



Northwest District Association

November 17, 2016

Portland City Council

1221 SW 4th Ave, Room 130

Portland, OR 97204

Attn: Comprehensive Plan Implementation

RE: Early Implementation – Amendment to BDS' FAR recommendation for RH 4:1 areas in Alphabet Historic District

Dear Commissioners:

The NWDA Planning Committee writes concerning potential amendments to BPS's recommendation to refine base zoning in the Alphabet Historic District by removing 4:1 FAR maps from certain RH-zoned parcels within the Alphabet Historic District. As you may recall, NWDA had originally requested the City delete all RH 4:1 FAR-zoned maps applicable to the Alphabet Historic District (an area representing about ½ the historic district). PSC had recommended deleting only the 4:1 FAR from parcels north of NW Glisan.

I. NWDA requests removal of all of RH 4:1 FAR in the Alphabet Historic District

NWDA continues to believe that a 4:1 FAR is inappropriate within the Alphabet Historic District (both north, and south of NW Glisan), because it promotes out-of-scale development that threatens the historic character of the district and is in conflict with the Historic Overlay (Alphabet Historic District Addendum to the Community Design Guidelines, which requires compatibility). An example is just south of Glisan, where the 5-story addition to the Northwest Portland International Hostel dwarfs the 3-story historic Italianate building next to it as well as adjacent 1-2 story historic buildings.



That the top story of the Hostel addition is entirely devoted to a large, single-family penthouse residence makes the sacrifice of this corner of the neighborhood's historic character all the more dear.



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II. Among the Options for amendments, NWDA supports Option A which removes RH 4:1 FAR in the Alphabet Historic District north of NW Glisan.

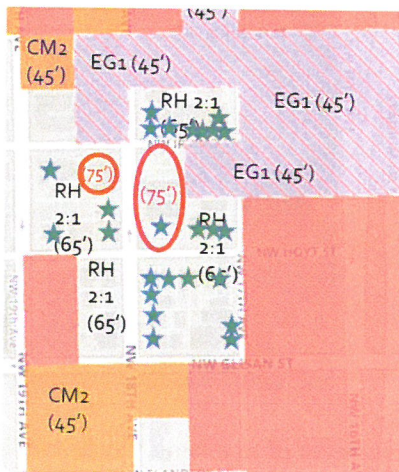
Among the three options set forth by BDS in its November 4, 2016 memo to Council concerning amendments to the Early Implementation Plan, NWDA supports Option A, which implements BDS' initial recommendation to remove RH 4:1 FAR north of NW Glisan. NWDA opposes Option C because it amounts to spot-zoning for speculative affordable housing projects that have not yet even gone through a pre-app. Option B, which deletes no 4:1 FAR parcels in the Alphabet Historic District, is in conflict with the 2035 Comprehensive Plan Policy 4.49's requirement to resolve zoning conflicts:

"Policy 4.49 Resolution of conflicts in historic districts. Adopt and periodically update design guidelines for unique historic districts. Refine base zoning in historic districts to take into account the character of the historic resources in the district."

NWDA's positions above are based on:

- Simultaneous 2035 Comp Plan Early Implementation zoning changes responsive to historic preservation policies adopted by City Council, (e.g. Mixed-Use Zoning (MUZ)).
- The encouragement of development proposals that conflict with the City's prior decisions and findings concerning development in the Alphabet Historic District.
- The potential for long-term adverse consequences from spot-zoning within historic districts to allow speculative affordable housing projects to address current needs.
- The erosion of National-Register-listed historic district boundaries, through spot-zoning to allow incompatible development.

NWDA testified before PSC and City Council during the multi-year 2035 Comp Plan process, and met with city staff multiple times throughout the process to provide feedback, including in connection with the MUZ project. Indeed, NWDA is pleased that City staff acknowledged and responded to the neighborhood's request to change some parcels in



and around the Alphabet Historic District to CM2 or EG1, rather than CM3. These zoning changes were necessary to carry out the intent of the Northwest District Plan and the Alphabet Historic District Addendum to the Community Design Guidelines by providing for lower-scale development in the Alphabet District, and employment on the district's eastern edge. (See attached testimony.)

Similarly, Option A provides for compatible development in the Alphabet Historic District. Option B or C's proposals to retain 4:1 FAR RH zoning for some parcels in the Alphabet Historic District, however, conflict with the CM2 and EG1 zoning, particularly in the case of Option C, where the

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proposed spot-zoning would allow development of up to 75' adjacent to a parcel of EG1 zoning that allows only 45' of development. Such EG1 zoning surrounds a cluster of 2-story individually-listed National Register landmarks on NW Irving St., and its lower scale complements such structures.

As NWDA has previously noted, City Council, in its own findings and decision rejecting a proposed 4-6 story project on the very parcels to be spot-zoned under Option C, pointed out that such proposal would conflict with the Northwest District Plan Objectives:

Objective F states: "Support small-scale developments that are oriented to pedestrian use. The existing historic building and the existing noncontributing resource are considered small-scale developments; the proposed replacement building is a rather large-scale development at 4-6 stories tall. A smaller-scale, and more appropriately scaled, development would potentially include 2- to 2½story rowhouse-type development which takes cues from the neighboring Landmark buildings.

Again, the Council noted that the RH base zone was not necessarily an entitlement, and new multi-dwelling developments, while generally desirable, if located within a historic district, must be compatible with the surrounding historic resources.¹

Recently, NHA, the affordable housing developer who has procured site control over two of the proposed spot-zoned parcels on NW Hoyt and Irving, presented an early concept drawing of a 3-6 story development substantially similar to incompatible massing previously proposed for this site, including a 72' 6-story building directly across from the cluster of landmarks on Irving:



¹ (Council Findings, Conclusions and Decision LU 14-210073 DM – Buck-Prager Building, p. 25.)

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This is precisely the type of incompatible proposal “right-zoning” the historic district would help to address. Resolving the zoning conflict between base zoning and the historic overlay by removing the 4:1 FAR is consistent with PC 33.700.070.E *Hierarchy of regulations*, which clearly states that the Historic Overlay supersedes base zoning. This would provide more certainty to developers and neighbors.

Nor is affordable housing in conflict with the Historic Overlay. Indeed, successful affordable housing projects that respect and preserve our historic resources include a project on NW 2nd and Burnside in Old Town/Chinatown that restored two historic buildings and created 62 compatible and affordable units:



The facade facing NW 2nd Avenue just north of Burnside. Innovative Housing has remodeled two Old Town buildings into 62 studio and one-bedroom apartments. 52 of which are affordable housing. Salvaged material and original features from the Erickson Salove and Erb Hotel Buildings, built in 1912, were retained for use throughout the new

1 / 42 Fullscreen Share Caption Buy

NHA’s own architects successfully restored a historic hotel in Corvallis that provides 35 compatible and affordable units with services:

Julian Hotel Apartments

150 SW Monroe Ave
Corvallis, OR 97333



The Julian Hotel Apartments is a historic apartment building located in downtown Corvallis that provides affordable studio and one-bedroom rentals to elderly or disabled households who qualify and are earning 50% or below the area median income (AMI) in Benton County. This property overlooks the Willamette River and is in the heart of downtown Corvallis with easy access to parks, the river walk, biking, and other activities. It is just minutes away from the library, post office, grocery store, pharmacy, downtown businesses, restaurants and the central transit station for Corvallis’ free city bus service.

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Moreover, the early concept proposals presented by NHA have not yet been reviewed by city staff as part of any pre-application conference. Spot-zoning the parcels for this speculative project as part of implementation of the 2035 Comprehensive Plan, to address a current housing crisis, may result in adverse long-term consequences, particularly if the affordable housing fails to materialize. Indeed, as Council knows, several projects originally slated for affordable housing in Portland, ultimately converted to market-rate housing. For instance, the high-end Linden apartments at 1250 E. Burnside was originally proposed as a senior housing project, and the City approved various adjustments conditioned upon a covenant by the owner requiring the project be limited to 55+ housing. The apartments at the Linden start at \$1385 for 1-BR units and are marketed to young, urbanites seeking “amazing views” and access to restaurants and shops. Should NHA’s project fail, the lots on NW Irving and Hoyt will have been spot-zoned to accommodate additional mass and height likely to be occupied by market-rate housing, 1,200 units of which the Northwest District has absorbed over the past few years.

Nor is the city’s need for additional housing of all types a sound basis for spot-zoning here. Just a few blocks north of this site, outside the historic district, the zoning code contemplates much higher (120’) building potential in the Northwest District. In fact, the portion of the Alphabet Historic District (less than 1/4) from which Option A seeks to remove 4:1 FAR is miniscule in comparison to the total area occupied by historic districts in Portland, which itself represents only 2-3% of Portland’s buildable land.



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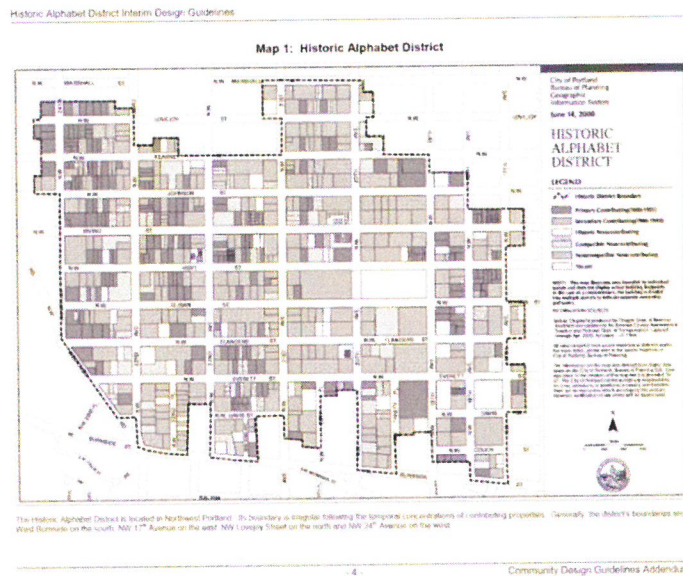


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Spot-zoning within the historic district also demeans the lengthy process undertaken by scores of volunteers over many years to establish the Alphabet Historic District in 2000 (see attached). The establishment of the Alphabet Historic District and its Design Guidelines were adopted by ordinance after a lengthy public process and approval by the State Historic Preservation Office (SHPO) and the National Parks Service (NPS).

