this commission should drop "sustainability" from its name and goals of Comp Plan as long as **demolitions** continue at the current pace. Portland will set a record for demolitions this year, and that number doesn't take into account all the "bulldozer remodels" that likely add 30 percent more to the demolition number. Losing hundreds of units of unique affordable housing—not to mention the mature urban tree canopy around it—impacts us all and only benefits mostly out-of-town developers (just 2 of the top 25 home builders in Portland are based in Portland).

I'm an infill developer myself and would do more if the staff at Bureau of Development Services wasn't so busy changing code for, and defending the lousy business practices of, these exploitive developers. With such a skewed playing field, the local homegrown players have few chances to participate.

Tossing hundreds of houses—at an average age of 87 years old—and their high-quality materials in Dumpsters is sad, irresponsible, and contrary to the goals of the Comp Plan. If we want a reputation as a "green" city, let's earn it, by **protecting the wide-ranging housing stock we already have, incentivizing real infill, and**



**increasing the quality and diversity of developers plying Portland's finest resource.**

The goals of the Comp Plan look great on paper, but where is the **verifiable commitment** to them now and in the future? The "mixed use" labels for development are just pretty names now, but planners have no specifics for them, say, allowable heights, setbacks, and so on. How can we get behind these labels if we don't know what they entail? I join other neighbors and neighborhood associations in demanding an extension of the comment period so that the Comp Plan planners can provide the detail necessary to back up the utopian visioning.

If we are supposed to trust the city to make the right choices without neighbor input, please reread the first paragraph of this letter.

Thank you,

  
Margaret Davis

503 233 2009  
**PERLEBERG & DAVIS**  
3617 N.E. 45th Ave.  
Portland, OR 97213

## Comprehensive Plan Testimony

### Alternative Dwelling Units

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

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### Study I-5 Removal

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

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### End Parking Minimums

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

Parking is also an equity issue as the money developers spend on automobile storage goes directly to the rent people pay. Without the requirement to include parking in new development, we'll end up with affordable density, a much better state of affairs than the current trend of pushing low-income folks to the suburbs so they end up driving (and parking) in Portland.

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### Inclusionary Zoning

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

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### Route Redundancy

An important concept in any transportation network is Route Redundancy. It animates many of our discussions when it comes to automobile traffic planning, but is also needed in multi-modal planning. By treating bicyclists as first class citizens on our commercial corridors, we'll also

mitigate issues that can occur when Neighborhood Greenways are closed for repair or other reasons.

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

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#### Transportation Hierarchy

The best part of Chapter 9 in the current Comprehensive Plan draft is the transportation hierarchy. This policy will allow the city to make the right choices more of the time. Only by following the hierarchy will we be able to grow Portland over the next decades, and maintain our quality of life.

Additionally, I'd like to see **safety as the #1 item in the hierarchy**, above all specific modes. Safety is the most comprehensive way to contextualize the rest of modal prioritization. It is also well-established that safety improvements focussed on pedestrians and bicyclists end up increasing safety for everyone.

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#### Vision Zero

As father who chose Portland over any other city in the United States, because of the opportunity to raise my kids with a healthy and happy lifestyle, without owning a car, I am dismayed by the city government's inability to make meaningful changes to improve safety and comfort for pedestrians, bicyclists, and transit users. A strong endorsement of Vision Zero, by **putting safety at the top of the transportation hierarchy**, above walking, cycling, and transit, will open the doors to so much low hanging fruit, and anchor the hierarchy in a truly multi-modal way.

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#### Diverters on Local Service Streets

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

- **Diversion:** Local Service Traffic Streets should feature frequent traffic diverters to discourage motor vehicle through traffic.

This is important to me because my wife and I use Greenways and other neighborhood streets as our primary route for pre-school drop-off and pickup, to shopping, and to downtown. Not a month goes by that we don't deal with some form of motorist harassment / threatening of traffic violence. I think this is the norm for bicyclists in the city. While some may accept it, now that my four year old is on her own two wheels, I won't.

The places that have the mode share we want, get there by making bicycling the most direct and convenient mode for neighborhood trips. Portland has the scale and density to pull this off, but we have a structural deficiency that will hold us back until we address it: the grid system. Only by preventing neighborhood cut through traffic, will we stand a chance to turn Portland into the sort of place most parents would be comfortable letting their children bike independently.

The solution is diversion by default, on all local service traffic streets. This accomplishes both goals about safety and comfort, and goals about making biking the most direct and convenient mode for grocery shopping / school pick-up / getting to the restaurant. Piecemeal diversion pits neighbor against neighbor, so the only answer is diverters every 2-3 blocks on all neighborhood streets.

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#### Repurposing Street Space

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

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

Sincerely,

J Chris Anderson  
5276 NE 26th Ave.  
Portland, OR 97211

--

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

October 14, 2014

Portland Planning and Sustainability Commission - Comprehensive Plan Update

I am writing in regards to the Notice of a Proposed Comprehensive Plan Map Change regarding the proposed designation change to my property at 8901 SE Crystal Springs Blvd, Portland, 97266.

My property is currently designated as High Density Single-Dwelling. Your proposed designation is Single dwelling 7,000.

I would like to request that my designation remain High Density Single-Dwelling. My basis for this request is as follows:

My property consists of .39 acres, shaped like a backwards 'L'. The southern end of my property is 115.6' by 57.6' = 6,658.56 square feet; over .15 acre. There are no buildings on this portion of my property. The only improvements are my extended driveway and my sewer line running 4' or less from the east property line. An additional home built in this area would not impair the open space concept. A simple rerouting of my driveway to lightly traveled 89<sup>th</sup> Ave and removal of any unwanted driveway on the .15 acre would be all that was required. This would still leave two good sized properties with room for landscaping and parking.

My property is .4 miles from the SE Flavel Street Max Station and .4 mile from the Tri-Met Bus stop at 92<sup>nd</sup> and Flavel. It is less than 3 blocks from the bike path. Wal-mart, Best Buy, Fred Meyer including pharmacy, Home Depot, a bank, a credit union, restaurants, Great Clips for hair, a gas station plus other businesses are all located within 1.2 miles of my property. All of the above points are conducive for good access and reduction of automobile useage. School buses stop at 89<sup>th</sup> and Crystal Springs to pick up and drop off students. I believe that all of these considerations are basic goals of the Proposed Comprehensive Plan.

Please reconsider the proposed designation for my property. I would greatly appreciate an acknowledgement that you have received this letter.

Thank you for your time and review of my request.

Carol Cross Parker

8901 SE Crystal Springs Blvd

Portland, OR 97266

[ancparker5669@comcast.net](mailto:ancparker5669@comcast.net)





# Rose City Park Neighborhood Association

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October 14, 2014 (Transmitted this day via e-mail to the following)

City of Portland  
Bureau of Planning & Sustainability  
Attn: Nan Stark, NE District Liaison (nan.stark@portlandoregon.gov)  
1900 4<sup>th</sup> Avenue  
Suite 7100  
Portland, OR 97201

CC: Susan Anderson [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov),  
Planning and Sustainability Commission [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov),  
Portland City Council [Karla.Moore-Love@portlandoregon.gov](mailto:Karla.Moore-Love@portlandoregon.gov)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Deborah & John Field, owners, [deblyfield@gmail.com](mailto:deblyfield@gmail.com)

Subject: RCPNA Recommends Approval of Re-zone/Designation of 3437 NE 48<sup>th</sup> from R2h to CN2h/  
2014 Map App: Multi-dwelling to Mixed Use-Dispersed

Dear Nan Stark,

On September 18th, 2014, the Land Use & Transportation Committee for Rose City Park Neighborhood Association completed its review and recommends the approval of the re-zone/designation change of property identified as Rose City Block 156, Lot 1, from R2 to CN2. Due to the time limitations in completing this review for the Planning and Sustainability Commission's hearing the LU & TC decision is deemed the final review for RCPNA.

At the LU & TC meeting the condition placed on this rezone stated that "the zone is to be no more intense than Neighborhood Commercial", as this is the least intensive commercial in the 1981 Comp. Plan Map designations. The reasoning behind this was that the Committee wanted to have the Commercial use to have the least impact possible on the abutting Residential uses to the north of the property.

The Comp. Plan Update Map App identifies Mixed Use – Dispersed as the least intensive Commercial designation. The designation of Mixed Use – Dispersed would meet the intent of the Committee's approval.

This property is located at 4730 NE Fremont and owned by Deborah & John Field. Situated on the southwest corner of NE Fremont and NE 48<sup>th</sup> Ave., this property is unique in that it contains both a residence and an active commercial business in separate buildings on the site. The commercial use,

Paperjam Press, is located on the western portion of the 7,500 sq. ft. lot and is considered a pre-existing non-conforming use in the R2h zone. The owners claim that their property was previously zoned for commercial and then was changed to residential use with the 1981 comprehensive plan update. The uses of the site has changed over time. But, the commercial use has remained active throughout the past 33 years. The owners of Paperjam Press wish to continue the current use of the site as a copy/publishing company.

The site continues to be charged commercial water rates. There is a short parking area on-site in front of the building with direct access off of Fremont for customers. The owners just want to have the property reclassified back to Commercial. It is located on the south side of Fremont across the street from Commercial property identified at CSh and CN2h. The proposed Comprehensive Plan Map identifies the northerly side of Fremont to be identified as Mixed Use - Neighborhood.

Attached is the application document that Deborah and John Field submitted to the LU & TC for their consideration. Also attached are draft minutes for the Aug. 21<sup>st</sup> and Sept. 18<sup>th</sup>, 2014 LU & TC meetings.

Please let us know if you have any questions or we can be of further assistance on this matter.

My best,



Tamara DeRidder, AICP  
Co-Chair, LU & TC  
Chairman, RCPNA  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213  
503-706-5804



Nate Carter, AIA  
Co-Chair, LU & TC  
Board, RCPNA  
2432 NE 59th Avenue  
Portland, OR 97213  
971-344-1919



Exhibit A - Oct. 14, 2014  
RCPNA Recommendation of  
Approval for re-zone/designation  
from Plan R2 to Mixed -Dispersed

Location:

Rose City Block 156, Lot 1 (4730 NE Fremont St.) Property owners: John & Deborah Field  
Rose City Block 155, Lot 16 (3436 NE 48th Ave.) Property owners: Ramod & Kamala Chherti

Proposal:

In consideration of the comprehensive plan update, we are proposing a zoning change for the southeastern and southwestern corner lots at the intersection of NE Fremont and 48th street. The north side of this tee intersection is zoned CN2h. Our request is that the two 7,500 sq. ft. R2h lots that split the south side of the intersection be classified likewise with a mixed use designation.

Background Information:

Document 09-155613PR furnished by the City of Portland, Bureau of Development Services has established that the property at 4730 NE Fremont has maintained legal status for nonconforming use ever since the comprehensive plan of 1981 which changed the zoning from C2L to R2h. We recognize that the terms of nonconforming use have been exaggerated a bit throughout the years in regard to the property. From 1993 to 2009, Wall Beds of Oregon used the property as an office and showroom. After purchasing the property in 2009, we were charged commercial water and sewer rates from the start, so apparently the city considers this to be commercial property. Most recently Portlandcitymaps.com has listed the property as generic commercial use. We have remodeled the residence which we currently occupy and have converted the former show room, with a three car parking lot, into a family-run digital print shop.

Objective:

Legitimizing the loose ends for the terms of nonconforming use is not our only goal. We share the City's vision to integrate living and retail spaces. The Beaumont business district could be revitalized by creating a balance of mixed use on the south side of Fremont. Opening up the south side would bring more people to the street and would allow for a continuous flow of foot traffic. The intersection at 48th and Fremont is a prime node with a crosswalk and bus stop. Rezoning the south side from NE 45th to 50th would be ideal, but may be too aggressive for the area at this time.

Addendum:

Both property owners have presented this proposal to the Rose City Park Neighborhood Association's land use committee and they were in full support. Nan Stark who represents NE Portland's Bureau of Development and Sustainability has indicated her support stating that this is a reasonable request. Our next step is to present our proposal at the September general meeting of the Rose City Park Neighborhood Association.

**Draft Meeting Notes**  
**RCPNA Land Use & Transportation Committee**  
**09/21/14 – Special Meeting 6:30-7:30 pm**

Attendees: Tamara DeRidder – Co Chair, Nate Carter- Co Chair, Terry Parker, Mona Hotchkiss, Ted Hart, Deborah Field, John Field, Ramod Chhetri, Dean Pottle, and Richard “Pete” Peterson.

Meeting Location: German-American Society, 5626 NE Alameda

After group self-introductions Tamara shared that the minutes of last month’s meeting were not yet available.

**Broadway and NE 60<sup>th</sup> Intersections Concerns:** Ted Hart provided the Committee members copies of an intersection diagram, photographs, and explanation of his concerns regarding the fact that there is no signalization at NE 60<sup>th</sup> and Broadway St. The diagram shows that the pattern of stop signs along NE 60<sup>th</sup> between Sandy Blvd. and Halsey being every 2 blocks except for the 3-block segment that includes Broadway St. intersection. If the every 2-block pattern continued from the north the next stop sign would occur at the Broadway intersection. There is a stop sign at 59<sup>th</sup> and Broadway that slows the east bound traffic. The document, attached, states numerous issues including collisions that occur due to the speed of the vehicles on NE 60<sup>th</sup> Ave. that typically average 45 mph in this section of road.

There was much discussion on the topic of safety, buses, existing stop signs, and other signage in the area. The discussion included identifying the cut-through traffic that comes from Halsey St. to get to Sandy Blvd. Motion made by Pete and seconded by Terry - **Recommend to PBOT: Need of traffic control measures to reduce vehicular speed and volume at NE Broadway and NE 60<sup>th</sup> Ave. for the safety of residents and neighborhood community 1) Create a 4-way stop at the intersection of NE 60<sup>th</sup> Ave. and NE Broadway St.; 2) Install a ‘No Left Turn’ sign for eastbound traffic on NE Halsey St. at NE 60<sup>th</sup> Ave.** Unanimous support.

**Comp. Plan Update Rezone/Designation Requests:** Tamara introduced the rezoning option currently being made available through the Comprehensive Plan Update. This type of rezoning is considered ‘Legislative’ in nature and therefore does NOT follow the typical rules of a 200’ notice to the adjacent property owners. The process for review for these properties follows the recommendation process of: Neighborhood Association, then District Liaison, then Portland Planning and Sustainability Commission, and then City Council. The change would then be inclusive with the map changes made with the Comprehensive Plan Update.

At the Aug. 21<sup>st</sup> LU & TC meeting we heard presentation from the owners of Paperjam Press, Deborah and John Field and their neighbor Ramod Chhetri with their request for a rezone/designation of their properties from R2h to CN2h. Their properties are identified as 4730 NE Fremont and 3436 NE 48<sup>th</sup>, respectively, and are located on the southwest and southeast corners of the intersection of NE Fremont St. and NE 48<sup>th</sup> Ave. The Committee at that time generally agreed with their request but made no formal decision. An official decision on those 2 properties is needed tonight.

In addition, Tamara contacted Dean Pottle who is the owner of the property abutting Paperjam Press as directed at the last meeting. Dean is the owner of Dean's Scene, an illegal bar that has been run out of Dean's basement for the past 7 years. Dean was asked by Tamara if he wanted to present a request for a zone change to Commercial for this property at the next LU & TC meeting. Dean agreed.

Dean Pottle, owner of the property located at 4714 NE Fremont, shared that he would like to have his property rezoned from R2 to C2 to allow him to run his bar legally. There is no on-site parking available. Concerns were raised about parking in the neighborhood and public urination complaints that had been received over the years as a result of his customers. Dean denied that there were any parking problems and that most of his clientele either walked or biked to his bar. Deborah Field countered that Dean knows from her complaints to him that his clients have parked on her property in the past. He shared that this issue had been corrected. The issue of noise was discussed since it had been brought to the attention of the LU & TC previously as a problem generated by his site. Dean shared that his back yard patio area is open to the property directly south, 3424 NE 47<sup>th</sup>, and west, 3436 NE 47<sup>th</sup>, of his site. The structure at the Paperjam Press property to the east, at 4730 NE Fremont, blocks any of the back yard activity that occurs on Pottle's property.

Tamara raise the question whether Dean's sewer line was actually separate from the property located to the east. She had received information that his property was currently serviced by a 'party line' with property identified as 3436 NE 47<sup>th</sup> Ave. Dean shared that this used to be the case but was taken care of years ago.

Dean shared that he would likely want to build a kitchen building in the back along the west property line to allow him additional space for his brewing. He noted that this would take care of any impact on the neighbors to the west. He was then asked about the neighbors to the south and had no response. Pete asked Dean directly whether he could actually be trusted to run a legitimate business after lying about running an illegal bar out of his house for years. Dean shared that he always thought of his property as commercial since it was one of the few properties that takes direct access off of Fremont St. By making his property zoned commercial then he could legitimize what he has been trying to do for years. Tamara asked Dean if he understood the building code standards for Commercial properties. Dean shared that he worked on Commercial structures all the time in his plumbing business and knows the codes very well. Pete let Dean know that he would not let this bar mess up his neighborhood and would be watching his activities to make sure they stayed legal.

Ramod discussed the possibilities of keeping his request separate from Dean's and Deborah Field agreed.

**Action: Recommend that all 3 properties, Pottle @ 4714 and Paperjam Press @ 4730 NE Fremont as well as Chhetri @ 3436 NE 48<sup>th</sup> Ave, be zoned as no more intense than Neighborhood Commercial with each property being looked at on a separate basis with separate letters. Unanimous yes.**

Adjourn – 7:30 pm

Attachment: Part of 09182014 Meeting Notes-NE 60th & Broadway Traffic Control Measure proposal.pdf

Drafted by T. DeRidder 10/08/14

**Draft Meeting Notes**  
**RCPNA Land Use & Transportation Committee**  
**08/21/14**

Attendees: Tamara DeRidder – Co Chair, Nate Carter- Co Chair, Terry Parker, Ed Gorman, Ted Hart, Deborah Field, John Field, Ramod Chhetri, Bill Winkler, and District Liaison Nan Stark.

Meeting Location: German-American Society, 5626 NE Alameda

After group self-introductions Tamara introduced the first topic – a request for two properties located on NE Fremont St. to be rezoned from the current Residential zone R2 to Commercial zone C2.

**Comp. Plan Update Rezone/Designation Requests:** The owners of Paperjam Press, Deborah and John Field, submitted a packet of information regarding their request, along with that of their neighbor Ramod Chhetri, for a rezone/designation of their properties from R2h to CN2h. Their properties are identified as 4730 NE Fremont and 3436 NE 48<sup>th</sup>, respectively, and are located on the southwest and southeast corners of the intersection of NE Fremont St. and NE 48<sup>th</sup> Ave.

Paperjam Press/ Deborah & John Field Property – Rose City Block 156, Lot 1; 4730 NE Fremont. This property is unique in that it contains both a residence and an active commercial business in separate buildings on the site. The commercial use, Paper Jam, is considered a pre-existing non-conforming use in the R2h zone. The owners claim that their property was previously zoned for commercial and then was changed to residential use with the 1981 comprehensive plan update. The uses of the site has changed over time. But, the commercial use has remained active throughout the past 33 years. The site continues to be charged commercial water rates. There is a short parking area on-site in front of the building with access off of Fremont for customers. The owners just want to have the property reclassified as Commercial. It is located on the south side of Fremont where the north side of this is an extension of the Commercial node that begins near NE 42<sup>nd</sup> Ave. The north side of the street in this area contains active commercial uses as the CN2h zone continues eastward to NE 50<sup>th</sup> where it changes to residential. The nearest Commercial zone located on the south side of Fremont stops at NE 45<sup>th</sup>Ave.

The owners of Paperjam Press wish to continue the current use of the site as a copy/publishing company.

Ramod Chhetri property – Rose City Block 155, Lot 16; 3436 NE 48<sup>th</sup> Ave. This property contains a single-dwelling residence with driveway access off of NE 48<sup>th</sup> Ave. There is no indication from the exterior that this property was ever used for previous commercial uses. The property owner, Ramod Chhetri, is also the owner of Himalayan Art & Handicraft currently located at 818 NW 23<sup>rd</sup> Ave. in downtown Portland where he holds a lease. He wishes to move this business to his Fremont property and expand his service to include classes on the site. He proposes to construct a commercial building on the east side of the site and continue to use the residence for primarily residential uses for his family.

Like the Paperjam Press property, the Chhetri property is located across the street from thriving commercial uses. He proposes that these two properties together could serve a bookends, forming a

small commercial node, to support neighborhood oriented commercial uses. Each of the two properties contains 7,500 sq. ft.

Discussion then ensued regarding the square footage of space that could be used for a new commercial structure and how parking might work on the site. Some concern was raised regarding commercial traffic taking access to the site off of NE 48<sup>th</sup>.

With guidance by District Liaison Nan Stark, it was determined that the CN and C2 zoning were the options that would apply now. These zones will be transitioned into Mixed Use zones with the adoption of the Comprehensive Plan. Nan also clarified the process of consideration in changing the zone on these properties with the Comprehensive Plan Update. First review is by the neighborhood association. Second review is by her as the District Liaison for BPS. Her recommendation on these requested changes will then be presented to the Planning and Sustainability Commission.

The Committee was in general agreement that both of these properties should be supported for the CN, commercial use. (Note: No formal action was taken at this point since it was unclear if additional forms and material was needed for final consideration by the neighborhood association.)

Tamara was directed to contact Dean Pottle, owner of Dean's Scene, whose property abuts Paperjam Press to ask him if he would like RCPNA to consider rezoning his property to commercial.

**Comp. Plan Update.** District Liaison Nan Stark discussed the proposed changes that the Comp. Plan Update holds for the RCPNA area. She shared that there were no major changes. The changes shown currently in the Map App/Comp. Plan Maps include:

1. The New Deal changed to Commercial; located at SW corner of NE Halsey St. and 53<sup>rd</sup> Ave. Discussion regarding the benefits of keeping the site zone residential and having it as a pre-existing non-conforming commercial included: A) The site contains the grass lot just to the west of the structure. A commercial zone could then allow micro-housing to be developed at this site as a permitted use; B) Pre-existing non-conforming gives the neighborhood association a greater say in the uses that would be allowed at this site. The standards for these types of uses is that they cannot increase in intensity compared to the previous use.

**Action: Unanimous vote to keep New Deal property as Residential.**

2. Building Heights in Sandy Blvd. Civic Corridor. Discussion was raised that the neighborhood association has historically pushed for a 4-story height limit next to the Alameda ridge to preserve views. Nan suggested for the Committee to look at different Commercial zones and correlating heights. The Mixed Use zone that is being applied all along the Sandy Corridor will be made up of at least 3 types of mixed use commercial. She shared that these commercial types are to closely match the current zoning that is applied to the properties. **Action: It was agreed that the Committee needed to research the existing zones and better understand how the Mixed Use designation/zone will change the proposed building heights for this area.**

9:00 adjourn.

Drafted by T. DeRidder 10/08/14

## Field/Chhetri Presentation 08/21/2014

Location: Rose City Block 156, Lot 1 (4730 NE Fremont St.) Property owners: John & Deborah Field Rose City Block 155, Lot 16 (3436 NE 48th Ave.) Property owners: Ramod & Kamala Chherti

### Proposal:

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### Background Information:

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### Objective:

Legitimizing the loose ends for the terms of nonconforming use is not our only goal. We share the City's vision to integrate living and retail spaces. The Beaumont business district could be revitalized by creating a balance of mixed use on the south side of Fremont. Opening up the south side would bring more people to the street and would allow for a continuous flow of foot traffic. The intersection at 48th and Fremont is a prime node with a crosswalk and bus stop. Rezoning the south side from NE 45th to 50th would be ideal, but may be too aggressive for the area at this time.

### Addendum:

Both property owners have presented this proposal to the Rose City Park Neighborhood Association's land use committee and they were in full support. Nan Stark who represents NE Portland's Bureau of Development and Sustainability has indicated her support stating that this is a reasonable request. Our next step is to present our proposal at the September general meeting of the Rose City Park Neighborhood Association.

Oct. 14, 2014

To: Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)  
1900 SW Fourth Ave.  
Portland, Oregon 97201-5380

**Re: Environmental Zone Regulation Plans  
2035 Comprehensive Plan**

I am requesting that the Planning and Sustainability Commission include the environmental zone regulation plans (listed below) that are present in the current Comprehensive Plan's policies 8.9-8.17, inclusive, to the 2035 Comprehensive Plan in Chapter 7, Environmental and Watershed Health.

Please add this to the record.

Thank you,



Ron Glanville, Russell NA Chair

2713 NE 132nd Ave, Portland, OR 97230

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

**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.

To: Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Oct 14 2014

1900 SW Fourth Ave  
Portland, Oregon 97201-5380

**Re: Request PSC Hearings Extension**

I am requesting that the Bureau of Planning and Sustainability provide the definitions for the new mixed-use zoning and new campus institutional zoning designations and that the Planning and Sustainability Commission either extend the hearings for the Comprehensive Plan or keep the hearings record open for at least 90 days following the release of these definitions. 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 you hold one hearing on the Comprehensive Plan in southwest Portland.

Please add this to the record.

Thank you,



Ron Glanville, Russell NA Chair  
2713 NE 132nd Ave Portland OR 97230

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

To: Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)  
1900 SW Fourth Ave  
Portland, Oregon 97201-5380

Oct. 14, 2014

**Re: The Role of Neighborhood Associations  
2035 Comprehensive Plan**

I am requesting that the Planning and Sustainability Commission add the following policies to the 2035 Comprehensive Plan in Chapter 2, Community Involvement.

**New Policy #1:**

*Neighborhood Associations must be used as Portland's acknowledged Citizen Involvement Program.*

**New Policy #2:**

*All of the policies adopted in the current comp plan concerning neighborhood plans, area plans, neighborhood livability, neighborhood character, and neighborhood stability must be included in the proposed draft.*

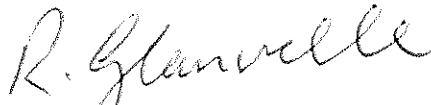
I am further requesting that the glossary definition of "Neighborhood" be changed to:

**Glossary:**

*Neighborhoods are defined by the geographic boundaries as established by the Neighborhood Associations and as accepted by the City.*

Please add this to the record.

Thank you,



Ron Glanville, Russell WA Chair

2713 NE 132nd Avenue Portland OR 97230

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

Portland Planning and Sustainability Commission,  
Hello Planning Commission,

10/14/2014

I write this letter in regards to the Property at 2348 SE Ankeny. I am requesting a designation change of our building from a residential nonconforming commercial use to conforming mixed use building.

Our building is on the south side of Ankeny with a restaurant, The Slide Inn and Jade Lounge, with two, 2 bedroom apartments up above and a garage alongside. The building is located on SE Ankeny at the corner of SE 24<sup>th</sup> and SE Ankeny.

I understand that the designation and zoning reevaluation presents itself every 30 years; hence we are hoping that you reconsider our situation.

We have officially been tenants of the building at 2348 SE Ankeny since 1994. My husband and I saw the potential in the neighborhood and opened our restaurant, Il Piatto. Locals thought we were crazy to house our business at this location. The neighborhood is changing and buildings and rental units are in demand. There are commercial and mixed use buildings up and down SE Ankeny east of our location.

Recently developed mixed use buildings are currently being built within 1 block on SE Ankeny.

Our zoning has been grandfathered in, due to the fact that the space was zoned commercial until the 1980's and has been a grocery store or restaurant since 1914. Our current zoning is R-2.5. Technically we have always been a mixed use building and thus we are requesting the status be changed to a conforming mixed use building.

We purchased the building in 2005. We have an unfinished top floor attic with 10 foot high ceilings that would make an amazing penthouse. My husband and I tried to see if we could make these improvements and we were told it could be \$20,000 to investigate the possibility. We do not have this type of money to ask a question and be possibly denied.

Our building is on the West Side of 24th at the corner. Our neighbor who is on the corner across the street is equally in the Grey Zone. We are not in the middle of the block. We would not be any problem for the neighborhood.

A conforming mixed use zoning and designation change would allow us to continue to have our business and we could additionally create a new tenancy in our building. In a city that is promoting high density living, this would be a positive community addition.

Enclosed is a small map,  
Sincerely,

Lenore Bingham  
[503-341-4276](tel:503-341-4276)

Eugen Bingham  
[503-341-1381](tel:503-341-1381)

Location:

Rose City Block 156, Lot 1 (4730 NE Fremont St.) Property owners: John & Deborah Field  
Rose City Block 155, Lot 16 (3436 NE 48th Ave.) Property owners: Ramod & Kamala Chherti

Proposal:

In consideration of the comprehensive plan update, we are proposing a zoning change for the southeastern and southwestern corner lots at the intersection of NE Fremont and 48th street. The north side of this tee intersection is zoned CN2h. Our request is that the two 7,500 sq. ft. R2h lots that split the south side of the intersection be classified likewise with a mixed use designation.

Background Information:

Document 09-155613PR furnished by the City of Portland, Bureau of Development Services has established that the property at 4730 NE Fremont has maintained legal status for nonconforming use ever since the comprehensive plan of 1981 which changed the zoning from C2L to R2h. We recognize that the terms of nonconforming use have been exaggerated a bit throughout the years in regard to the property. From 1993 to 2009, Wall Beds of Oregon used the property as an office and showroom. After purchasing the property in 2009, we were charged commercial water and sewer rates from the start, so apparently the city considers this to be commercial property. Most recently Portlandcitymaps.com has listed the property as generic commercial use. We have remodeled the residence which we currently occupy and have converted the former show room, with a three car parking lot, into a family-run digital print shop.

