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July 26, 2016

VIA EMAIL (PSC@PORTLANDOREGON.GOV)

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201-5380

Re: SolTerra Testimony Requesting 4:1 FAR at 25 N Fargo Street to Prevent New Mixed Use Developments from Becoming Non-Conforming

Dear Chair Schultz and Members of the Planning and Sustainability Commission:

This office represents SolTerra Architecture, Inc. (“SolTerra”) which owns property located at 25 North Fargo Street (the “Woods Site”). The Woods Site is proposed to be down-zoned from RX to RH. The Woods Site is *not* included on the 4:1 FAR maps in the Miscellaneous Zoning Amendments Project, which will make SolTerra’s brand new development non-conforming. We request that the Commission include this property on the 4:1 FAR maps and establish a 75-foot height limit for the site.

The Woods Site is proposed to be down-zoned from RXd to RHd, which we understand is part of the City’s effort to eliminate the RX zone outside of the Central City and Gateway Plan Districts. SolTerra’s proposed development, which in the last stages of building permit review, and will be constructed before the Composite Zoning Map changes become effective, will conform to the Property’s current RX zoning. The development will also conform to the RH development standards if the 4:1 FAR and 75 foot height limits are imposed. SolTerra requests that if the RH zoning is imposed, the Woods Site is allowed a 4:1 FAR and 75 foot height limit.

Thank you for your consideration of this request.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Allison J. Reynolds".

Allison J. Reynolds

From: Jim Laubenthal [mailto:laubenthaljim@gmail.com]
Sent: Tuesday, July 26, 2016 2:26 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>; Cole, John <John.Cole@portlandoregon.gov>
Cc: Lucas Miller <lmiller@riversidegcc.com>; John Lof <jlof@riversidegcc.com>
Subject: Miscellaneous Zoning Testimony Submittal - Peninsula Canal Trail

This email comments on the recent submittal by the Bureau of Environmental Services to relocate a future trail adjacent to Riverside (trail # 2922) from the top of the existing levee onto active course areas. We oppose the change of alignment for this section adjacent to Riverside. We support the current location on the top of the levee as shown on the existing Map App.

We only found out yesterday about the idea of relocating this section of trail onto active parts of the golf course. There has been no conversation with us regarding the feasibility of this major change. We are quite surprised at this last minute switch.

By way of background, we worked cooperatively with Metro to locate an easement for this section of the trail on the levee. At that time we had concerns about public safety, but felt a trail made sense. This area proposed by BES is an active part of the course and would not be safe for trail users. The other trail section to the north is probably more feasible for this concept of moving to the toe of the levee.

We are hoping that staff and the PSC will continue with the current alignment for this section. Riverside must strongly object to this last minute change, as it would cause severe adverse impacts on us.

Jim Laubenthal, Riverside Land Use



Northwest District Association

July 26, 2016

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

RE: Comprehensive Plan Update: Miscellaneous Zoning Amendments
Request re: Alphabet Historic District

Dear Commissioners:

The NWDA Planning Committee writes concerning zoning in the Alphabet Historic District described in the Miscellaneous Zoning Amendments Project (MZA). NWDA appreciates the City's receptiveness to NWDA feedback provided in the form of public testimony concerning historic preservation, reflected in the recently adopted Comprehensive Plan policies.

Consistent with such policies, NWDA requests deletion of Map 120-9 (formerly Map 120-7) and Map 120-6 (formerly Map 120-8) in order to eliminate 4:1 FAR allowances in RH-zoned parcels in the Alphabet Historic District (see attached) so the default of 2:1 FAR allowances apply in such areas.

NWDA's request is based upon:

- The 2035 Comprehensive Plan's Historic Preservation Policies, including Policy 4.49
- The Alphabet Historic District Addendum to Community Design Guidelines
- Existing FAR in Alphabet Historic District, and FAR in other Historic Districts

I. **Compliance with Policy 4.49 – Resolve Conflicts.**

The 2035 Comprehensive Plan calls for a resolution of conflicts between base zoning and design guidelines in historic districts:

"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."

BPS acknowledged recently, while recommending denial of destruction of a contributing resource in favor of a 6-story apartment complex on a RH-zoned parcel with 4:1 FAR, that such zoning in the Alphabet Historic District could jeopardize the character of the historic district and encourage destruction of historic structures:

"There are many historic buildings within the district that are four or five, or even six, stories tall, and this density is noted in the National Register nomination as part of the significance of this neighborhood. However, staff notes that the RH zone covers broad areas of the district, thereby seemingly encouraging demolition of the older smaller-scaled buildings that fall within this zone; this zoning designation was, in fact, noted in the Alphabet Historic District



Northwest District Association

National Register nomination as a ‘threat to the remaining single-family homes in the neighborhood’.” (emphasis added)