Historic Alphabet District Interim Design Guidelines	
NOW, THEREFORE, the Council directs	
Section 1:	
a. Portland's <i>Community Design Guidelines</i> , as adopted by Ordinance No. 171589, are hereby adopted as the interim design guidelines for historic design review in the proposed Historic Alphabet District.	e. The Historical Landmarks Commission and the City Council on appeal, shall conduct design review in the Historic Alphabet District using the <i>Community Design Guidelines</i> supplemented by the three additional guidelines listed in Attachment A. These interim guidelines of design acceptability will be used until superseded by permanent special district design guidelines developed and adopted for the Historic Alphabet District.
b. The <i>Community Design Guidelines</i> are to be supplemented with three additional guidelines (Historic Alphabet District Special Addendum Guidelines) to ensure that the U.S. Secretary of the Interior's Standards for Historic Design Review are met. These supplemental guidelines are listed in Attachment A, <i>Commission Report on Interim Design Guidelines for the Proposed Alphabet District as proposed by The Portland Historic Landmarks Commission</i> .	f. The Background and Findings presented in Attachment A, <i>Commission Report on Interim Design Guidelines for the Proposed Alphabet District as proposed by The Portland Historic Landmarks Commission</i> , are hereby adopted as additional findings supporting the adoption of interim design guidelines for the Historic Alphabet District.
c. The Historic Alphabet District Context Statement listed in Attachment A, <i>Commission Report on Interim Design Guidelines for the Proposed Alphabet District as proposed by The Portland Historic Landmarks Commission</i> , are hereby adopted as the document that will be used to guide interpretation and application of the interim design guidelines during the design review process in the Historic Alphabet District.	g. The review body conducting design review is authorized to waive individual guidelines for specific projects, based on their finding that such waiver will better accomplish the <i>Comprehensive Plan's</i> Urban Design Goal policies and objectives.
d. The Portland Bureau of Planning will develop special design guidelines tailored specifically for the Historic Alphabet District that will supersede adopted interim measures, as resources are available. It is desirable	h. The review body may also address aspects of a project's design, which are not covered in the guidelines, where the review body finds that such action is necessary to better accomplish the <i>Comprehensive Plan's</i> Urban Design Goal policies and objectives.
	i. The Historical Landmarks Commission may modify.

The boundaries of the district were carefully crafted to include only parcels with "a consistently contiguous relationship" reflecting the periods of significance recognized by the district, and respecting property owners' concerns. (See attached nomination form.)



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Spot-zoning within the Alphabet Historic District to allow incompatible development erodes this boundary and the significance afforded the Alphabet Historic District by the City, the State of Oregon, and the US Parks Service.

Given the small number of parcels affected by Option A, any argument that removing the 4:1 FAR in these areas would substantially reduce the city's capacity for building more housing lacks merit. Perhaps more to the point, removing 4:1 FAR merely restores 2:1 FAR applicable to RH zoned parcels elsewhere and helps to ensure compatibility required by the Historic Overlay.

In summary, NWDA requests that City Council either: 1) removes all 4:1 FAR in the RH zones in the Alphabet Historic District, or 2) adopts Option A, which was proposed by BDS and supported by the Portland Historic Landmarks Commission. NWDA asks that City Council reject Options B and C set forth in the memo from BDS dated November 4, 2016.

Best Regards,
Northwest District Association Planning Committee

Northwest District Association Planning Committee

Encl.

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Background

A. Why This Addendum Exists

The community driven process began at the end of the 1980s when residents of Northwest Portland became concerned about the demolition of historically significant buildings to make way for development. In the early 1990s the Northwest District Association received two grants from the State Historic Preservation Office to document the neighborhood's significant historic buildings and prepare a historic district proposal. Scores of volunteers contributed hundreds of hours to this project. Much of the required inventory work was completed and a rich legacy of information was created.

In October 1997, the City of Portland received a grant from the State Historic Preservation Office to enhance the City's historic preservation efforts. The grant allowed completion of the historic district project, initiated by Northwest's citizen, to become a City priority. This project ensured that the efforts of citizen volunteers to create a historic district would receive official consideration.



Looking east on NW Cass Street between NW 19th and 21st Avenues

On March 8, 1999, the Portland Historic Landmarks Commission (PHLC) accepted the Bureau of Planning recommendation to forward the nomination of the Historic Alphabet District to the State Historic Preservation Office (SHPO). This recommendation was based on the National Register Criteria for evaluation. The Portland Historic Landmarks Commission forwarded the Historic Alphabet District nomination to the SHPO based on its meeting the following criteria:

Criterion A: Birthplace of important local institutions

Criterion B: Residential district once home to key figures in Portland's history

Criterion C: Representative of the early architectural development of Portland, with a concentration of diverse multi-family structures and significant works of prominent architects

On October 28, 1999, the State's review board, the State Advisory Committee on Historic Preservation, held the first of two hearings on the merits of the nomination as required by Oregon Administrative Rule 736-050-260 (8). A second hearing, planned for February 2000, was postponed to allow an opportunity for consideration and approval of interim design guidelines. The second hearing, held on May 12, 2000, resulted in the SHPO's acceptance of the Historic Alphabet District nomination. The SHPO Advisory Committee Review Board decided that the nomination met the National Register criteria for listing and forwarded their recommendation to the U.S. Secretary of Interior in Washington, D.C. The Keeper of the National Register of Historic Places will decide to accept or decline the nomination based on the criteria for listing by Fall of 2000. The majority of National Register nominations submitted through the Oregon SHPO Advisory Committee are accepted for listing.

Historic Alphabet District Interim Design Guidelines

During this process some property owners within the Historic Alphabet District opposed the nomination because of the uncertainty created by the design review process. Proponents from the neighborhood worked with opponents of the Historic Alphabet District to develop an approach to design review that reduced or eliminated the basis for opposition to the district's creation. The Bureau of Planning became involved in October 1999, in response to these discussions.

A key point of the opponent's concern to the district's listing in the National Register was the vague language of the amended version of the U.S. Secretary of the Interior's Standards for Historic Design Review, as stated in Section 33.846.140 (C) of Portland's zoning code (Appendix B). Difficulty with the interpretation and application of the guideline language was a major point of apprehension. The Portland Historic Landmarks Commission also expressed concern with the vague nature of the language in the amended version of the U.S. Secretary of the Interior's Standards for Historic Design Review. Property owners were thus concerned that new construction and exterior alterations of existing buildings would become more contentious and uncertain under the existing standards.

Their concerns were supported by a recent Land Use Board of Appeals (LUBA) ruling (LUBA No. 99-105) regarding the applicability of Section 33.846.140 (C) to a project located in the King's Hill National Historic District. LUBA was concerned that the approval criteria of Section 33.846.140 (C) appeared to have no applicability to new construction. LUBA's decision provided further impetus for the City to clarify the design standards language for National Historic Districts without a special design guidelines document. A clarified set of guidelines is intended to provide greater assurance to developers as well as interested residents.

Both opponents and proponents identified the development of design guidelines for the Historic Alphabet District as a desired outcome. Consensus was developed on the use of the City's adopted *Community Design Guidelines* as the first step in this process. The *Community Design Guidelines* are more specific, use many visual examples, and provide greater clarity than the more general design standards of Section 33.846.140 (C). The adoption of the *Community Design Guidelines* and the development of interim design guidelines constituted the first step in the amelioration of opposition to the listing of the Historic Alphabet District onto the National Register of Historic Places.

The use of the *Community Design Guidelines* and interim design guidelines is intended to provide assurance to property owners, the Landmarks Commission, and other interested parties that properties in the Historic Alphabet District will have workable design review criteria. The second step in this process is also dependent upon the listing of the Historic Alphabet District in the National Register of Historic Places and will require the development of a special district design guidelines document.

B. Who Will Be Using It

Design guidelines are mandatory approval criteria that must be met as part of design review and historic design review. The *Community Design Guidelines* and the three Historic Alphabet District design guidelines function as the mandatory approval criteria for projects located within the Historic Alphabet District. These documents will be used on an interim basis during the period between the listing of the Historic Alphabet District on the National Register of Historic Places and the adoption of a special district design guidelines document. Developers of projects located within the boundaries of the Historic Alphabet District (see Map 1, p. 4) are required to explain, in their application, how their design meets each applicable guideline (see Applicability Chart, p. 41).

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Historic Alphabet District Interim Design Guidelines

Design review provides an opportunity for public evaluation of new construction and exterior changes to buildings and sites. The design review process is used to evaluate architectural composition, compatibility, and quality applied to new construction and exterior changes to existing buildings. Building materials, landscaping, and the location of parking are also elements considered during design review. The interior remodeling of a landmark's significant interior rooms may also be subject to historic design review.

C. How It Is Intended To Be Used

The use of the *Community Design Guidelines* and the Historic Alphabet District design guidelines is intended to create a consistent and dependable design review process for projects located in the Historic Alphabet District. The guidelines state broader concepts in order to provide flexibility to designers; yet they are requirements. Each project proposal will be evaluated against the applicable design guidelines. The applicability chart on page 41 identifies the applicable design guidelines for projects located within the Historic Alphabet District. During the design review process, the review body must find that the proposal meets each of the applicable design guidelines. Proposals that do not meet all the applicable design guidelines will not be approved. If the review body approves the proposed design, they may add conditions to their approval if necessary to ensure the proposal's compliance with the guidelines.

The planners within the Office of Planning & Development Review and the Portland Historic Landmarks Commission conduct historic design review. The Portland Historic Landmarks Commission is a volunteer board and includes members with expertise in design, development and historic preservation. The members of the commission are nominated by Portland's Mayor and confirmed by the City Council.



Looking southwest at NW 10th Avenue from NW Johnson Street



Looking southeast at 622 NW 23rd Avenue

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National Park Service

National Register of Historic Places Continuation Sheet

Section number 7 Page 6

Historic Alphabet District
Name of Property

Multnomah, OR
County and State

land uses, the ordinance jeopardized the neighborhood's single-family character, while welcoming the multi-family development that characterizes the neighborhood today.