Objective:

Legitimizing the loose ends for the terms of nonconforming use is not our only goal. We share the City's vision to integrate living and retail spaces. The Beaumont business district could be revitalized by creating a balance of mixed use on the south side of Fremont. Opening up the south side would bring more people to the street and would allow for a continuous flow of foot traffic. The intersection at 48th and Fremont is a prime node with a crosswalk and bus stop. Rezoning the south side from NE 45th to 50th would be ideal, but may be too aggressive for the area at this time.

Addendum:

Both property owners have presented this proposal to the Rose City Park Neighborhood Association's land use committee and they were in full support. Nan Stark who represents NE Portland's Bureau of Development and Sustainability has indicated her support stating that this is a reasonable request. Our next step is to present our proposal at the September general meeting of the Rose City Park Neighborhood Association.

## Contact Information for the Field/Chherti-Comprehensive Plan Proposal 2014

Deborah L. Field  
phone: 503.475.0980  
email: deblyfield@gmail.com  
address: 4730 NE Fremont, Portland OR 97213

John M. Field:  
phone: 503.475.2311  
email: therealjohnfield@gmail.com  
address: 4730 NE Fremont, Portland OR 97213

Ramod B. Chherti:  
phone: 510.331.2587  
email: himalayanincense@gmail.com  
address: 18001 SE 43rd Way, Vancouver WA 98683



# Rose City Park Neighborhood Association

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October 14, 2014 (Transmitted this day via e-mail to the following)

City of Portland  
Bureau of Planning & Sustainability  
Attn: Nan Stark, NE District Liaison ([nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov))  
1900 4<sup>th</sup> Avenue  
Suite 7100  
Portland, OR 97201

CC: Susan Anderson [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov),  
Planning and Sustainability Commission [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov),  
Portland City Council [Karla.Moore-Love@portlandoregon.gov](mailto:Karla.Moore-Love@portlandoregon.gov)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Deborah & John Field, owners, [deblyfield@gmail.com](mailto:deblyfield@gmail.com)

Subject: RCPNA Recommends Approval of Re-zone/Designation of 3437 NE 48<sup>th</sup> from R2h to CN2h/  
2014 Map App: Multi-dwelling to Mixed Use-Dispersed

Dear Nan Stark,

On September 18th, 2014, the Land Use & Transportation Committee for Rose City Park Neighborhood Association completed its review and recommends the approval of the re-zone/designation change of property identified as Rose City Block 156, Lot 1, from R2 to CN2. Due to the time limitations in completing this review for the Planning and Sustainability Commission's hearing the LU & TC decision is deemed the final review for RCPNA.

At the LU & TC meeting the condition placed on this rezone stated that "the zone is to be no more intense than Neighborhood Commercial", as this is the least intensive commercial in the 1981 Comp. Plan Map designations. The reasoning behind this was that the Committee wanted to have the Commercial use to have the least impact possible on the abutting Residential uses to the north of the property.

The Comp. Plan Update Map App identifies Mixed Use – Dispersed as the least intensive Commercial designation. The designation of Mixed Use – Dispersed would meet the intent of the Committee's approval.

This property is located at 4730 NE Fremont and owned by Deborah & John Field. Situated on the southwest corner of NE Fremont and NE 48<sup>th</sup> Ave., this property is unique in that it contains both a residence and an active commercial business in separate buildings on the site. The commercial use,



Paperjam Press, is located on the western portion of the 7,500 sq. ft. lot and is considered a pre-existing non-conforming use in the R2h zone. The owners claim that their property was previously zoned for commercial and then was changed to residential use with the 1981 comprehensive plan update. The uses of the site has changed over time. But, the commercial use has remained active throughout the past 33 years. The owners of Paperjam Press wish to continue the current use of the site as a copy/publishing company.

The site continues to be charged commercial water rates. There is a short parking area on-site in front of the building with direct access off of Fremont for customers. The owners just want to have the property reclassified back to Commercial. It is located on the south side of Fremont across the street from Commercial property identified at CSh and CN2h. The proposed Comprehensive Plan Map identifies the northerly side of Fremont to be identified as Mixed Use - Neighborhood.

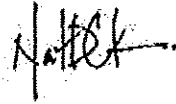
Attached is the application document that Deborah and John Field submitted to the LU & TC for their consideration. Also attached are draft minutes for the Aug. 21<sup>st</sup> and Sept. 18<sup>th</sup>, 2014 LU & TC meetings.

Please let us know if you have any questions or we can be of further assistance on this matter.

My best,



Tamara DeRidder, AICP  
Co-Chair, LU & TC  
Chairman, RCPNA  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213  
503-706-5804



Nate Carter, AIA  
Co-Chair, LU & TC  
Board, RCPNA  
2432 NE 59th Avenue  
Portland, OR 97213  
971-344-1919

Exhibit B – Oct 14, 2014  
RCPNA Recommendation  
Of Approval for Rezone -Fields  
**Draft Meeting Notes**  
**RCPNA Land Use & Transportation Committee**  
**08/21/14**

Attendees: Tamara DeRidder – Co Chair, Nate Carter- Co Chair, Terry Parker, Ed Gorman, Ted Hart, Deborah Field, John Field, Ramod Chhetri, Bill Winkler, and District Liaison Nan Stark.

Meeting Location: German-American Society, 5626 NE Alameda

After group self-introductions Tamara introduced the first topic – a request for two properties located on NE Fremont St. to be rezoned from the current Residential zone R2 to Commercial zone C2.

**Comp. Plan Update Rezone/Designation Requests:** The owners of Paperjam Press, Deborah and John Field, submitted a packet of information regarding their request, along with that of their neighbor Ramod Chhetri, for a rezone/designation of their properties from R2h to CN2h. Their properties are identified as 4730 NE Fremont and 3436 NE 48<sup>th</sup>, respectively, and are located on the southwest and southeast corners of the intersection of NE Fremont St. and NE 48<sup>th</sup> Ave.

Paperjam Press/ Deborah & John Field Property – Rose City Block 156, Lot 1; 4730 NE Fremont. This property is unique in that it contains both a residence and an active commercial business in separate buildings on the site. The commercial use, Paper Jam, is considered a pre-existing non-conforming use in the R2h zone. The owners claim that their property was previously zoned for commercial and then was changed to residential use with the 1981 comprehensive plan update. The uses of the site has changed over time. But, the commercial use has remained active throughout the past 33 years. The site continues to be charged commercial water rates. There is a short parking area on-site in front of the building with access off of Fremont for customers. The owners just want to have the property reclassified as Commercial. It is located on the south side of Fremont where the north side of this is an extension of the Commercial node that begins near NE 42<sup>nd</sup> Ave. The north side of the street in this area contains active commercial uses as the CN2h zone continues eastward to NE 50<sup>th</sup> where it changes to residential. The nearest Commercial zone located on the south side of Fremont stops at NE 45<sup>th</sup> Ave.

The owners of Paperjam Press wish to continue the current use of the site as a copy/publishing company.

Ramod Chhetri property – Rose City Block 155, Lot 16; 3436 NE 48<sup>th</sup> Ave. This property contains a single-dwelling residence with driveway access off of NE 48<sup>th</sup> Ave. There is no indication from the exterior that this property was ever used for previous commercial uses. The property owner, Ramod Chhetri, is also the owner of Himalayan Art & Handicraft currently located at 818 NW 23<sup>rd</sup> Ave. in downtown Portland where he holds a lease. He wishes to move this business to his Fremont property and expand his service to include classes on the site. He proposes to construct a commercial building on the east side of the site and continue to use the residence for primarily residential uses for his family.

Like the Paperjam Press property, the Chhetri property is located across the street from thriving commercial uses. He proposes that these two properties together could serve a bookends, forming a

Exhibit B – Oct 14, 2014  
RCPNA Recommendation  
Of Approval for Rezone -Fields

small commercial node, to support neighborhood oriented commercial uses. Each of the two properties contains 7,500 sq. ft.

Discussion then ensued regarding the square footage of space that could be used for a new commercial structure and how parking might work on the site. Some concern was raised regarding commercial traffic taking access to the site off of NE 48<sup>th</sup>.

With guidance by District Liaison Nan Stark, it was determined that the CN and C2 zoning were the options that would apply now. These zones will be transitioned into Mixed Use zones with the adoption of the Comprehensive Plan. Nan also clarified the process of consideration in changing the zone on these properties with the Comprehensive Plan Update. First review is by the neighborhood association. Second review is by her as the District Liaison for BPS. Her recommendation on these requested changes will then be presented to the Planning and Sustainability Commission.

The Committee was in general agreement that both of these properties should be supported for the CN, commercial use. (Note: No formal action was taken at this point since it was unclear if additional forms and material was needed for final consideration by the neighborhood association.)

Tamara was directed to contact Dean Pottle, owner of Dean's Scene, whose property abuts Paperjam Press to ask him if he would like RCPNA to consider rezoning his property to commercial.

**Comp. Plan Update.** District Liaison Nan Stark discussed the proposed changes that the Comp. Plan Update holds for the RCPNA area. She shared that there were no major changes. The changes shown currently in the Map App/Comp. Plan Maps include:

1. The New Deal changed to Commercial; located at SW corner of NE Halsey St. and 53<sup>rd</sup> Ave. Discussion regarding the benefits of keeping the site zone residential and having it as a pre-existing non-conforming commercial included: A) The site contains the grass lot just to the west of the structure. A commercial zone could then allow micro-housing to be developed at this site as a permitted use; B) Pre-existing non-conforming gives the neighborhood association a greater say in the uses that would be allowed at this site. The standards for these types of uses is that they cannot increase in intensity compared to the previous use. **Action: Unanimous vote to keep New Deal property as Residential.**
2. Building Heights in Sandy Blvd. Civic Corridor. Discussion was raised that the neighborhood association has historically pushed for a 4-story height limit next to the Alameda ridge to preserve views. Nan suggested for the Committee to look at different Commercial zones and correlating heights. The Mixed Use zone that is being applied all along the Sandy Corridor will be made up of at least 3 types of mixed use commercial. She shared that these commercial types are to closely match the current zoning that is applied to the properties. **Action: It was agreed that the Committee needed to research the existing zones and better understand how the Mixed Use designation/zone will change the proposed building heights for this area.**

9:00 adjourn.

Drafted by T. DeRidder 10/08/14

Exhibit B – Oct 14, 2014  
RCPNA Recommendation  
Of Approval for Rezone -Fields  
**Field/Chhetri Presentation 08/21/2014**

Location: Rose City Block 156, Lot 1 (4730 NE Fremont St.) Property owners: John & Deborah Field Rose City Block 155, Lot 16 (3436 NE 48th Ave.) Property owners: Ramod & Kamala Chherti

**Proposal:**

In consideration of the comprehensive plan update, we are proposing a zoning change for the southeastern and southwestern corner lots at the intersection of NE Fremont and 48th street. The north side of this tee intersection is zoned CN2h. Our request is that the two 7,500 sq. ft. R2h lots that split the south side of the intersection be classified likewise with a mixed use designation.

**Background Information:**

Document 09-155613PR furnished by the City of Portland, Bureau of Development Services has established that the property at 4730 NE Fremont has maintained legal status for nonconforming use ever since the comprehensive plan of 1981 which changed the zoning from C2L to R2h. We recognize that the terms of nonconforming use have been exaggerated a bit throughout the years in regard to the property. From 1993 to 2009, Wall Beds of Oregon used the property as an office and showroom. After purchasing the property in 2009, we were charged commercial water and sewer rates from the start, so apparently the city considers this to be commercial property. Most recently Portlandcitymaps.com has listed the property as generic commercial use. We have remodeled the residence which we currently occupy and have converted the former show room, with a three car parking lot, into a family-run digital print shop.

**Objective:**

Legitimizing the loose ends for the terms of nonconforming use is not our only goal. We share the City's vision to integrate living and retail spaces. The Beaumont business district could be revitalized by creating a balance of mixed use on the south side of Fremont. Opening up the south side would bring more people to the street and would allow for a continuous flow of foot traffic. The intersection at 48th and Fremont is a prime node with a crosswalk and bus stop. Rezoning the south side from NE 45th to 50th would be ideal, but may be too aggressive for the area at this time.

**Addendum:**

Both property owners have presented this proposal to the Rose City Park Neighborhood Association's land use committee and they were in full support. Nan Stark who represents NE Portland's Bureau of Development and Sustainability has indicated her support stating that this is a reasonable request. Our next step is to present our proposal at the September general meeting of the Rose City Park Neighborhood Association.

## Field-Chhetri Proposal

**To:**

Rose City Neighborhood Association

**Request:**

We seek your approval for a change to "Mixed Use" at 48<sup>th</sup> & Fremont.

**Background:**

John and Deborah Field own the southwest corner property at 48<sup>th</sup> and Fremont. We have been in the printing and design business for 20 years and currently own Paperjam Press. We offer custom printing, cards, paper, fax & copy, and invitations.

Ramod and Kamala Chherti own the southeast corner property at 48<sup>th</sup> and Fremont. We moved to Portland several years ago and opened our store, Himalayan Art & Handicraft – which is currently located on NW 23<sup>rd</sup> Street. We import handicrafts from Nepal, India, and Tibet.

**Objective:**

We, Ramod and Kamala, are currently renting out our house but are finding it more and more difficult to find good tenants because of the noise generated from Fremont Street. We would like to move our business from NW 23<sup>rd</sup> to NE 48<sup>th</sup> Street to the ground floor and create apartments on the top floor. We feel that we can do more with our property if it is zoned to Mixed Use, and it would also be a benefit to the neighborhood.

We, Deborah and John, currently live and work on our property. We would like the opportunity to develop it by adding more retail storefront and living spaces. The addition of more storefront would help other small businesses on the street by creating more interest and more shoppers. And we feel it is a benefit to residents because we can offer them more places to shop nearby, so as to diminish the time spent driving to find goods and services. As local residents we bank, take our dog to the vet, fix our car, shop for clothes and gifts, workout at the gym, and dine in Beaumont Village. We have wonderful businesses on the street but we feel there is room for more variety.

**Conclusion:**

We want to add to the vitality of the business district by being able to develop our properties into more retail storefront and living spaces. The northern side of Fremont is storefront from 41<sup>st</sup> to 52<sup>nd</sup>. And the southern side of Fremont is storefront from 40<sup>st</sup> to 44<sup>th</sup>. Our properties face the retail zone at 48<sup>th</sup> and Fremont. Because we intersect with Fremont a natural node is created, and this node creates a great opportunity to add more retail storefront and/or living spaces to our neighborhood. We believe that allowing our properties to be zoned as Mixed Use is a positive outcome for all the businesses on the street because it will bring more interest and foot traffic. And it will be a benefit for the people who live in the area because it will give them more choices for services, shopping, and eating in the business district. The people of Portland understand and actively support local small businesses. We believe in promoting the development of small business and the concept of "shopping local" which adds to the economic stability of our neighborhoods.

MULLENWARTH COUNTY

1" = 100'

SEE MAP IN 2E 19CD

N.E. 49TH AVE.

FREMONT

(FREMONT)

N.E.

5/7L BANKS ADD.

16	8700	8600	7100	1
15	8500	SEE CS 12828	7200	2
14	8400		7300	3
13	8300	156	7400	4
12	8200		7500	5
11	8100		7600	5
10	8000		7700	7
9	7900	7800		8

(48TH ST.) AVE.

16	7000	5500	5400	1
15	6900	5600		2
14	6800	5700		3
13	6700	5800		4
12	6600	5900	SEE CS 16853	5
11	6500	6000		6
10	6400	6100		7
9	6300	6200		8

(49TH ST.) AVE.

16	5300	5200	3700	1
15	5100	3800		2
14	5000	3900		3
13	4900	4000		4
12	4800	4100		5
11	4700	4200		6
10	4600	4300		7
9	4500	4400		8

(50TH ST.) AVE.

16	3600	3500	3400	1
15	3400	3300		2
14	3300			3
13	3200			4
12	3100			5
11	3000			6
10	2900	SEE 65		7
9	2800			8

N.E.

KLICKITAT 201



TERRY PARKER  
P.O. BOX 13503  
PORTLAND, OREGON 97213-0503

**Subject: Testimony to the Portland Planning and Sustainability Commission related to the Comprehensive Plan victimizing Portlanders, October 14, 2014**

The anti-car mindset contained in the comp plan victimizes Portlanders. The driving "community" is victimized by the siphoning off and poaching motorist paid gas taxes to fund specialized infrastructure for freeloading bicyclists that arrogantly refuse to follow even the simplest of traffic control devices. When receiving citations for blowing through controlled intersections outside the Metro area, their self-righteous excuse is they don't have to stop in Portland. Sharing the road must require sharing the financial responsibility. The comp plan needs to specify bicyclists pay for bicycle infrastructure.

Family time and the environment are victimized with projects like curb extensions and the road diet plan on Foster. A combined 1280 daily hours will be added to travel times on Foster alone with engines running longer and more fuel being consumed. Motor vehicle capacity needs to be expanded to keep traffic flowing, not reduced.

Neighborhood livability and quality of life are being victimized by not requiring adequate parking commensurate with new multi-family residential development. Neighborhood streets fill up with parked cars - some occupying the same place for days on end. This victimization is already taking place on lower Division. PBOT now wants to manage on-street parking - likely with new fees - thereby victimizing under represented daily drivers and automobile owners, and further victimizing longtime residents for a problem that City policy has created. A 2013 study identified that 72 percent of the occupied units in apartment buildings without parking have one or more cars. The comp plan needs a reality check by requiring a minimum of ,75 parking places per unit for new residential development - including on civic corridors like Sandy Boulevard, in town centers like Hollywood and around transit stations.

Job seekers are victimized in that eight to ten percent of the jobs in the US are tied to the auto industry - most of them family wage jobs. An average new car dealership in Oregon employs about 60 people. The income people earn is also victimized.. A bicycle mechanic earns about 27 to 28 thousand dollars per year while an auto mechanic earns closer to 40 or 50 thousand dollars. With a higher percentage of lower wage jobs due to the anti-car mindset, the City receives less tax revenue to provide services to the people, and spends a greater share of tax dollars to subsidize low income households.

Finally, taxpayers are victimized. Whereas driving is subsidized at less than a dime per passenger mile, transit is subsidized at over 60 cents per passenger mile. Enlarging the footprint of transit and adding streetcar lines increases costs in effect broadening the nonexistence of financial self-sustainability. While a financially self-sustainability goal for transit must be inserted into the comp plan, it is economically unfeasible to expect any form or magnitude of transit will take everybody where they want to go. You don't see the City of Portland rushing to eliminate the fleet of city owned cars.

In closing, for the economic vitality of Portland; transportation hierarchies, language and incentives that financially encourage alternatives to driving along with attacks on the automobile all need to be removed from the comprehensive plan.

Respectively submitted,  
Terry Parker, Northeast Portland



2345/2349 S.E. ANKENY

Portland Planning and Sustainability Commission

09/25/14

Hello Portland Planning Commission

I am writing about my property at 2345 SE Ankeny and basement storefront 2349 SE Ankeny I am requesting that new zoning plan change the this property to commercial or mixed use.

The pre 1981 plan zoned this property commercial. In 1924 the basement floor was lowered and got a new address 2349 S.E. Ankeny. The basement became a grocery store . The building remained a conner grocery store into the 40's and has had a variety of retail and service businesses into the 1980's.

2345 SE Ankeny and the property across Ankeny 2348 SE Ankeny had been retail stores or restaurants for many years before the 1981 zone change. 2348 SE Ankeny is a restaurant today in residential zone.

I lost my ability to have a store because I did not have a store for 2 years after purchasing the wreck of a building 1989.

The plan was to have a store in the basement when I bought the building. I was unaware of the 2 year stipulation in the zoning code. I spent my time energy getting the two apts. upstairs ready to rent. The clock was ticking on my ability to have coffee shop in the basement. I lost it.

I applied for a Nonconforming situation in 1994. {Enclosed} I received a response from Kevin Brady city planner asking for more proof. I was not willing to go through a Type 2 land use review. I had already spent days proving the basement was indeed a store. I did not pursue the issue.

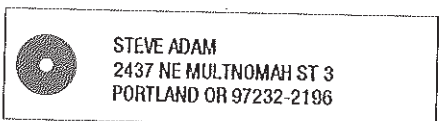
The 3032 Zone Map is Hopscotch running east and west on Ankeny. The zone changes from residential to commercial in the middle of SE 24th Street across the street for my property. Please change the hopscotch and include my propey in the commercial zone.

Over the years many people have contacted me about having a shop in my building. I understand why. The building is on a corner lot abutting the sidewalk with large street side picture windows. Perfect for a small shop. I have to turn them down because of this zoning issue. I have a store that can't be a store.

A small city of apartments is being built a block away on Ankeny east, density is increasing in the neighborhood.

1924, or even more 2014 a small shop or store at this address would be an asset to the neighborhood.

Please make it so. Thank You  
Steve Adam 503-975-6846



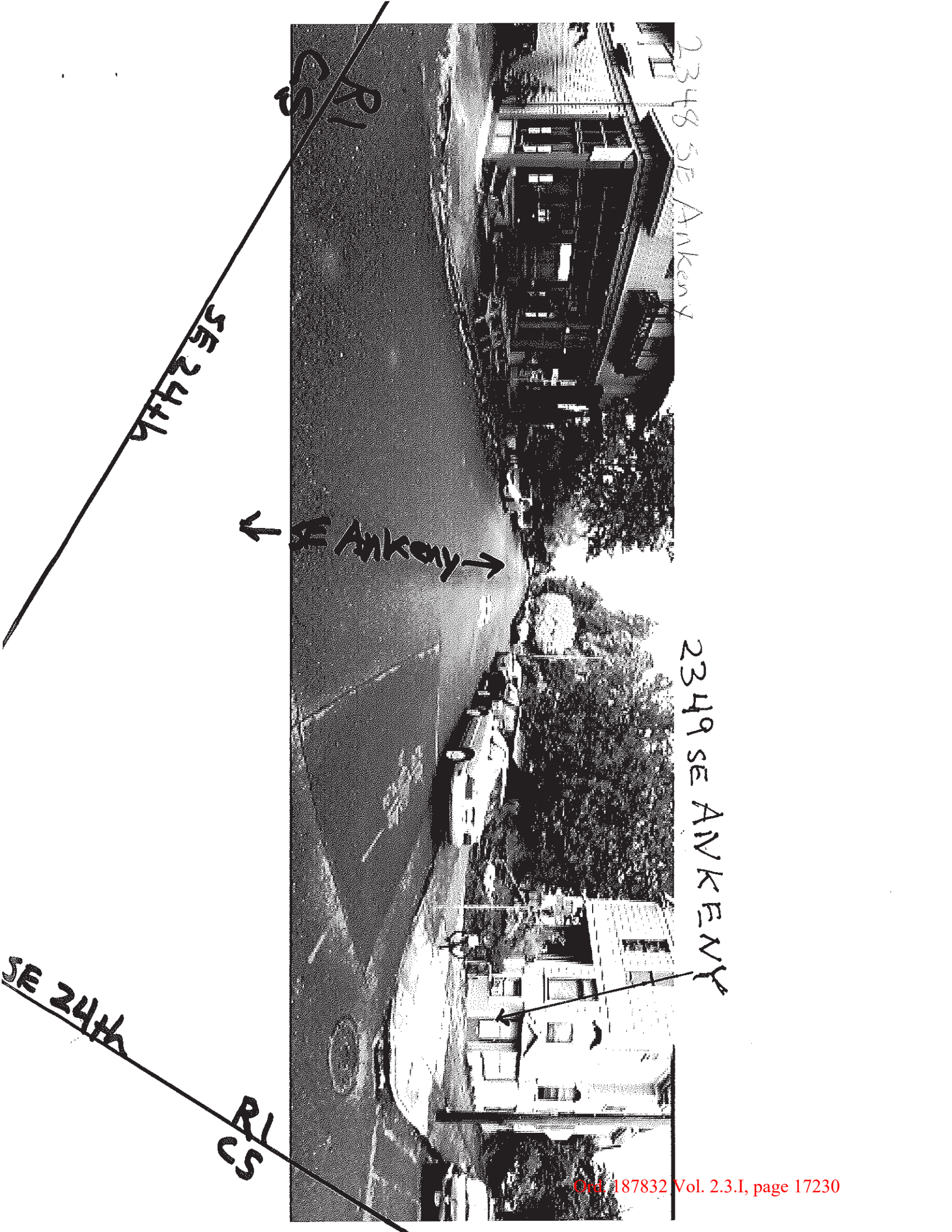


1349 SE Anthony

SE AN

SE 26th

RI zone  
OS zone



2348 SE Ankeny

2349 SE ANKENY

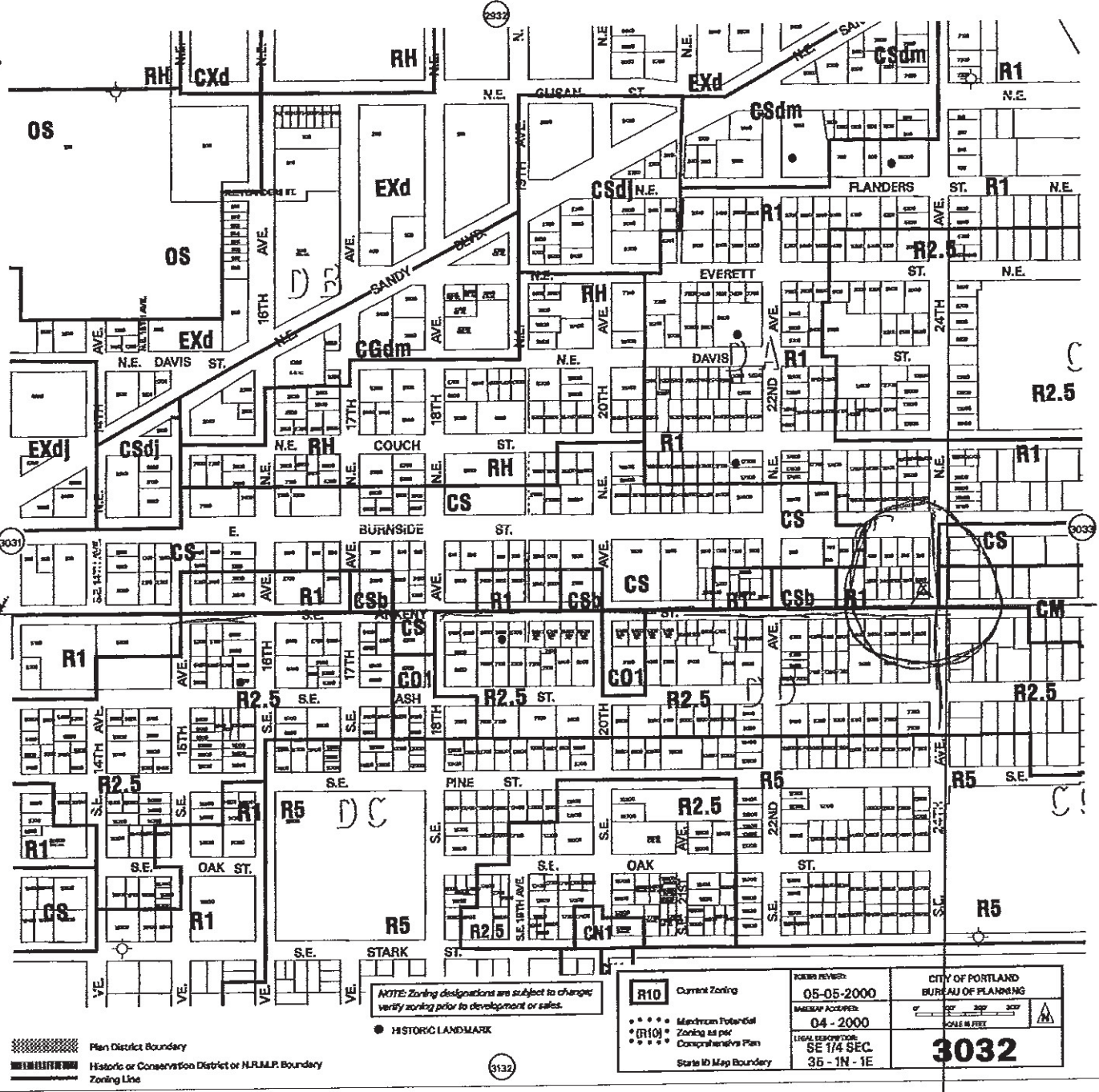
SE 24th

R1  
CS

SR  
CS

← SE Ankeny →

SE 24th



SE Ankeny

2345 SE. Ankeny

SE 24th

<b>R10</b> Current Zoning ••••• Maximum Potential Zoning as per Comprehensive Plan • (R10) • State ID Map Boundary	NEXT REVIEW: <b>05-05-2000</b>	CITY OF PORTLAND BUREAU OF PLANNING SCALE 1/4" = 100' <b>3032</b>
	BASEMAP ACQUIRED: <b>04 - 2000</b>	
	LEGAL DESCRIPTION: SE 1/4 SEC. 36 - 1N - 1E	
	HISTORIC LANDMARK	

NC-00082



CITY OF  
**PORTLAND, OREGON**  
BUREAU OF PLANNING

Charlie Hales, Commissioner  
David C. Knowles, Interim Director  
1120 S.W. 5th, Room 1002  
Portland, Oregon 97204-1966  
Telephone: (503) 823-7700  
FAX (503) 823-7800

March 17, 1994

Steven Adam  
2437 NE Multnomah Blvd.  
Portland, OR 97232

**RE: Nonconforming use establishment for 2345 SE Ankeny (South half of lot 10, Block 4, Keystone Addition, map 3032, R-44920-0480).**

Dear Mr. Adam:

This letter is in response to your request for nonconforming use establishment of the property noted above. The property is currently zoned R1 (Multi-dwelling Residential). The proposed use of a store and coffee shop is classified as Retail Sales and Service and is prohibited in the R1 zone.