-Staff Report and Recommendation for LU 14-210073 DM – Buck-Prager Building Pages 13-14

Eliminating 4:1 FAR in favor of 2:1 FAR in RH-zones will help reduce proposals for such out-of-scale projects. Indeed, BPS Staff acknowledged the risk of encouraging such projects given existing zoning in the district:

“In the past several years, there have been many new buildings constructed within the Northwest neighborhood and within the Alphet Historic District. One of these is a six story EX-zoned residential building one block away. Two blocks away is another 5-story EX-zoned residential building with a 5-story RH-zoned building across the street. Since construction, staff and the Historic Landmarks Commission have determined that these new buildings are **excessively large and relatively incompatible**, particularly in one case where the new building is adjacent to, and dwarfs, a Landmark 3-story apartment building directly to its south.” (emphasis added)

-Staff Report and Recommendation for LU 14-210073 DM – Buck-Prager Building Page 14.

II. Consistency with Community Design Guidelines.

Eliminating 4:1 allowances in RH-zones ensures development that is consistent with the Community Design Guidelines applicable to proposed development projects in the Alphet Historic District:

ALPHABET HISTORIC DISTRICT ADDENDUM TO COMMUNITY DESIGN GUIDELINES

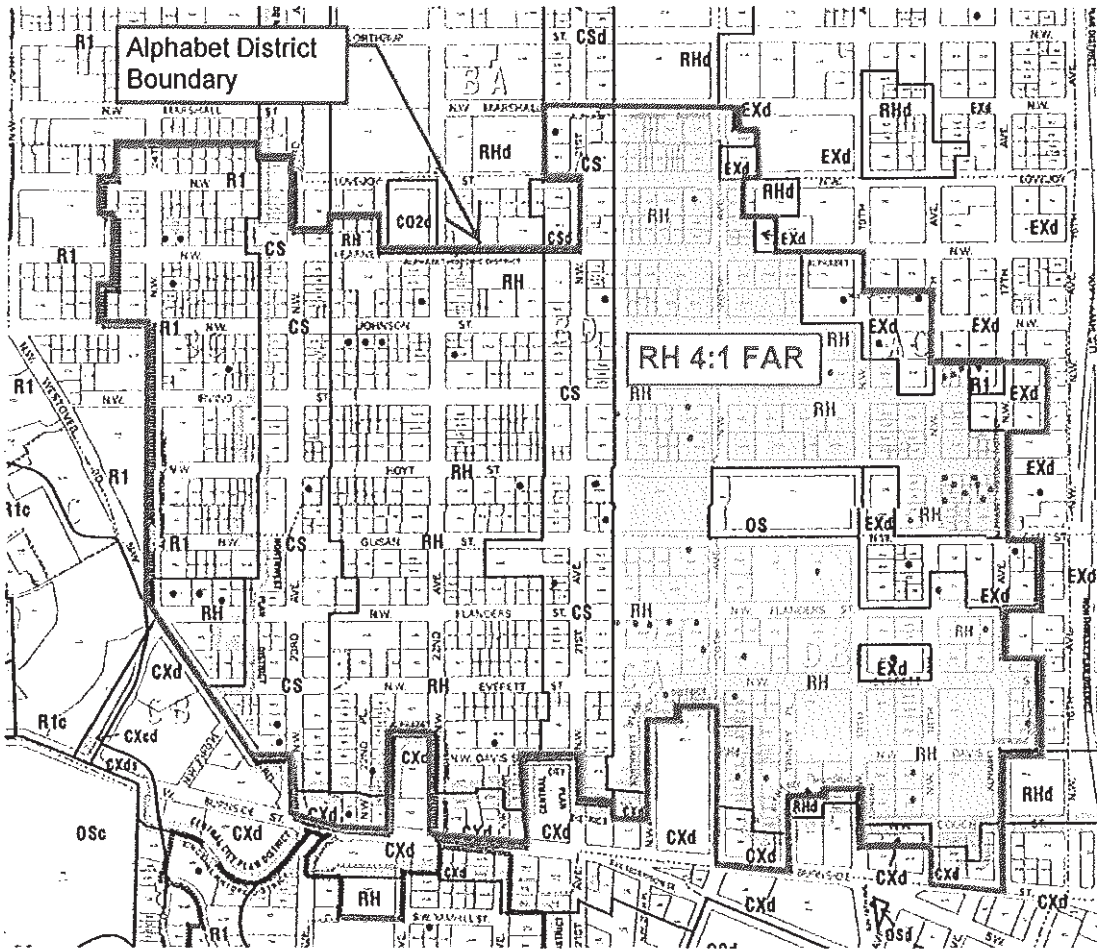
- **Historic Alphet District Guideline 2:** “The design of new construction will be compatible with the historic qualities of the district as identified in the Historic Context Statement.”
- **Historic Alphet District Guideline 3:** “Hierarchy of Compatibility. Exterior alterations and additions will 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 Alphet District.”