TOPOGRAPHY AND BOUNDARIES

The irregularly shaped Historic Alphabet District is bounded by NW Lovejoy Street at the district's northwest line. This line roughly follows the original platting of King's 2nd Addition and terminates at NW 24th Avenue. The district's northern boundary then turns south and continues east along the centerline of NW Kearney Street until NW 21st Avenue. The blocks between NW 21st and 23rd Avenues and NW Kearney and Lovejoy Streets were not included due to a sizeable medical campus characterized by noncompatible noncontributing development.² The boundary then heads north along the centerline of NW 21st Avenue, a vibrant commercial corridor within the district. The boundary then turns east for one block along the right-of-way of NW Lovejoy Street. The boundary expands north and east for one block. This block has been included in the district as the northernmost concentration of intact historic resources. North of this boundary, there is a noticeable degradation in the type and quality of resources remaining. Furthermore, the remaining resources fail to maintain a consistently contiguous relationship to one another. Both sides of NW Lovejoy Street have been included in the district to preserve the historic streetscape. East of this block, the boundary stairsteps south to NW 17th Avenue. This boundary roughly follows the shift in land uses, while retaining rare resources that meet the temporal guidelines of the period of significance.³

Next, the district is bounded by U.S. Highway I-405 to the east, located one block east of NW 17th Avenue. Many structures located between NW 16th and 17th Avenues were constructed after the period of significance or lack sufficient historic integrity to be included within the district's boundaries. However, some buildings along the eastern frontage of NW 17th Avenue have been included within the district to preserve and anchor intersections, when possible. These intersections house structures that additionally adhere to temporal boundaries as defined by the period of significance.

The Historic Alphabet District is further defined by W. Burnside Street to the south. The boundary jogs irregularly along W. Burnside Street to exclude properties that more appropriately address the historic phenomenon of W. Burnside Street as a transportation arterial. However, buildings that invoke the significant infill development of multi-family residences in the Northwest neighborhood during the secondary period of significance have been included.

Finally, the district's western boundary is defined by NW 24th Avenue. This boundary generally follows the western boundary of the originally platted King's 2nd Addition.⁴ The boundary is also delineated by the topographical change west of NW 24th Avenue. All four corners at the intersection of NW 24th Avenue and Lovejoy Street have been similarly included to retain the character of that intersection.

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July 12, 2016

Bureau of Planning and Sustainability
900 SW 4th Ave #7100
Portland, OR 97201

RE: Comprehensive Plan Update: Composite Zoning Proposal – Alphabet Historic District

Dear Commissioners:

I am writing on behalf of the NWDA Planning Committee concerning proposed zoning in and around the Alphabet Historic District that is described in the Composite Zoning Proposal (CZP) on the Map App. NWDA appreciates BPS' receptiveness to feedback provided in the form of public testimony throughout the Comp Plan 2035 process, much of which is reflected in the CZP. There are, however, a few areas in the CZP for which we request underlying base-zone changes in order to comply with the Comp Plan Policy 4.49 to reconcile conflicts in historic districts and to refine base zoning: *Policy 4.49 Resolution of conflicts in historic districts. Adopt and periodically update design guidelines for unique historic districts. Refine base zoning in historic districts to take into account the character of the historic resources in the district.*

The proposed zoning in these few areas appear to potentially encourage development that would conflict with the Northwest District Plan and the Alphabet Historic District Addendum to the Community Design Guidelines by encouraging demolition of historic resources and out-of-scale projects that would detract from the character of individually-listed and contributing structures within the Alphabet Historic District:

- Northwest District Plan - Eastern Edge: Desired Characteristics and Traditions "The historic resources of the Eastern Edge, part of which is located in the Alphabet Historic District, should be preserved. The scattered remnants of the historically working-class Slabtown neighborhood, located in northern portions of the area, are a particularly vulnerable component of the area's built environment that should also be preserved."
- Alphabet Historic District Addendum to Community Design Guidelines – o **Historic Alphabet District Guideline 2:** "The design of new construction will be compatible with the historic qualities of the district as identified in the Historic Context Statement."

- o *Historic Alphabet District Guideline 3: "Hierarchy of Compatibility: Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a historic or conservation district, with the rest of the District. Where practical, compatibility will be pursued on all three levels. New development will seek to incorporate design themes characteristic of similar buildings in the Historic Alphabet District."*

Specifically, NWDA believes that proposed CM3 zoning in Alphabet Historic District should be zoned CM2 instead, because we believe a) lower FAR and height allowances are more compatible with the historic designation of such properties, and b) a base zone more consistent with historic policies and guidelines will provide more up-front certainty and clarity to developers:

Address	Within Historic District?	Historic Designation	Proposed	Requested
1819 NW Everett St./NW/NCC	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
732 NW 19 th Ave	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
1815 NW Flanders St.	Yes	Contributing Structure in NR Alphabet Historic District	CM3	CM2
535 NW 16 th St ²	No	Individually Listed on National Register of Historic Places	CM3	EG1
811 NW 19 th Ave	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
829 NW 19 th Ave.	Yes	Contributing Structure in NR Alphabet Historic District	CM3	CM2
1809 NW Johnson St.	Yes	Individually Listed on National Register of Historic Places	CM3	CM2
1927 NW Lovejoy St.	Yes	Non-Contributing (adjacent to Contributing)	CM3	CM2
1959-63 NW Kearney St.	Yes	Non-Contributing (adjacent to Contributing)	CM3	CM2
434 NW 19 th Ave	Yes	Contributing in NR Alphabet Historic District	CM3	CM2
1818 NW Gilsan St.	Yes	Contributing in NR Alphabet Historic District	CM3	CM2
425 NW 18 th Ave.	Yes	Individually Listed on National Register of Historic Places	CM3	CM2

² We also request that the Individually-Listed Historic Landmark at 535 NW 16th St (Ace Hardware), be zoned EG1 rather than CM3 as described in the CZP.

Thank you for considering our request to change the CZP to reflect that CM3 properties within the Alphabet Historic District be zoned

CM2.1 Sincerely,

A handwritten signature in cursive script, appearing to read 'W. Chung', written in black ink.

Wendy Chung

Encl.

July 11, 2016

Planning and Sustainability Commission

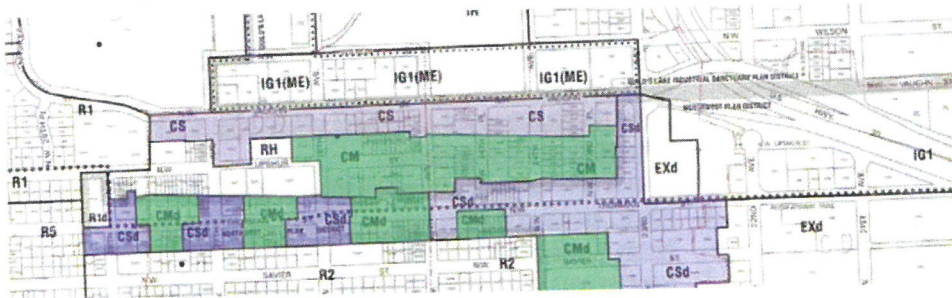
Re: Composite Zoning Map

The NWDA Planning Committee has been participating and providing testimony on the Early Implementation Projects of Employment Zoning, Campus Institutional Zoning and Mixed Use Zoning. Several of the comments we have made have been reflected in the plan, but a few have not. In order to be consistent with our Northwest District Policy Plan adopted November 5th 2003, we request the following changes.

1. Thurman-Vaughn Subarea of the Northwest District Plan

Current Zoning is a mixture of CS and CM with a d overlay for Thurman development.

The Zoning Map proposes this whole area be zoned as CM2.



NW District Policy in the Thurman-Vaughn Subarea

Enhance this mixed-use subarea by emphasizing housing along NW Upshur and NW Thurman Streets and commercial uses on the south side of NW Vaughn Street and in nodes at intersections along NW Thurman Street.

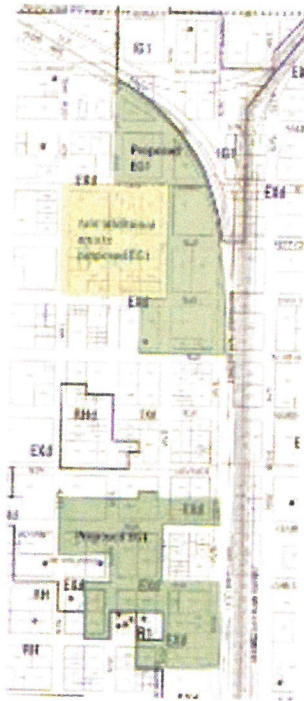
Thurman-Vaughn Subarea Objectives

- A. Enhance NW Thurman Street as a neighborhood-oriented main street that is primarily residential, with commercial uses clustered at intersections.
- B. Emphasize residential and live/work opportunities on NW Upshur Street.
- C. Encourage development on the south side of NW Vaughn Street that includes a continuous frontage of commercial buildings, unifies the streetscape, and supports both the mixed-use area to the south and the industrial sanctuary to the north.

In the NWDA testimony for the Mixed Use Zoning we requested that the areas currently zoned CM would become CM1 while the CS become CM2 in support of the policy.

We request the areas currently designated CM be changed to CM1 with a d Overlay. Areas currently CS can remain CM2 as shown on the map.

2. Eastern Edge Subarea of the Northwest District Plan



Area is currently zoned Employment EX.

The Zoning Map proposes some of this area as EG1.

NW District Policy in the Thurman-Vaughn Subarea

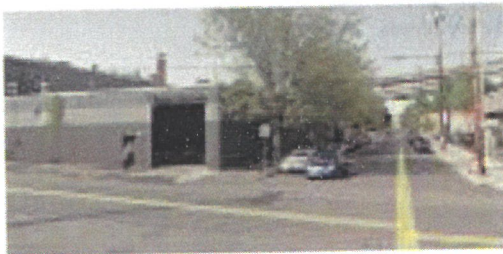
Foster the development of the Eastern Edge as a transition between the more urban Central City and the Northwest District.

Eastern Edge Objectives

- A. Support the established mixed-use urban character of this subarea.
- B. Encourage the location of businesses that serve local needs along NW 18th and NW 19th Avenues.
- C. Foster the establishment and growth of firms that provide living-wage jobs in this subarea.
- D. Protect existing housing from conversion to other uses.
- E. Protect existing industrial firms in the subarea from being forced to relocate out of the area.
- F. Increase multi-modal connectivity between the Central City and the Eastern Edge.

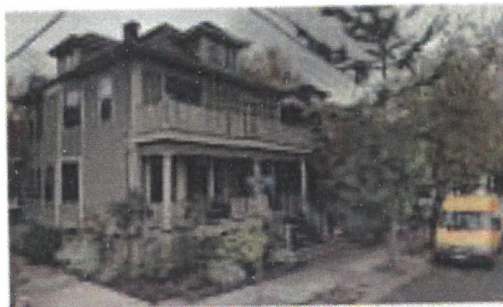
In our testimony for the Mixed Use Zoning, NWDA testified in support of the areas shown for EG1 rather than CM3 to support the existing industries in the area, several of which have been lost to high density residential development. In the area shown in yellow there are several light industrial or service jobs that we want to also see protected. These include Cascade Rubber, Parr Lumber, ARC Printing, two machine shops, creative office space and others.