In 1924, a building permit was issued establishing a store at this address. The zoning of this property up to 1959 was Zone 3 (Commercial) and between 1959 and 1981 was zoned M3. In 1981 the zone changed again to R1, the present zoning. Uses classified as Retail Sales and Service were allowed in both the Zone 3 and M3 zones. According to the standard evidence you have submitted, there have been a variety of uses categorized as Retail Sales and Service at this address since 1981 (when the changed to R1). This standard evidence includes both Polk directory and telephone directory listings for the years since the zone change in 1981 and through 1989.

In order to establish legal nonconforming status, standard evidence would need to be submitted for years following 1989. Standard evidence includes only that evidence that is listed in Chapter 33.258.038.B (Documenting A Nonconforming Situation) of the City of Portland Zoning Code. Since nonconforming uses lose their nonconforming status if discontinued for more than 2 years, uses in the Retail Sales and Services category at this address cannot be reestablished. Without standard evidence between the years 1989 and 1994, a nonconforming use cannot be established.

If you have nonstandard evidence for the years 1989 and 1994, you could apply for a Determination of Legal Nonconforming Status Review. This Type II land use review would either certify or deny legal status of the nonconforming use and a fee is charged.

This letter is advisory. This response is based upon the legal description listed in the request for establishment of a nonconforming use and it is the current zoning as of the date of this letter. Zoning regulations do change over time. If you should require further information or assistance, please call me at 823-7700.

Sincerely,

A handwritten signature in black ink that reads "Kevin Brady". The signature is written in a cursive style with a large, sweeping "K" and "B".

Kevin Brady, City Planner  
Current Planning, Permit Center



CITY OF PORTLAND  
BUREAU OF PLANNING  
LAND USE PERMITS  
1st FLOOR, PERMIT CENTER  
1120 S.W. FIFTH AVENUE  
PORTLAND, OR 97204-1966  
(503) 823-PLAN (823-7526)

FILE No.: \_\_\_\_\_ (staff will assign number)

# DOCUMENTING A NONCONFORMING SITUATION

Applicant's name: Steven Adam Company name: \_\_\_\_\_  
(person to contact)  
Mailing address: 2437 NE Multnomah Zip code: 97232  
Portland Or 97232 Day phone: 249-8181

Legal description(s) (Lot, block, addition, tax lot, section, township and range): South one-half Lot 10, Block 4, Keystone Addition City of Portland, Mult. Co.

Assessor's account number(s): R44920-0480 Sq. ft. or acreage of site: 2500

Street address or fronting street(s): 2345/2349 SE Ankeny Zoning: R1

Cross street: SE 24th + SE Ankeny 1/4 section map no.(s): 3032

Type of Nonconforming Situation(s): (check box or boxes)  Use  Residential Density  Development

Describe: Re Open Basement As: Store - coffee shop

Please list your standard evidence. Include this material and a site plan with your application. An explanation of what constitutes standard evidence is on the reverse side of this form. Organize both your list and your attached documentation by date. If you do not have standard evidence, a Determination of Legal Nonconforming Status view is required. Forms for this review are available from Zoning in the Permit Center, at 1120 S.W. Fifth Avenue, between 8:30 AM and 4:30 PM.

Situation allowed when established:

Date	Use/development	Type of Documentation
<u>Dec 18, 1924</u>	<u>Excavated basement floor to have headroom for store</u>	<u>Building Permit # 149340</u>

Situation maintained over time:

Date	Use/development	Type of Documentation
<u>1929/41</u>	<u>Grocery Store / First time 2349 appears as secondary address - 1929</u>	<u>Polk Directory</u>
<u>Early 80's</u>	<u>Book Store</u>	<u>Historic Resource Inventory</u>
<u>1980-85</u>	<u>Womans Place Bookstore</u>	<u>Polk Directory / Phone Book</u>
<u>1988-89</u>	<u>Clothing + Sheepskin store</u>	<u>Portland Phone Book</u>
<u>1974-1993</u>	<u>Store or Office</u>	<u>Tax Assessors - Characteristic Card</u>

Attach additional pages, if necessary) See reverse side.

Previous Land Use Reviews: \_\_\_\_\_

FEES FOR DOCUMENTING NONCONFORMING SITUATION AND CURRENT USE CATEGORY IS \$109.00

For Office Use Only Intake Staff Initials: \_\_\_\_\_ Date Received: \_\_\_\_\_ Receipt No.: \_\_\_\_\_  
Evidence Acceptable:  YES  NO

1

FORM W-208 CITY OF PORTLAND, OREGON DEPARTMENT OF PUBLIC WORKS BUREAU OF BUILDINGS PERMIT NO. 149340

Date Dec. 18, 1924 REPORT OF INSPECTION

Building on 2345 SE Ankeny St. Between E. 22nd and E. 24th

Lot \_\_\_\_\_ Block \_\_\_\_\_ in \_\_\_\_\_ Addition \_\_\_\_\_

Owner H.L. Erving Address 15 E. 30th St.

Contractor same Address \_\_\_\_\_

2 Story, Class VII, Grade 4A, rep. res. Cost \$400.

DATE	HOUR	Description of Alterations and Repairs
		street 11404, fuel bin under stairway to basement, partition 22' long for laundry room, cupboard in kitchen, replaster 1 bedroom on 1st floor, cement basement floor install furnace with concrete cold air shaft, lower basement floor 8"
DEC 22	1924	<u>12:15</u> <u>Finish</u> <u>Frame work in 1st story</u>
FEB 6	1925	<u>304</u> <u>Apparently finished, Not aspd.</u> <u>White card</u>

W. R. WELLS

Lowered  
Basement  
floor for  
Grocery  
Store















7

November 1, 1993

*Memorandum*

To: Steve Adams

From: Jeff Smith / City of Portland Bicycle Program



Re: Bike rack installation

The bicycle rack currently in place in front of the building at 2349 SE Ankeny Street was installed by the Bicycle Program as part of our bicycle rack request program. While our records do not indicate the date or circumstances of this rack installation (it was prior to 1986), the program is operated on a request basis to serve cyclists and the business locations that tend to attract them. It seems most likely that a business of some sort was functioning at this location at the time that the rack was installed.

## **PSC Testimony on the Draft Comprehensive Plan, 10-14-14**

- More than a year ago, the PSC “got it right” in examining all of the testimony from expert witnesses and the well-informed public. But, now, a year later, the Draft Comprehensive Plan does not!
- You recognized that carving out 300 acres from the heart of WHI’s 825-acre total area exposes wildlife to unsafe and unsupportive “fringe habitat.” So, you mitigated for that; but, DCP does not!
- You recognized the development of a marine terminal and related industrial complex would negatively impact juvenile fish along the shallows around WHI, and mitigated for that; but, the DCP does not!
- You recognized an expanded freeway and interstate bridge with more effective access to and from the island would be essential for any successful marine development on WHI; but, the DCP does not!
- You recognized much heavier industrial truck traffic across Hayden Island would bring extensive pollution to the area, threatening the health of residents, and you mitigated for that; but, the DCP does not!
- You recognized this much greater truck traffic through new retail developments on Hayden Island would negatively impact the local economy, and you mitigated for that, but, the DCP does not!
- You recognized these critically important things, and voted seven to three to send them on with these mitigations to City Council for its further consideration, while the DCP recognized none of these things!
- You recognize that in the last year no new evidence has reduced these mitigations, but has increased the need for these mitigations. Only the political pressure to eliminate them has increased.
- Believe in the evidence, believe in your original votes, stand for your facts and convictions, and require the Draft Comprehensive Plan to include every last one of your mitigations for Hayden Island.

Timme A. Helzer  
220 North Hayden Bay Drive

# Hayden Island is an Island

## Limited access and facilities

Hayden Island is serviced by the I5 off-ramps at the Columbia River. These ramps are overloaded during peak rush hours, especially during the afternoon-evening hours by all the Northbound Washington residents who work in Oregon. Holidays create other congestion periods, especially Christmas.

Access to west from I5 is provided by a single road, N Hayden Island Drive and access to the east is provided by N Tomahawk Island Dr. Both of these roads dead-end on their side of the island. Both of these roads are only two lanes wide. During the spring and summer months, parking on N Tomahawk Island Dr frequently closes the road down to a single lane, creating significant congestion and sometimes dangerous traffic problems. Note that there are no alternative routes, nor the ability to provide any due to the narrowness of the island.

The Yacht Harbor Apartments (formerly Salpare Bay Condominiums) will have 373 units located near the east end of NE Tomahawk Island Drive (note that N Tomahawk Island Dr is shown as changing into NE Tomahawk Island Dr even though there is no physical change in the road or direction). The 373 units is up from the original permit of 204 luxury condos of the Salpare Bay development.

No upgrades of the local roads were required because the development is located on its own local road. These rules need to be changed since it is clear that there is only one road to the apartments! The small road that is used to avoid any consequences of their large development is essentially a renamed driveway!

Hayden Island currently has about 2800 residents – Yacht Harbor will add about 27% more residents based on an occupancy of 2 people per unit! Yet the single dead-end road is the only access. Needless to say, this is a very significant increase in the population of the island without any changes in the currently marginal infrastructure and access!

In addition to the sub-standard road access there are additional issues:

- Yacht Harbor is ~1 mile from bus service and there are no plans to extend it.
- Water pressure is inadequate as shown by the Thunderbird fire.
- There are no evacuation or emergency plans for the Island in case of disaster.

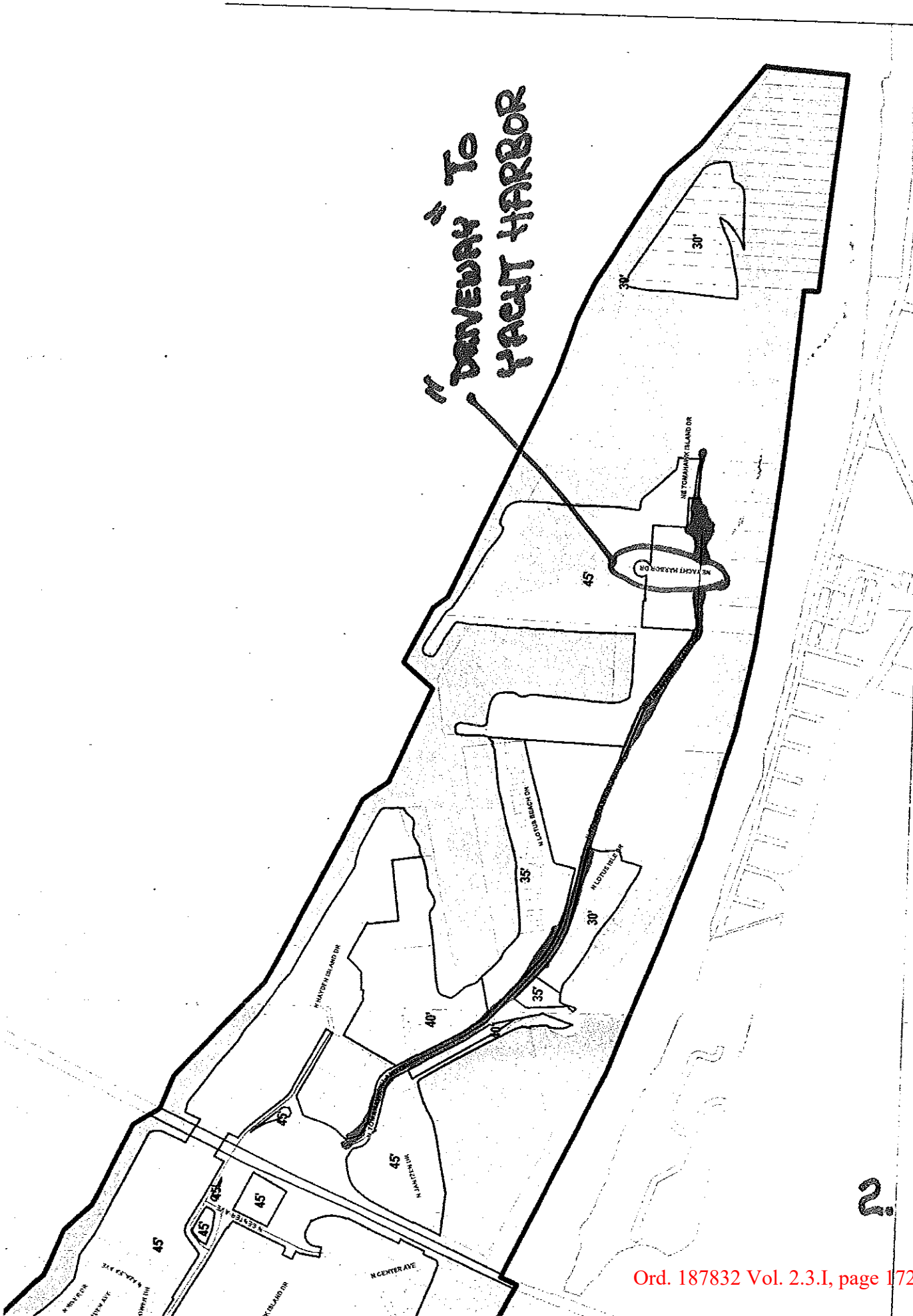
## Changes to Hayden Island Plan

The current Hayden Island Plan was based on upgrades to the island infrastructure based on the building of the CRC. It should be noted that most of those promised changes were backed out of the last CRC plan before it was closed down. It is also unlikely that there will be a new project within the next 20 years that will significantly upgrade Hayden Island infrastructure.

Two maximum height changes on the east end of the island were made reflecting the anticipated upgrades in infrastructure. These changes were to 80' and 90'.

- These changes should be reduced to their previous values given the current infrastructure and character of Hayden Island.
- Any additional large projects should be required to wait for improved access or required to provide it themselves.
- The loophole that allows for glorified driveways to serve as a local road should be removed.





DRIVEWAY TO  
YACHT HARBOR








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

City of Portland, Oregon  
Charlie Hales, Mayor • Susan Anderson, Director

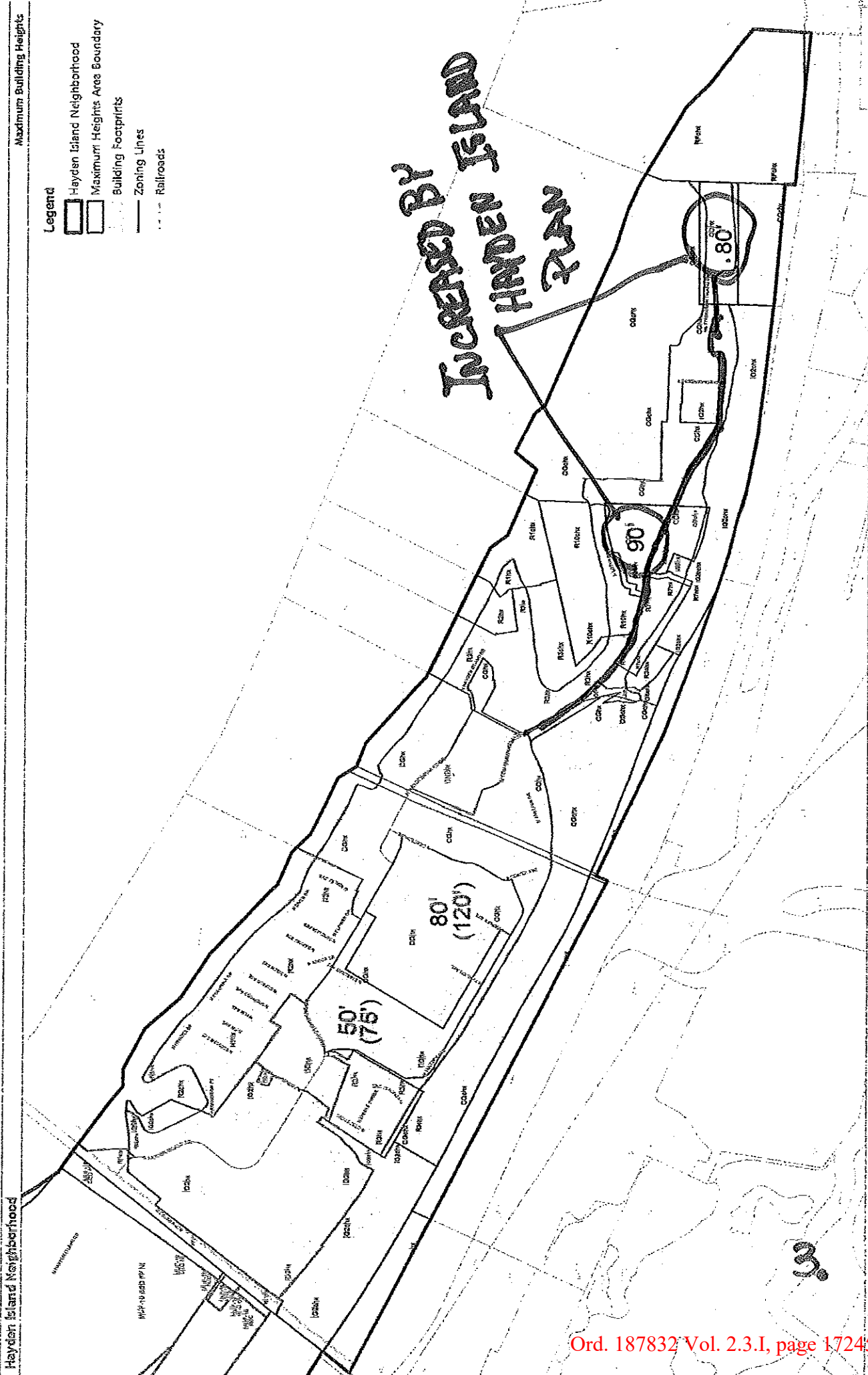


?

Legend

-  Hayden Island Neighborhood
-  Maximum Heights Area Boundary
-  Building Footprints
-  Zoning Lines
-  Railroads

INCREASED BY  
HAYDEN ISLAND  
PLAN



**Bureau of Planning and Sustainability**  
 Innovation. Collaboration. Practical Solutions.  
 City of Portland, Oregon  
 Charis Jahn, Mayor | Steve Adkins, Director



Testimony at Comprehensive Plan Public Hearing  
Parkrose High School  
October 14, 2014

Dear Commission members,

We would like to provide testimony regarding the proposed rezoning of the former Whitaker School site on NE 42nd Ave.

The “What We Heard From the Public” memo dated February 19, 2014, regarding the community feedback received by the Comprehensive Plan Team, noted, “Transitions and neighborhood context are important between the zoning on the main streets and development elsewhere. Stepdowns and setbacks are important to mitigate impacts on livability.”

That comment is especially relevant to the proposed rezoning and future redevelopment of the Whitaker School site. Stepdowns and setbacks should be utilized to maintain the residential character of the neighborhood and preserve the livability of the houses on NE 39th Ave and NE Simpson St, including our home directly adjacent to the site on Simpson. Open space should be maintained as much as possible, in keeping with the character of Fernhill Park and the surrounding neighborhood. Appropriate transitions from any commercial development along 42nd Ave to the residential neighborhood behind the parcel are essential to maintaining the character of the neighborhood. The community, including the Concordia Neighborhood Association, will likely advocate for a development of the land that includes a usage that is beneficial to the neighborhood, such as a community center.

If possible, the Comprehensive Plan should indicate that the guiding objectives for the transition from the redeveloped Whitaker School site to adjacent residential zones should be drawn from the residential zones themselves. Height, setbacks, and allowable uses in the areas adjacent to residential zones should ensure an orderly and harmonious transition, and avoid negative impacts on solar access, peace and quiet, and odors. In particular, parking, loading, and dumpster access should be specifically prohibited as transition area uses.

Thank you for your consideration of this testimony.

Emily Seltzer and John Wilson  
3844 NE Simpson Street  
Portland, Oregon 97211



# Columbia Pacific Building and Construction Trades Council

October 14, 2014

Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, Oregon 97201

RE: Portland Comprehensive Plan Update

Dear Chair André Baugh and the Portland Planning and Sustainability Commission,

The Columbia Pacific Building and Construction Trades Council (CPBCTC) would like to recognize the City of Portland for its work to date on the Comprehensive Plan Update that will guide the City's growth and development over the next 20 years. Long-term planning is critical to creating the good jobs, strong economy and healthy communities that we all desire, and for that, we commend you.

The CPBCTC represents more than 15,000 members in 25 different skilled crafts in the local construction industry. We are committed to professionalism and quality; we have nine training centers located throughout the Portland-metro area where we train thousands of apprentices and journey level workers. We spend over \$10 million dollars each year, every penny of it from the private sector, to provide our members with access to acclaimed training programs for the construction industry. We believe that, along with our affiliates across Oregon, we have created the most skilled local workforce in the world, all without any public money.

The CPBCTC is fully committed to making Portland as great a place as it can be. Our members are a vital part of Portland. We live, work, and raise our families here. We provide good family-wage jobs here. We build the foundation of the city and its economy. We are proud to call Portland home and to be a part of the diverse communities that make up our city.

With that in mind, we have reviewed the Comprehensive Plan Update and draft map. We believe the plan contains many strong points as well as some areas for additional consideration. As you move forward with the process, we urge you to adopt the following principles:

- **Preserve and expand industrial land in the City of Portland.**

The importance of industrial land and industrial land reserves cannot be overstated. A large supply of industrial land is a key component of any economy that values good middle class

jobs. Maintaining industrial land is necessary to preserve current jobs and economic activity, as is having additional land available to attract new economic activity and jobs. We live in an area with tight constraints on land – natural and human made – and it is critical that every bit of existing industrial land be preserved as industrial. Once industrial land changes to non-industrial uses, it is almost impossible to get back. We ask that all current industrial land be preserved as industrial and additional land be made available for industrial purposes, through opening new land, cleaning up brownfield sites, and other responsible means.

- **Prioritize projects that have existing and/or established funding sources.**

Everyone was hit hard by the recent recession, particularly the construction industry. While the local economy continues to improve, many of our workers are still struggling to find work. In order to help get our members back to work – and allow them to support their families and pay taxes – we ask that you prioritize projects that have identified funding and timelines so we can break ground and move quickly to create good opportunities for workers.

- **Enable the development of West Hayden Island as an industrial site and job creator.**

Building on our previous comments regarding industrial land and shovel-ready projects, we ask that you do all you can to expedite and advance the development of West Hayden Island as a new site for industrial activity, as outlined in the Comprehensive Plan Update.

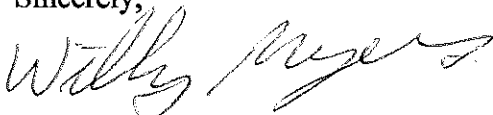
- **Adopt policies and plans that protect and create good middle class jobs.**

Portland has a reputation as being an open and equitable place. This has made the City a popular place to live and has attracted many new residents over the years. However, we must be careful not to lose our strong roots as a working industrial city. If we truly want to be an equitable place, the Comprehensive Plan must represent all Portlanders from all backgrounds and professions. This means preserving and expanding skilled trades jobs that allow Portlanders to earn a good living, support their family, and learn valuable skills, achieve upward mobility. Land use and planning truly are equity issues and we ask that you treat them as such.

Thank you for your consideration. The CPBCTC wants to be a good partner in building a safe, prosperous and healthy city, and we encourage you to consider us a resource as the process moves forward.

Together, we can work to build a city that we are all proud to call home.

Sincerely,



Willy Myers

Executive Secretary Treasurer

*Comp Plan*

**Testimony from Gary Miniszewski, Home Owner address: 8343 SW 57<sup>th</sup> Avenue  
Portland OR. Resident of AshCreek Neighborhood**

*Oct 14, 2014*

**Proposed Comp Plan Policies;** City Staff can readily makes findings to back these policies up.

### **School Facilities**

Policy 8.100 to take place of Private institutions Policy. That can be numbered 8.101

Elementary Schools: Because local elementary schools help to create socially cohesive neighborhoods and allow for walking and bicycling to school, encourage public school districts (especially Portland Public School District) to re-consider elementary schools closures made in the last 15 years. This should be done to determine if demographic changes in the school respective service areas have changed to possibly justify re-opening the schools.

### **Residential InFill Development**

Policy 5.45 to take place of Responding to social isolation. That can be numbered 5.46

The City will develop development standards to mitigate impacts of new dwellings which are proposed to be constructed in existing neighborhoods zoned for residential use. These developments standards for physical compatibility shall address house design, height, massing, back and sideyard setbacks, roof design etc. to mitigate the impacts on existing adjoining and adjacent dwellings. Some of the main factors to be considered for impact mitigation will be sunlight for existing and potential solar panels on existing dwellings, sunlight into existing dwelling windows, solar radiation for existing rear and side yard vegetable gardens/ landscaping, existing home owner privacy, street parking capacity, and neighborhood architectural patterns.

### **Proposed change to Special Projects:**

SW Garden Home Road from Capitol Hwy to Multnomah. Map no. 90034 Reconstruct Rd to three lanes with signal improvement at Multnomah intersection, drainage, bike lanes, sidewalks and curbs.

I and the AshCreek Neighborhood Association recommend that this project be broken into two parts and revised as follows:

- a. Multnomah intersection be made into a controled intersection with traffic signals. Please see attached Ashcreek Neighborhood letter to Commissioner Novick.
- b. Make minimal road should improvements along Garden Home Road from Capitol to Multnomah for pedestrian and bicycle saftety. This would include drainge designed for the physically constrained right-of-way. Please see attached Ashcreek Neighborhood letter to Commissioner Novic.

The reason for Garden Home Road does not need to be rebuilt to inculde three lands with sidewalks and curbs is this road is only a "neighborhood collector". It has been designated as a neighborhood collector because it only has avg weekday traffic count of 1, 500 to 2,000 vehicles. This segment of Garden Home Rd is also constrained by topography that includes creek ravens, and severe vertical and horizontal curves. The cost of the proposal would far outweigh the any added benefits of the

improvements.

This part of Portland, like most of SW Portland, is hilly, wooded and is rural/suburban in character. To build the road proposed would be out of character with the surrounding neighborhood.

As seen on a road map, Multnomah Blvd closely runs parallel with Garden Road and it is a "district collector" with traffic counts ten times the magnitude as Garden Home Road (avg daily traffic volume: 12,000 to 15,000). I would like to venture the guess that when the City made this recommendation for the reconstruction of total length of Garden Home Rd from Capitol to Multnomah, it mistakenly used information derived from a "Portland Commercial Corridor Study" made a few years ago for the Garden Home Rd segment between SW 69<sup>th</sup> and 76<sup>th</sup> Avenues. Based on the results of that study, it can be easily concluded that that segment should be reconstructed to have three lanes with curbs, sidewalks and gutters as Oleson Road has been recently improved. Traffic from Multnomah Blvd funnels into that segment of Garden Home Road causing it to serve as a District Collector.

Cc: Leah Treat, PBOT, Peter Hurley, PBOT, Mark Lear, PBOT, Joan Frederiksen Planning, Bureau of Planning and Sustainability, Dean Smith Chairman of AshCreek Neighborhood Association, Manianne Fitzgerald, SWNI Transportation Chair

19 2 of 2



ASHCREEK

## ASHCREEK NEIGHBORHOOD ASSOCIATION

September 15, 2014

Commissioner Steve Novick  
City of Portland  
1221 SW Fourth Avenue, Room 210  
Portland, Oregon 97204

Re: Portland Comprehensive Plan List of Significant Projects

Dear Commissioner Novick:

The Ashcreek Neighborhood Association (ANA) reviewed the Draft Comprehensive Plan List of Significant Transportation Projects (draft dated July 2014). We offer the following comments and priorities. Ashcreek focused its discussion on projects near its boundaries in SW Portland.

### Comments:

ANA recommends that PBOT revise the project description for the SW Garden Home Road improvements (TSP #90033). Several years ago, this project was divided into two projects that are reflected in Metro's 2014 Regional Transportation Plan. We request that PBOT revise the Garden Home Road TSP project description to match the language in the RTP:

- RTP 10191, Garden Home Road from Capitol to Multnomah, Improve and signalize the intersection at SW Garden Home Road/Multnomah Blvd.
- RTP 11116, Garden Home Road from Capitol to Multnomah, pedestrian and bicycle safety improvements, including drainage designed for constrained right-of-way.

We also request that PBOT consider separating out and refining the portion of TSP project 90011 (55<sup>th</sup>/Pasadena/Pomona Bikeway (Taylors Ferry-Barbur)) to construct sidewalk and bicycle facilities in the segment from SW 61<sup>st</sup> and Pomona to SW 64<sup>th</sup> and Barbur Blvd. This will make it much safer for walking and biking through this high-density section of the neighborhood to frequent bus service transit stops, shops and services on Barbur. There has been a lot of infill in this area since project 90011 was developed over a dozen years ago, including a 21-unit housing development (Ashcreek Commons, a Home Forward property) that does not have a sidewalk to walk from the residences to the nearby bus stop on Barbur Blvd.

### Priorities:

ANA's priority projects support near-term construction of the following projects:

- a. Improvements at the intersection at SW Garden Home Road/Multnomah Blvd (RTP 10191),
- b. Garden Home Road from Capitol to Multnomah, pedestrian and bicycle safety improvements (RTP 11116)
- c. Pedestrian and bicycle facilities from SW 61<sup>st</sup> and Pomona to SW 64<sup>th</sup> and Barbur (portion of TSP 90011),
- d. Capitol Highway Bicycle & Pedestrian improvements (Multnomah-Taylors Ferry) (TSP 90026)
- e. Taylors Ferry Road bicycle/pedestrian Improvements (Capitol Highway-City limits) (TSP 90064)



Commissioner Steve Novick  
September 9, 2014  
Page 2

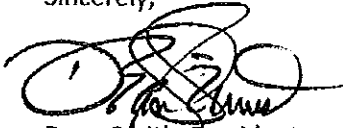
The City of Portland agreed to improve the Garden Home Road/Multnomah Blvd. intersection when jurisdiction was transferred to the City (Ordinance 165422 dated May 13, 1992). This project has been on PBOT's Systems Development Charge project list since 1999 due to significant growth in the area, but few improvements have been made to date. We urge PBOT to work with Ashcreek neighbors on designs that will improve safety at this dangerous intersection as soon as possible.