RH-zoning with 4:1 FAR in this area was established prior to the designation of the Alphet Historic District, and during a period when such zoning was intended to encourage the type of high-density development that is now commonplace throughout the Northwest District¹, of which the Alphet Historic District is a small part.

¹ According to the MUZ 10/10/14 assessment (see attached), the Northwest District has the highest density and largest number of housing units among the mixed-used areas studied citywide.



4:1 Allowances in RH-Zoned Parcels in Alphabet Historic District





From: Mixed-Use Zoning – 10/10/14 Assessment

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NORTHWEST DISTRICT

The Northwest District centers on NW 23rd Avenue and NW Lovejoy Street. With a WalkScore® of 84, it is a very walkable neighborhood with numerous destinations along its commercial corridors. It has the highest amount of available housing in the city and a great deal of studio and one-bedroom units. Residential vacancy rates are the highest in the city. It is a major employment center, and the entertainment industry pays well relative to other areas. The area is not diverse racially, and over 80% of all residents are between 21 and 64 years of age.

TABLE 1: DEMOGRAPHIC SNAPSHOT

	Northwest				City of Portland			
	1990	2000	2010†	%/yr ‡	1990	2000	2010†	%/yr ‡
Population	9,355	9,648	11,119	0.9%	456,600	529,171	583,776	1.0%
Households	6,184	6,535	7,325	0.9%	205,105	223,737	248,246	1.0%
Average Household Size	1.43	1.45	1.49	0.2%	2.30	2.30	2.28	0.0%
Median Household Income*	\$29,350	\$39,151	\$38,870	1.5%	\$43,064	\$50,842	\$49,537	0.7%
Per Capita Income*	\$32,857	\$41,266	\$42,867	1.4%	\$23,931	\$28,673	\$29,635	1.1%
Age Characteristics								
% Under 20	8.7%	7.9%	7.8%	-0.5%	24.9%	23.7%	21.5%	-0.7%
% Over 64	16.4%	10.0%	10.5%	-1.8%	14.4%	11.6%	10.4%	-1.4%
Race								
% White	91.0%	88.9%	87.3%	-0.2%	82.9%	77.9%	76.1%	-0.4%
% Black	2.5%	2.2%	1.3%	-1.9%	6.9%	6.6%	6.3%	-0.5%
% American Indian	1.0%	1.1%	0.6%	-2.0%	1.2%	1.1%	1.0%	-0.8%
% Asian	2.4%	3.7%	4.9%	5.4%	4.8%	6.3%	7.1%	2.4%
% Hawaiian/Pacific Islander	0.3%	0.2%	0.2%	-0.3%	0.3%	0.4%	0.5%	5.1%
% Other	0.7%	1.4%	1.8%	7.0%	1.1%	3.5%	4.2%	13.5%
% Two or more races	2.4%	2.6%	4.0%	3.4%	2.7%	4.1%	4.7%	3.5%
Ethnicity								
% Hispanic/Latino	2.7%	3.9%	5.2%	4.5%	3.2%	6.3%	9.4%	9.0%
% Not Hispanic/Latino	97.3%	96.1%	94.8%	-0.1%	96.8%	93.7%	90.6%	-0.3%

* Median household income and per capita income reflect estimated 2010 values. † Percentages change over years for the period of 1990-2010. ‡ All dollar amounts are adjusted for inflation to 2010 dollars. Source: U.S. Census Bureau, Census 1990, 2000, 2010, and American Community Survey 2012; Ed and Julie Lee, Analyst, 2013; City of Portland Bureau of Planning and Sustainability, 2014.

Northwest District has the highest population density of any neighborhood in the analysis areas, at 14,100 people per square mile in 2010 (Table 1). The average household size is the lowest of all analysis areas at 1.5 persons per household, and the proportion of the population under the age of 20 is very low, only 7.8% compared to 21.5% citywide—few children live in the area. These two factors help shed light on why the per capita income is significantly higher in Northwest, while median household income remains lower than the City.

Northwest is one of the least racially diverse areas in the city. Its White population comprised over 87% of the total in 2010. In the period from 1990 to 2010, the population of color grew by about 3.7%. Those identifying as Asian (4.9%) and two or more races (4.0%) were the largest non-White populations.