We request the area identified above in yellow be added to the area proposed as EG1.

In addition, in order to be compatible with the character of the EG1 area in the southern portion of the Eastern Edge and adjacent to the Alphabet Historic District, the block between NW Kearney & Johnson, and NW 16th and 17th should be zoned CM2 instead of CM3 as shown on the map. The block consists of several houses that are not protected by the Historic District and would be more vulnerable to demolition.



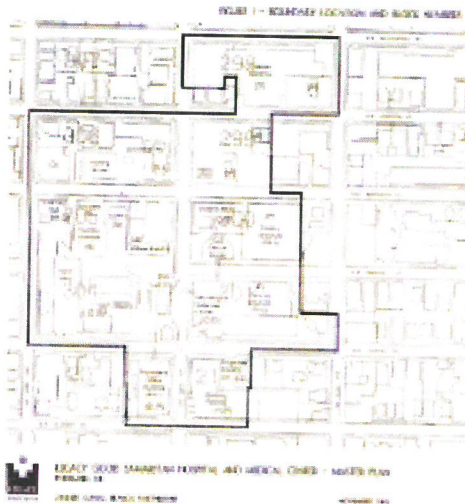
We request the area identified above in light red be zoned CM2 not CM3 as shown on the Composite Zoning Map.

3. Campus Institutional Zoning of the Northwest District Plan

The Good Samaritan Hospital complex in Northwest District is different from the other Institutional Zoning areas. It is integrated with the surrounding neighborhood through a street grid pattern. We believe that the area should continue to be managed through a Conditional Use Master Plan but new code does not allow that after 2025.

Northwest Plan District

Since Good Samaritan Hospital has been regulated through a CUMP, there is no code language in the NW Plan District reflecting uses or development standards for the area specific to the Hospital. If Campus Institutional Zoning is placed on the Good Samaritan Hospital area and no CUMP is required, we need to amend the Plan District code to be specific to the area needs.



We request the Good Samaritan Hospital complex be removed from Institutional Zoning.

Additional testimony is being provided by Wendy Chung, another NWDA Planning Committee member regarding Comp Plan Policy:

Policy 4.49 Resolution of conflicts in historic districts. Adopt and periodically update design guidelines for unique historic districts. Refine base zoning in historic districts to take into account the character of the historic resources in the district.

Mixed Use Zone CM3 as shown on the Composite Zoning Map is not appropriate within the Historic Alphabet District.

Sincerely,

A handwritten signature in blue ink that reads "Karen Karlsson". The signature is written in a cursive style with a long, sweeping underline.

Karen Karlsson

NWDA President and Member of the Planning Committee

Doug Klotz
1908 SE 35th Pl
Portland, OR 97214
11-17-16

Mayor Hales and Commissioners

As this is the last hearing about the 2035 Comprehensive Plan, I'm looking forward to the actual implementation in 2018, including some needed zone changes. Here's Amendments I support:

Support Amendment 34, Removal of parking minimums

Potentially the most important amendment before you is No. 34, removing minimum parking requirements in the Mixed Use Zones. We heard a lot about the housing crisis yesterday, and this amendment is another tool we can use to help solve that.

While the upcoming IZ project proposes exempting just affordable housing units, that is not enough. A whole-building exemption from parking would help bring the project to viability.

Arbitrary 31-unit threshold suppresses housing supply. Many developments have been built at exactly 30 units, so they won't have to add parking. The cost of even the minimum 6 stalls can be 300,000 in construction and lost opportunity to build other units. The requirements are ineffective, since tenants will park on the street as long as it is free. Required spaces in buildings sit empty.

Please approve this amendment and roll out the new parking programs at the same time.

Support #28(c), Option C for Drivethroughs. We have plenty of existing drivethroughs, and this option allows them to stay and be rebuilt. This seems like the best compromise, with new drivethroughs being allowed only for those uses connected with servicing the actual vehicle, which by their nature need the car to be there.

Support Mapping Amendments in SE Portland:

#11, Lots on west side of Chavez near Division to CM-2. Expands a commercial node with good transit

#12, 50th and Hawthorne to CM-2. Completes the intersection, and exempts buildings further east

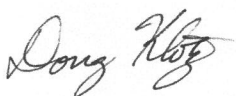
#13, 50th and Hawthorne "d" overlay. Matches rest of Hawthorne

#14, 60th and Belmont. Matches large development at intersection

#15, Sellwood Moreland "d" overlay. Consistent with much of SE

#16, South side of Powell, to CM-2. Near two light rail stations, and EX is across Powell from it.

Thank you.



November 17, 2016

Portland City Council

RE: Sullivan's Gulch / 2100 NE Broadway
Proposed Comprehensive Plan Zone Change to CM3d

Dear Council Members –

In review of the proposed Comprehensive Plan Zoning for the site located at 2100 NE Broadway in the Sullivan's Gulch Neighborhood, I would sincerely suggest reconsideration of the designation of this zone, with a recommendation of revising the zoning to CM3. The recommended designation currently proposed for the 2035 Comprehensive Plan is CM2. The site in question consists of several lots totaling more than 30,000 square feet of land and a 3-story 15,000 square foot office building situated prominently at the intersection of NE Broadway, NE Weidler and NE 21st Avenue. This site is under single ownership and is bordered by the streets referenced above, and has been a part of multiple studies with a common goal of slowing traffic along NE Broadway, improving pedestrian circulation and connectivity, while increasing density and providing much needed housing for the local area.

I suggest that CM2 is an inappropriate designation for this commercial node, and that CM3 better represents the opportunities for development that the zoning for this area should accommodate. Allowing for a higher density of residential development in this directly connected neighborhood will in fact allow for more pedestrian-oriented projects leading to a decrease in motor vehicle trips through this Neighborhood. A reduction in traffic on these streets is a goal of the City and of paramount concern to the Neighbors.

The proposed CM2 zoning designation represents an inappropriate decrease in allowed density, based upon its proposed lower maximum height, and the inclusion of a maximum FAR of 2.5:1. Sullivan's Gulch and the Lloyd Center areas have an extremely high concentration of jobs, and in need of more housing options. Providing opportunity for an increase in nearby residential density to accommodate the need for ease of access and reduced travel and commute distances for this concentration of people is the logical direction for the zoning of this node.

As such I request reconsideration of the designation of this zoning to be amended to a CM3 designation. Thank you again for your time and consideration.

Sincerely,

Richard Larson

November 17, 2016

Portland City Council

RE: Rose City Park / 3443 NE 57th Ave
Proposed Comprehensive Plan Zone Change to CM2

Dear Council Members –

In review of the proposed Comprehensive Plan Zoning for the site located at 3443 NE 57th in the Rose City Park Neighborhood, I would sincerely suggest reconsideration of the designation of this zone, with a recommendation of revising the zoning to CM2. The recommended designation currently proposed for the 2035 Comprehensive Plan is CM1. The site in question consists of several lots totaling more than 20,000 square feet of land and a single-story 5,000 square foot restaurant building situated at the intersection of NE Fremont and NE 57th Avenue.

I suggest that CM1 is a down-zoning and an inappropriate designation for this commercial node, and that CM2 better represents the opportunities for development that the zoning for this area should accommodate. Allowing for a higher density of residential development in this directly connected neighborhood will in fact allow for more pedestrian-oriented projects leading to a decrease in motor vehicle trips through this Neighborhood. A reduction in traffic on these streets is a goal of the City and of paramount concern to the Neighbors.

The proposed CM1 zoning designation represents an inappropriate decrease in allowed density, based upon its proposed lower maximum height, and the inclusion of a maximum FAR of 2.5:1. Rose City Park is in need of more housing options. Providing opportunity for an increase in residential density to accommodate the need for ease of access and reduced travel and commute distances for this concentration of people is the logical direction for the zoning of this node.

As such I request reconsideration of the designation of this zoning to be amended to a CM2 designation. Thank you again for your time and consideration.

Sincerely,

Richard Larson

November 17, 2016

Portland City Council

RE: Sabin Neighborhood / 1303-1339 NE Fremont
Proposed Comprehensive Plan Zone Change to CM2

Dear Council Members –

In review of the proposed Comprehensive Plan Zoning for the site located at 1303-1339 NE Fremont in the Sabin Neighborhood, I would sincerely suggest reconsideration of the designation of this zone, with a recommendation of revising the zoning to CM2. The recommended designation currently proposed for the 2035 Comprehensive Plan is CM1. The site in question consists of two lots totaling approximately 9,000 square feet of land and a single-story 9,000 square foot multi-tenant building located completely from NE 13th through NE 14th along NE Fremont.

I suggest that CM1 is a down-zoning and an inappropriate designation for this commercial node, and that CM2 better represents the opportunities for development that the zoning for this area should accommodate. Allowing for a higher density of residential development in this directly connected neighborhood will in fact allow for more pedestrian-oriented projects leading to a decrease in motor vehicle trips through this Neighborhood. A reduction in traffic on these streets is a goal of the City and of paramount concern to the Neighbors.

The proposed CM1 zoning designation represents an inappropriate decrease in allowed density, based upon its proposed lower maximum height, and the inclusion of a maximum FAR of 2.5:1. Rose City Park is in need of more housing options. Providing opportunity for an increase in residential density to accommodate the need for ease of access and reduced travel and commute distances for this concentration of people is the logical direction for the zoning of this node.

As such I request reconsideration of the designation of this zoning to be amended to a CM2 designation. Thank you again for your time and consideration.

Sincerely,

Richard Larson

From: Sara L
To: [BPS Comprehensive Plan Testimony](#)
Cc: pdxshoupistas@gmail.com
Subject: Comprehensive Plan Implementation Amendment 34
Date: Thursday, November 17, 2016 11:27:01 PM

To Whom It May Concern:

I am writing today in support of Portland achieving its own goals concerning parking and transportation. I ask that you eliminate parking requirements for new development. Instead, focus on no free, city-subsidized parking on streets within city limits.

The Comp Plan is clear on many points, including this one. But, speaking as someone who has engaged the process, there are too many ways in which the Comp Plan is ignored and not implemented. This is contrary to democracy and democratic rule. Portland prides itself on being planned by its citizens. Let's see those words and that sentiment of support actually translate into real world results.

Please eliminate minimum parking requirements for new development.