Ashcreek met a number of times with PBOT staff in 2011-12 to discuss various safety proposals along Garden Home Road. ANA submitted a letter to PBOT on June 13, 2012 prioritizing needed safety improvements, but PBOT has not formally responded and ANA is still awaiting construction of improvements.

The Ashcreek Neighborhood has very few sidewalks on its busy streets and no safe way to walk to nearby commercial centers in Garden Home, West Portland and Multnomah Village. We request that PBOT review our list of the five priorities above and construct needed safety improvements as soon as possible.

If you have any questions, please contact our Transportation Chair Marianne Fitzgerald at (503) 246-1847.

Sincerely,



Dean Smith, President  
Ashcreek Neighborhood Association  
c/o Southwest Neighborhoods, Inc.  
7688 SW Capitol Highway  
Portland, OR 97219

cc: Leah Treat, PBOT  
Peter Hurley, PBOT  
Mark Lear, PBOT  
Roger Averbeck, SWNI Transportation Chair

To Whom it may concern:

If this designation of R20 is implemented it will create a large hardship for me and my family personally, as well as other in the same area, I beleive. I have about 2 acres on Patton. We have had this property, as well as the property to the east of it when my grandfather purchased it to be a rental income property in the 1940's. My father continued as same, selling half in the late 70's. I inherited it 12 years ago, and some years ago we began the process with engineers to divide it into about five 10,000 square foot lots. Then land values dropped dramatically, so I decided not to continue at this time, as we would barely break even after all the division costs, even though we would retain the original antique farmhouse as a rental. So even though we put nearly 40K into it we halted the process. Basically this new proposed designation would certainly not help the rental or housing shortage in Portland, and I'm really surprised to find this has even been suggested. Although we certainly praise and appreciate green spaces, still, if our spaces are divided intelligently and well, it could remain beautiful with our R10 original plans.

Also, correct me if I'm wrong, but I beleive an R20 designation would increase our property taxes.

Aesha Lorenz Al-Saeed & family  
2747 SW Roswell  
Portland 97201  
503.223.8720  
eyez\_lorenz@mail2world.com

377

Portland Planning and Sustainability Commission Public Hearing

Date: 10/14/14  
 Name: Cristina Salacios (Please print legibly) ✓  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 2710 NE 14th Ave  
 City: Portland Zip: OR 97217 Phone: 503 460-9702X  
 Email Address and/or Fax No.: Cristina@oregoncat.org  
 What agenda item do you wish to comment on? Displacement  
 Site Address, if different from above: \_\_\_\_\_

32

Portland Planning and Sustainability Commission Public Hearing

Date: 10/14/14  
 Name: Doug Cook (Please print legibly) ✓  
 Authorized Spokesperson representing: Self (if applicable)  
 Address: 14011 NE Rose Pkwy  
 City: Portland Zip: OR Phone: 503-997-8000  
 Email Address and/or Fax No.: doug.cook12@gmail.com  
 What agenda item do you wish to comment on? East Portland  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

30 ✓

Date: 10/14 / 2014

Name: Gary MINISZEWSKI (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 8343 SW 57th Ave

City: PDX Zip: 97219 Phone: 503 892-3903

Email Address and/or Fax No.: garyminiszewski@gmail.com

What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

31 ✓

Date: 10/14/14

Name: Steve Hansen (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 3115 NE. 83RD

City: Port. Zip: 97220 Phone: 503-754-4098

Email Address and/or Fax No.: \_\_\_\_\_

What agenda item do you wish to comment on? Mult Use Parking Trains.

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

28



Date: Oct, 14, 14  
 Name: Janet Linstead (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 123 S.E 139th  
 City: Port. Or. Zip: 97233 Phone: \_\_\_\_\_  
 Email Address and/or Fax No.: linstead4252@centurylink.net  
 What agenda item do you wish to comment on? CP  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

29



Date: 10/14/2014  
 Name: Willy Myers (Please print legibly)  
 Authorized Spokesperson representing: Columbia Pacific (if applicable)  
 Address: Building and construction Trades Council  
 City: \_\_\_\_\_ Zip: 97206 Phone: \_\_\_\_\_  
 Email Address and/or Fax No.: Willy@CPBTC.com  
 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: \_\_\_\_\_

26 ✓

Portland Planning and Sustainability Commission Public Hearing

Date: OCT 14 2014  
Name: LAURIE KOVACK (Please print legibly)  
Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
Address: 736 SE 28TH AVE  
City: PORTLAND Zip: 97214 Phone: \_\_\_\_\_  
Email Address and/or Fax No.: LKOVACK@MAC.COM  
What agenda item do you wish to comment on? COMP PLAN  
Site Address, if different from above: \_\_\_\_\_

27

Portland Planning and Sustainability Commission Public Hearing

Date: 10-14-2014  
Name: Apscha Lorenz Al-Sawed (Please print legibly)  
Authorized Spokesperson representing: \_\_\_\_\_  
Address: 2747 SW Reswell  
City: \_\_\_\_\_ Zip: 97201 Phone: 223-8720  
Email Address and/or Fax No.: eyez.lorenz@mail2world.com  
What agenda item do you wish to comment on? The proposed change from R10- to R20 on Patton Rd.  
Site Address, if different from above: 5920 SW Patton Rd.

Portland Planning and Sustainability Commission Public Hearing

27 ✓

Date: \_\_\_\_\_  
 Name: Wendy Newton (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 2848 NE 31<sup>st</sup> Ave  
 City: PDX Zip: 97212 Phone: 503-869-9092  
 Email Address and/or Fax No.: newton2@msn.com  
 What agenda item do you wish to comment on? Chapter 4 of Draft Comp Plan  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

25 ✓

Date: 10/14/14  
 Name: Emily Seltzer (Please print legibly)  
 Authorized Spokesperson representing: N/A (if applicable)  
 Address: 3844 NE Simpson St  
 City: Portland Zip: 97211 Phone: 503-740-8225  
 Email Address and/or Fax No.: seltzer.emily@gmail.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

23

Date: 10/14/2014  
 Name: DON GROTTING (Please print legibly)  
 Authorized Spokesperson representing: David Douglas SD  
 Address: 12123 SE Lexington  
 City: Portland Zip: 97266 Phone: 503-308-0170  
 Email Address and/or Fax No.: don.grotting@ddouglas.k12.or.us  
 What agenda item do you wish to comment on? David Douglas Zoning & Comp Plan  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

24

Date: OCT 14, 2014  
 Name: FRIEDA CHRISTOPHER (Please print legibly)  
 Authorized Spokesperson representing: DD School Board (if applicable)  
 Address: 13311 SE Sherman  
 City: \_\_\_\_\_ Zip: 97233 Phone: 254-6369  
 Email Address and/or Fax No.: frieda.fc@comcast.net  
 What agenda item do you wish to comment on? Comp Plan, zoning  
 Site Address, if different from above: \_\_\_\_\_



Portland Planning and Sustainability Commission Public Hearing

22  
✓

Date: 10/14/14  
 Name: DARRELL DESPER (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_  
 Address: 720 NE 92  
 City: Portland Zip: 97220 Phone: 503 252 6203  
 Email Address and/or Fax No.: d-desper@msn.com  
 What agenda item do you wish to comment on? Road Maintenance  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

0 (FIRST)  
✓

Date: 10-14-14  
 Name: Rep. Jeff Beardon (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ Zip: \_\_\_\_\_ 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

19 ✓

Date: 10-14-14

Name: Deborah and John Field (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_

Address: 3437 NE 48th Portland OR 97213

City: Portland Zip: 97213 Phone: 503-475-0980

Email Address and/or Fax No.: debbyfield@gmail.com

What agenda item do you wish to comment on? Requesting change in relation

Site Address, if different from above: to the Comprehensive Plan

Portland Planning and Sustainability Commission Public Hearing

22 ✓

Date: 10-14-14

Name: Kamala Chhetri (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 3436 NE 48th AVE Rose city Park

City: Portland Zip: 98682 Phone: 510-331-2587

Email Address and/or Fax No.: samod7@hotmail.com

What agenda item do you wish to comment on? Request for mixed zone at 48th

Site Address, if different from above: \_\_\_\_\_ Freemont

Portland Planning and Sustainability Commission Public Hearing

Date: 10/14/14

Name: Cassie Cohen (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_

Address: 3802 NE MLK BLVD

City: Portland Zip: 97212 Phone: 503-662-2590

Email Address and/or Fax No.: cassie@groundworkportland.org

What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

Date: \_\_\_\_\_

Name: Dou BAACH (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 495 SW BURLING AVE PC

City: PDX Zip: 97239 Phone: 246-2088

Email Address and/or Fax No.: BAACH@Q.COM

What agenda item do you wish to comment on? \_\_\_\_\_

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

Date: \_\_\_\_\_  
 Name: Jeremy O'Leary (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_  
 Address: PO Box 30253  
 City: Portland Zip: 97294 Phone: 503 610 2393  
 Email Address and/or Fax No.: Jeremy@cityrepair.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

Date: 10/14/14  
 Name: Claire Coleman Evans (Please print legibly)  
 Authorized Spokesperson representing: Bridlemile NA  
 Address: 6260 SW Hamilton Way  
 City: Portland Zip: OR Phone: 503-452-7648  
 Email Address and/or Fax No.: eclaire27@comcast.net  
503-452-7648 FAX  
 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: \_\_\_\_\_

Neighborhood Association be put back into Comp Plan =  
 Extension of Public comment period until all zoning is decided.  
 Mixed use / commercial / institutional Extra

Portland Planning and Sustainability Commission Public Hearing

13

Date: 10/14/2014  
 Name: Mary Ann Schwab (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: \_\_\_\_\_  
 City: Portland Zip: OR 97214 Phone: (503) 236-3522  
 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: 10-14-14  
 Name: Belinda Marrier (Please print legibly)  
 Authorized Spokesperson representing: Serendipity Center (if applicable)  
 Address: ~~14815~~ PO Box 33350  
 City: Portland Zip: 97292-3350 Phone: 503-761-7139  
 Email Address and/or Fax No.: belindam@serendipitycenter.org  
 What agenda item do you wish to comment on? Comp Plan  
 Site Address, if different from above: 14815 SE Division  
Portland 97236

12

Portland Planning and Sustainability Commission Public Hearing



Date: 10/14/14  
 Name: Bruce Campbell (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 3261 NE Holland Ct.  
 City: PDX Zip: 97211 Phone: 503-281-4536  
 Email Address and/or Fax No.: Campbell1849@comcast.net  
 What agenda item do you wish to comment on? Broadmoor Golf / Columbia Slough  
 Site Address, if different from above: \_\_\_\_\_

16

Portland Planning and Sustainability Commission Public Hearing



Date: 10-14-14  
 Name: Joe Rossi (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_  
 Address: 3839 NE 122nd Ave  
 City: Portland Zip: 97230 Phone: 503-753-9671  
 Email Address and/or Fax No.: jjoerossi@mac.com  
 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: Same

Portland Planning and Sustainability Commission Public Hearing

8

Date: 10-14-14

Name: TIM HELZER (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 220 N. Hayden Bay Dr.

City: Pdx Zip: 97217 Phone: (503) 247-0303

Email Address and/or Fax No.: helzert@comcast.net

What agenda item do you wish to comment on? D.C.P re: West Hayden Island

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

9

Date: 10-14-14

Name: RONALD EBERSOLE (Please print legibly)

Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)

Address: 11630 N. ISLAND COVE LN

City: PORTLAND Zip: 97217 Phone: 503 320-8398

Email Address and/or Fax No.: rje242@gmail.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

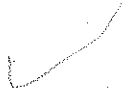
10



Date: 10-14-2014  
 Name: Jeff Geisler (Please print legibly)  
 Authorized Spokesperson representing: Hi Noon (if applicable)  
 Address: 11614 N ISLAND COVE LN  
 City: Portland Zip: 97217 Phone: 503-245-1111  
 Email Address and/or Fax No.: jeffgeisler@msn.com  
 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

11



Date: 10-14-14  
 Name: Nick Sauvie (Please print legibly)  
 Authorized Spokesperson representing: East Portland Action Planning (if applicable)  
 Address: 5215 SE Duke St  
 City: Portland Zip: 97206 Phone: 503-788-8052  
 Email Address and/or Fax No.: nick@rosecdc.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



Date: 10/14/14  
 Name: EUGENE BINGHAM (Please print legibly)  
 Authorized Spokesperson representing: EUGEN BINGHAM (if applicable)  
 Address: 2348 SE Ankeny  
 City: Portland Zip: 97214 Phone: 503-341-1381  
 Email Address and/or Fax No.: Slideinn1@gmail.com  
 What agenda item do you wish to comment on? \_\_\_\_\_  
 Site Address, if different from above: 2348 SE Ankeny

Portland Planning and Sustainability Commission Public Hearing



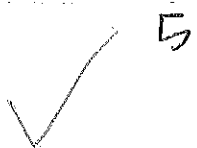
Date: Oct 14, 2014  
 Name: DAVID HAMPSTEN (Please print legibly)  
 Authorized Spokesperson representing: EPAP (if applicable)  
 Address: 302 SE 105th Ave Apt 26  
 City: Portland Zip: 97216 Phone: 971-322-6599  
 Email Address and/or Fax No.: David\_hampsten@yahoo.com  
 What agenda item do you wish to comment on? Comp Plan - TSP  
 Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing



Date: 10/14/14  
 Name: Steven Adam (Please print legibly)  
 Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
 Address: 2437 NE Multnomah  
 City: Portland Zip: 97232 Phone: 503-975-6846  
 Email Address and/or Fax No.: adam53me@hotmail.com  
 What agenda item do you wish to comment on? Comp Plan  
 Site Address, if different from above: 2345/2349 S.E. Ankeny

Portland Planning and Sustainability Commission Public Hearing



Date: 10/14/14  
 Name: Lenore Bingham (Please print legibly)  
 Authorized Spokesperson representing: Lenore Bingham  
 Address: 2348 SE Ankeny  
 City: Portland Zip: OR 97214 Phone: 503-341-4276  
 Email Address and/or Fax No.: slideinn1@gmail.com  
 What agenda item do you wish to comment on? comp plan  
 Site Address, if different from above: 2348 SE Ankeny

Portland Planning and Sustainability Commission Public Hearing

Date: 10-14-14

Name: TERRY PARKER (Please print legibly)

Authorized Spokesperson representing: MYSOJ (if applicable)

Address: P.O. Box 13503

City: PORTLAND Zip: 97213 Phone: 503 284 8742

Email Address and/or Fax No.: parker2012@gmail.com

What agenda item do you wish to comment on? COMA PLAN

Site Address, if different from above: \_\_\_\_\_

Portland Planning and Sustainability Commission Public Hearing

Date: October 14

Name: Bob Salling (Please print legibly)

Authorized Spokesperson representing: Aurora

Address: 5151 NW Cornell Rd

City: Portland Zip: 97210 Phone: (03380) 9721

Email Address and/or Fax No.: bsalling

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: 10/14/14  
Name: MOE FARHOUND (Please print legibly)  
Authorized Spokesperson representing: \_\_\_\_\_ (if applicable)  
Address: 661 S.E. 162<sup>nd</sup> AVE  
City: Portland Zip: OR Phone: 97233  
Email Address and/or Fax No.: moe FarhounD @Hotmail.com  
What agenda item do you wish to comment on? comprehensive plan  
Site Address, if different from above: same multiple site

**INSTRUCTIONS FOR TESTIFYING BEFORE the PLANNING and SUSTAINABILITY COMMISSION**

**Summarize remarks** - Testimony is limited to three (3) minutes. Please prepare your remarks to fit within the allowed time. If you plan to distribute documents or use visual aids, be prepared to provide enough copies to distribute to the entire 11-member commission PLUS one copy for the Director (12 copies total).

**Sign up to testify** - Completely fill out a testimony card. Give your card to the Commission Coordinator sitting at the end of the Commission table.

**Present oral testimony** - When the Planning and Sustainability Commission Chair calls your name from the testimony card, submit any documents you want entered in the record to the Coordinator. Sit at the testimony table. Speak into the microphone and begin your testimony by stating your name and address. Remember to speak clearly.

**Written testimony** - If you wish to submit a comment but not speak, hand your testimony and copies of the document(s) to the Coordinator.

**Group testimony** - If you are aware of many people in the audience who share your feelings or are representing the same organization, you can organize a few main speakers from your group to speak for three (3) minutes each about different topics related to the project. To let the Planning and Sustainability Commission understand the amount of support, one of the speakers can ask audience members to stand who share similar sentiments. Repetitive testimony is not always as effective as a planned, coordinated presentation.

**Special needs** - If you require special visual or audio accommodation in order to testify, please contact the Planning and Sustainability Bureau (503-823-7700) at least 72 hours before the meeting with your request.

OUR COMMUNITY, OUR VOICES !

1

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: TA ZA VAN MOUT

My email address is: \_\_\_\_\_

Please support our community to stop or decrease displacement by:

Burmese

1 ဂမ္ဘာ့ ဝတ္တရား ရှိရန်: ၂၀၂၃-၂၀၂၄

2 စာ ဝတ္တရား ဂမ္ဘာ့:

3 မှတ်တမ်း: ၂၀၂၃

ဂမ္ဘာ့: ၂၀၂၃-၂၀၂၄

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES !

3

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: Ganga Khanel

My email address is: 2626 SE 112th AVE APT 18

Please support our community to stop or decrease displacement by:

= ဂမ္ဘာ့ လို ဂမ္ဘာ့ မေ့ရန် ကျင့် ကျင့် \$307.00

မိမိ အဖေ မှာ ကျင့် property manager ကျင့်

ပထမ ပထမ ရိပ်သာ ကျင့် ဣ။ မှတ် လျှောက် မှတ်

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES !

Burmese

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: Kobedamoh

My email address is: \_\_\_\_\_

Please support our community to stop or decrease displacement by:

ကျင့် ဂမ္ဘာ့ ကျင့် ကျင့် ကျင့် ကျင့်

\_\_\_\_\_

\_\_\_\_\_

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES !

3

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: MANGAR

My email address is: \_\_\_\_\_

Please support our community to stop or decrease displacement by:

ကျင့် ကျင့် ကျင့် ကျင့် ကျင့်

\_\_\_\_\_

\_\_\_\_\_

Sponsored by:



The Community Alliance of Tenants

**OUR COMMUNITY, OUR VOICES!**

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan  
My name is: Mylint-HLA  
My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

- ① 021 225 6 2715
- ② 021 225 6 2715
- ③ 511 07 07 07

*Bummer*

⑤



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The Community Alliance of Tenants

**OUR COMMUNITY, OUR VOICES!**

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan  
My name is: Me Na  
My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

- ① \_\_\_\_\_
- ② \_\_\_\_\_
- ③ \_\_\_\_\_

*Bummer*

⑦



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The Community Alliance of Tenants

**OUR COMMUNITY, OUR VOICES!**

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan  
My name is: Rui Wang  
My ~~email~~ address is: 30 ONE 147 AVE #325  
Please support our community to stop or decrease displacement by:

- ① 021 225 6 2715
- ② 021 225 6 2715
- ③ 021 225 6 2715

⑥



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The Community Alliance of Tenants

**OUR COMMUNITY, OUR VOICES!**

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan  
My name is: PE KYE MA  
My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

- ① 021 225 6 2715
- ② 021 225 6 2715
- ③ 021 225 6 2715

*Bummer*



Sponsored by:  
The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES! Burman

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

(9)

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

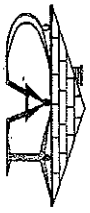
My name is: SA GI DAR

My email address is:

Please support our community to stop or decrease displacement by:

or list of ppl who

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES!

(11)

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: Ram Adakke

My email address is: 2547 SE 174th Ave APT 17 Portland OR

Please support our community to stop or decrease displacement by: 97236

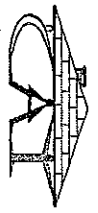
Parking ~~to~~ Clean

around Clean every day

2620 SE 112th Ave APT 95, SE 8550'00 SDR

2916 125th Ave APT 24 RT \$350.00 SDR

Sponsored by: fund of AT ATTJF 319514



I Request my security deposit RE-Back

The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES!

(10)

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

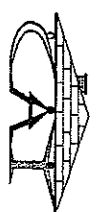
My name is: MA KHANA

My email address is:

Please support our community to stop or decrease displacement by:

or list of ppl who

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES!

(12)

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: Taba Adakke

My email address is: 2547 SE 174th Ave APT 17 Portland OR

Please support our community to stop or decrease displacement by: 97236

APT around Clean every day

security deposit Reten back Messery

suitor siferat van had got 317945

Ram and me same problem we want



security deposit Back

The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES! <sup>(13)</sup> *Burmesse*

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

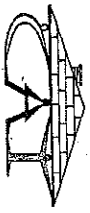
My name is: NU JAN BE

My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

*of sd of yg sd 2026.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES! <sup>(15)</sup> *Burmesse*

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: SUM MYINT

My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

*of sd of yg sd 2026.*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES! <sup>(14)</sup>

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: BRAD S 107

My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

*of sd of yg sd 2025*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sponsored by:



The Community Alliance of Tenants

OUR COMMUNITY, OUR VOICES! <sup>(16)</sup> *Burmesse*

We need safe, robust neighborhoods with affordable housing, affordable stores, employment opportunities & training programs.

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: MI CHO

My email address is: \_\_\_\_\_  
Please support our community to stop or decrease displacement by:

*of sd of yg sd 2025*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Sponsored by:



The Community Alliance of Tenants



**OUR COMMUNITY, OUR VOICES !**

(17)

**We need safe, robust neighborhoods with affordable housing,  
affordable stores, employment opportunities & training programs.**

Dear: Planning & Sustainability Commissioners/Comprehensive Plan

My name is: Ah Nyi Lah Taw

My email address is: \_\_\_\_\_

Please support our community to stop or decrease displacement by:

ကိုယ် ငါ့ရဲ့ ဒေသ ကို ချစ်မိတတ်

ရေ: သမီး စော့ တော ဒေသ

Sponsored by:



**The Community Alliance of Tenants**

# Montavilla

*neighborhood association*

% SE Uplift • 3534 SE Main St • Portland, OR, 97214

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Portland Planning and Sustainability Commission  
1900 SW 4th Ave  
Portland, OR 97201-5380

October 13, 2014

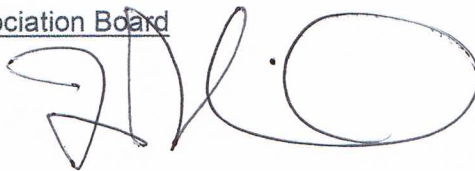
Re: Proposed Comprehensive Plan "Mixed Employment" Designation along 82<sup>nd</sup> Avenue

As we stated in our letter of May 14, 2014, we generally support the proposed Comp Plan designation of "Mixed Employment" along 82<sup>nd</sup> Avenue between Mill and Alder Streets. This is the designation as currently shown for that area on Map App 2. We urge caution regarding the following three issues as this becomes more tightly defined in the Comp Plan: 1) Take care with regard to exactly where and how the boundaries of this designation are drawn to minimize impact on existing adjacent housing. 2) When writing the proposed zoning language, be sure that it helps to minimize impact on adjacent and nearby housing. 3) Write the zoning language such that it emphasizes light industrial use and office parks to minimize any potential for increasing truck traffic in the area.

Sincerely,

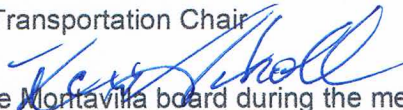
Montavilla Neighborhood Association Board

Fritz Hirsch, Board Chair



and

Lew Scholl, Land Use & Transportation Chair



Representing a vote of the Montavilla board during the meeting of 10/13/2014.

CC: Marty Stockton, Portland Bureau of Planning and Sustainability



October 13, 2014

VIA EMAIL AND US MAIL

Planning & Sustainability Commission  
1900 SW 4th Avenue  
Portland, OR 97201-5380  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

RE: Comprehensive Plan Testimony

Dear Planning & Sustainability Commission:

I write on behalf of the Sabin Community Association (“SCA”) to provide testimony regarding the proposed draft of the Portland Comprehensive Plan. The SCA appreciates the hard work by City staff and community stakeholders to create a thoughtful vision for Portland’s future. The draft Plan articulates a set of policies that will serve our community well through the coming years. However, we believe that the draft Plan could be improved in several ways, as discussed below.

#### **OVERVIEW**

The SCA sees the comprehensive planning process as an opportunity to address concerns shared citywide by many neighborhood associations and individual citizens. New planning guidelines should discourage demolitions and encourage preservation of dwellings. At present, demolitions in Sabin are typically no longer replacing dilapidated dwellings or filling gaps. Instead, new construction is replacing older, generally sound homes with single-family or at most, two single-family houses. This trend is eliminating the historic resources of our neighborhoods, is environmentally destructive, is making housing less affordable, and does little or nothing to contribute to density. The Plan should adopt policies to favor preservation and renovation over demolition, and the City should implement and enforce those policies through its building and zoning codes.

**RECOMMENDATIONS ON SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:**

**“Policy 3.79: Inner Neighborhoods infill.** Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts’ historic development patterns.”

*SCA Concern:* “Infill” in the Sabin area is not generally alleviating blight or filling vacant lots anymore. Instead, it has become most common in Sabin for a developer to demolish a single-family home and replace it with another single-family home or, if the lot is partitioned, with two single-family homes. The SCA would like to see language in the Plan that encourages housing stock preservation and discourages unnecessary demolitions. Infill and new construction should be encouraged only on sites that are vacant or truly underutilized.

- *SCA Recommendation:* Define the terms “infill” and “underutilized.” A lot with a single-family home on it should not be deemed to be underutilized, unless the lot is located in a town or neighborhood center or along a civic or neighborhood corridor.
- *SCA Recommendation:* Promote the recognition, maintenance, and preservation of sound housing stock.
- *SCA Recommendation:* Discourage demolition of sound housing stock, to the extent reasonably possible.

**“Policy 3.81: Inner Neighborhood residential areas.** Continue the pattern of small, connected blocks and regular lot patterns in Inner Neighborhood residential areas.”

*SCA Concern:* The phrase “regular lot patterns” is vague and does not address the variety of regular lot patterns in each neighborhood.

- *SCA Recommendation:* Define “regular lot patterns,” to clarify whether lot partitioning is considered consistent with surrounding lots in residential areas.

**“Policy 4.7: Access to light and air.** Provide for public access to light and air by managing and shaping height, and mass of buildings, while accommodating urban scale development; and

**“Policy 4.8: Privacy and solar access.** Encourage building and site designs that limit reductions in privacy and solar access for residents and neighbors, while accommodating urban scale development.”

*SCA Concern:* City policy should not be one-size fits all. Appropriate expectations for light, air, privacy, and solar access will vary depending on location. Denser development should be encouraged in town and neighborhood centers and along civic and

neighborhood corridors, while more protection for light, air, and privacy should be given in single-family neighborhoods that are the historic norm in our communities.

- *SCA Recommendation:* Define the vague term “urban scale development.”
- *SCA Recommendation:* Provide greater protection for light, air, privacy, solar access in single-family and Central City pattern areas, while accommodating urban scale development in town and neighborhood centers and along civic and neighborhood corridors.

**“Policy 4.13: Scale and patterns.** Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, opens space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.”

*SCA Concern:* This policy captures the type of regulations that the SCA would like the City to encourage. New development should take into consideration neighborhood patterns and scale. However, as written, this policy will have very little impact without implementation in enforceable regulations. Moreover, the phrase “respect existing entitlements” is open-ended enough to negate the entire policy, if it were to be construed as a policy of continuing to allow any development that is permissible as a matter of right under current City Code.

- *SCA Recommendation:* Mandate that the City implement the scale and pattern policy in enforceable regulations in City Code.
- *SCA Recommendation:* Narrowly define the phrase “respect existing entitlements” or delete it from the policy.

**“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.”

*SCA Concern:* The language in this policy is vague, leaving room for varied interpretation depending on how the City understands the concepts of infill and underutilized properties.

- *SCA Recommendation:* Define the terms “fill in” and “underutilized.” A lot with a single-family home on it should not be deemed to be underutilized, unless the lot is located in a town or neighborhood center or along a civic or neighborhood corridor.

**“Policy 4.40: Historic Resources Inventory.** Survey and inventory historic resources as part of future planning projects, with a focus on areas of anticipated growth and change.”

*SCA Concern:* The City of Portland’s Historic Resources Inventory (HRI) is now 30 years old, leaving a large gap in the City’s protection of potentially historic structures and significant cultural areas. This gap leaves many properties vulnerable to demolition without proper consideration. According to the National Register of Historic Places, structures of at least 50 years of age are old enough to be considered eligible for listing.

- *SCA Recommendation:* Conduct a citywide survey to update the HRI, not just project-based assessment.
- *SCA Recommendation:* Prioritize creating at least a preliminary inventory in areas of where demolitions are anticipated to be concentrated, including the inner east-side neighborhoods.
- *SCA Recommendation:* Recognizing that the City does not always have the benefit of a recently updated HRI, adopt policies that discourage demolition of houses more than 50 years old more strongly than they discourage demolition of younger houses.

**“Policy 4.48: Prioritize reuse.** Encourage maintenance, rehabilitation, and/or relocation of viable buildings over demolition and new construction.”

*SCA Concern:* Relocation of buildings is not a realistic option in most instances, and the City should focus its attention on more pressing issues.