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TABLE 2: HOUSING PROFILE

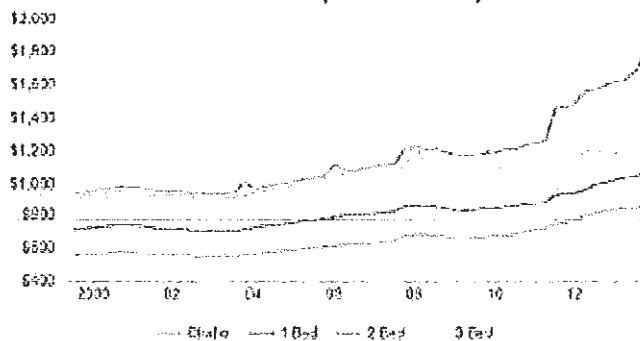
	Northwest Portland	All Centers	City of Portland
Housing Units (Census 2010)	8,066	58,333	265,439
% Owner-Occupied	22.8%	47.6%	53.7%
% Renter-Occupied	77.2%	52.2%	46.3%
% Vacant Housing Units	9.1%	6.0%	6.4%
Rental Market (June 2014)†			
Studio	\$1,100	\$1,098	\$873
1-Bedroom	\$1,432	\$1,195	\$946
2-Bedroom	\$1,939	\$1,273	\$1,047
3-Bedroom or more	\$2,295	\$1,550	\$1,186
Single-Family Home Market ‡			
2004 Median Sale Price	\$600,250	\$185,000	\$188,500
2004 Median Price/SF	\$202	\$128	\$129
2014 Median Sale Price	\$630,500	\$279,000	\$280,000
2014 Median Price/SF	\$293	\$210	\$187
Median Sale Price %4/yr *	0.5%	5.1%	4.9%
Median Price/SF %4/yr *	4.5%	6.4%	4.5%

All dollar amounts are in current dollars. † Rental market for the City of Portland reflects stable rates for Q1 2014. ‡ Single-family home market captures Q1 and Q2 of 2004 and 2014 only. * Percentage change per year is for the period of 2004 - 2014. Source: US Census Bureau, Census 2010, and American Community Survey 2012. (4) Business Analyst, 2014; City of Portland Bureau of Planning and Sustainability, 2014; RedMapper and Trulia; City of Portland Assessor's data.

✓ In addition to a high population density, Northwest had the largest number of housing units in 2010 at 8,000 (Table 2). The majority of units were renter-occupied, over 77%, which is 26 percentage points higher than all other analysis areas. The cost of rental housing is very high in the neighborhood. One-bedroom units cost nearly \$500 more in Northwest than they do in the City overall. The median price per square foot was \$2.24 in June 2014, compared to the median of all centers at \$1.14 per square foot. Stable rental rates show that three-bedroom units peaked in 2008 (Figure 1). From 2009 to Q1 2014, studio and one-bedroom units have shown steady price increases. Two-bedroom units sharply increased beginning Q3 2011, and these unit types are currently valued higher than three-bedroom units by about \$300.

The median value of \$630,000 for the residential home market in Northwest is more than double the city median. However, in the period from 2004 to 2014, home values have appreciated at an annual rate slower than inflation—only 0.5% per year (Table 2).

FIGURE 1: RENTAL HOUSING RATES, NORTHWEST, 2000 – 2014 (Q1)



Source: CoStar Realty Information 2014, Portland Development Commission

This spreadsheet was extracted from June, 2011, GIS data provided to the Architectural Heritage Center