Thank you,

Sara Long

From: Martin Hoogendijk
To: [BPS Comprehensive Plan Testimony](#)
Cc: ted@tedwheeler.com; [Hales, Mayor](#); chair.landuse.smile@gmail.com
Subject: Please don't waive minimum parking requirements!
Date: Thursday, November 17, 2016 9:35:12 PM

Hi City Council,

I'm very upset to hear that the planning committee has sent in a proposal to get rid of the minimum parking requirements without taking into consideration whether there is enough street parking available. I live in Sellwood, SE Portland and we increasingly have problems with a shortage of street parking because of large apartment buildings that are built without sufficient parking spaces in the buildings.

It's crazy. We used to have a live-able neighborhood that had sufficient street parking for everyone. Now, under the guise of "urban density" we're seeing all these large apartment buildings being built that don't provide sufficient parking spaces for their renters. There seems to be a notion that people living in those apartments will just ride their bike or take public transportation, but that's simply not the reality. They all bring a car with them and park on the street. On my street in Sellwood, on two blocks of either side of us, I am the only one who bikes to work everyday. We still have to have a vehicle of course that needs to be parked somewhere. Everyone else commutes by car even with an abundance of public transport options.

I'm not sure why Sellwood is being targeted for these urban density projects. It seems like there is a notion that because we have the new Sellwood bridge and the new Max line that the neighborhood can now all of a sudden sustain more density. This notion is wrong. Just look at SE Tacoma Street at 8AM: it leads to a beautiful new bridge, except nobody can get on it. All the streets in Sellwood, including residential streets are completely congested with cars waiting to get onto the bridge. You may think: "well, that's just what we want: people will have to take the bus or the Max because commuting by car is becoming impossible." Well, guess what: the bus is sitting in the same traffic jam and the Max is so and slow and inconvenient that it literally takes me an hour and 15 minutes from door to door (going by bike only takes me 35 minutes -- and not everyone is fortunate enough to be able to ride a bike to work either). Even if people were to take public transportation, they will still own a vehicle (or two or three) and will have to park that vehicle somewhere during the day. Yes, people will still own a vehicle because taking the bus to the grocery store, Mount Hood, or even going across town to visit friends and family just doesn't work!

I strongly oppose waiving parking minimums as well as strongly oppose increasing urban density in Sellwood. We want to keep the residential, cozy, and quiet feel of Sellwood and these polices are destroying our neighborhood.

Martin Hoogendijk
Home owner
1743 SE Marion Street
Portland, OR 97202

From: Richard Potestio
To: [BPS Comprehensive Plan Testimony](#)
Cc: [Tracy, Morgan](#)
Subject: COMP PLAN 2035
Date: Thursday, November 17, 2016 5:50:08 PM

Dear Commissioners

I ask that you return the Comp Plan in its entirety to the B. Of Planning and Sustainability for further review with the directive that a comprehensive urban design vision be formulated and incorporated to guide the specific provisions.

The Comp Plan 2035 is an incredibly important document, however it will not enable the city to realize its core objectives of directing growth such that the result is a more diverse, equitable, economically viable and affordable city. And certainly given its lack of design consciousness it will not produce a more beautiful and enriching environment.

Why? Because it is in essence a grand scale tweeking of the zoning parameters that have created our current housing crisis
-in particular the gentrification and displacement of persons and communities.

Zoning defines and categorizes daily human activities and renames them as "uses" and then segregates these into distinct and separate areas or "zones". As such it segregates a person's daily activities into disparate areas requiring a "trip" to connect them and integrate them into a routine or sequence of acts. Trips become commutes as distances increase. As one witnesses each rush hour, the artificial separation of activities into zones generates enough trips or commutes to grid lock our transportation system and squander personal time and health.

Zoning by virtue of its regulation not only on use but on the intensity of use and the allowed size of a building to house that use(s) is also a tool of economic value, opportunity or disparity. This leads to segregation of people and communities on the basis of economic resources and opportunity or lack thereof.

Tweeking this system, as the Comp Plan will do, only exacerbates the problems of zoning.

Suppressing building heights, FARs or other regulations with corollary bonuses intended to incentivize desired outcomes is negative in essence and will be counter productive in application.

An example is the contrary proposal to increase density by allowing 2-3 units on a single unit lot while simultaneously reducing the allowed building size.
The trade-off is a net zero increase in population as a 3-4 bedroom family sized house will be replaced with three 1 bedroom apartments or two 2 bedroom duplexes.

If one applies simple math to the proposed infill options described in the Residential Task Force document, one finds that in all but a few options the net increase in bedrooms and therefore in residents on a lot is zero. However, more disturbing is the fact that only one option replaces or adds family sized housing.
The consequence of this downsized density will be the wholesale destruction of our family scaled housing stock and the resultant displacement of Portland's families in favor of mobile young singles.
While more units will not assuredly mean that more people will live on that lot, it is likely that the family with 1-2 cars will be replaced by 3-4 singles each owning a car. So while the density of persons remains the same, the density of cars doubles.

And apparently no one has considered where these singles, once coupled and rearing children, will live? Given their mobility it is probable that they will leave Portland for more affordable and family friendly cities.

I have shared my concerns and my detailed visions for vibrant neighborhoods filled with affordable houses with the

offices of those accessible Commissioners: Fish, Novick and Saltzman.

I sincerely hope that all the Commissioners, and the Mayor, will realize that the Comp Plan is a flawed document hampered by a lack of vision and political leadership.

I know, given a more positive, affirmative, and aspirational mandate our planners and citizen volunteers can produce a visionary and progressive plan that will ensure its goals are achieved.

Yours

Richard A Potestio
2211 SW Park Place no 502
Portland, Oregon 97205
503-381-9719
rick@potestiostudio.com

Sent from my iPhone

From: royhuggins@gmail.com
To: [BPS Comprehensive Plan Testimony](#)
Subject: Comprehensive Plan Implementation
Date: Thursday, November 17, 2016 5:29:11 PM

Please trade minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones.

Thank you,

--

-Roy Huggins, LPC NCC
[Portland Counseling and Therapy](#), [日本語](#)
[All Japan Counseling](#)
e: info@portland-counseling-therapy.com
p: (503) 839-4825

Director, Person-Centered Tech
www.personcenteredtech.com

From: Evan Heidtmann
To: [BPS Comprehensive Plan Testimony](#)
Subject: Comprehensive Plan Implementation
Date: Thursday, November 17, 2016 5:09:00 PM

I recently testified in person. I wanted to follow up regarding a point made by some other testifiers.

Removing parking minimums and adding parking permits absolutely do work together, and as a matter of policy I believe it's important to use both at once to properly decouple parking from housing.

However, because it will take some time for Comp Plan changes to go into effect, we'll have plenty of time to get a permit program going before then.

Vote now to approve Amendment 34, vote now to approve amendment 51, and work next year to bring the comprehensive "parking toolkit" to life across the city. It's the responsible choice.

Thanks!

Evan Heidtmann
4906 NE Grand Ave, 97211

From: Annie Allerdice
To: [BPS Comprehensive Plan Testimony](#)
Subject: Comprehensive Plan Implementation.
Date: Thursday, November 17, 2016 4:42:24 PM

Testimony.

20 year plan adjustment.

Removing the the proposed 2009 CRC river easement for the West Bank of the Hayden Island Mobile Home Park river walkway, noted in the 172 pg. ODOT document.

This, walkway is a private for tenants only usage. The HOA was concerned in 2009 about how this easement would be implemented. After the failure of the CRC, I believe everyone thought the rest of the changes were scraped. It was a shock, when we learned you still planned to create a public access pedestrian and cycle river pathway.

Which required the removal of 122 mobile homes, trees, 50 moorage parking and wildlife habitat trees.

The ODOT doc., on page 12 mentions preserving the residential mobile, moorage and boat houses.

It also mentions two parks, one to be placed between the Thunderbird, and Red Lion Hotels.

After, reading other documents about developers seeking valuable river access land for high end developments, I wondered if this was a well orchestrated Land Grab disguised as a Bike Path.

Anyone that knows about imminent domain knows that if the city gets permission to access this private lands, the property around it becomes subject to additional access needs for public access.

Then the added commercial zone overlay change last summer for the park, including my home, made me think you already had a developer in the wings lobbying for this property.

Your talking about displacing people on fixed incomes, young families, singles, Vets of 455 homes and 169 RV visitors and year round slips. In a low inventory high rental market.

Seriously, this is unreasonable.

Do not assume we will simply roll over, and sign off on this harebrained scheme.

So, I oppose any access of the parks pathway. I want the city to remove all mention of this from the comprehension plan.

You can reroute the bike path to the superstore Main Street.

Annie Allerdice
1501 N. Hayden Island Dr. 86E
Portland, Oregon 97217
503-704-1633
Nopopromo@gmail.com

Sent from my iPhone

From: Christopher Eykamp
To: [BPS Comprehensive Plan Testimony](#)
Subject: Comprehensive Plan Implementation / Parking minimums
Date: Thursday, November 17, 2016 4:17:06 PM

Dear Mayor and City Council Members,

Please link the elimination of parking requirements on new residential construction to the creation of a parking permit or other management system in the area of the new development.

Eliminating parking requirements for new residential construction without a permit system in place will cause problems for existing businesses and residents (renters and owners alike), will increase distracted drivers "circling the block" looking for a place to park (increasing pollution, congestion, and creating problems for pedestrians and cyclists), and would provide a mechanism for developers to externalize their costs onto the surrounding areas.

Do not believe claims that parking drives up the cost of housing -- developers have every incentive to charge what they can; if building costs fall, those savings will translate to greater profit, not reduced rent/sales price.

New buildings should not be required to offer parking if they are situated in an area with a parking permit system designed to help manage the problem, or if residents are somehow restricted from owning cars. These limitations should be included in any Comprehensive Plan amendments eliminating parking requirements. That would mean that, as permit systems are phased in, parking requirements could be phased out.

Linking the creation of a permit system to the relaxation of parking requirements seems like an appropriate balance that protects existing residents while providing a clear road map for eliminating parking requirements, without the need to make future amendments to the Comprehensive Plan.

Thank you,

Chris Eykamp
2101 SE Tibbetts
Portland 97202

From: Verna
To: [BPS Comprehensive Plan Testimony](#)
Subject: South Waterfront Project
Date: Thursday, November 17, 2016 4:02:24 PM

I am a resident and board member of the Rivers Edge Condominiums. Along with other residents, I have my concerns about extending Moody Street and the street car to Hamilton Court.

Andrew Aebi's project was to find a solution to the traffic problems in the South Portal (south end of South Waterfront). It seems to me that all aspects need to be considered. He told our association that his concern was not about the north end of South Waterfront nor anything south of Hamilton Court.