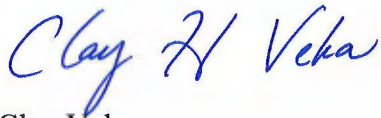
- *SCA Recommendation:* Delete “relocation” from the list of activities to be encouraged.

The SCA encourages the City to incorporate our recommendations into the Comprehensive Plan and to follow through with actionable and enforceable policies for future growth and development.

Planning & Sustainability Commission  
October 13, 2014  
Page 5

Please feel free to contact me at (503) 961-3702 or at [clayveka@gmail.com](mailto:clayveka@gmail.com) should you have any questions about this comment. Thank you for considering our input.

Sincerely,



Clay Veka  
President, Sabin Community Association  
Sabin Community Association  
c/o NE Coalition of Neighborhoods  
4815 NE 7th Avenue  
Portland, OR 97211

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
BPS Director Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

From: Planning and Sustainability Commission  
Sent: Monday, October 13, 2014 12:20 PM  
To: Kovacs, Madeline  
Subject: FW: PSC Comprehensive Plan Testimony / Transportation

Crestwood NA address is: 7688 SW Capitol Hwy, Portland, OR 97219

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](http://www.portlandoregon.gov/bps)

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From: Niles, Linda [mailto:LNNILES@stoel.com]  
Sent: Monday, October 13, 2014 12:08 PM  
To: Planning and Sustainability Commission  
Cc: Transportation System Plan; Roger Averbeck (transportation@swni.org)  
Subject: PSC Comprehensive Plan Testimony / Transportation

October 13, 2014

Portland Planning and Sustainability Commission  
Comprehensive Plan Update  
1900 SW 4th Ave., Suite 7100  
Portland, OR 97201  
Email: [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Re: PSC Comprehensive Plan Testimony / Transportation

Ladies and Gentlemen:

This letter addresses the List of Significant Projects that accompanies the current draft Comprehensive Plan, and specifically one project that we feel strongly should be added to the list – Southwest 48th Avenue/45th Drive/45th Avenue.

This street is a north-south connector running between Taylors Ferry and Beaverton-Hillsdale



Highway. Although fairly close to Capitol Highway, it's the only north-south connector between Capitol Highway and Oleson Road. It links a number of community areas, including but not limited to:

- \* West Portland Methodist Church, daycare center and community garden,
- \* Woods Park walking trails,
- \* Retail amenities at Multnomah Boulevard,
- \* Gabriel Park,
- \* Southwest Community Center,
- \* Medical offices and shops at Vermont Street,
- \* Several outlets to Beaverton-Hillsdale Highway, and
- \* A primary route to Alpenrose Dairy, busy site of youth baseball, 4H, and a variety of other activities.

Pedestrian and bicycle conditions are among the worst in the area – no shoulders, nowhere to walk but narrow ditches along most of its length, a winding, hilly road that limits visibility, low light, and frequently speeding car traffic.

Topography is a major challenge along 48th Avenue/45th Drive, and creative solutions may need to be considered. One idea that has been mentioned in our group is the construction of a boardwalk along the portion of the road that abuts Woods Park, an environmentally sensitive approach that could also be relatively economical.

We appreciate your willingness to listen to our concerns and ideas and hope that this suggested addition can be included in the List of Significant Projects when finalized.

Sincerely,

Tony Hansen, President  
Linda Niles, Transportation Chair

cc: TSP@portlandoregon.gov  
Roger Averbek

October 13, 2014

To: Planning and Sustainability Commission  
1900 SW Fourth Ave.  
Portland, OR 97201-5380  
[Psc@portlandoregon.gov](mailto:Psc@portlandoregon.gov)

**Re: Request PSC Hearings Extension**

To Whom It May Concern:

I respectfully request that the Bureau of Planning and Sustainability provide the definitions for the new mixed-use zoning and new campus institutional zoning designations and that the Planning and Sustainability Commission either extend the hearings for the Comprehensive Plan or keep the hearings record open for at least 90 days following the release of these definitions. 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.

Like East Portland, Southwest Portland lacks a great deal of necessary infrastructure to accommodate new growth, such as improved streets, sidewalks, bike lanes, park facilities, and stormwater controls. While I support moving toward higher density as a way to protect our farmland and make Portland a more vibrant place to live, this lack of basic infrastructure must be taken into consideration with any new zoning or development in this portion of the city.

Please add this to the record.

Thank you,  
Chris Lyons  
4153 SW Lobelia St.

cc: MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

Leah Treat, Portland Director of Transportation  
Portland Bureau of Transportation  
1120 SW Fifth Ave, Suite 800  
Portland, OR 97204

October 13, 2014

Re: 80<sup>th</sup> Avenue Ped/Bike Greenway through Montavilla

This is to endorse the concept of a neighborhood Greenway on 80<sup>th</sup> Avenue through the entire length of the Montavilla Neighborhood between NE Halsey and the PCC Southeast Campus at SE Sherman. The Montavilla Neighborhood Association board has voted to endorse this greenway route as the highest priority bike and pedestrian route through Montavilla. Both the 80<sup>th</sup> Greenway and the nearby 70's Greenway are shown on the 2030 Bike Plan map. The attached map is based on that map and was modified to show the important destinations, as listed below, that the 80<sup>th</sup> Greenway would connect. We have noticed that while the 70's Greenway is shown on the "List of Significant Projects" in the Draft Comprehensive Plan, the 80<sup>th</sup> Avenue Greenway is not even mentioned. We wish to correct this situation and request that the 80<sup>th</sup> Avenue Greenway be given the highest priority in Montavilla. We also acknowledge that the 70's Greenway could be an important north-south through route. The part of the 70's route that's most important to Montavilla is between 74<sup>th</sup> Avenue overcrossing of I-84 and East Burnside.

The following facts support our reasons for giving the highest priority to the 80<sup>th</sup> Greenway:

- 80<sup>th</sup> Avenue provides the closest parallel route for bike access to destinations on 82<sup>nd</sup> Avenue.
- There have been frequent requests for 80<sup>th</sup> Avenue pedestrian crossings at Washington, Burnside, and Glisan.
- Adjacent to SE 80<sup>th</sup> on the south side of Washington Street, an entire 1 and ½ blocks is zoned R1. Development to that density has already begun. As development continues, there will be an increased demand for a safe crossing at SE 80<sup>th</sup> and Washington.
- 80<sup>th</sup> connects residential areas to two elementary schools: Bridger and Vestal
- NE Everett Street could become a valuable east-west greenway connection to Vestal Elementary and between the 70's greenway and the 80<sup>th</sup> greenway. This would require roadway improvements on Everett between 77<sup>th</sup> and 78<sup>th</sup>.
- Adjacent to and south of Bridger Elementary, roadway improvements are badly needed on 80<sup>th</sup> Avenue – particularly between Mill and Stephens - a section that is already part of the east-west greenway route.
- 80<sup>th</sup> passes one block from the Milepost 5 artist community and JOIN, the agency for the homeless.
- 80<sup>th</sup> connects between the core of two popular business districts; one on Glisan and one on Stark.
- A greenway on 80<sup>th</sup> would also help with bike/ped access to Montavilla Park and Community Center and to Multnomah University.

- 80<sup>th</sup> provides the only reasonable bike access to the PCC SE Campus from the north on the west side of 82<sup>nd</sup> other than riding the sidewalk on 82<sup>nd</sup> Avenue. The completion of this route will require some roadway improvements of 90<sup>th</sup> for about 1-1/2 blocks south of Harrison Street.
- The extra width of 80<sup>th</sup> between Glisan and Stark tempts speeding; Traffic calming is therefore needed – particularly at Everett Street, an active crossing for access to Vestal Elementary.
- At NE Multnomah Street a 6-block east-west greenway extending from 80<sup>th</sup> to 74<sup>th</sup> would connect to the 74<sup>th</sup> Avenue overcrossing of I-84 – the only safe and easy such crossing in the area. Extending this greenway east of 80<sup>th</sup> and across 82<sup>nd</sup> would connect to the existing 80's Greenway.
- At the 80<sup>th</sup> Avenue intersection with NE Halsey, there is a future possibility for much needed bike lanes on the I-84/82<sup>nd</sup> Avenue overcrossing on Halsey as shown on the 2030 bike plan.
- As shown on the attached map, there are several locations for cross-connections from 80<sup>th</sup> to the three north-south greenways in Montavilla: The existing bike lanes on E Burnside; the proposed greenway on or near Multnomah & Hassalo Streets; the existing westbound bike lane on Stark, the proposed greenway on Yamhill, and the existing greenway on Mill.
- There have been complaints about vehicles speeding or ignoring stop signs on SE Yamhill in the vicinity of 80<sup>th</sup>. Traffic calming there could improve safety for children walking to Bridger Elementary.
- 80<sup>th</sup> connects to the existing greenway on Mill, which provides safe and easy east-west bike access across much of Portland's east side; extending from close-in neighborhoods to the easternmost neighborhoods.

As signed below, this is also endorsed by <sup>Dr.</sup> the Jessica Howard, President of the PCC Southeast Campus. We have conducted a walk along the southern portion of the 80<sup>th</sup> route with the PBOT Pedestrian Advisory Committee and have done a public bike tour of much of the route in conjunction with the North Tabor Neighborhood Association (NTNA) Land Use and Transportation Committee. A map of the greenway route and the associated crossings has been posted on MNA's public electronic media, and the concept has only received a high level of support. We also expect NTNA's endorsement.

Thank you for considering our interests. We realize that there are many project requests and that it takes time to find funding. We believe that this is an excellent and cost-effective project that could provide an increased level of access and safety for our neighborhood.

Sincerely,

Fritz Hirsch, Board Chair



Lew Scholl, Land Use & Transportation Chair



For the Montavilla Neighborhood Association Board - See the next page for more endorsements.

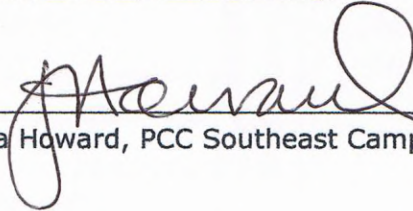
C: Margi Bradway, PBOT Active Transportation Division Manager  
Roger Geller, Bicycle Coordinator  
Greg Raisman, Traffic Safety Specialist  
Mark Lear, PBOT

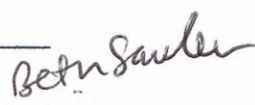
# Montavilla

neighborhood association

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Also endorsed by the following:


  
\_\_\_\_\_  
Jessica Howard, PCC Southeast Campus President


10.16.14  
Date 


North Tabor Neighborhood Association - chair  
Montavilla East Tabor Business Association Supports  
& approves of this proposal.

Alma M. Lee Treasurer  
Beth Buffetta Resident  
Jina Jost (Stark Street Pizza and local Resident)

Peter Emerson (Bipartisan Cafe)


 (Montavilla Community  
Acupuncture owner  
plus local resident)

 Adam R. Stein  
- ARS Property Investments I  
- Montavilla Brew works

 → EAST GLISAN PIZZA LOUNGE  
8001 NE GLISAN 11/01/14

James Kriger SQUARE SEAN REMODELING CO.  
Bob D. ... Montavilla Law Center

John Thompson, Milepost 5 Studios & Lofts

 Head Viking, Vestal Viking Biking Club.  
Tyler Bradford

Ma Jlin, Jora Exam Director

The 80th Ave GWay could tie into a future modified bike friendly Halsey-I-84/82nd overcrossing.

This is the most important part of the "70's" GWay, plus perhaps as far as Burnside. South of that, 80th is more relevant to the Montavilla Neighborhood.

Completing the greenway on Multnomah St. would improve connectivity between three N-S GWays

NE Hassalo appears to be the best E-W route between the 80's GWay and 82nd. Explore how to connect one block north to cross at signalized intersection at Multnomah. Consider one-block of ped-bike ROW purchase; east side of 82nd. Crossing at Holladay per the 2030 bike plan may be impractical due to existing ped island.

New GWay proposed on Everett

80th Avenue GWay is important for Montavilla and would improve access to schools, parks, and businesses on and near 82nd Avenue

Completing this piece of the Yamhill greenway would provide connectivity between the three N-S GWays.

Improve street here to complete access to PCC SE Campus.

From Portland's 2030 Bike Plan Map  
Comments by Lew Scholl 9/29/2014

**\* Bike-Ped Crossing Improvement Issues**

**○ Priority Greenway Routes**

# Montavilla Greenway & Ped Issues

Comment1217\_2014.10.10\_Hurst

From: Planning and Sustainability Commission  
Sent: Monday, October 13, 2014 10:18 AM  
To: Kovacs, Madeline  
Subject: FW: Appeal of partition LU 14-135815 LDP: Dreambuilders at SW 28th & Nevada

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](http://www.portlandoregon.gov/bps)

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From: Jan Hurst [mailto:gargouillade@aol.com]  
Sent: Friday, October 10, 2014 9:30 AM  
To: Planning and Sustainability Commission  
Subject: Re: Appeal of partition LU 14-135815 LDP: Dreambuilders at SW 28th & Nevada

Date: October 9, 2014  
To: Planning and Sustainability Commission  
psc@portlandoregon.gov  
To: Hearings Officer: 1900 SW Fourth Ave, Portland, Oregon 97201-5380  
From: Jan Hurst  
Re: Appeal of partition LU 14-135815 LDP:  
Dreambuilders, has taken one nice large lot on the corner of AW 28th & Nevada with many trees including several old Doug Firs and has placed a huge house on half of it by dividing it into two small 5000 sq ft lots (they called it reverting to the original lot lines even though the small house had been occupying the whole lot for the history of the Village). They just sold the house to a nice young couple who loved the trees next door without telling them they planned to cut them all down and put two houses conjoined by a shared roof on 2500 sq feet each. This is weirdly not named a duplex. The couple was felt betrayed that they just bought that expensive house which will be next to a defacto duplex. Land-hoarding for appreciation is now par for the course for developers who entice older people to sell their land. I know Al Becker, previous owner, would have been appalled to know the lot he protected for years was used this way for developer profits. He always had a sign by his old house saying "rethink rezoning". He supported habitat for wildlife, clean air, shade, and water filtration. I further object to city policy that allowed him to install useless sidewalks instead of leaving the tiny bit of

Page 1

remaining  
land open

The original permit granted Dreambuilders the right to revert to "historic lot lines" that never existed in history and was used as an excuse to try to subdivide the lot into 3 parcels allowing them to violate building standards by putting two houses on 5000 sq

feet. Dreambuilders has lawyers and money. The neighborhood is left with incomprehensible notices to only adjacent houses that do not in any way describe options

or warn the neighborhood until the rights to appeal are eroded step by step. I strongly oppose zoning code section 3310.24 E which violates any reasonable understanding of the neighborhood character and expectations under the comprehensive SW Community Plan. It would take down 3 large Doug Fir trees which provide wildlife habitat, clean air, shade and water management as well as beauty and land value added to adjacent property.

I would also like to request that you hold one hearing on the Comprehensive Plan in southwest Portland. Please add this to the record.

Thank you,

Jan Hurst  
7344 SW 27th Ave  
Portland, OR 97219  
gargouillade@aol.com  
503-977-9713



Comment1219\_2014.10.10\_Jones

From: Planning and Sustainability Commission  
Sent: Monday, October 13, 2014 10:20 AM  
To: Kovacs, Madeline  
Subject: FW: Comprehensive Plan Testimony

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

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From: Jones, Rena [mailto:rena.jones@sap.com]  
Sent: Friday, October 10, 2014 1:19 PM  
To: Planning and Sustainability Commission  
Subject: Comprehensive Plan Testimony

Please stop allowing non-conforming development in R-5 zones city wide. 25X100 lots are non-conforming to the R-5 base zone and should not be granted building permits. Our density goals are already being met without this type of development and this type of development is extremely destructive. Currently 17,000 homes sit on lots that could be developed on, encouraging demolitions of homes and trees. Also, when scrutinizing the code, it doesn't really seem legal to grant building rights on these lots.

There was never a skinny home built in Concordia before 2001. They are not "grandfathered rights" as the code says because they were never allowed in the first place. BDS gave that right in early 2000.

This type of development encourages destruction of old growth trees and is in direct opposition to the goals in the comp plan for protecting urban tree canopy, reducing heat islands and protecting watersheds. Also, skinny lot construction is exempt from the new tree code so they are guaranteed to be destroyed.

"Objective D: Increase tree canopy

Currently, tree canopy covers about 26% of the city. Many tree deficient areas are also lower-income neighborhoods, some with air quality problems.

By 2035, Portlanders have planted more than 250,000 trees. Large canopy trees are protected, and tree canopy

covers at least 1/3 of the city."

This year alone, we have seen 15 old growths of Concordia's 96 old growths go down to build on skinny lots. That is not what the cities goals are in this comp plan and if the practice of granting building rights to non-conforming lots of record are stopped, the city will reach its goals on protecting large tree canopy in this comp plan.

Also, please stop the needless destruction of our older homes for suburban style infill. There needs to be minimum setbacks that conform to the neighborhood and help protect trees. There absolutely is a demolition epidemic happening and the city needs to encourage restoration not demolition by implementing significant landfill taxes.

"Direction 3: Adapt and mitigate for a changing climate

Objective A: Reduce home energy use

Over the past 20 years, household energy use has increased by 19%. Buildings account for more than 40% of carbon emissions in Multnomah County.

By 2035, household energy use is 20% lower than current levels."

what we are seeing with the uptick in demolitions is in direct opposition of these goals. The new homes being built are twice the size of the current homes, increasing energy costs, wiping out all old-growth trees, creating larger heat islands and creating millions of tons of waste annually. 36 million tons of waste was generated from demolitions alone last year and 38% of it ended up in the landfill. This is a tremendous waste and is not sustainable.

These are typically 1 for 1 replacements and do nothing for our density goals.

We need to create smart laws that enforce these goals. Currently, the city caters to developers who are not at all in-line with the cities goals or its residents and are rapidly destroying urban canopy are creating millions of tons of waste of embodied energy.

Thanks,

Rena Jones  
Executive Inside Sales  
SuccessFactors, an SAP Company  
Office: (503) 954-3926  
Cell: (415)-613-7665  
renajones@successfactors.com

Comment1220\_2014.10.10\_Klotz

From: Planning and Sustainability Commission  
Sent: Monday, October 13, 2014 10:21 AM  
To: Kovacs, Madeline  
Subject: FW: 50th and Division Comprehensive Plan Testimony with my address

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](http://www.portlandoregon.gov/bps)

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From: Doug X [mailto:[dougurb@gmail.com](mailto:dougurb@gmail.com)]  
Sent: Friday, October 10, 2014 8:55 PM  
To: Planning and Sustainability Commission  
Cc: Stockton, Marty  
Subject: 50th and Division Comprehensive Plan Testimony with my address

Note: My previous version omitted my address

Members of the Commission:

Two recent news articles confirm the importance of SE 50th and Division as part of the SE

Belmont/Hawthorne/Division Town Center:

First, the mixed-use building planned on the NW corner by developer Aaron Jones: From the Portland Tribune, 10-7-2014:

"After the City Council ordered a stopgap change in its parking policies, Jones managed to

acquire property near Division Street Lofts, which includes the transmission business and the

popular Taqueria Los Gorditos food stand on Division and 50th.

So now Jones is looking at building another 100 to 110 more units, but this time he says he

must include 35 to 40 parking stalls.

"There doesn't seem to be any demand for those," Jones says."

Full article:

<http://www.pamplinmedia.com/pt/9-news/236010-101298-city-angles-for-parkings-sweet-spot>

Second, owner Lisa Sedlar says that Green Zebra company will now turn its attention to

financing a new grocery store on the SW corner of 50th and Division.

From the BikePortland website, 10-8-2014:

"Having proven her concept with Green Zebra's Lombard location, Sedlar and her team are now

raising \$3 million in series B investment to open their second location, which will be a 6,400-

square-foot building on Division near 50th, and to start developing a third location that hasn't

Comment1220\_2014.10.10\_klotz

yet been identified.....

"Sedlar predicted that the Division location, which has only eight parking spaces and is in a much more densely populated area, will draw 40 percent of its transactions from people arriving without a car.

"The grocery store is the anchor amenity to the 20-minute neighborhood," Sedlar said. "The main reason people have to get in their car and drive somewhere is to get to the grocery store."

Full article:

<http://bikeportland.org/2014/10/08/bike-friendly-convenience-store-blows-past-sales-targets-prepares-expand-111977#more-111977>

Two more notes that argue for extending the Mixed Use - Urban Center designation for commercial sites further east along Division, from the current extent at 44th to about 51st at least, as well as north and south from Division along 50th.

Thank you

Doug Klotz  
1908 SE 35th Place  
Portland, OR 97214

Comment1221\_2014.10.10\_Kelting

From: Planning and Sustainability Commission  
Sent: Monday, October 13, 2014 10:21 AM  
To: Kovacs, Madeline  
Subject: FW: Appeal of partition LU 14-135815 LDP

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: Carol Kelting [mailto:ckelting@yahoo.com]  
Sent: Friday, October 10, 2014 10:27 PM  
To: Planning and Sustainability Commission  
Subject: Appeal of partition LU 14-135815 LDP

10-10-2014

To Planning and Sustainability Commission  
Hearings officer  
1900 SW Fourth Ave.  
Portland, OR 97201-5380

From Carol Kelting

I want to voice my objection to Dreambuilders building a defacto duplex on the corner of SW 28th and Nevada. They divided the lot into two small 5000 sq. ft. lots, saying, erroneously, that would revert the land to the original lot lines, but there was only one small house on the lot at least since 1946, when my family moved to this neighborhood. The original permit was never legally followed. There are also several old Doug Fir trees, which they are planning to cut down. This area is covered with Doug Firs serving the community with wildlife habitat, clean air, shade and water filtration. I strongly oppose zoning code section 3310.24 E. It violates the character of the neighborhood and SW Community Plan expectations. I request that a hearing be held on the Comprehensive Plan in SW Portland. Please add this to the record.

Thank you,  
Carol Kelting  
2540 SW Miles St.  
Portland OR 97219

Comment1222\_2014.10.10\_Murphy

From: Planning and Sustainability Commission  
Sent: Monday, October 13, 2014 10:22 AM  
To: Kovacs, Madeline  
Subject: FW: [Approved Sender] Re: [Approved Sender] Re: 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](http://www.portlandoregon.gov/bps)

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From: Donna Murphy [mailto:[pennyputupon@yahoo.com](mailto:pennyputupon@yahoo.com)]  
Sent: Saturday, October 11, 2014 4:12 PM  
To: Planning and Sustainability Commission  
Subject: [Approved Sender] Re: [Approved Sender] Re: West Hayden Island

Hi, Julie,

I'd be happy to give you my address so that you can post my comment.

Donna Murphy  
519 W Taylor, Space 321  
Santa Maria, CA 93458

On Wednesday, September 24, 2014 10:55 AM, Planning and Sustainability Commission <[pssc@portlandoregon.gov](mailto:pssc@portlandoregon.gov)> wrote:

Hi Donna,  
Regardless of where you live, I do need your address to be able to include your comments in the record for the PSC. Can you please email me you current (CA) address?

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](http://www.portlandoregon.gov/bps)

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Comment1222\_2014.10.10\_Murphy

disabilities. For accommodations, translations, complaints, and additional information, contact me, City TTY 503-823-6868, or use Oregon Relay Service: 711.

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From: Donna Murphy [mailto:pennyputupon@yahoo.com]  
Sent: Tuesday, September 23, 2014 9:46 PM  
To: Planning and Sustainability Commission  
Subject: [Approved Sender] Re: West Hayden Island

Julie,  
I no longer live in Portland and now reside in Santa Maria, CA.

I lived on Hayden Island and served as a Co-Chair of HILP for two years. I still keep up with the West Hayden Island vs. POP through my friends on facebook and through Audubon. I won't be giving public testimony, but I will continue to send in comments. Thank you for contacting me.  
Donna Murphy

On Monday, September 15, 2014 10:58 AM, Planning and Sustainability Commission <psc@portlandoregon.gov> wrote:

Hello Donna,

Thank you for your comments to the Planning and Sustainability Commission. So that we can include them in the record, can you please email me your mailing address as is required for public testimony?

Thanks,  
julie

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

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From: Donna Murphy [mailto:pennyputupon@yahoo.com]  
Sent: Saturday, September 13, 2014 8:51 PM  
To: Planning and Sustainability Commission  
Subject: West Hayden Island

Is the PSC really turning its back on the residents of Hayden Island and North Portland after making a commitment to protect us and after 5 years of working on this? where is the equity for all in that?

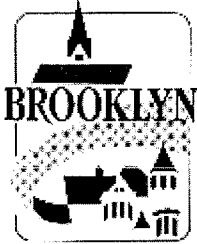
Comment1222\_2014.10.10\_Murphy

Keep WHI designated as an open space. It makes no sense to convert critical natural areas to industrial use. Make the companies and the Port clean up the huge brownfields and utilize that instead. The Draft Comp Plan is a sneaky way for the Port and the city to put a knife in our back. Stand by your commitments, remove the section on WHI from the Comp Plan.

Donna Murphy

Former Co-Chair of Hayden Island Livability Project





October 10, 2014

VIA EMAIL [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Ave.  
Portland, Oregon 97201-5380

Re: Request PSC Hearings Extension

I would like to request that the Bureau of Planning and Sustainability (BPS) provide the definitions for the new mixed-use zoning designations and the new campus institutional zoning designation and either extend the hearings for the Comprehensive Plan or keep the hearings record open for at least 90 days following the release of these definitions. 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.

Please add this to the record.

Thank you.

Eric J. Wieland, Chair  
Brooklyn Action Corps  
(503)226-2966  
[Eric@brooklyn-neighborhood.org](mailto:Eric@brooklyn-neighborhood.org)

96108-00002:438633.doc

cc: Mayor Charlie Hales ([MayorCharlieHales@PortlandOregon.gov](mailto:MayorCharlieHales@PortlandOregon.gov))  
Commissioner Amanda Fritz ([Amanda@PortlandOregon.gov](mailto:Amanda@PortlandOregon.gov))  
Commissioner Nick Fish ([Nick@PortlandOregon.gov](mailto:Nick@PortlandOregon.gov))  
Commissioner Steve Novick ([Novick@PortlandOregon.gov](mailto:Novick@PortlandOregon.gov))  
Commissioner Dan Saltzman ([Dan@PortlandOregon.gov](mailto:Dan@PortlandOregon.gov))  
City Auditor LaVonne Griffin-Valade ([LaVonne@PortlandOregon.gov](mailto:LaVonne@PortlandOregon.gov))  
Susan Anderson ([Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov))  
Ashe Urban, SE Uplift ([ashe@seuplift.org](mailto:ashe@seuplift.org))

From: Jan VanStavern and Joseph Rozewski  
Homeowners, 2636 SE Division St.  
Portland, OR 97202

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

Cc: Marty Stockton, Southeast District Liaison  
inc: supporting graphic

**RE: Comments on the City's Comprehensive Plan Update**

Dear Commissioners:

We are providing this letter to comment on the proposed updates to the Portland Comprehensive Plan currently under your consideration. Please enter this letter into the official record in this matter.

We own the property located at 2636 SE Division Street, where we have resided for the past nine years. The property where our single-family residential home sits is currently zoned Medium Density Residential (R1) and is within a Main Street Corridor (m) overlay zone. That zoning implements the R1 Comprehensive Plan designation currently applicable to our property. Other properties on Division Street adjacent to and across the street from our house are similarly zoned. The western-most properties on our block, however, and all the properties adjacent to the intersection of SE Division Street and SE 26<sup>th</sup> Avenue, are zoned Mixed Commercial (MC) under the current Mixed Use-Urban Center designation of the Comprehensive Plan.

We write to request that the Proposed Draft of the Comprehensive Plan ("Draft Plan") be modified to apply the Urban Commercial Comprehensive Plan designation to our property. In its current form, the Draft Plan would already change the Mixed Use-Urban Center designations to our west to the Urban Commercial designation. That new designation would also apply to the R1 property immediately to our west.

We fully support the changes the Draft Plan that would apply to our block, but we do not think it makes sense to make our property the only property on the block face not part of the Urban Commercial designation. Our property is relatively narrow with respect to our frontage on Division Street. If our property is omitted from the new Urban Commercial designation, it will create a more isolated parcel that offers no transition between our single-family home and any mixed-use development that would be allowed on the rest of our block.

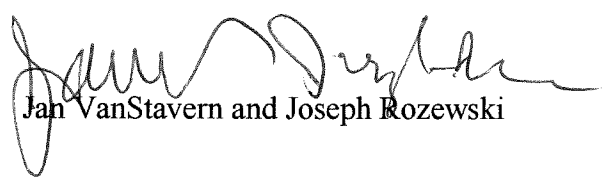
Applying the Urban Commercial designation to our property would create more opportunity for a future mixed-use development to find the optimum orientation on our block, rather than being artificially hemmed in by the presence of our property's more-limited zoning designations. Although split-zoned developments are possible, they simply do not allow the variety of options that a larger, homogenous zone would allow. Further, incorporating our property into the new designation would create the opportunity to activate two corners of our block rather than just one, which promotes the strong emphasis on design and street level activity the City hopes to achieve through the Urban Commercial designation.

Attached to this letter are two figures depicting our property in relation to adjacent properties. The first figure shows the current zoning and the second figure shows the changes currently being proposed in the Draft Plan. We believe these figures illustrate how natural it should be to

include our property in the Urban Commercial designation being proposed for the rest of our block face.