Building ID	State ID	Year Built	Average Height	Base Zone	Comp Plan Zone	Historic District	Site Street Address	Building FAR
1N1E33AB-8000-B1	1N1E33AB 8000	1962	46.810	RH	RH	AB	1026 NW 20TH AVE	2.4218
1N1E33BA-2700-B1	1N1E33BA 2700	1926	25.792	RH	RH	AB	1037 NW 20TH AVE	1.3036
1N1E33DB-9700-B1	1N1E33DB 9700	1910	39.750	RH	RH	AB	104 NW 20TH AVE	2.2626
1N1E33CA-4100-B1	1N1E33CA 4100	1910	27.946	RH	RH	AB	104-106 NW 22ND PL	1.0692
1N1E33CA-6100-B1	1N1E33CA 6100	1910	0.000	RH	RH	AB	110 NW KING AVE	2.2053
1N1E33DB-9600-B1	1N1E33DB 9600	1911	35.000	RH	RH	AB	112 NW 20TH AVE	1.9000
1N1E33CA-3400-B1	1N1E33CA 3400	1925	25.862	RH	RH	AB	115 NW 22ND PL	0.7990
1N1E33CA-4200-B1	1N1E33CA 4200	0	0.000	RH	RH	AB	115 WJ/ NW 22ND AVE	0.0000
1N1E33CA-5600-B1	1N1E33CA 5600	1909	29.079	RH	RH	AB	117 NW KING AVE	0.6416
1N1E33DB-8500-B3	1N1E33DB 8500	1912	0.000	RH	RH	AB	117 NW TRINITY PL	
1N1E33CA-4300-B1	1N1E33CA 4300	1906	20.000	RH	RH	AB	118 NW 22ND PL	2.9427
1N1E33DB-7800-B1	1N1E33DB 7800	1912	45.646	RH	RH	AB	120 NW TRINITY PL	0.9473
1N1E33CA-3300-B1	1N1E33CA 3300	1908	24.081	RH	RH	AB	121-125 NW 22ND PL	2.3010
1N1E33DB-9500-B1	1N1E33DB 9500	1910	23.200	RH	RH	AB	124 NW 20TH AVE	0.5824
1N1E33CA-4400-B1	1N1E33CA 4400	1906	26.782	RH	RH	AB	124 NW 20TH AVE	0.9989
1N1E33CA-13700-B1	1N1E33CA 13700	1907	69.278	RH	RH	AB	124 NW 22ND PL	0.9428
1N1E33DB-5000-B1	1N1E33DB 5000	0	33.400	RH	RH	AB	125 NW 20TH PL	2.6167
1N1E33DB-8600-B1	1N1E33DB 8600	1908	35.607	RH	RH	AB	130 NW 19TH AVE	1.5576
1N1E33DB-7700-B2	1N1E33DB 7700	1904	0.000	RH	RH	AB	133 NW TRINITY PL	1.0233
1N1E33DB-4400-B1	1N1E33DB 4400	1880	25.000	RH	RH	AB	147 NW 19TH AVE	0.7701
1N1E33DB-4500-B2	1N1E33DB 4500	1905	11.550	RH	RH	AB	1628 NW EVERETT ST	0.8608
1N1E33AC-2600-B1	1N1E33AC 2600	1906	29.574	RH	RH	AB	1634 NW EVERETT ST	0.9812
1N1E33AC-3900-B1	1N1E33AC 3900	1902	34.790	RH	RH	AB	1701-1719 NW GLISAN ST	1.6753
							1703 NW HOYT ST	1.4548

This spreadsheet was extracted from June, 2011, GIS data provided to the Architectural Heritage Center

1N1E33AC-3800-B1	1N1E33AC 3800	1890	33.240	RH	RH	AB	1704 NW HOYT ST	1.2083
1N1E33AC-3600-B1	1N1E33AC 3600	1890	35.020	RH	RH	AB	1710 NW HOYT ST	1.1118
1N1E33AC-4000-B1	1N1E33AC 4000	1902	34.560	RH	RH	AB	1711 NW HOYT ST	1.0417
1N1E33DB-5400-B1	1N1E33DB 5400	1925	39.441	RH	RH	AB	1715 NW COUCH ST	1.0896
1N1E33AC-3500-B1	1N1E33AC 3500	1890	32.510	RH	RH	AB	1716 NW HOYT ST	0.6907
1N1E33AC-4100-B1	1N1E33AC 4100	1902	34.900	RH	RH	AB	1717 NW HOYT ST	1.2266
1N1E33AC-3400-B1	1N1E33AC 3400	1890	28.790	RH	RH	AB	1720 NW HOYT ST	0.6603
1N1E33AC-4700-B1	1N1E33AC 4700	1962	40.483	RH	RH	AB	1721 NW IRVING ST	0.6795
1N1E33AC-2700-B1	1N1E33AC 2700	1886	28.630	RH	RH	AB	1721-1723 NW GLISAN ST	0.8940
1N1E33AC-4200-B1	1N1E33AC 4200	1919	33.035	RH	RH	AB	1727 NW HOYT ST	1.2802
1N1E33AC-3300-B1	1N1E33AC 3300	1890	27.020	RH	RH	AB	1728 NW HOYT ST	1.0138
1N1E33DB-6500-B1	1N1E33DB 6500	1908	53.350	RH	RH	AB	1730 NW COUCH ST	3.6112
1N1E33DB-3200-B1	1N1E33DB 3200	1924	30.910	RH	RH	AB	1731 NW EVERETT ST	1.5708
1N1E33AC-2800-B1	1N1E33AC 2800	1890	30.380	RH	RH	AB	1731 NW GLISAN ST	0.5408
1N1E33AC-3200-B1	1N1E33AC 3200	1890	26.730	RH	RH	AB	1734 NW HOYT ST	0.9995
1N1E33AC-4900-B1	1N1E33AC 4900	1962	40.033	RH	RH	AB	1735 NW IRVING ST	1.0776
1N1E33DB-3300-B1	1N1E33DB 3300	1965	23.983	RH	RH	AB	1740 NW FLANDERS ST	0.5271
1N1E33DB-700-B1	1N1E33DB 700	1927	18.130	RH	RH	AB	1740 NW GLISAN ST	1.0000
1N1E33AC-6600-B1	1N1E33AC 6600	1929	15.060	RH	RH	AB	1801-1817 NW IRVING ST	0.9600
1N1E33AC-7900-B2	1N1E33AC 7900	1900	15.390	RH	RH	AB	1805 NW GLISAN ST	0.5612
1N1E33AC-6700-B1	1N1E33AC 6700	1957	11.545	RH	RH	AB	1808-1816 NW IRVING ST	0.4056
1N1E33DB-4900-B1	1N1E33DB 4900	0	15.000	RH	RH	AB	1809 NW DAVIS ST	0.2900
1N1E33DB-80000-B1	1N1E33DB 80000	0	40.125	RH	RH	AB	1810 NW EVERETT ST	0.0000
1N1E33DB-50000-B1	1N1E33DB 50000	0	58.833	RH	RH	AB	1811 NW COUCH ST	0.0000
1N1E33DB-3000-B1	1N1E33DB 3000	1908	60.250	RH	RH	AB	1812 NW FLANDERS ST	4.2764