His plan pushes the traffic in South Waterfront further south to Hamilton Court. It doesn't seem to solve the problem and causes problems for businesses and residents in the area of Hamilton Ct. and Landing Drive.

Hamilton Ct. is a privately owned street. It is short and has an increased elevation up to Macadam. Because of visibility, it is currently difficult to make a left turn from Landing Drive onto Hamilton Ct. to access Macadam. Employees and residents from several businesses and new apartment buildings on Landing Drive use Hamilton Ct. to come and go onto Macadam.

Hamilton Ct. relieves some of the traffic on Landing Drive which is another privately owned street. The city has referred to this street as a driveway with many parking lots.

Since the South Portal project would direct more traffic south to Hamilton Ct., it would make that street even more difficult and dangerous to access for residents and businesses on Landing Drive. Consequently, more drivers will choose to use Landing Drive to access Macadam going south. Landing Drive is narrow, doesn't have sidewalks, or bike paths.

We didn't find out about this project until June 2016. Representatives from The Landing, Heron Pointe, and Rivers Edge Condos contacted and met with Andrew to discuss our concerns. We asked him to include a traffic study on Landing Drive since we will all be impacted by his proposal. He told us we would have to pay for our own traffic study. We did not have money to pay for that study. It should have been in his scope for the project. Since the city deemed Landing Drive more of a driveway than a street, it is obvious more traffic should not be directed to that street.

Verna Reardon
5110 SW Landing Drive, #202
Portland, OR 97239

From: Sam Noble
To: [BPS Comprehensive Plan Testimony](#)
Subject: Early Implementation Package testimony
Date: Thursday, November 17, 2016 3:59:41 PM

Sam Noble
420 SE 62nd Ave.
Portland, OR 97215

To Portland City Council,

I live in the Mt. Tabor neighborhood.

I write in favor of all of the following amendments:

#12 5000-5018 SE Hawthorne Blvd (change from CM1 to CM2)

#25b FAR Option B - Reject the PSC recommended 2:1 FAR in the northern Alphabet District, retaining 4:1 where is it currently mapped.

#30 Allow housing on campuses with CI2 zoning.

The following two amendments are particularly important to me:

#34 Change the recommended draft to remove minimum off-street parking requirements from sites close to frequent transit.

Less required parking will allow more units to be built. Combined with our inclusionary housing requirements, this will mean that we're more likely to get more total developer subsidized units built.

#14 SE 60th Ave and SE Belmont St (change from CM1 to CM2)

This is one of the very few commercial nodes within walking distance of my house. Many of these buildings are going to redevelop over the comprehensive plan period and they are adjacent to some large existing buildings. The higher the zoning intensity, the more likely that these sites will redevelop in the short term to provide commercial services that I can access by foot.

Thank you.

From: Jim Laubenthal
To: [BPS Comprehensive Plan Testimony](#)
Cc: [Lucas Miller](#)
Subject: Riverside Supports Amendment 8
Date: Thursday, November 17, 2016 3:47:54 PM

We support Amendment 8 to remove the "I" overlay from Riverside until the golf course is converted to industrial at some future date. The overlay does not work on Open Space land. We submitted a detailed letter in early October describing our concerns. It would essentially convert us into a non-conforming use. In terms of continued operation and periodic course projects, it is not clear how these could proceed with the "I" overlay. We appreciate the assistance of staff in helping us assess this, and would appreciate Council support for this amendment.

Jim Laubenthal
Riverside Golf and Country Club

From: Terry Griffiths
To: [zCharlie Hales](#); [Commissioner Fritz](#); [Commissioner Novick](#); [Council Clerk – Testimony](#); [Commissioner Fish](#); [Commissioner Saltzman](#)
Cc: [Stockton, Marty](#)
Subject: Item # 19 on the Early Implementation Amendments
Date: Thursday, November 17, 2016 3:34:53 PM
Attachments: [woodstock_center_diagram.pdf](#)

November 17, 2016
4128 SE Reedway,
Portland, OR 97202

Dear Portland City Council Members,

I am a member of the Woodstock Neighborhood Association Land Use Committee (WNA LUC). At our monthly meeting last night, we (seven attendees and SE Planning liaison Marty Stockton) had a long discussion about Amendment 19, the request by Don Hanna for zone changes for three properties on the western half of the block between SE 52nd and SE 51st in Woodstock as well as an adjacent property to the east along SE Martins. Also included in Amendment 19 request are two properties on the northeast corner of SE 51st and Woodstock. The request for all of these properties is for a change from R1 or R2.5 (residential) zoning to CM2.

While we were unable to agree on a specific response to the amendment request, a number of concerns were raised as noted below:

- We all agreed that the zone change request was neither open or transparent. The WNA LUC received only cursory notice on November 7. There was no notice to adjacent and nearby property owners as would have been required in a quasi-judicial review. There was no effort on the part of the property owner to discuss his plans with the neighborhood.
- SE 51st, for the entire block between SE Woodstock Blvd and SE Martins is a dirt road in deplorable condition. Whatever improvements are required will have a significant effect on the surrounding neighborhood.
- The nearby intersection at SE 52nd and Woodstock is notorious for having backed up traffic at peak hours. Will the development anticipated by this zone change amendment add to congestion at this intersection; will it encourage more cut-through traffic on nearby local streets?

We are informed that this zone change amendment request has led to two additional zone change amendment requests, also for a change from R2.5 to CM2: One is for all the residential properties behind and adjacent to The Joinery, the remainder of the full block between SE 48th and SE 49th, SE Woodstock and SE Martins (except for the property that is the Joinery itself, which is already zoned CM2).

The second is for two properties behind Otto's Sausage Kitchen, 4138 SE Woodstock Blvd; 6025 SE 42nd and 6029 SE 42nd. We have received no official notice for either of these requests.

All of the properties requesting these zone change amendments were designated CM2 on the Comp Plan Map but not actually zoned that way. Granting these requested zone changes outright will give the property owners CM2 zoning without requiring the process of applying for a Zone Change in Compliance with the Comprehensive Plan. While a Zone Change in compliance with the Comprehensive Plan is a considerable expense for property owners it provides:

- Opportunity for further neighborhood notification and public comments, and
- Allows the infrastructure bureaus (Portland Bureau of Transportation, the Bureau of Environmental Services and the Water Bureau) to conduct additional analyses of the entire infrastructure system.

The properties adjacent to Otto's and The Joinery were heretofore simply designated CM2, based on a recommendation by Planning Staff who felt that further review required by a Zone Change in Compliance would be beneficial. While loathe to impose financial burdens on the owners of either Otto's or The Joinery, both of which are community-minded, destination businesses in our neighborhood, I submit that designated, rather than outright CM2 zoning is the appropriate process for changing the zoning for ALL of these properties.

Infrastructure concerns are very real in our neighborhood. Please see the attached map which shows all of the unimproved streets at the very center of our neighborhood where several of the properties concerned are located.

Sincerely,





Terry Griffiths
4128 SE Reedway,
Portland, Oregon 97202
4128 SE Reedway,
Portland, Oregon 97202

Map 5

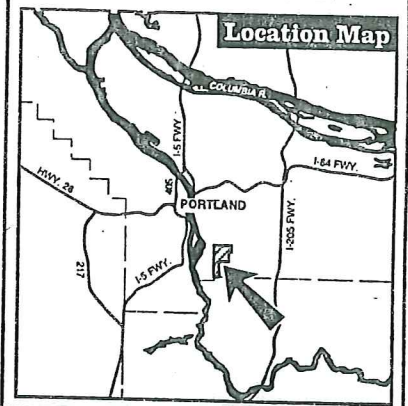
Unimproved Rights of Way

Within 1/4 mile of Woodstock Neighborhood Center

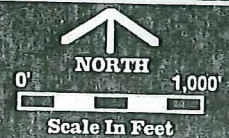
Legend:

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

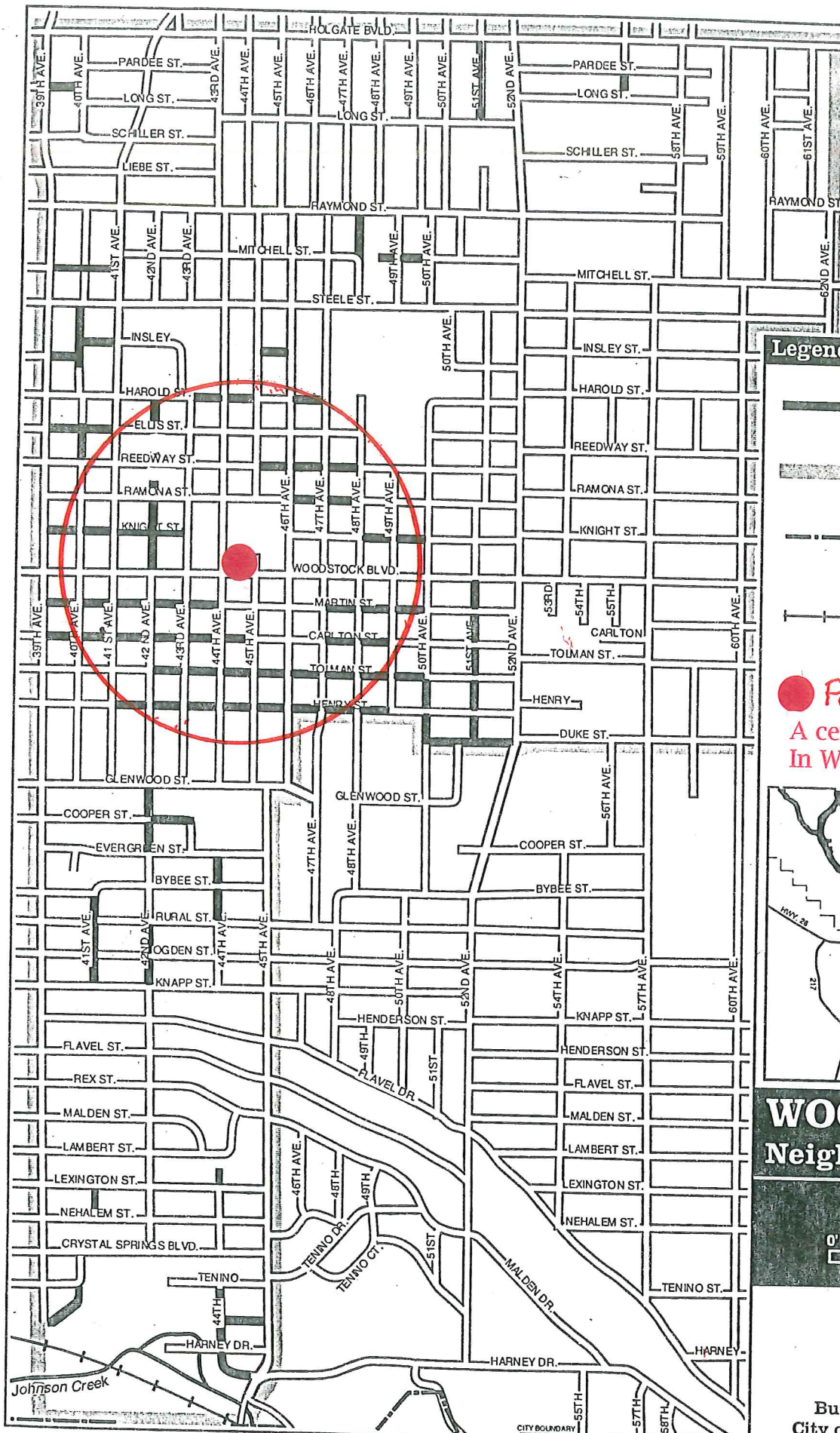
 **Papaccino's**
A central location
in Woodstock Center