We have shared our proposal with the Hosford-Abernathy Neighborhood District Association and received support from our neighbors regarding this requested modification to the Draft Plan. Along with others, we have watched with interest as our neighborhood has undergone great change—even in the relatively short time that we have owned our house. While we recognize that most of that change has occurred on its own, we support the City’s efforts to create a more defined vision that will guide that change as it continues to occur. We believe our proposed modification to the Draft Plan will result in a more enduring vision that does not unnecessarily limit what should be possible along our block. We hope you will include these modifications when you approve the final version of the Comprehensive Plan Update.

Sincerely,



Jan VanStavern and Joseph Rozewski

FIGURE 1 (current zoning)

# PortlandMaps

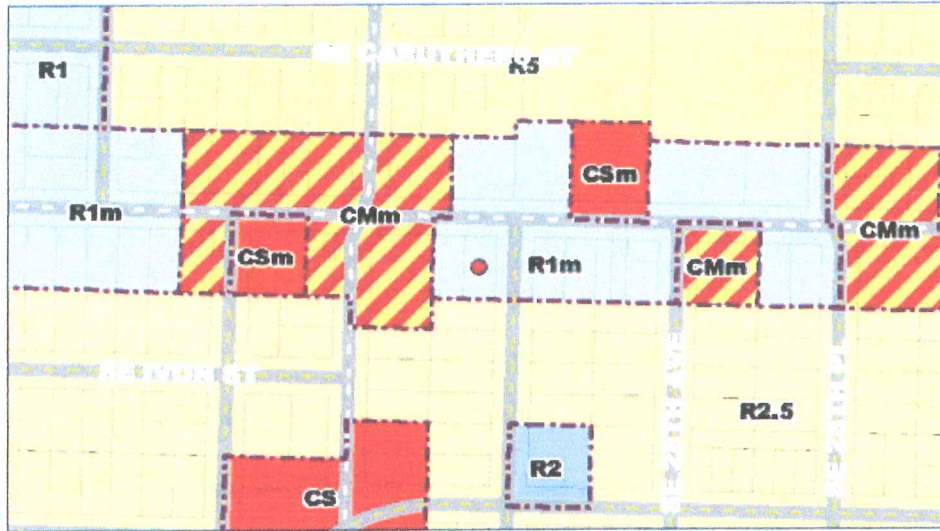
**2636 SE DIVISION ST - HOSFORD-ABERNETHY - PORTLAND**

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[Summary](#) | [Benchmarks](#) | [Businesses](#) | [Elevation](#) | [Fire](#) | [Hazard](#) | [Photo](#) | [Property](#) | [Tax Map](#) | [UGB](#) | [USB](#) | [Walkability](#) | **Zoning** | [Zip Code](#) | [Public Art](#)

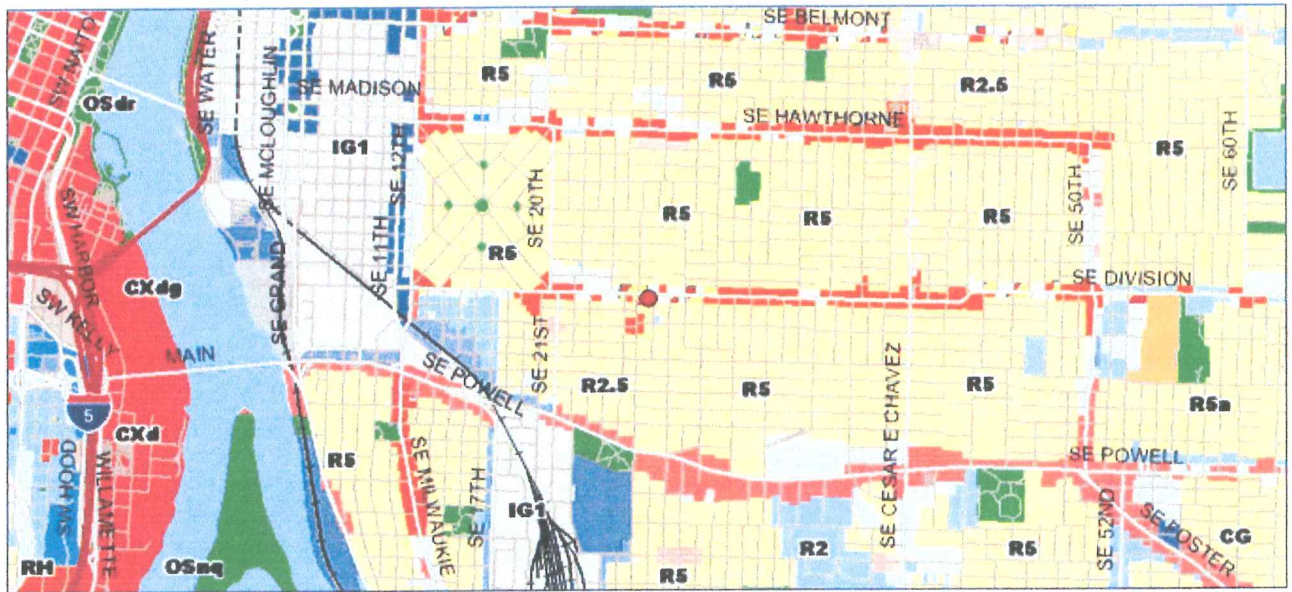
## Zoning



- Commercial
- Employment
- Industrial
- Open Space
- Residential (Single)
- Residential (Farming)
- Residential (Multi)
- Commercial/Residential

0 | 300 FT

Zone	R1 (Medium Density Res. 1,000)	Plan District	
Overlay	m	NRMP District	
Comp Plan	R1	Historical Resource Type	
Comp Plan Overlay		Historic District	
Zoning Map	3333	Conservation District	
Urban Renewal Area		Wellhead Protection Area	No



0 | 3000 FT

**2035 Comprehensive Plan  
Proposed Draft Map App**

**Land Use**

**Transportation**

**Infrastructure**

**Legend**

**Combined Proposed Changes**

**Centers and Corridors**

- Mixed Use – Dispersed
- Mixed Use – Neighborhood
- Mixed Use – Civic Corridor
- Mixed Use – Urban Center

**Jobs**

**Risks and Service Gaps**

**Neighborhoods, Parks and Open Space**



FIGURE 2 (current proposal)

4207 SE Rex Street,  
Portland, OR 97206

October 10, 2014

Dear Members of the Planning and Sustainability Commission:

RE: Comprehensive Plan Testimony for Green Thumb  
6801 SE 60th Avenue, Portland, OR 97206

I served as an elected official on the Portland School Board, from 2003 to 2011. For almost 20 years, I have also lived in the 97206 zip code, about a mile from the Green Thumb property. Hence, I am writing this letter in my capacity of having had a long-term and deep understanding of communities of color and those who live in poverty, i.e. in outer southeast Portland--both through my own lived experience in the neighborhood, and also as a leader elected to the school board from zone 7, in the recent past.

As a long-term resident in the area, I have critical understanding of the issues that constituents and communities in the Green Thumb area face. Recent refugees and immigrant populations that have settled in the area, live in dire poverty. We need to preserve green spaces for our disenfranchised and marginalized families and children, many of whom have no power and cannot voice their interests due to lack of English Language access and a lack of understanding of the American political systems of civic participation. They have limited power and practically no time as they try to make ends meet.

I am here to speak for those who are voiceless and invisible in this area of town, mostly the forgotten communities of outer southeast Portland.

Unequivocally, for these populations, I 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).

There are innumerable studies that show the negative effects of densely populated areas on the mental and physical health and well-being of individuals. With increasing congestion comes increasing problems of air-quality and related asthma and other health issues especially impacting the most vulnerable populations, our children. It is critical that we preserve green spaces for them.

In particular, for almost a decade as a faculty member at Portland State University, my colleagues and I have been committed to and engaged in community-based sustainability work at the Learning Gardens Laboratory (LGL), located at the 12 acre Green Thumb site. The mission

of the Learning Gardens Lab is to support academic achievement and local sustainable food systems by providing garden-based education for public school students and their families, university students, and community members. Established a decade ago, LGLab is a unique partnership between Portland State University, Portland Public Schools, The City of Portland's Parks and Recreation, and Oregon State University Extension Service. For Lane Middle school students, this facility is a haven for learning and engaging with food that they grow and harvest along with their families in the community. It is truly important to learn about food systems as these populations are even more vulnerable than affluent communities when it comes to food insecurity.

Hundreds of students and their families at Lane Middle School, have benefited by being involved at the Green Thumb site. I have seen first-hand and research with my colleagues provides evidence that adolescents express their sense of place and how important it is for them to have the natural area to work on food issues. They state that when they go home, there is no such opportunity for them. Through the resident farmer program, we have Lane and the Brentwood Darlington community participating in growing food. This helps with not only bringing healthy food to low-income communities but also helps with developing a sense of community for a population that is uprooted from their homes. Also, Lane students are benefitting academically particularly learning science in engaging ways, thus moving the school toward closing the achievement gap for low-income and minority students.

While affluent communities can take-for-granted that they can access green spaces, communities in poverty cannot. They do not have the luxury to go on field trips or camping to enjoy the "outdoors." For those without the means, the best option is to have greenspaces right where they live. Let's ensure that for generations to come, Green Thumb provides an outlet of health and also opportunities for children and adolescents and their families to grow food as is now done at the site.

I urge you to rezone the Green Thumb site to Open Space (OS), in order to ensure the quality of life that outer southeast residents deserve. It is the right thing to do.

Thank you for your public service.

Sincerely,

A handwritten signature in cursive script, reading "Dilafruz Williams". The signature is written in black ink on a white background.

Dilafruz Williams, Ph.D.  
Portland Public School Board member, 2003-2011  
Resident, 97206 zip code  
Professor, Portland State University



**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.

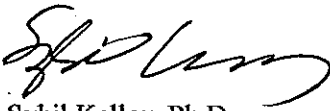
Portland State University has dedicated considerable resources to the Green Thumb site over the past ten years and is committed to continuing our strong relationships and programs to address the needs of outer southeast Portland. In close partnership with the Brentwood Darlington Neighborhood Association, 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



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,

A handwritten signature in black ink, appearing to read "Nick Sauvie". The signature is written in a cursive, slightly slanted style.

Nick Sauvie  
Executive Director

Comment1215\_2014.10.09\_Sauter

From: Planning and Sustainability Commission  
Sent: Thursday, October 09, 2014 12:12 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  
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: Samuel Sauter [mailto:samuelsauter@gmail.com]  
Sent: Thursday, October 09, 2014 12:09 PM  
To: Planning and Sustainability Commission  
Subject: Re: "Comprehensive Plan Testimony"

Thanks Julie!

Should I resend the entire message with my address at the end or is providing it here adequate so that my comments will be included?

Sam Sauter - Property Manager  
Sauter Rental Property LLC  
1415 SE Martins Street  
Portland Oregon 97202

503-351-9758

On Thu, Oct 9, 2014 at 12:04 PM, Planning and Sustainability Commission <psc@portlandoregon.gov> wrote:  
Hello Sam,

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

I am also copying our Comp Plan Helpdesk staff so they can help address some of your questions.

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: Samuel Sauter [mailto:samuelsauter@gmail.com]  
Sent: Thursday, October 09, 2014 12:00 PM  
To: Planning and Sustainability Commission  
Cc: Rebecca Brock; Rachel Janzen; Bob Sauter  
Subject: "Comprehensive Plan Testimony"

Attn: Portland City Council

We are very interested in how these changes will effect our commercial and residential property values and how this will effect our ability to develop our property in the future. Adopting an undefined comprehensive plan and then using that as a mandate from the people to then make future detailed changes to zoning code seems like a blank check with unknown effect.

We are very interested in the Portland Police's CEPTED program and we are requesting that the CEPTED program should have equal weight in the development code and be adopted in its entirety as a part of Portland's Development and Zoning code. When there is conflict between the CEPTED and Portland Zoning codes, citizens should have the right to adopt the crime reduction techniques outlined in CEPTED if desired - WITHOUT a \$2000 formal appeal.

Just as the Portland Fire Bureau has a full time Fire Marshall in the building and planning department to reduce fire and increase life safety, the Portland Police Department should have a Police representative to inform design process of the built environment in the early stages to increase safety and reduce environmental opportunities for crime.

We have two examples where property we manage has suffered because the planning department does not effectively acknowledge the safety concepts outlined in the Portland Police's CEPTED program:

1) We would like to put up a fence around a parking and storage area. We'd like an open chain link fence that CEPTED says will reduce crime (through "Natural Surveillance"), the zoning code requires a obscure fence with slats. The Planning department does not currently have allowances to balance these considerations without going through a \$2000 appeal process. We have been told that if we did go through the process we would likely be denied.

2) We manage property near the underpass at 17th and SE Powell BLVD. The officers that patrol the sidewalks on both side of the underpass were not consulted about the work they have to do to keep these lanes clear before the design development team had completed the work and the new max overpass.

Campers and loiterers looking to get out of the wind and rain are attracted to these multiuse lanes. With camping we get tents, tarps, storage, shopping carts, debris and human excrement (there is no bathroom). This restricts the lane width and provides visual obstructions to hide behind. Preview and visibility is shortened and obscured by the curving shape of the passageway ramps, overpasses and their dark shadows. This forces path users into close contact with potentially aggressive or predatory individuals loitering in the passageway. The personal safety choice to avoid confrontations by maintaining distance is taken away in these long narrow enclosed corridors.

These multiuse lanes are unique because they are enclosed and confined by a 6' tall chain link fence and a tall concrete barrier wall leaving a dark narrow 7' wide "cattle chute" for a distance of over 550 feet. This makes it impossible to escape the passageway in the event of an assault. This 6' tall chain link fence obscures the view of our city, sight distance, aesthetics and activity from drivers, cyclists and pedestrians. "See and be seen" is the overall goal when it comes to Crime Prevention Through Environmental Design (CPTED) and natural surveillance. A person is less likely to commit a crime if they think someone will see them do it.

[http://cptedsecurity.com/cpted\\_design\\_guidelines.htm](http://cptedsecurity.com/cpted_design_guidelines.htm)  
This 7' wide lane is less than the recommended 10' minimum width of a shared use "Bike and Pedestrian" path. Bicycles can reach speeds of 30 miles per hour and braking ability is reduced with the long steep (15% grade) ramp. Lane obstructions increase hazard when there is no option to step of the path to avoid a collision. Maintenance, graffiti removal, signage, debris and disposal of the human excrement (sanitation biohazard) along this lane are not being addressed in a timely maner. The tunnel walls are not cleaned so they are dirty and dark - they absorb light requiring additional lighting to achieve a feeling of safety. The "Broken window Theory" suggests that one "broken window" or nuisance, if allowed to exist, will lead to others and ultimately to the decline of an entire neighborhood. Neglected and poorly maintained properties are breeding grounds for criminal activity.

[http://cptedsecurity.com/cpted\\_design\\_guidelines.htm](http://cptedsecurity.com/cpted_design_guidelines.htm)  
Our NRT Officer Anthony Zanetti, has reported that he has a difficult time keeping this area clear because there is no signage for him to enforce and because current rules allow for up to 50% of any sidewalk to be blocked.

Currently there is no alternative wheelchair accessible path way across the new Max line and train tracks

for 10 to 11 blocks to either side of SE Powell BLVD. This multiuse lane is a critical high traffic thoroughfare for the disabled, students, elderly and the most vulnerable members of our society. Keeping this artery clear and safe is vital to the health of neighboring businesses.

SOLUTIONS

1) Post Signage:

2) Lower the 6' tall chain link fence to a less segregating and more neighborly 54" guard rail height. This would significantly improve the viewshed, openness, surveillance, safety and overall livability. The 54" height is considered adequate for cyclist safety and to prevent users from tossing debris off the bridge. Most of our other overpasses and bridges have a more welcoming guardrail height of 42" or less. 6' tall fencing is not required where traffic is parallel to a pedestrian way.  
[http://design.transportation.org/Documents/BikeRailHeight,NCHRP20-7\(168\)FinalReport.pdf](http://design.transportation.org/Documents/BikeRailHeight,NCHRP20-7(168)FinalReport.pdf)

We think that design of the build environment needs to include Portland Police's CEPTED concepts and safety and crime reduction should be a part of the dream of our ideal future of Portland. We want to reduce opportunity for criminals and improve safety for pedestrians.

Sam Sauter - Property Manager / Architect  
Sauter Rental Property LLC  
503-351-9758



**OREGON**  
ASSOCIATION OF  
NURSERIES

29751  
SW Town Center  
Loop W

Wilsonville, OR  
97070

Phone  
503.682.5089

Toll-Free  
1.800.342.6401

Fax  
503.682.5099

Web  
[www.oan.org](http://www.oan.org)

October 8, 2014

Andre Baugh, Chair  
City of Portland, Planning and Sustainability Commission  
1900 SW 4th Ave, Suite 7100  
Portland, Oregon 97201

Dear Mr. Baugh:

I am writing in support of one of our most innovative and sustainable members, Portland Nursery, and your deliberation of zoning requirements for their operation in the City of Portland. I am grateful for this opportunity to provide some information for the planning and sustainability commission's consideration.

It my understanding that the commission is reviewing the zoning regarding the property owned by Portland Nursery. I would like to give input on the importance of Portland Nursery continuing business within the city limits of Portland.

Portland Nursery supplies many Portland residents with diverse plant material that is otherwise limited, unless citizens drove outside of the city limits. Its acreage and size provides the community a local source of high quality plants, when taken home adds to the beauty and livability of our neighborhoods. Portland Nursery supports the local economy by buying over 95% of their products from within a 100 mile radius. They are one of the largest independent retail nurseries in the state, and therefore support many of our small wholesale growers.

I have been out to visit this operation on many occasions and appreciate the fact that we have a family, locally-owned business that attracts environmentally-conscious customers. They are also a good sized employer – with 70 full-time staff with a peak of over 100 full-time employees in high season, many of which have worked at Portland Nursery for over a decade. They hire smart, committed people who share their knowledge with the community. Because of the size of Portland Nursery, it is extremely unlikely that another local garden center would have the resources necessary to operate at the rate Portland Nursery does. A commercial piece of property their size would be far and few between within city limits, not to mention that the horticulture industry is not an easy business to start. Our industry is both urban and rural and it is my view that Portland Nursery provides easy access to city residents to utilize all modes of transportation

Education within the horticulture industry is one that should be fostered, Portland Nursery has always held education as a top priority, for this reason they have supported education in many facets. They donate to over 400 local schools and non-profit organizations each year, employ a full-time Community Outreach Coordinator and have played an active role in getting gardens into Portland schools.

Portland Nursery is truly an asset to Portland, one that will not easily be replaced. I would respectfully ask you and the members of the Planning and Sustainability Commission to provide this community leader, economic and environmental steward of the city, the designation they need to be a viable business. Thank you and hope you believe, like we do, that economic vitality can go hand in hand with sustainability and long-term environmental health.

Warm regards,

Jeff Stone, Executive Director  
Oregon Association of Nurseries  
29751 SW Town Center Loop, West  
Wilsonville, Oregon 97070

Ord. 187832 Vol. 2.3.I, page 17315



August 15, 2014

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, OR 97201-5380

RE: Comprehensive Plan Map Request  
3519-3531 WI/SE Division Street  
State ID: 1S1E01DC 11600

We request that the Mixed Use Civic Corridor designation be extended over the adjacent parking lot to the property at 3519-3531 SE Division Street.

The structure was originally built in 1925 (84 years ago). The parking lot has been associated with the building since that time. The parking area is a legally established non-conforming use.

We intend to build an extension to the building into the parking lot that will reduce the impact on the surrounding residential uses and allow a small family owned business to expand.

Please find enclosed the notes about the property from the owner, maps, aerials showing historic use, ownership documents showing continuous use, and support from the Richmond neighborhood.

The owner has restored the building into a vibrant part of the neighborhood. The change in designation will allow completion of the renovation.

Sincerely,



Peter Finley Fry, Planning Consultant

Cc Reed Dow, owner  
Tom Monroe, tenant, Southeast Wine Collective.

Date 8/9/2014

Notes about the property at 3525 and 3219 SE Division

This building was originally permitted for building on 4-3-1925. The back of the building (North) was built as a garage for auto repair and in the front was retail stores. The vacant area in the back of the auto repair was used as parking and storage.

In 1945 Eastside rug and furniture cleaning moved into the building and continue to use the back area for parking and loading.

1961 Murray Dow (my dad) moved into the building and used the building as a rug cleaning plant. Subsequently my dad purchased the building in approximately 1970.

All this time the parking lot and storage area was gravel. In 1981 we received a permit to pave the lot. In the order to get the permit we had to give up the back northwest section of land to the city (see map) this permit was a revocable permit.

The lot continued to be used to support the cleaning business  
Trucks, storage containers and dumpsters.

After the death of both my mother and father I purchase the building from the estate and sold the cleaning business. The new owners moved to a new location.

In that the building was not rentable in its current condition I decided in 2011 to remodeled building and upgraded the parking lot.

We received from the city a Nonconforming use for the parking lot on 5/15/2012

At the present time it seems appropriate to the rezone this parking area in that its use from 1925 to the present has been a commercial use.

I would to enclose all or a portion of the parking area into a building consistent with the CS zoning that would remove any adverse impacts on the surrounding neighborhood.

The proposal was presented to the neighborhood association who voted to support it.



Reed Dow  
Dry Rental Properties, LLC  
26828 Maple Valley Black Diamond RD SE  
Suite 299  
Maple Valley WA 98038

425-310-7247  
[reed@reeddow.com](mailto:reed@reeddow.com)

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2425 SE 35TH PL - RICHMOND -  
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## Aerial Photo

'12 / '11 / '10 / '09 / '08 / '07 / '06 / '05 / **2004** / '03 / '02 / '01    6" / 2' / 4' / 10' / 20'    Streets: **Off** Lots: **Off** Dot: **On**



0 |—————| 50 FT

City of Portland, Corporate GIS

8/8/2014

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## Aerial Photo

2012 / '11 / '10 / '09 / '08 / '07 / '06 / '05 / '04 / '03 / '02 / '01    6" / 2' / 4' / 10' / 20' Streets: **Off** Lots: **Off** Dot: **On**



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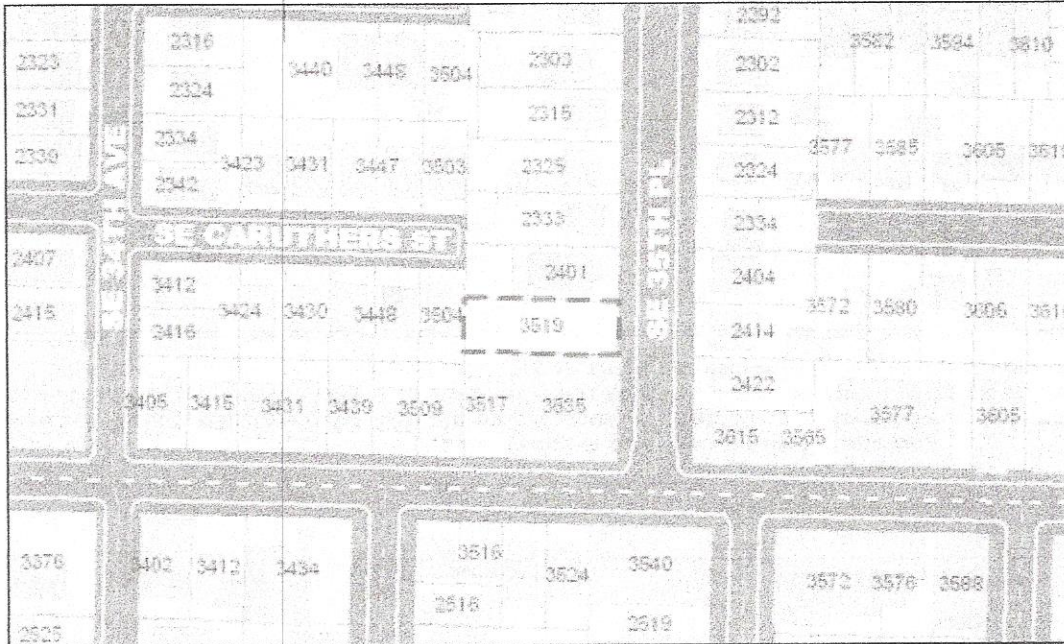
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## 3519 SE DIVISION ST - RICHMOND - PORTLAND

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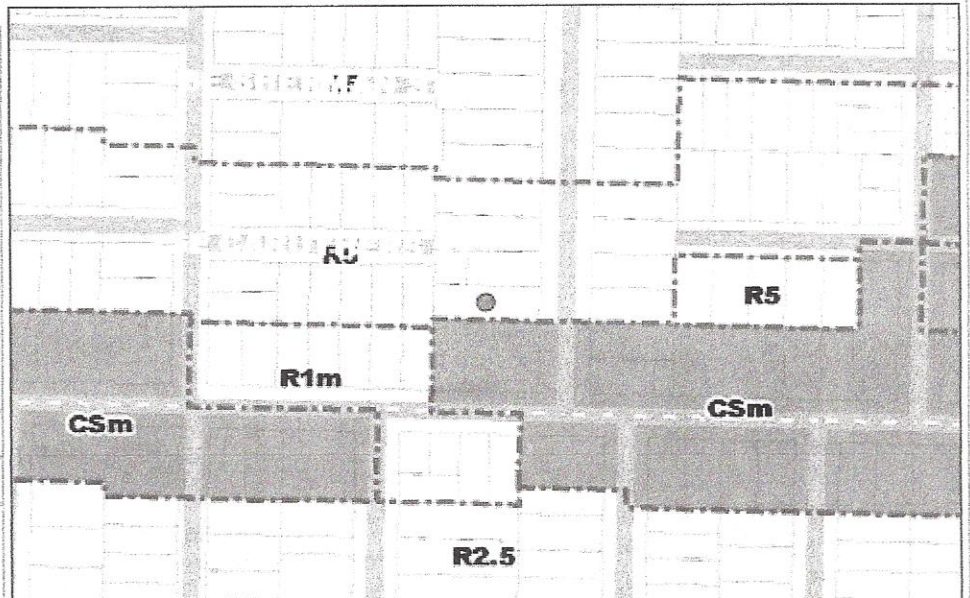
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### Property & Location



### Zoning

Property	
Zone	R5
Description	<a href="#">Residential 5,000</a>
Overlay	
Comp Plan	R2.5
Comp Plan Overlay	
Historic District	
Conservation District	
Plan District	
NRMP District	
Urban Renewal District	n/a
Zoning Map	<a href="#">3234</a>



IS IE IDC  
PORTLAND

SW 1/4 SE 1/4 SEC. 1 T. 15S. R. 1E. W. 3M.  
MULTNOMAH COUNTY

CANCELLED NO.  
9500  
13200  
23000

THIS MAP WAS PREPARED FOR  
ASSESSMENT PURPOSE ONLY



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PORTLAND

## **Richmond Neighborhood Association meeting**

**Monday, 2-10-14**

Waverly Church  
3300 SE Woodward, Portland Or

Minutes by Doug Klotz

Chaired by: Jeff Cropp

### **Board members in attendance:**

Bonnie Bray, Doug Klotz, Cyd Manro, Cliff Hutchinson, Judah Gold-Markel, Jonathan King, Elizabeth Varga, (Julie Fitzwater present but not voting), Heather Flint-Chatto, Jeff Cropp

**Board members not in attendance:** Allen Field, Jordan Lanz,

### **Others in attendance:**

Pam Birkel, Dave Currie, Don Gavitte, Marsha Hanchrow, Diana Foss, Ty Durbrow, Guy Bryant, Dick Park, Julie Dow, Bernard Koser, Neeley Wells, Sally Joughin, Dennis and Amy Whitworth, Linda Ralley, Tom Kishel, Rolando Apuilizan of PPS, Steve Olson of DOWA-IBI Group, Matthew Machado and Liz Mahon of PBOT, Kenneth Ulappa, Lisa Pickert, Denise Hare, Justin Belk, Taylor Gibson, Mark Zahner.

Meeting began at 7:05, with introductions. Adoption of December minutes is postponed until April.

**Announcements:** Jeff Cropp announced that next month's RNA meeting will be a candidate's forum, with candidates invited for the Multnomah County District 1 race, and the House District 42 race.

Bonnie Brae announced that Art Walk this year will be March 1 and 2.

Rolando Aquilizan from PPS and Steve Olson from DOWA/IBI architecture explained plans for rebuilding of Franklin H.S., to take place in 2015-2016. The school will be closed, and students will attend Marshall H.S. for the two years. The central historic buildings will remain. Some newer structures will be removed and new buildings will be sited to complement the historic central structure. Capacity will increase from 1500 to 1700 students.

Developer Guy Bryant described and showed rough plans for his 2-unit project at 1525 SE 35<sup>th</sup> Place. The existing 1895 house will be removed. Some urged him to engage the Rebuilding Center to salvage the framing lumber and other features of the house. Bryant said the "rowhouse"-style building would have garages in front, but tucked down under the front of the units. It is in a Transition zone, and will draw design influence from the nearby commercial as well as the adjacent residential buildings.

Two property owners sought RNA support for zone changes to take place as part of the Comprehensive Plan Update:

Reed Dow described the zone change for which he seeks RNA support. His property is at 2425 SE 35<sup>th</sup> Place, the parking lot north of the SE Wine Collective. He proposes the zone on parking lot at north end to be changed from R-5 to CS, to match the associated building. This would allow construction of a one-story building to enclose the wine and grape storage now taking place on the parking lot. After discussion \_\_\_\_\_ moved, and \_\_\_\_\_ seconded, that the board support this, but ask city to put some lower height limit on project. The vote was 6-3 in support. In favor were, Bonnie, Doug, Cyd, Jeff, Jonathan, , Heather. Opposed were Judah, Julie, and Cliff.