This spreadsheet was extracted from June, 2011, GIS data provided to the Architectural Heritage Center

1N1E33AC-7300-B1	1N1E33AC 7300	1898	35.340	RH	RH	AB	1815 NW HOYT ST	1.9014
1N1E33AC-7200-B1	1N1E33AC 7200	1908	27.670	RH	RH	AB	1823 NW HOYT ST	1.3053
1N1E33DB-5100-B1	1N1E33DB 5100	1920	35.450	RH	RH	AB	1835 NW COUCH ST	1.9600
1N1E33AC-9700-B1	1N1E33AC 9700	1951	22.465	RH	RH	AB	1920 NW JOHNSON ST	0.9817
1N1E33AC-9500-B1	1N1E33AC 9500	1929	26.598	RH	RH	AB	1929 NW IRVING ST	1.4838
1N1E33DB-1900-B1	1N1E33DB 1900	1949	31.534	RH	RH	AB	1931 NW FLANDERS ST	0.5653
1N1E33DB-1800-B1	1N1E33DB 1800	1928	0.000	RH	RH	AB	1931 W/ NW FLANDERS ST	0.2793
1N1E33AC-10500-B1	1N1E33AC 10500	1910	29.155	RH	RH	AB	1942 NW KEARNEY ST	0.5396
1N1E33AC-9400-B1	1N1E33AC 9400	1929	30.624	RH	RH	AB	1943 NW IRVING ST	1.8604
1N1E33AC-9800-B1	1N1E33AC 9800	1929	31.198	RH	RH	AB	1944 NW JOHNSON ST	1.9059
1N1E33DB-2500-B1	1N1E33DB 2500	1930	35.450	RH	RH	AB	1949 NW EVERETT ST	1.7850
1N1E33AC-9300-B1	1N1E33AC 9300	1928	31.971	RH	RH	AB	1953 NW IRVING ST	1.7908
1N1E33AC-9900-B1	1N1E33AC 9900	1927	29.141	RH	RH	AB	1954 NW JOHNSON ST	1.9144
1N1E33AC-8500-B1	1N1E33AC 8500	1925	28.571	RH	RH	AB	1955 NW HOYT ST	1.1453
1N1E33DB-8900-B1	1N1E33DB 8900	1907	29.629	RH	RH	AB	1956 NW EVERETT ST	0.4352
1N1E33AC-8900-B1	1N1E33AC 8900	1926	26.465	RH	RH	AB	1958 NW IRVING ST	1.4352
1N1E33DB-9000-B1	1N1E33DB 9000	1906	27.422	RH	RH	AB	1962 NW EVERETT ST	0.9130
1N1E33AC-10600-B1	1N1E33AC 10600	1884	37.731	RH	RH	AB	1962 NW KEARNEY ST	0.7212
1N1E33AC-9200-B1	1N1E33AC 9200	1928	26.699	RH	RH	AB	1963 NW IRVING ST	1.6280
1N1E33AC-10000-B1	1N1E33AC 10000	1927	28.429	RH	RH	AB	1964 NW JOHNSON ST	1.9212
1N1E33AC-10700-B1	1N1E33AC 10700	1965	52.849	RH	RH	AB	1969 NW JOHNSON ST	2.1586
1N1E33DB-2600-B1	1N1E33DB 2600	1994	32.745	RH	RH	AB	1972 NW FLANDERS ST	2.3043
1N1E33DB-2400-B1	1N1E33DB 2400	1938	56.092	RH	RH	AB	1975 NW EVERETT ST	2.1881
1N1E33AC-10900-B1	1N1E33AC 10900	1905	37.000	RH	RH	AB	1977 NW KEARNEY ST	1.3640

This spreadsheet was extracted from June, 2011, GIS data provided to the Architectural Heritage Center