WOODSTOCK Neighborhood Plan



June 1995
Bureau of Planning
City of Portland, Oregon



November 17, 2016

To: City Council Members

From: Alice Blatt, Wilkes Community Group Board Member
15231 NE Holladay, Portland, OR 97230

Re: Resubmitted testimony related to TSP, important to east Portland

This is a reiteration (previous submissions 3/13/15, 1/15/16, 10/17/16) of our urgent need for much improved safety on NE 148th Ave. between Halsey St. and Airport Way. There are no traffic control signals or crosswalks (controlled or otherwise) between Halsey St. and Sandy Blvd. (a distance of 1.25 miles). The most egregiously unsafe area begins under the I-84/UP RR overpass and north. This is especially important because 148th Ave. is one of only three streets (122nd, 148th, 162nd) extending north from Halsey under I-84/UP RR to Sandy Blvd., accessing the Columbia South Shore employment and recreational area.

Our most important needs include:

- 1) A regulated crosswalk north of the freeway overpass (Rose Parkway?) and/or a regulated crosswalk south of the freeway overpass (Sacramento?).
- 2) Connected, paved sidewalks under overpass (see photo below) and north to Airport Way (See Jill Erickson testimony submitted today).
- 3) Connected bike lanes under overpass and north to Airport Way (See Jill Erickson testimony submitted today).
- 4) Corrected line-of-sight problem north of overpass. The change in slope blocks the view from the north of cars coming down 148th under the overpass. This problem affects cars entering 148th Ave. from the east from 148th Pl. (46 homes on Graham St.) and Rose Parkway/Siskiyou (190 condos, approximately 300 vehicles) (see photo below for similarly blocked view from west side). Leveling the slope, coupled with decrease from four lanes to two lanes under the overpass, will certainly generate increased vehicular speed, necessitating some form of reliable speed control.

In early February, 2015, all 13 east Portland neighborhoods met and prioritized over 70 submitted projects, voting our NE 148th Ave. safety problems 2nd in importance to east Portland. The Wilkes Community Group had previously, at three general meetings, unanimously prioritized the following five East Portland TSP identified projects in our neighborhood.

#50009 – 148th Ave. Safety Improvements first in importance, followed by

#50028 – Outer Halsey pedestrian improvements between 102nd and 162nd Aves.

#50012 – NE 162nd Ave. bikeway (Sandy to Thompson)

#50035 – Outer Sandy Blvd. safety 141st Ave. to City limits

#50016 – Airport Way ITC

We appreciate the attention paid to Halsey and Airport Way in the Early Implementation Package; also #102340 Columbia Slough Trail gaps (to NE 158th). Attention must be called to safety problems on NE 162nd (#50012), very similar to 148th, quite unsafe, and definitely in need of attention.

Please recognize the very serious immediate importance of safety improvements on NE 148th, especially under and north of the overpass.

Looking south on 148th at east side walkway under railroad and freeway overpasses.



Line-of-sight from driver's level from 3001 NE 148th to UP overpass.



PORTLAND CITY COUNCIL

Comprehensive Plan, Refinement Amendment #53

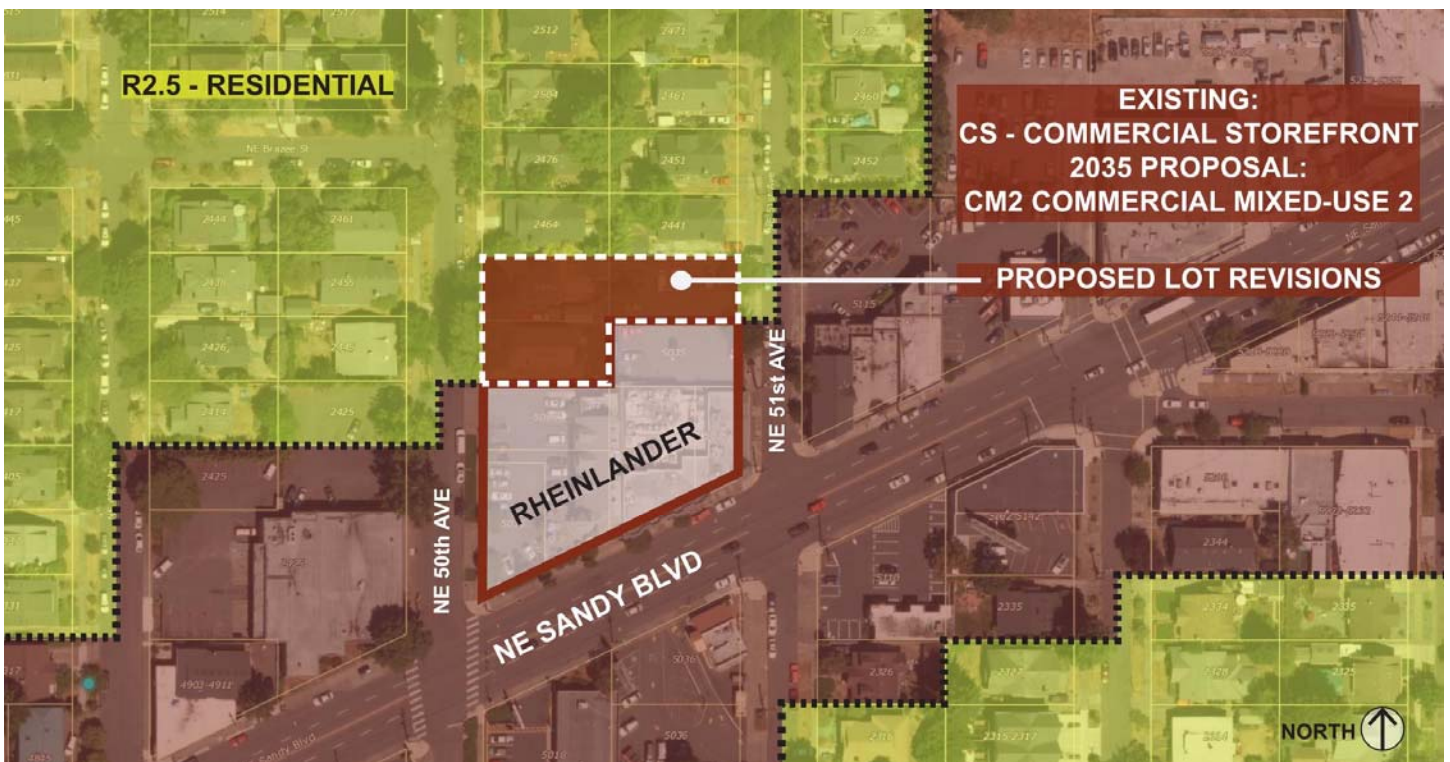
cputestimony@portlandoregon.gov

VENERABLE GROUP, INC.

5035 NE Sandy Blvd

2446 NE 50th Ave

2456 NE 50th Ave



VENERABLE GROUP, INC.

DER RHEINLANDER REDEVELOPMENT SITE

PORTLAND CITY COUNCIL

cputestimony@portlandoregon.gov

Subject line: Comprehensive Plan Testimony on **Amendment #53**

RE: Venerable Group Inc., 5305 NE Sandy Blvd, 2446 NE 50th, 2456 NE 50th

Dear Council Members:

Venerable Group, Inc. is developing a new building on the former Der Rheinlander restaurant property that will house the Portland Clinic as an anchor tenant. There will also be 8,000 square feet of new retail and office space for new neighborhood services and businesses. The development site is part of the 2035 Comprehensive Plan to be rezoned from CS to CM2 in the restructuring of the Mixed-Use zones. As part of this investment, we seek to rezone the three adjacent sites to the north also owned by Venerable, in order to consolidate the campus.

1. 5305 NE Sandy Blvd –NE lot

This parcel includes a split-zoned R2.5 portion on the north-east corner currently used as a commercial parking lot for the restaurant. Zoning across NE 51st is CM2, and is currently used as the parking lot for Laurelwood Public House & Brewing. The zigzag step zoning along the diagonal of NE Sandy creates non-contextual zoning relationships. Rezoning this lot would provide zoning consistency and a clearer edge to the adjacent neighborhood. We propose rezoning to the CM2 classification.



RE: 5035 NE Sandy Blvd– parking lot on NE 51st, north of Sandy
2446 NE 50th – house on NE 50st, north of Sandy
2456 NE 50th – house on NE 50st, north of Sandy

I am in favor of having my properties converted to Commercial Mixed Use 2 and/or R1.



Craig Kelly

11/17/16

Venerable Group, Inc.