Pamela Birkel asked for support for a change of zoning on her property at 5134 SE Division, from R-1 to CS for the lot, at the corner of 52<sup>nd</sup> and Division. The change would allow more units to be built, and make the property more valuable. Many neighbors objected to the increased number of units that would be allowed, and parking it would bring (1 neighbor stated she had a petition with 20 names opposing the zone change). Some board members noted that this was the right place to put such mixed-use buildings. Sean moved that the neighborhood support the change to CS. Doug seconded. The motion failed, 4-5. In favor were Sean, Cyd, Doug, Julie. Opposed were Bonnie, Jeff, Jonathan, Judah and Cliff. A second motion, by Heather, seconded by Judah, proposed the Board support instead a change from R-1 to CN-1. This passed 7-2, with Heather, Doug, Jonathan, Cyd, Bonnie, Judah and Julie in favor, and Sean and Cliff opposed.

Liz Mahon, PBOT: Gave update on Division Streetscape construction

Matthew Machado of PBOT, described PBOT's studies of two streets:  
SE 32<sup>nd</sup> Ave between Division and Clinton. No traffic control change called for at this time

SE 34<sup>th</sup> Ave. between Division and Clinton. Did not support the proposed one-way with contra-flow bike lane at this time. PBOT would restudy after completion of Division Streetscape. Mark Zahner and Jeff Cropp spoke of the safety issues for bicyclists with the current configuration.

Heather passed out paper write-in ballots to vote on RNA representatives to Design on Division project. Elected from RNA Board: Heather Flint-Chatto, Sean Barnett, Cyd Manro. The three received 10, 7 and 7 votes respectively. Judah received 4. This meant the stated plan to select 2 representatives and an alternate did not work. In post-meeting discussion, Heather suggested Sean and Cyd both attend, with one vote between them. Elected for Richmond neighborhood at-large representative: Debbie Hochhalter (not in attendance, but had sent in a statement of interest and resume). She received 7 votes, with Justin Belk 2, and Linda Ralley 1 vote.

Meeting adjourned at 9:30 PM



**From:** Cole, John Andrew [<mailto:John.Cole@portlandoregon.gov>]

**Sent:** Monday, January 27, 2014 3:45 PM

**To:** Reed

**Subject:** RE: 3525 Se Division parking lot

No additional paperwork is necessary. It would be helpful for you if the neighborhood association was willing to send me a note that they support the request.

City staff will be reviewing all zone change requests over the coming Spring

John

---

**From:** Reed [<mailto:reed@reeddow.com>]

**Sent:** Monday, January 27, 2014 3:39 PM

**To:** Cole, John Andrew

**Subject:** 3525 Se Division parking lot

Hi Mr. Cole,

Peter and I are scheduled to talk to the SE neighborhood group on February 10<sup>th</sup>. They have been very supportive of the zoning change in informal talks.

We will have them update you on the results of the meeting.

Are there any other steps or paper work, I should be doing with the City at this time?

Sincerely,

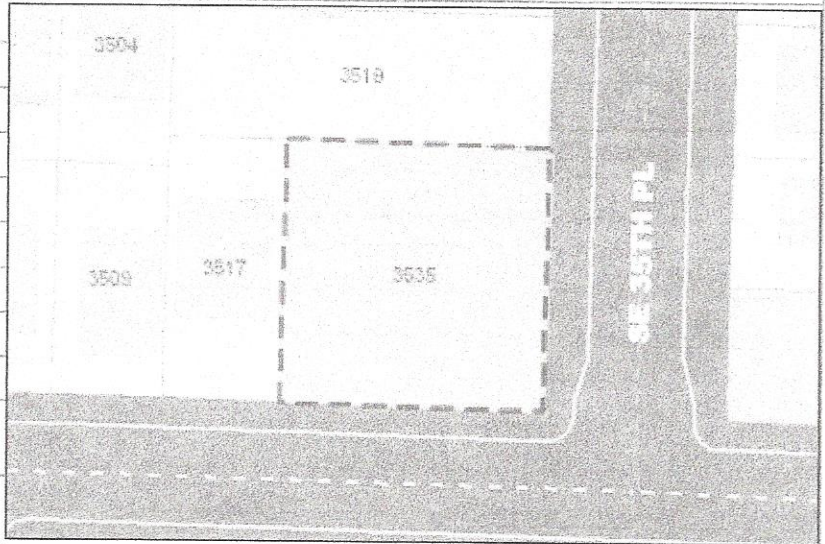
Reed Dow

[360-356-6257](tel:360-356-6257)

## 3525 SE DIVISION ST - RICHMOND - PORTLAND

### General Information

Property ID R234265
County MULTNOMAH
State ID 1S1E01DC 10000
Alt Account # R645300230
Map Number 3234 OLD
Site Info
Site Address 3519-3531 SE DIVISION ST
City/State/Zip PORTLAND OR 97202
Owner Info ( <a href="#">Privacy</a> )
Owner(s) Name DRY RENTAL PROPERTIES LLC
Owner Address 26828 MAPLE VALLEY HWY #299
City/State/Zip MAPLE VALLEY WA 98038



### Property Description

Tax Roll PARK VIEW ANX, E 100' OF LOT 7	Use SR
Lot 7	Block
Tax Districts	
101 PORT OF PORTLAND	130 CITY OF PORTLAND
130L CITY OF PORTLAND - NEW LEVIES	130M CITY OF PORTLAND PARKS LOP
143 METRO	164 EAST MULT SOIL/WATER
170 MULTNOMAH COUNTY	170L MULT CO LIBRARY LOCAL OPT TAX
171 URBAN RENEWAL PORTLAND	173 URB REN SPECIAL LEVY - PORTLAND
198 TRI-MET TRANSPORTATION	304 MULTNOMAH ESD
309 PORTLAND COMM COLLEGE	311 PORTLAND SCHOOL DIST #1

### Deed Information

Sale Date	Type	Instrument	Sale Price
11/24/2006	WARRANTY DEED	2006220108	\$590,000.00
	BARGAIN & SALE DEED	2006071162	\$0.00
	INST	BP23351979	\$0.00

### Land Information

Type	Acres	SQFT
COMMERCIAL LAND	0.2300	10,000

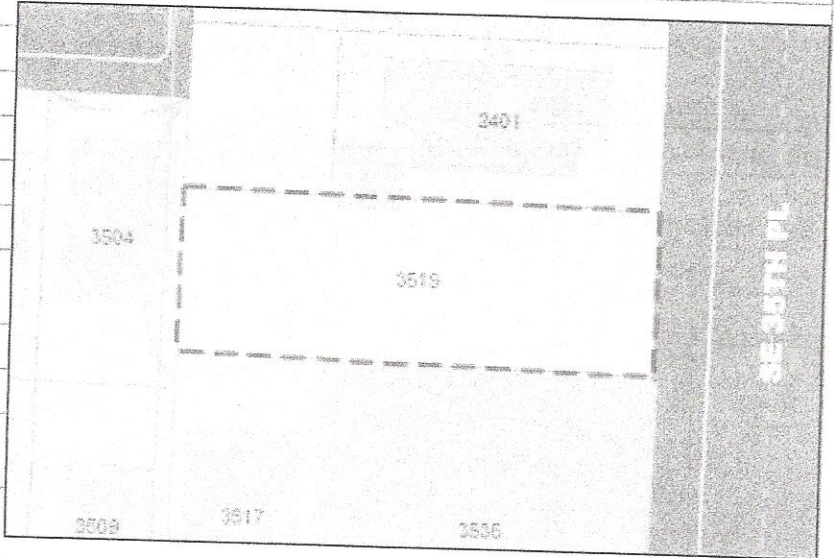
### Improvement Information

Improvement Type RETAIL

## 3519 SE DIVISION ST - RICHMOND - PORTLAND

### General Information

Property ID	R234262
County	MULTNOMAH
State ID	1S1E01DC 11600
Alt Account #	R645300200
Map Number	3234 OLD
Site Info	
Site Address	3519-3531 WI/ SE DIVISION ST
City/State/Zip	PORTLAND OR 97202
Owner Info (Privacy)	
Owner(s) Name	DRY RENTAL PROPERTIES LLC
Owner Address	26828 MAPLE VALLEY HWY #299
City/State/Zip	MAPLE VALLEY WA 98038



0 |-----| 65 FT

### Property Description

Tax Roll	PARK VIEW ANX, LOT 6 EXC N 50'	Use	SR
	Lot 6 EXC N 50'	Block	
Tax Districts			
101	PORT OF PORTLAND	130	CITY OF PORTLAND
130L	CITY OF PORTLAND - NEW LEVIES	130M	CITY OF PORTLAND PARKS LOP
143	METRO	164	EAST MULT SOIL/WATER
170	MULTNOMAH COUNTY	170L	MULT CO LIBRARY LOCAL OPT TAX
171	URBAN RENEWAL PORTLAND	173	URB REN SPECIAL LEVY - PORTLAND
198	TRI-MET TRANSPORTATION	304	MULTNOMAH ESD
309	PORTLAND COMM COLLEGE	311	PORTLAND SCHOOL DIST #1

### Deed Information

Sale Date	Type	Instrument	Sale Price
	INST	BP23351979	\$0.00

### Land Information

Type		
RESIDENTIAL LAND	Acres	SQFT
	0.1700	7,300

### Improvement Information

Improvement Type	
Improvement Value	\$0.00

October 9, 2019

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, Oregon 97201-5380

RE: Moe Farhoud, Second Chance

Please find enclosed four locations that we would request that a more intense residential designation be applied: Multi-family – Dwelling – 1,000. In three cases, the properties abut a Multi-family – Dwelling – 1,000 and in one case the property abuts commercial designation.

The owner/developer intends to increase the number of units within the buildings by using the existing space more effectively. The actual number of bedrooms would not change as the two and one bedroom units would be converted to studio and one bedroom units.

We have provided the owner's request, the locations, and letter's documenting the quality of the apartments, the quality of management, and, most importantly, the public purpose and need for these projects.

Sincerely,



Peter Finley Fry

October 2, 2014

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, Oregon 97201-5380

RE: Portland Comprehensive Plan Periodic review  
15220 SE Stark  
13801-13865 SE Stark  
14112-14134 SE Stark  
912-924 NE 91<sup>st</sup>

I respectfully request that these properties be designated Multi-Dwelling – 1,000.


I am a refugee from Lebanon who escaped from the Lebanon's civil war, due to the passing of my parents and siblings, to my extending family that have lived in Portland since the 50s. I have worked as a Saturday Market vendor, architect/engineer, and renovated the New Market and Skidmore Buildings.

I have acquired apartment buildings under Stark Firs Management in the Gateway/Rockwood area and provide affordable and quality housing to the disenfranchised since 1988. My mission is "Second Chance". I provide housing to those who have evictions, convictions, and credit issues. I work closely with the State, Portland police, and my neighborhoods, churches and agencies.

I buy apartment buildings and reuse and renovate them. I increase the number of units to the market demand and affordability by making two and one bedroom units into studio and one bedroom units. I need the Multi-family-Dwelling – 1,000 to allow this to happen. My projects do not create an increase in intensity. They provide affordable units for people to stabilize in a supportive and compassionate environment.

My aspirations are consistent with all the proposed Comprehensive Plan goals and many of the policies.

Thank you



Moe Farhoud, Second Chance

**15220 SE STARK ST - CENTENNIAL  
- PORTLAND**

**Summary** | [Benchmarks](#) | [Businesses](#) | [Elevation](#) | [Fire](#) | [Hazard](#)

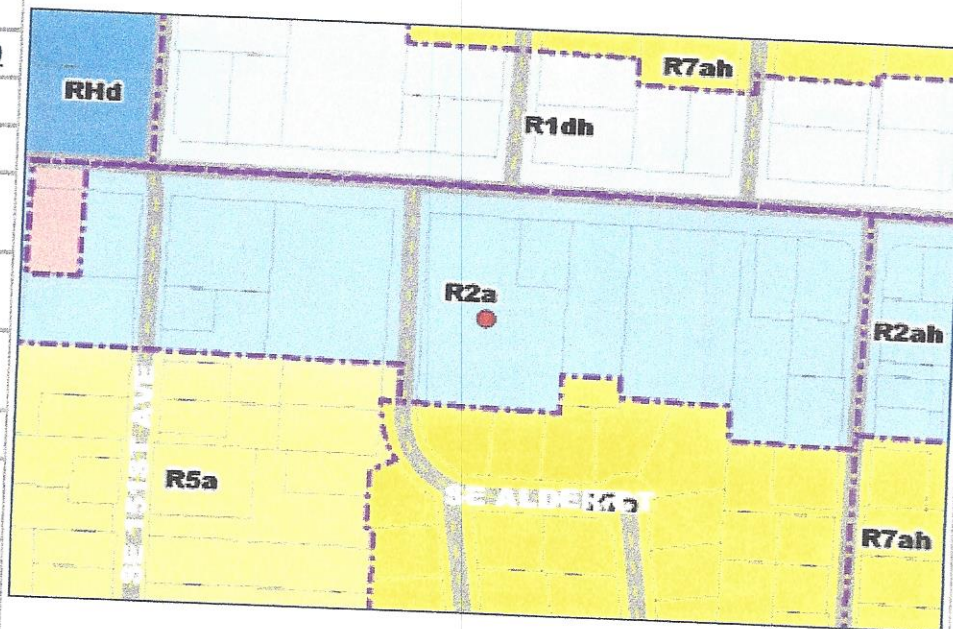
## Property & Location



## Zoning

Property

Zone	R2
Description	Low Density Res. 2,000
Overlay	a
Comp Plan	R2
Comp Plan Overlay	
Historic District	
Conservation District	
Plan District	
NRMP District	
Urban Renewal District	NPI Rosewood
Zoning Map	3146



## Aerial Photo

2012 / '11 / '10 / '09 / '08 / '07 / '06 / '05 / '04 / '03 / '02 / '01    6" / 2" / 4" / 10" / 20"    Streets: **Off** Lots: **Off** Dot: **On**



0 |-----| 100 FT

City of Portland, Corporate GIS

9/29/2014

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ADCOF

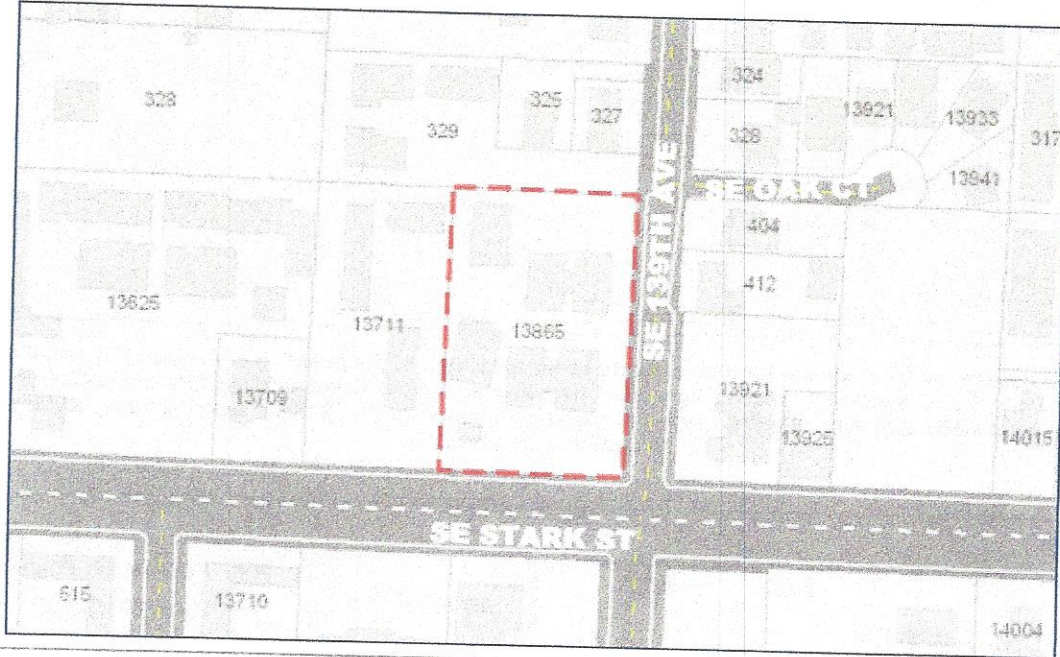
# PortlandMaps

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**13801 SE STARK ST - HAZELWOOD - PORTLAND**

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[Summary](#) | [Benchmarks](#) | [Businesses](#) | [Elevation](#) | [Fire](#) | [Hazard](#) | [Photo](#) | [Property](#) | [Tax Map](#) | [UGB](#) | [USB](#) | [Walkability](#) | [Zoning](#) | [Zip Code](#) | [Public Art](#)

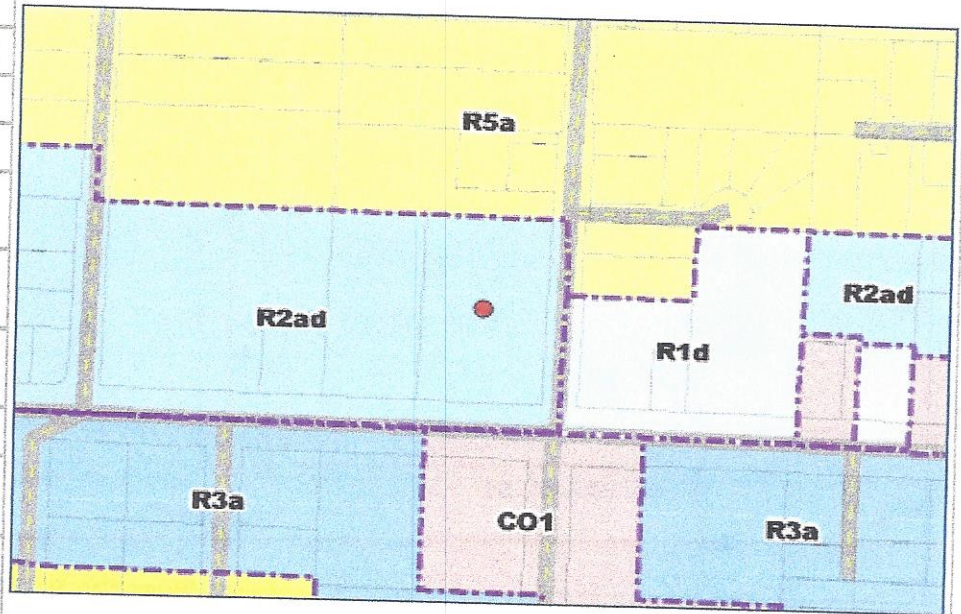
## Property & Location



## Zoning

### Property

Zone	R2
Description	Low Density Res. 2,000
Overlay	a, d
Comp Plan	R2
Comp Plan Overlay	
Historic District	
Conservation District	
Plan District	EC
NRMP District	
Urban Renewal District	n/a
Zoning Map	3044

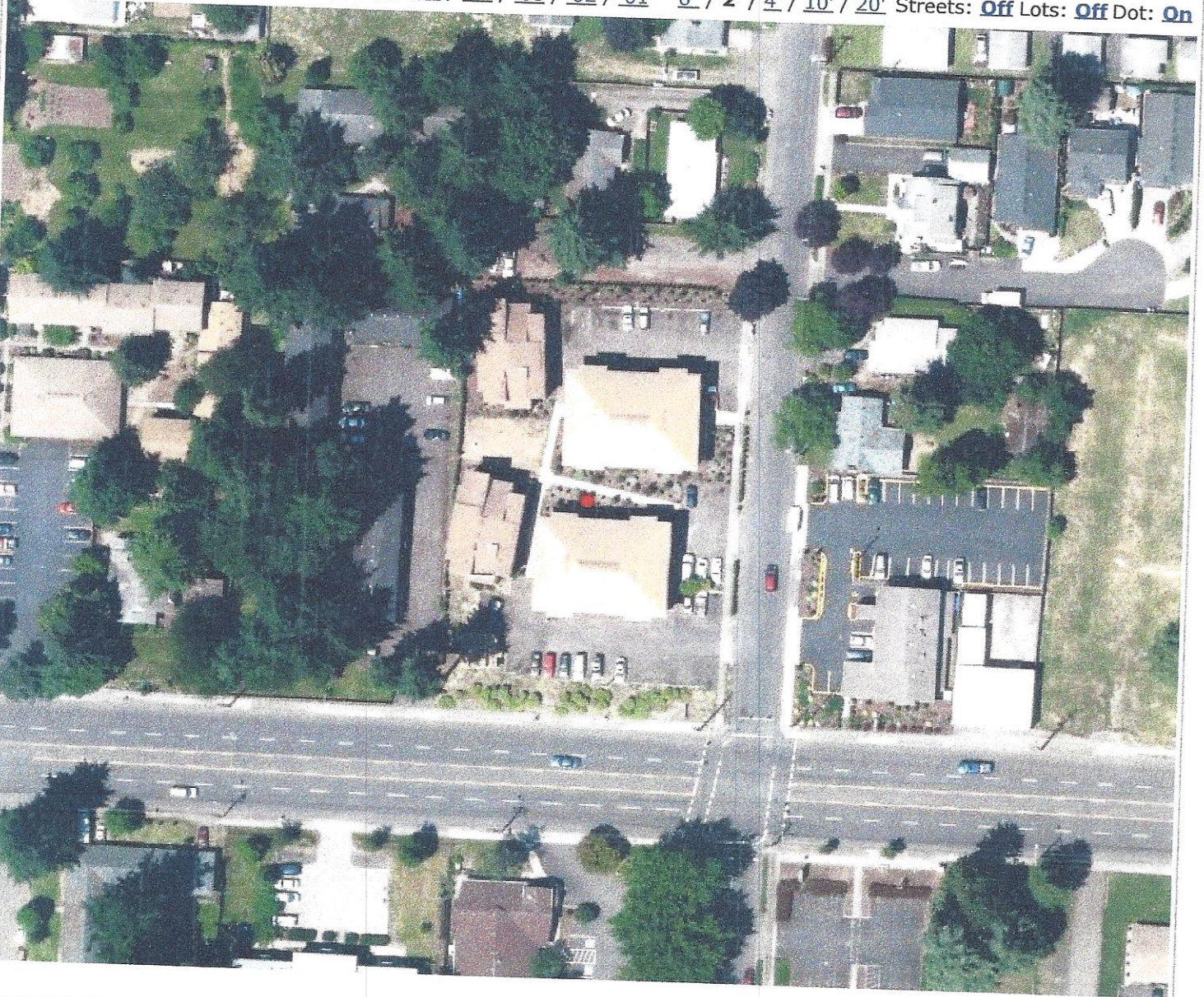




13801 SE STARK ST - HAZELWOOD -  
PORTLAND

## Aerial Photo

2012 / '11 / '10 / '09 / '08 / '07 / '06 / '05 / '04 / '03 / '02 / '01    6" / 2' / 4' / 10' / 20'    Streets: **Off** Lots: **Off** Dot: **On**



0 |-----| 100 FT

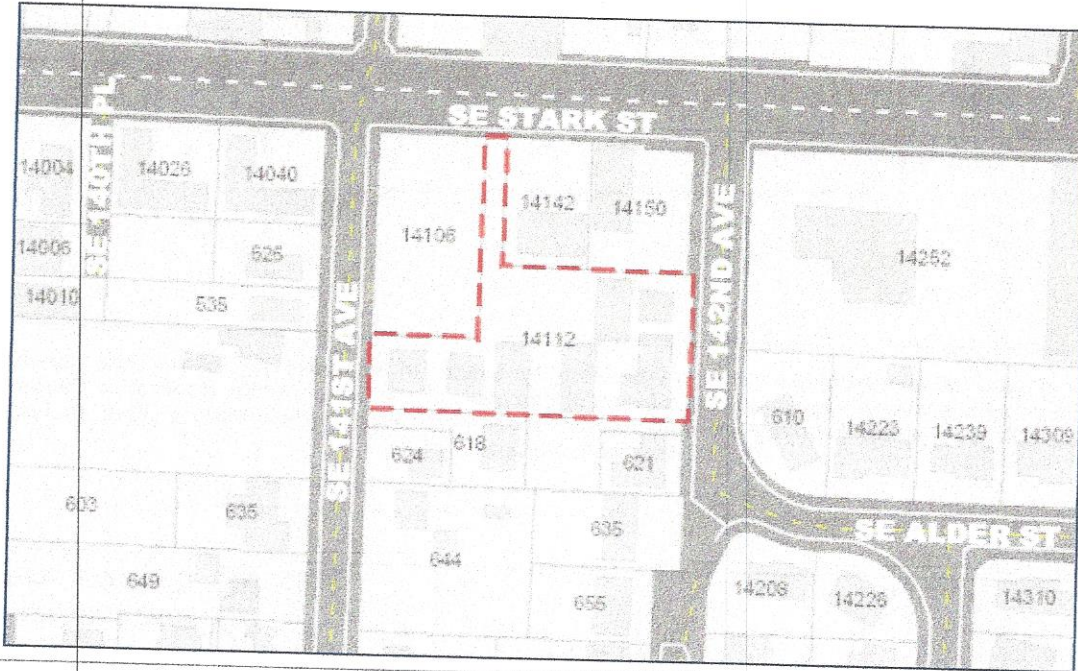
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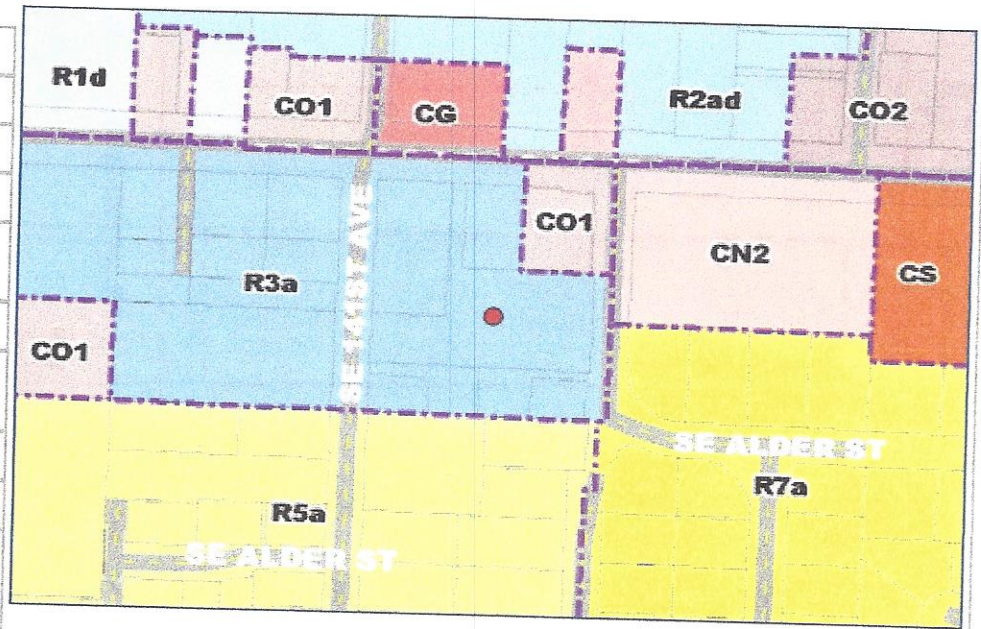
**14112 SE STARK ST -  
HAZELWOOD - PORTLAND**

### Property & Location



### Zoning

	Property
Zone	R3
Description	Residential 3,000
Overlay	a
Comp Plan	R3
Comp Plan Overlay	
Historic District	
Conservation District	
Plan District	
NRMP District	
Urban Renewal District	NPI Rosewood
Zoning Map	3144



14112 SE STARK ST - HAZELWOOD -  
PORTLAND

[Explorer](#) | [Property](#) | **Maps** | [Projects](#) | [Crime](#) | [Census](#) |  
[Environmental](#) | [Transportation](#)

[Summary](#) | [Benchmarks](#) | [Businesses](#) | [Elevation](#) | [Fire](#) | [Hazard](#) | **Photo** | [Property](#) | [Tax Map](#) | [UGB](#) | [USB](#) |  
[Walkability](#) | [Zoning](#) | [Zip Code](#) | [Public Art](#)

## Aerial Photo

2012 / '11 / '10 / '09 / '08 / '07 / '06 / '05 / '04 / '03 / '02 / '01    6" / 2' / 4' / 10' / 20'    Streets: **Off** Lots: **Off** Dot: **On**



City of Portland, Corporate GIS

9/29/2014

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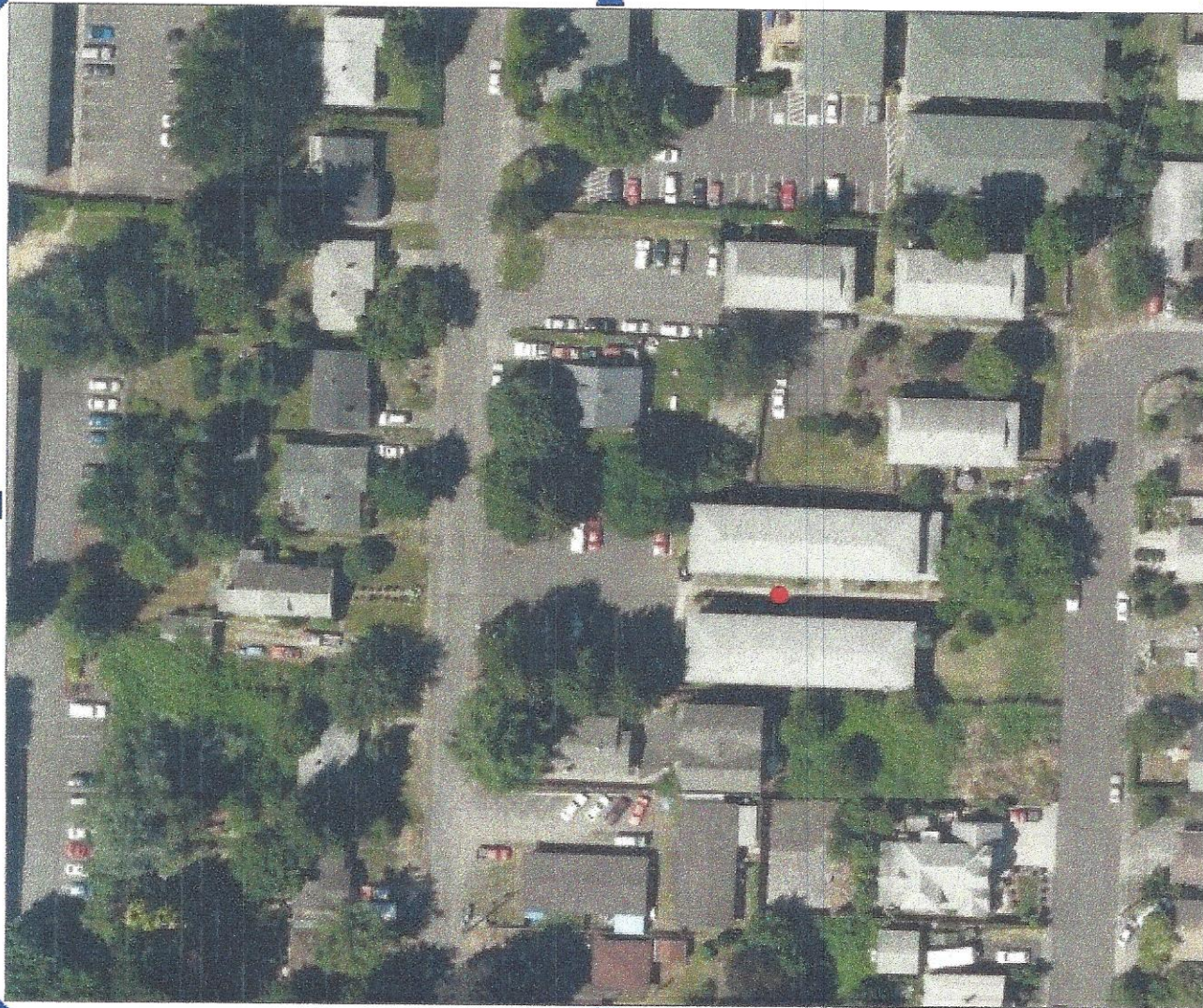
**924 NE 91ST AVE -  
MONTAVILLA - PORTLAND**

[Explorer](#) | [Property](#) | [Maps](#) | [Projects](#) | [Crime](#) | [Census](#) | [Environmental](#) | [Transportation](#)

Explore the area, view different themes

[Aerial Photos Detail](#)

Long -122.56957 Lat 45.52966



Aerial Photos

0 |—————| 100 FT

City of Portland, Corporate GIS

9/25/2014

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January 25, 2012

Stark Firs Management, Inc  
16124 SE Alder St Apt 1A  
Portland, OR 97233

Dear Friends,

I hope you are enjoying the start of a great 2013. Your 2012 giving made a big difference for our neighbors in need. The \$500 you contributed in the last year enabled SnowCap to feed all the hungry that crossed our doorstep. We are trying to keep this number down to 8,000 people per month, but several months exceeded 11,000 people. This number includes the families that shop in our food pantry, the children that receive backpacks full of weekend food, the seniors and disabled whose boxes are delivered and the many folks who receive boxes from our mobile food pantry. All in all we distributed 1,483,793 lbs of food in 2012. Your gifts made this bit of food security possible for the many unemployed, underemployed and just plain low wage workers who can't stretch paychecks to feed all the hungry in the house.