1N1E33AC-10800-B1	1N1E33AC 10800	1947	18.530	RH	RH	AB	1987 NW KEARNEY ST	0.9380
1N1E33DB-8700-B1	1N1E33DB 8700	1906	30.535	RH	RH	AB	201 NW TRINITY PL	1.5147
1N1E33BD-3400-B1	1N1E33BD 3400	1957	18.055	RH	RH	AB	2010 NW KEARNEY ST	1.0105
1N1E33BD-100-B1	1N1E33BD 100	1924	26.853	RH	RH	AB	2011 NW LOVEJOY ST	1.4118
1N1E33BD-1800-B1	1N1E33BD 1800	1912	43.039	RH	RH	AB	2015 NW KEARNEY ST	3.6944
1N1E33DB-9400-B1	1N1E33DB 9400	1997	24.200	RH	RH	AB	202-218 NW 20TH AVE	2.8446
1N1E33BD-1900-B1	1N1E33BD 1900	1890	27.448	RH	RH	AB	2023 NW KEARNEY ST	0.4618
1N1E33BD-300-B1	1N1E33BD 300	1991	28.834	RH	RH	AB	2023 NW LOVEJOY ST	1.1859
1N1E33CA-12400-B1	1N1E33CA 12400	1931	32.367	RH	RH	AB	2030 NW FLANDERS ST	2.1429
1N1E33BA-2800-B1	1N1E33BA 2800	1926	22.966	RH	RH	AB	2030 NW MARSHALL ST	1.4513
1N1E33BD-3600-B1	1N1E33BD 3600	1940	17.084	RH	RH	AB	2031 NW JOHNSON ST	0.7776
1N1E33CA-14000-B1	1N1E33CA 14000	1890	0.000	RH	RH	AB	2032 NW EVERETT ST	1.0689
1N1E33BD-6400-B2	1N1E33BD 6400	1926	15.064	RH	RH	AB	2033 NW GLISAN ST	1.0539
1N1E33BD-2000-B1	1N1E33BD 2000	1898	30.963	RH	RH	AB	2035 NW KEARNEY ST	0.6668
1N1E33BD-5700-B1	1N1E33BD 5700	1907	29.489	RH	RH	AB	2036 NW IRVING ST	0.6304
1N1E33BD-500-B1	1N1E33BD 500	1905	27.258	RH	RH	AB	2037 NW LOVEJOY ST	0.6981
1N1E33BD-4700-B1	1N1E33BD 4700	1916	28.146	RH	RH	AB	2039 NW IRVING ST	1.0705
1N1E33CA-4500-B1	1N1E33CA 4500	1908	21.676	RH	RH	AB	204 NW 22ND PL	0.6873
1N1E33CA-12600-B1	1N1E33CA 12600	1972	80.168	RH	RH	AB	2041 NW EVERETT ST	2.3916
1N1E33CA-11400-B1	1N1E33CA 11400	1941	13.720	RH	RH	AB	2042-2050 NW GLISAN ST	0.4625
1N1E33BD-2100-B1	1N1E33BD 2100	1910	27.326	RH	RH	AB	2043 NW KEARNEY ST	0.4393
1N1E33BD-3700-B1	1N1E33BD 3700	1908	29.990	RH	RH	AB	2043-2045 NW JOHNSON ST	0.6514
1N1E33BD-5600-B1	1N1E33BD 5600	1897	26.430	RH	RH	AB	2046 NW IRVING ST	0.4742
1N1E33BA-3000-B1	1N1E33BA 3000	1991	27.959	RH	RH	AB	2046 NW MARSHALL ST	0.7533
1N1E33BD-6100-B1	1N1E33BD 6100	1957	12.021	RH	RH	AB	2049 NW HOYT ST	0.3324
1N1E33BD-700-B1	1N1E33BD 700	1991	28.227	RH	RH	AB	2049 NW LOVEJOY ST	0.9061
1N1E33BD-4800-B1	1N1E33BD 4800	1948	13.944	RH	RH	AB	2049-2063 NW IRVING ST	0.5938
1N1E33CA-13900-B1	1N1E33CA 13900	1890	18.933	RH	RH	AB	2050 NW EVERETT ST	0.2480
1N1E33BD-4500-B1	1N1E33BD 4500	1898	27.378	RH	RH	AB	2050 NW JOHNSON ST	0.5357