Date

70 NW Couch, Suite 207

Portland, OR 97209

Phone: 503-224-2446

Fax: 503-224-2311

Owner of:

5035 NE Sandy Blvd., 2446 NE 50th, 2456 NE 50th

Portland, OR 97213

From: Allen F
To: [BPS Comprehensive Plan Testimony](#); [Commissioner Fritz](#); [Commissioner Saltzman](#); [Hales, Mayor](#); [Commissioner Novick](#); [Commissioner Fish](#)
Cc: [Stockton, Marty](#)
Subject: Minutes of Oct RNA meeting re Inclusionary Housing and Mixed Use Zones vote
Date: Thursday, November 17, 2016 3:26:46 PM
Attachments: [MUZ & IH ltr w Minutes.pdf](#)
[10-10-16 RNA Minutes - Approved.pdf](#)

Dear Mayor Hales and Commissioners:

For what it's worth, attached are the final, recently approved Minutes of the Richmond Neighborhood Association's meeting of October 10, 2016. The Minutes document the motions and vote which formed the RNA's position on Inclusionary Housing and the Mixed Use Zones project. Since there have been several letters from the RNA and me on these topics, this should clear up any confusion as what the RNA's recommendations are, as voted in in the October meeting. As the Minutes state, and as described in my letters, the RNA voted in the following motions:

Inclusionary Housing: The RNA supports inclusionary zoning, but:

- It is "concerned that incentives need to be calibrated so that we achieve affordability"
- "if FAR bonuses are used, we want to see more assessment of impacts such as solar shading" and
- "recommend increasing Floor Area Ratios from 2.5:1 to 3.5:1 for small buildings"

Mixed Use Zones:

- "minimize or eliminate CE zoning in Richmond
- "RNA prefers more pedestrian-oriented Zones CM2 or CM3"
- "CM3 preferred on Powell"

As to all bullet points:

- "With assessment of impacts -- such as solar shading -- for adjacent residential properties"

As with my other letters, I am not speaking on behalf of, or for, the RNA, but merely reporting on the vote and approved Minutes for the meeting at issue. I realize you are probably getting tired of getting these letters, but I cannot

understate the importance of Council having an accurate and correct statement of what the RNA voted in on these issues.

Respectfully,
Allen Field,

Cc: Marty Stockton, BPS SE District Liaison

Allen Field
3290 SE Grant
Portland, Oregon 97214

November 17, 2016

Comprehensive Plan Update cputestimony@portlandoregon.gov
Mayor Charlie Hales mayorhales@portlandoregon.gov
Commissioner Dan Saltzman dan@portlandoregon.gov
Commissioner Amanda Fritz amanda@portlandoregon.gov
Commissioner Nick Fish nick@portlandoregon.gov
Commissioner Steve Novick novick@portlandoregon.gov
Portland City Council
1221 SW 4th Ave, Room 130
Portland, OR 97204

Re: Minutes of October 10, 2016 vote on Inclusionary Housing and Mixed Use Zones

Dear Mayor Hales and Commissioners:

For what it's worth, attached are the final, recently approved Minutes of the Richmond Neighborhood Association's meeting of October 10, 2016. The Minutes document the motions and vote which formed the RNA's position on Inclusionary Housing and the Mixed Use Zones project. Since there have been several letters from the RNA and me on these topics, this should clear up any confusion as what to the RNA's recommendations are, as voted in in the October meeting. As the Minutes state, and as described in my letters, the RNA voted in the following motions:

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Portland City Council
November 17, 2016
Page 2

probably getting tired of getting these letters, but I cannot understate the importance of Council having an accurate and correct statement of what the RNA voted in on these issues.

Respectfully,

A handwritten signature in black ink, appearing to read 'A. Field', written in a cursive style.

Allen Field,

Cc: Marty Stockton, BPS SE District Liaison

RNA October 10, 2016 Minutes

Minutes by: Allen Field

Meeting was called to order at 7pm by Cyd Manro.

Board Members Present: Allen Field, Cyd Manro, Alan Kessler, Eric Matthews, Tom McTighe, Heather Flint-Chatto (arrived 7:40 pm), Greg Petras, Matt Otis, Jan (participated remotely via Skype on Alan's computer), Elizabeth Williams

Board Members Absent: Jonathan King, Brendon Haggerty

Others Present: Doug Klotz, Liana Corliss, Russ Gorby, Marty Stockton, Callie Jones, Paul Leistner, Carolyn Hintz, Liz Potter, Denise Hare, Daniel Merys, Laura Travisano, Donna Meyer, Bonnie Blair, Ryan Foote, Joseph Storr, Holly Swendio

Agenda Consent: No hard copies agendas available, but Cyd explained that Richmond Carbon agenda items was voluntarily withdrawn by Eric, to be reset to November. (Copies of agenda arrived when Tom McTighe subsequently arrived.)

No Precinct Report given: No Officer present

September Meeting Minutes: Minutes were not sent out to the Board to review; set over to next meeting

Announcements:

Allen announced:

- Dec. 3 Friend of Trees Richmond/HAND/Buckman/Brooklyn tree planting, tree prices and deadlines;
- Oct 20 SEED premier at EcoFilm Fest at Hollywood Theater; &
- Oct 15 Parke Diem work party at Sewallcrest Community Garden

Committee Reports:

1. **Land Use:** Matt gave a presentation with a PowerPoint handout on 2 issues: a) inclusionary housing and b) Mixed Use Zones, for RNA to state its position on them.
 - a. **Inclusionary housing:** Inclusionary housing now legal through recent legislation, but can only apply to buildings with 20 or more units (property can have 2 separate buildings: inclusionary housing applies to building not property) and limited to MFI (median family income) at 80%. Matt gave background on issue, referring to PowerPoint handout, and explained Land Use committee meeting discussion on issues, which was outlined in handout. There was Q & A with Board and audience about draft recommendations in handout and issues of 60% vs 80%, height bonuses, MFI solar shading, and FAR. Cyd took straw poll which showed Board supported all the recommendations. Alan Kessler opposed assessing solar shading

impacts, Callie Johnson supported make such assessments, and Allen stated it is good to make such assessment -- it's only an assessment, doesn't set any standards on the matter, and can ignore assessed impacts.

Motion by Matt / 2nd by Erik: adopt the 3 recommendations on p. 8 of Matt's handout (attached):

- "support inclusionary zoning", but
 - we're "concerned that incentives need to be calibrated so that we achieve affordability"
 - "if FAR bonuses are used, we want to see more assessment of impacts such as solar shading" and
 - "recommend increasing Floor Area Ratios from 2.5:1 to 3.5:1 for small buildings"

Motion adopted by unanimous vote, no abstentions

- b. Mixed Use Zoning:** Matt, with reference to handout, explained M/U zone classification: CM2, CM3 and CE. Hawthorne and Division have CM2 proposed and Powell has CM2 and some CE properties proposed. Issue that was discussed at Land Use Committee meeting was whether Powell should be CM3 and CE minimized or eliminated. CE would allow for drive-thru, while CM does not. Issue of CE was the main concern, to change it to mixed-use CM zoning. CM2 for Hawthorne and Division is already what's there, so not going to be any real change there and no need to fight to change that. CE property on Hawthorne is Fred Meyer, but not in Richmond, so won't address it.

Marty Stockton, BPS SE Liaison, explained that BPS staff took conservative approach and recommended, for Powell and Foster, a straight conversion from current zoning to CM2; to recommend CM3 would require extensive public process by city. Matt explained that Land Use Committee recommended reducing or eliminating CE on Powell but split whether should be CM2 or CM3 on Powell. CM3 allows for 7 story buildings. Marty explained that CE allows for exterior storage and display, such as at Urban Farm Store and Naomis, and that land is so valuable now that CE property is being developed as CM type buildings, i.e., mixed-use. Allen said more notice to community needed for recommending change to CM3 and there's already only a few CE properties in Richmond as it is and we need employment centers so more people can work in Richmond. Cyd took straw poll on Powell issue of CE and CM2 vs CM3 on Powell.

Motion by Alan Kessler / Cyd 2nd: moved to adopt RNA Land Use Committee recommendation as stated in bold in handout, p. 12 (attached):

- "minimize or eliminate CE zoning in Richmond"
- "RNA prefers more pedestrian-oriented Zones CM2 or CM3"

- “CM3 preferred on Powell”

Motion passed with all in favor except Allen opposing, no abstentions

Motion by Cyd / Heather 2nd: moved to adopt caveat stated in handout to attach to above recommendations:

- “With assessment of impacts -- such as solar shading – for adjacent residential properties”

Motion passed with Allen, Heather, Jan, Tom, Greg, Elizabeth, Cyd, Matt voting in favor, Alan and Erik opposing, and no abstentions.

Liana Corliss, who lives on 38th Ave, between Market and Hawthorne, explained that all R zoned properties on her entire block are proposed to change to CM2, except her property and 1 neighbor, which will be R2.5; all properties currently R5. She asked Board to support her proposal to recommend properties be R1 on C. Chavez and R2.5 on 38th. Marty explained that BPS conservatively recommended properties be gently upzoned to R2.5, but that Planning and Sustainability Commission, upon urging of testimony, recommended changing it to CM2. No vote taken on matter.

2. **SEUL Coalition Rep. Denise Hare:** Discussed Powell-Division Bus Rapid Transit (BRT) project and SEUL’s letter to Metro opposing decision to move bus route to Division: fewer stops will occur and might not be any faster than current buses. She encouraged people to contact people listed in SEUL letter to give opinions on issues. She also asked for feedback if people are noticing much homelessness in neighborhood. Cyd said there is lots of camping in cars and Allen said there had not been much camping in Sewallcrest Park.

Paul Leistner handed out a postcard announcing meeting at Tabor Commons, 10/27, 7-8:30pm, to discuss new uses for Cafe au Play, 5633 SE Division. He gave short history of property and there was Q&A on it.

3. **Outdoor Spaces Committee:** Allen requested Board to authorize paying PP&R \$430 to go toward paying \$900 invoice for Sewallcrest Park movie; SEUL will apply \$500 in RNA’s movie fund toward invoice.

Motion by Cyd / Elizabeth 2nd: Moved to pay \$420 to city.

Motion passed by unanimous vote, no abstentions

4. **Proposal for new Emergency Preparedness Committee:** Callie distributed handout describing new committee. She gave background for need for committee and how there can be new Emergency Preparedness tab on website.

Motion by Cyd / 2nd by Heather: to create new committee.

Motion passed by unanimous vote, with Jan abstaining. Cyd stated that at 1st meeting the committee can discuss what their stated outcomes will be.

Agenda Items:

1. Rob Nosse: Rob was a no-show.
2. Proposed RNA goal re Carbon Footprint: Erik had earlier agreed to set over item to next meeting.
3. Consideration of DDI statement re 1st story heights, setback and building height: Heather gave quick background of Division Design Initiative and remaining issue/concern several board members had on language in draft Guidelines concerning 1st floor 18' minimum height, 3 story community preference (stated in response to M/U Design Preference question re scale, size, style, building form, façade, street frontage,) and upper level setbacks. There was discussion and attempt at compromise language but not resolved; no motion made to resolve language on these 3 issues in Guidelines. Cyd stated the issue will have to be pushed to next month. Heather stated that needed more time on agenda to discuss and resolve issue.

Meeting Feedback: Comments from Board Members and audience provided.

Meeting adjourned at 9:10

Next meeting: November 14, 2016