May you enjoy all the blessings of a good life as you extend yourself to provide the basics to others. I know that you will join with us in praying that things are better in 2013.

Please let us know if you see errors in this record. You can email [danni@snowcap.org](mailto:danni@snowcap.org) or leave a message at 503.674.8785 ext. 19. We will make corrections and send a new letter ASAP.

Sincerely,

Judy Alley  
Executive Director

Donation Deliveries  
1788 SE Pine St.

Client Services  
Behind 17805 SE Stark

Phone: 503.674.8785  
Fax: 503.674.5355

[www.snowcap.org](http://www.snowcap.org)  
[judy@snowcap.org](mailto:judy@snowcap.org)

Post Office Box 160, Fairview, OR 97024 - 0160

Richard Gravening  
15220 S.E. Stark #18  
Portland OR 97233

To Chase Bank:

My name is Richard Gravening and I live in one of the buildings that Moe Farhoud owns. I came to Moe after doing a 10 year sentence in prison. Not only did Moe find me a place to live but he also found me employment. I am currently managing the gas station where I work and am making a decent living.

If it weren't for Moe giving me a chance to stand on my feet, I would most likely be in the same boat as most other felons, struggling to survive. Most residential landlords and employers are not as understanding.

Moe Farhoud is doing the community a good service by believing that people can do good with encouragement and hard work. I would like to see Stark Firs Management continue to provide this kind of business to others who have been down on their luck.

Thank you

Richard Gravening

A handwritten signature in cursive script that reads "Richard Gravening". The signature is written in black ink and is positioned to the right of the typed name.

# Western Regional Lead Training Center

1950 S.E. 176th. Ave. Portland, OR, 97233-4739 503.761.2800

In Recognition That

## Moe Farhoud

16124 SE Alder St. Portland, OR. 97233

Has Successfully fulfilled the requirements for  
**Renovator Initial - English**  
8 training hours Per 40 CFR Part 745.225

Certificate Number:

R-1-8882-10-0465

Date of Exam

04/15/2010

Patrick J. Lehne  
Program Manager



Expiration Date

04/15/2015





With \$14 million in financing, we helped transform the 99,000-square-foot landmark into 72 units of affordable and mixed-income housing. Approximately 70% of the housing will be reserved for lower-income residents.

#### **Stark Firs Management – Portland, OR**

Since 2005, we have provided \$8.5 million in funding to Stark Firs Management and financed 205 affordable housing units in the East Portland/Rockwood area. Stark Firs has been recognized by the local police department, the Department of Veteran's Affairs (VA), Rosewood Initiative Group and the Central City Concern Community Engagement Program for providing clean, safe, quality housing.

Housing Development Fund – Stamford, CT  
As part of its participation in the

Neighborhood Stabilization Program in Connecticut, we invested \$200,000 in the Housing Development Fund (HDF) to help it buy and rehabilitate abandoned properties in Bridgeport. With our help, HDF acquired and made necessary improvements to eight properties, the last of which was renovated and sold in July 2011. All of these homes were sold to homebuyers who earned less than 120% of the local median income.

#### **COMMUNITY DEVELOPMENT FINANCIAL INSTITUTION GRANTS**

As much as we do on our own, we are able to bring even more capital to underserved markets by partnering with community development financial institutions (CDFIs).

But over the last several years, CDFIs and other nonprofits have struggled to secure financing. So we stepped up our participation. In 2011 alone, we donated \$20 million to CDFIs that support affordable housing and economic development in low- and moderate-income communities, providing much-needed financing for affordable housing preservation and creation across the country. Some of our 2011 grants included:

Enterprise Community Partners. Enterprise is leveraging the \$5 million in Chase funding to deliver \$50 million in capital to preserve 3,500 affordable housing units in Atlanta, Denver, Los Angeles and Seattle neighborhoods, and rural towns and cities across the state of Washington.

IFF and Access Living. With the help of a \$4 million grant from Chase, IFF and Access Living, a nationally recognized disability rights advocate, have developed Home First Illinois to provide accessible homes that — because they will carry very little debt — will remain permanently affordable to very low-income, disabled persons.

New Jersey Community Capital. Chase's \$4 million donation to New Jersey Community Capital will allow the community to implement a number of programs and initiatives aimed at creating affordable housing and stabilizing at-risk New Jersey communities.

**"With the partnership of Chase, Stark Firs Management is making a positive impact in this community. Together, we are seeing lives transformed simply by having a safe place to live and a supportive environment in which to make a new beginning."**

*Moe Farhoud,  
Owner & President,  
Stark Firs  
Management*

*Residential Inspection, Police, Landlords, and Tenants in Partnership for Healthy Communities*

**Moe Farhoud**

*has completed the City of Portland's eight hour*

# *Landlord Training Program*

*Keeping illegal activity out of rental property and  
promoting safe and livable residential neighborhoods throughout the city*

*Sponsored by:*

*The Office of Planning and Development Review*



*Charlie Flates*

*Commissioner of Public Safety*

*March 16, 2001*

*Date*

*Margaret Mahoney*

*Director of the Office of Planning  
and Development Review*

**Oregon Department of Human Services  
Multnomah County Environmental Health**

Awards this Practical Professional Training Certificate of Attendance to



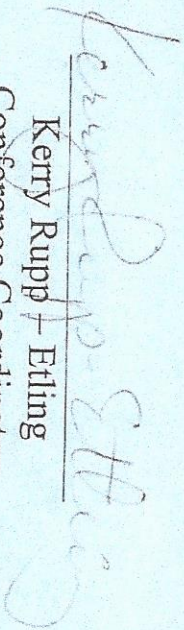
**MOE FARHOU**



For  
3.5 Technical Hours in

**POOL AND SPA OPERATIONS AND MAINTENANCE**

*Given at Multnomah County Environmental Health Office June 27, 2006*

  
Kerry Rupp-Elling  
Conference Coordinator

# U.S. Department of Labor

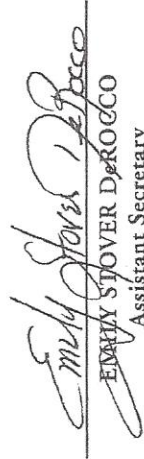
## Certificate of Appreciation

*Presented to*

Mohammed Farhoud

*This Certificate of Appreciation is in recognition of your personal and significant contribution to the National Occupational Information Network (O\*NET) Data Collection Program, our Nation's primary source of occupational information.*



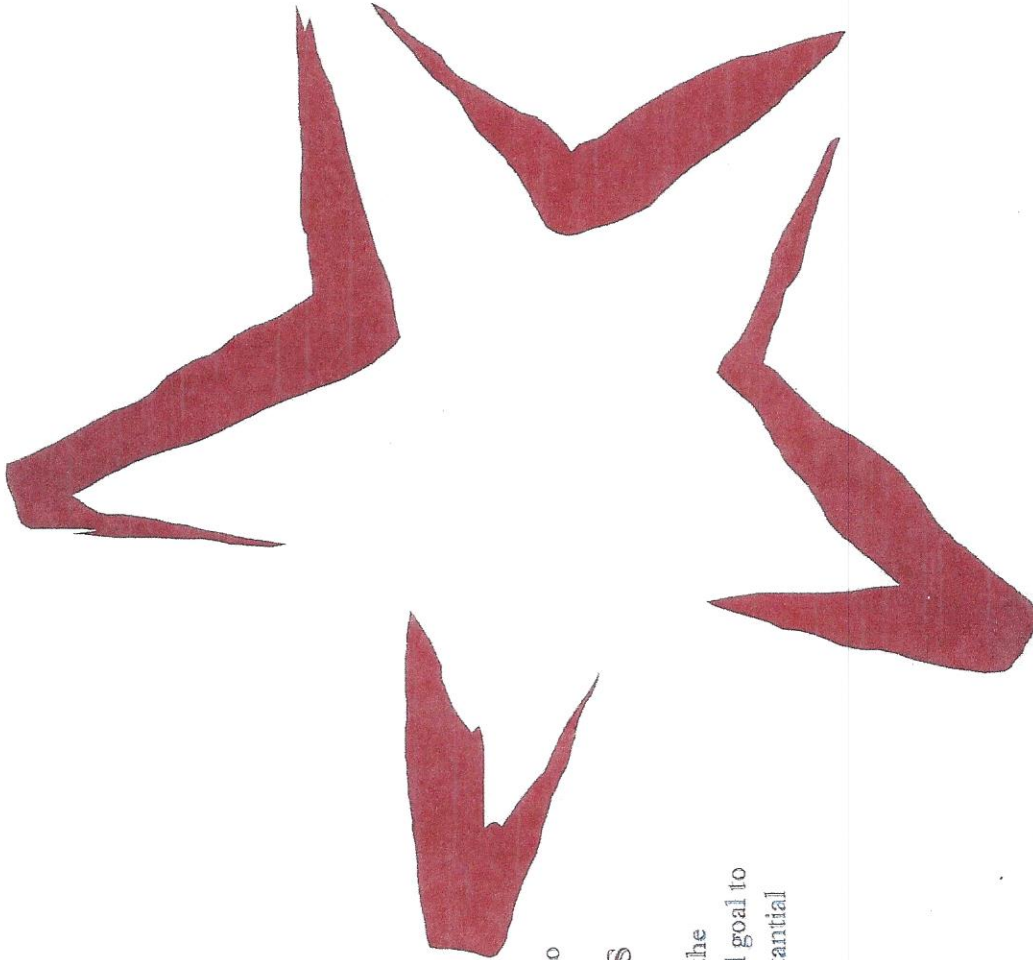
  
EMILY STOVER DEROCCO  
Assistant Secretary  
Employment and Training Administration



# Certificate of Appreciation

This certificate is awarded to  
**Moe Faroud & Norine Ross**

In appreciation of your tireless efforts to assist the Department of Veterans Affairs achieve the national goal to end Homelessness by housing veterans with substantial challenges



*Serving America's Heroes*

Department of Veterans Affairs  
VA Medical Center, Portland, OR  
1601 E. Fourth Plain Blvd., Bldg 18  
Vancouver, WA 98661

**SuSan Brisby, LMSW**  
HUD / VASH Case Manager

Phone: (503) 220-8262 ext. 34026  
Cell: (971) 207-7062  
Fax: (360) 737-1424  
E-mail: SuSan.Brisby2@va.gov

V3DOM/CRS  
P.O. Box 1035  
Portland, OR 97207

*This Card Was Proudly Made By A Veteran With A Disability*

*Eileen Devine*

Eileen Devine

Portland VA Community Reintegration Program Manager

4-13-10

Date



Jill Powell  
ACCESS Case Manager  
503-280-4723  
jpowell@tprojects.org

February 10, 2012

To whom it may concern:

I am writing in this letter in regards to the Stark Firs Property Management Company. I have been working with both Norine and Stephanie there since June of 2011, when I first contacted them on a recommendation from a co-worker that they were good to work with for people who had difficult housing histories. As a housing case manager for people who usually have some sort of barriers to housing, it was good to hear that there were property managers out there who were willing to give folks a second chance. In my time working with them since, I have referred several people to their agency, and because of their willingness to work with both us and them a good number of previously homeless people with very few options for housing have been able to be housed.

In my time working with the folks at Stark Firs I have found them to be professional, compassionate and very easy to work with. By providing folks with a second chance up front they offer something that is unique and often difficult to find in the world of housing and property management companies. Their "low barrier" approach is something that is very much needed and appreciated, we need more properties such as theirs so as to be able to offer more people options for housing. I recommend them highly and hope to continue working with them. Thank you for your time and consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jill Powell", written in a cursive style.

Jill Powell,  
Access Case Manager, Transition projects  
503-280-4723 Direct  
503-280-4700 Main  
503-280-4730 Fax  
665 NW Hoyt  
Portland, Oregon 97209  
[jpowell@tprojects.org](mailto:jpowell@tprojects.org)  
[www.tprojects.org](http://www.tprojects.org)

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665 NW Hoyt Portland, OR 97209 | 503.280.4700. | [www.tprojects.org](http://www.tprojects.org)

16124 S.E. Alder St. #2B

Portland, Oregon 97233

February 8, 2012

To Whom It May Concern;

I, John F. Davis, am writing this letter on behalf of Stark Firs Management LLC and the owner and staff of Alder Royal Apartments where I reside. I am very happy living here at the Alder Royal Apartments thank to the understanding and them giving me a second chance to establish rental history. They have given me a second chance where no one else would accept me does to my criminal past. It is very nice to have a place and people like these around to help out people like me.

He has been a get asset to the community providing a place like this to help out people like me. He just won't allow everyone on his properties but if he feels that you are worth the help then he will help you out in any way he can to help you get back on your feet.

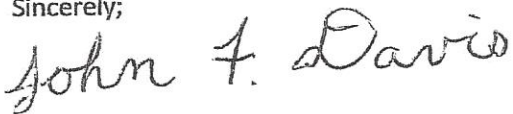
He works very hard to keep all his properties clean of any problem people and If any problems should arise he will work with you till the problems are taken care of in the most appropriate and timely manner.

His maintenance staff is very well knowledge in their work and get the work orders done in a timely and appropriate manner and leave no messes when they come in and leave when the work is done. They work with the residents to schedule a time to do the work. They also give plenty of notice if they need to enter your apartment to check for problems that could affect you and your neighbors.

Overall I am very happy that I have been given a second chance and I am very proud and happy that it is here at the Alder Royal Apartments and with Stark Firs Management LLC. I feel that the more properties that have the more people the will be able to help like me and that would be a very good thing for the community.

Thank you for your time.

Sincerely;



John F. Davis

Resident

Alder Royal Apartments



I am writing to you today on behalf of Moe Farhoud. I first met Moe 5 years ago when our son's began playing soccer together and they attended the same school. Even after moving his children to a different educational program, he continued to be a regular supporter of the Valley Premier, FC Soccer program. Through the years my relationship with the soccer league has grown from parent, to photographer, to board member (from Registrar to Vice President and currently President for the second year. Moe's son and my own have been playing together for the last 5 years and his own involvement has also grown. As we have watched this team grow older and closer the parents and supporters have also become closer. Moe's assistance, both financial and supportive has grown also. He has facilitated the growth of our team and league by providing funds to help with scholarships and also by motivating parents to have their children play more during the year by funding partial season fees so the cost goes down drastically for all parents involved. This helps the players in so many ways, from staying active to continuing to have the bond that being around each other on a weekly basis creates. Moe has also involved more of his family members in our club to help support us. We feel that this is always wonderful as one of the aspects of our club that we try to promote is the feeling of "being a part of a big soccer family".

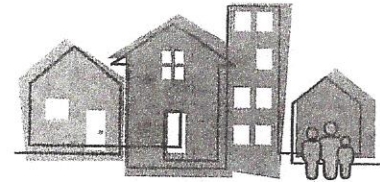
I consider Moe Farhoud to be a large and wonderful part of the Damascus area and staunch supporter of our soccer club. He has demonstrated a generosity to help children be active and have fun that no other parent has shown us.

Thank you,

Stefanie Craft  
VPFC Board President  
stefanierc@yahoo.com



partnerships to transform neighborhoods  
Second Stories PO Box 66884 Portland, OR 97290



**SECOND STORIES**

## Year End Giving Statement

Second Stories  
PO Box 66884  
Portland, OR 97290  
503.516.5881 Tax ID: 30-0574195  
info@secondstories.org

Stark Firs Management  
[moefarhoud@hotmail.com](mailto:moefarhoud@hotmail.com)  
[rhonny@starkfirs.com](mailto:rhonny@starkfirs.com)

### Donation information:

7/3/12	Check #1700	\$500.00
9/26/12	Check #1133	\$250.00
11/7/12	Check #1145	\$250.00
<b>Total</b>		<b>\$1,000.00</b>

Thanks so much for supporting Second Stories with your generous donation. We really appreciate your investment in us as we respond to the need of impoverished communities. By helping us to train churches and individuals in Christian Community Development, we together transform neighborhoods with a holistic gospel. That is invaluable!

We are growing! This year we have extended our work from Portland and the Northwest to Uganda in Partnership with Lahash International. This has seen amazingly positive results thus far as we have engaged with churches, community members and vulnerable children. Thank you for your part in this expansion of our gospel and development oriented work.

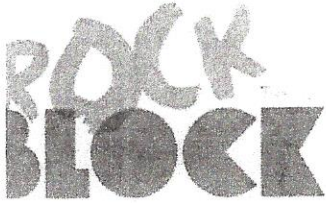
Please keep this receipt for your records.

We appreciate your generosity and support.

Best regards,

Clark Blakeman

Executive Director  
Second Stories



Stark Firs Management  
661 SE 162<sup>nd</sup> Avenue  
Portland, OR 97233

May 2, 2014

Dear Moe,

Thank you for your generous donation in support of Rock the Block. Your gift plays an important role in helping to make this event a success. On behalf of the families of Rockwood – thank you!

Rockwood is a vibrant, family oriented community full of diversity, strength, and possibility. In spite of this, Rockwood experiences some significant challenges. The community is faced with high rates of poverty and crime as well as a significant lack of resources.

At Pathfinders, our mission is to break the cycle of criminality. We accomplish our mission through prevention and intervention programing with a focus on high risk individuals, families, and children. Our vision for change is that clients who emerge from our programs and services are living crime-free lives and prospering as accountable citizens in their communities. Rock the Block is a great tool in helping us work towards accomplishing these goals. We could not do this important work without support from a committed community, so again we say, thank you!

If you have any comments or would like to get more information about Pathfinders of Oregon and our programming, please contact our office at (503) 892-5396 or visit our website at: [pathfindersoforegon.org](http://pathfindersoforegon.org).

Sincerely,  
Brooke Crews  
Project Manager

# OUTSTANDING COMMUNITY PARTNER

*In recognition of Stark Firs Management  
and their continued partnership with Central City Concern's HRR program.*

*Presented to*

## Stark Firs Management

*In Recognition of Outstanding Commitment and Service to*

 **Central City Concern Community Engagement Program/Housing Rapid Response  
Service Coordination Team**

Signature 

Date June 25, 2010

Signature \_\_\_\_\_ Date June 25, 2010



February 9, 2012

Dear Ms.

We are writing this letter to show our strong support for t . presently being submitted by Moe Farhoud and his staff at Stark Firs Management. Lutheran Community Services (Refugee Reception and Placement Program has been working with Mr. Farhoud for several years with our housing needs. We resettled many refugees arrived from different countries and our agency have a hard time renting due to not enough credit history and background information. Thus, Stark Fir Property Management always waives the screening fee for our refugee clients. He understands that our client is new to this country and they have no background history to check.

Furthermore, Mr. Farhoud always goes out of his way to assist us by providing affordable, quality, safe housing for our client needs. He also understands the financial stress and the challenges that many of new arrivals face. In some occasion, when we explain about the client financial situation, he was very sympathetic and waived the penalties, cleaning fee for breaking the lease and deposit was refunded fully to the tenant. Mr. Farhoud is more focus in establishing a safe, clean, affordable, crime free housing amongst its residents. Mr. Farhoud and his staff are always professional and eager to help our client when requested.

Margo Sobieraj  
Reception and Placement Supervisor  
Lutheran Community Services Northwest



... FOR THE W...  
... JUSTICE • HOPE

MULTICULTURAL  
COMMUNITY  
SERVICES OF:

Portland, OR  
11 St SE Avenue  
Portland, OR 97214  
Phone: 503-238-0342  
Fax: 503-238-0357  
www.lcsnw.org

Encouver, WA  
10111 1st Street  
Encouver, WA 98663  
Phone: 360-494-5624  
Fax: 360-494-8515  
www.lcsnw.org

Seattle, WA  
10 University Way NE  
Seattle, WA 98105  
Phone: 206-447-4306  
Fax: 206-447-6211  
www.lcsnw.org

Everett, WA  
1000 1st Street  
Everett, WA 98201  
Phone: 425-354-4754  
Fax: 425-354-6211

Dear Ms. [REDACTED]:

We are writing this letter to show our strong support for the Loan, presently being submitted by Moe Farhoud at Stark Firs Management. Lutheran Community Services (Refugee Reception and Placement Program) has been working with Mr. Farhoud for several years with our housing needs. We have resettled over 35,000 refugees in the Portland Metro area and Washington County. Many refugees arrive from different countries and our agency has difficulty renting due to the lack of a credit history and background information.

The apartments we rent are furnished and ready for the clients ahead of their arrival. Although the clients are screened by Homeland Security, we give the apartment manager the option to screen them. Stark Firs Property Management kindly waive the screening fee for our refugees. Mr Farhoud appreciates that the clients are new to a strange country and have a very unsettled background due, unfortunately to being refugees torn from their native land.

Mr. Farhoud always goes out of his way assisting us by providing affordable, quality, and safe housing suitable for their needs.. He also understands the financial stress and the challenges that many of them face.. At times when we explain the clients financial situation, he is very sympathetic and waives the penalties and cleaning fees for breaking the Lease. He kindly returned the deposit to the client.. Mr Farhoud is focused on establishing safe, clean, affordable and crime free housing for the residents. It is an extremely positive experience when working with Mr Farhoud and his staff.

Should this loan be approved, Mr. Farhoud and his staff will continue to provide safe, affordable housing, thus, continuing to build a strong and healthy neighborhood. We would like to see Mr. Farhoud continue working with our agency and our clients to align service integration in the Community. We trust you will give serious consideration to granting the loan to Mr. Farhoud and Stark Firs Management.

Sincerely,  
*Hilary A. Clarke*  
Hilary A. Clarke  
Reception, Placement & Housing

2/13/2012



February 10, 2012

To whom it may concern:

It has been my pleasure to cooperate with Star Fir management. I work with low income clients who have many housing barriers, and if not for rental agencies such as Stark Fir, my clients would have no chance of finding housing.

Sincerely,

Jindra Kukla  
Prog.Spec.  
Impact NW  
503 988 6000 ext.246



CITY OF PORTLAND, OREGON



**Bureau of Police**

Sam Adams, Mayor

Michael Reese, Chief of Police

1111 S.W. 2nd Avenue • Portland, OR 97204 • Phone: 503-823-0000 • Fax: 503-823-0342

Integrity • Compassion • Accountability • Respect • Excellence • Service

Dear Ms

This letter is to tell you about my experience working with Moe Farhoud and his staff at Stark Firs Management. Mr. Farhoud has been generous with providing meeting space and donating supplies in the ongoing effort to open a non-profit café in the 600 block of SE 162<sup>nd</sup> Avenue. This area is part of a Portland Police Bureau supported community project called the Rosewood Initiative. I have been able to contact Mr. Farhoud or members of his management staff in order to deal with ongoing crime issues and have found them to be helpful and professional.

His company offers housing to those with low income as well as those who have had criminal histories and cannot rent elsewhere. Mr. Farhoud and his staff ensure that if their tenants abide by the rules and continue to stay out of trouble they will have a safe place to live. Mr. Farhoud and his staff will not hesitate to remove any tenants who violate rules and jeopardize the living conditions for other tenants.

I would like to see Stark Firs Management stay in business in the Rosewood area.

Sincerely,

Wendi Steinbronn

Sergeant Wendi Steinbronn

DPSST #28922

Portland Police Bureau – East Precinct

737 SE 106<sup>th</sup> Avenue Portland, Oregon 97216

(503) 823-4545

wendi.steinbronn@portlandoregon.gov



The Rosewood Initiative

Building Our Community Together

February 4, 2012

Attention:

The Rosewood Initiative would like to express our support and partnership with Stark Firs Property Management in working toward neighborhood improvement in East Portland and Gresham.

Stark Firs has been a critical partner in our work to make the Rosewood area a desirable place to live, work and play. They participate in community visioning and public safety meetings, have donated food and volunteers for multiple events, and help us with outreach about community events through their connection to neighborhood residents.

Stark Firs' properties are home to many of our community members in Rosewood and we are actively working together to provide the best possible living environment. Over the past few years, Stark Firs made significant improvements to their properties and we hope that they will be able to continue this level of commitment to property management.

Jenny Glass

Executive Director, The Rosewood Initiative

503.756.8681

Rosewood Café, 609 SE 162<sup>nd</sup> Ave, Portland, OR 97233

RosewoodInitiative.org



Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

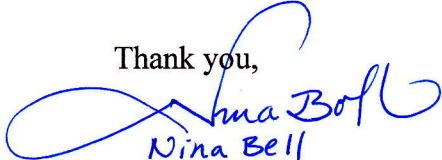
1900 SW Fourth Ave  
Portland, Oregon 97201-5380

**Re: Request PSC Hearings Extension**

I would like to request that the Bureau of Planning and Sustainability (BPS) provide the definitions for the new mixed-use zoning designations and the new campus institutional zoning designation and either extend the hearings for the Comprehensive Plan or keep the hearings record open for at least 90 days following the release of these definitions. 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.

Please add this to the record.

Thank you,



Nina Bell  
2866 NE Dunckley  
Portland, OR 97212

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)

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Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

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Portland, Oregon 97201-5380

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Please add this to the record.

Thank you,

*Shawn K. Fuchs*  
*Richard L. Hayes*

6105 NE Sacramento St.  
Portland, Ore. 97213

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

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Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

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Please add this to the record.

Thank you,

*Barbara Kerr & Gary Clifford*  
1150 NE Faloma Rd.  
Portland, OR 97211

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)

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Please add this to the record.

Thank you,



3617 NE 45th Ave Portland OR 97213

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)

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[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

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Please add this to the record.

Thank you,

*Joel Schmitz* *Joel E. Schmitz*  
3405 NE Shaver St  
Portland, OR 97212

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

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Thank you,

  
908 SE Cora, Portland, OR 97202

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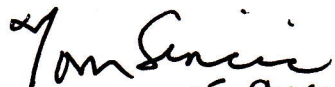
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Please add this to the record.

Thank you,

  
3967 NE Cesar E Chavez Blvd, Portland, OR 97212

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)

Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)

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Thank you,

  
3946 NE 66th Ave, Portland, OR 97213

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Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)

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Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)





October 8, 2014

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

Mixed Use – Neighborhood designation for three SFR zoned properties to south of Halsey Street on NE 112<sup>th</sup> Avenue.

We have studied the City's draft 2035 Plan for the Gateway area. We favor the draft plan's proposal to change designations at 1353, 1409, 1421, 1406, 1418 and 1342 NE 112<sup>th</sup> Avenue to Mixed use – Neighborhood instead of the existing Single Family Residential zoning.

Yours truly,

William Bitar