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1N1E33BD-3300-B1	1N1E33BD 3300	1957	10.805	RH	RH	AB	2050 NW KEARNEY ST	0.3587
1N1E33BD-1400-B1	1N1E33BD 1400	1961	11.391	RH	RH	AB	2050 NW LOVEJOY ST	0.3427
1N1E33BD-800-B1	1N1E33BD 800	1927	30.169	RH	RH	AB	2051 NW LOVEJOY ST	1.9600
1N1E33BD-3900-B1	1N1E33BD 3900	1906	32.501	RH	RH	AB	2055-2057 NW JOHNSON ST	0.9589
1N1E33CA-11300-B1	1N1E33CA 11300	1917	30.502	RH	RH	AB	2056 NW GLISAN ST	2.2980
1N1E33BD-4400-B1	1N1E33BD 4400	1904	26.592	RH	RH	AB	2058 NW JOHNSON ST	0.6123
1N1E33BD-3200-B1	1N1E33BD 3200	1907	26.921	RH	RH	AB	2058 NW KEARNEY ST	0.4444
1N1E33BD-1300-B1	1N1E33BD 1300	1923	38.014	RH	RH	AB	2060 NW LOVEJOY ST	2.2560
1N1E33BD-6200-B1	1N1E33BD 6200	1884	30.008	RH	RH	AB	2061 NW HOYT ST	0.6240
1N1E33BD-2300-B1	1N1E33BD 2300	1908	28.442	RH	RH	AB	2061 NW KEARNEY ST	0.7588
1N1E33BA-3100-B1	1N1E33BA 3100	1927	27.418	RH	RH	AB	2062 NW MARSHALL ST	1.1851
1N1E33CA-12000-B1	1N1E33CA 12000	1960	53.579	RH	RH	AB	2065 NW FLANDERS ST	2.7342
1N1E33CA-11200-B1	1N1E33CA 11200	1914	26.345	RH	RH	AB	2066 NW GLISAN ST	1.7400
1N1E33BD-3100-B1	1N1E33BD 3100	1904	33.370	RH	RH	AB	2066 NW KEARNEY ST	1.0638
1N1E33BD-4900-B1	1N1E33BD 4900	1886	29.912	RH	RH	AB	2067 NW IRVING ST	0.4340
1N1E33BD-900-B1	1N1E33BD 900	1890	26.143	RH	RH	AB	2067 NW LOVEJOY ST	0.6178
1N1E33BD-4300-B1	1N1E33BD 4300	1890	26.561	RH	RH	AB	2068 NW JOHNSON ST	0.6758
1N1E33BD-1200-B1	1N1E33BD 1200	1910	29.130	RH	RH	AB	2068 NW LOVEJOY ST	0.6376
1N1E33BD-2400-B1	1N1E33BD 2400	1890	22.429	RH	RH	AB	2069 NW KEARNEY ST	0.5031
1N1E33DB-4300-B2	1N1E33DB 4300	1937	18.100	RH	RH	AB	210 NW 17TH AVE	0.6677
1N1E33CA-4600-B1	1N1E33CA 4600	1908	25.238	RH	RH	AB	210 NW 22ND PL	0.8484
1N1E33CA-9600-B1	1N1E33CA 9600	1906	41.438	RH	RH	AB	2110 NW FLANDERS ST	2.8828
1N1E33BD-11700-B1	1N1E33BD 11700	1920	17.476	RH	RH	AB	2112-2116 NW KEARNEY ST	1.0000
1N1E33CA-7400-B1	1N1E33CA 7400	1890	30.573	RH	RH	AB	2122 NW EVERETT ST	0.5651
1N1E33BD-6900-B2	1N1E33BD 6900	1980	9.210	RH	RH	AB	2122-2126 NW HOYT ST	0.5120
1N1E33BD-8300-B1	1N1E33BD 8300	1899	19.873	RH	RH	AB	2123 NW HOYT ST	0.4072
1N1E33CA-9400-B1	1N1E33CA 9400	1900	30.578	RH	RH	AB	2124 NW FLANDERS ST	1.1166

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1N1E33CA-7900-B1	1N1E33CA 7900	1892	31.267	RH	RH	AB	2125 NW EVERETT ST	0.6107
1N1E33CA-10000-B1	1N1E33CA 10000	1905	33.056	RH	RH	AB	2125 NW FLANDERS ST	0.5920
1N1E33BD-8200-B1	1N1E33BD 8200	1895	23.796	RH	RH	AB	2125 NW HOYT ST	0.6412
1N1E33CA-7300-B1	1N1E33CA 7300	1890	31.578	RH	RH	AB	2130 NW EVERETT ST	0.6773
1N1E33CA-6400-B1	1N1E33CA 6400	1885	28.581	RH	RH	AB	2131 NW DAVIS ST	0.7520
1N1E33CA-600-B1	1N1E33CA 600	1907	0.000	RH	RH	AB	2131-2137 NW GLISAN ST	1.1184
1N1E33BD-8100-B1	1N1E33BD 8100	1897	30.081	RH	RH	AB	2133 NW HOYT ST	0.4876
1N1E33CA-9300-B1	1N1E33CA 9300	1926	27.302	RH	RH	AB	2134 NW FLANDERS ST	1.6480
1N1E33BD-7000-B1	1N1E33BD 7000	1885	32.549	RH	RH	AB	2134 NW HOYT ST	0.5848
1N1E33CA-10100-B1	1N1E33CA 10100	1929	32.067	RH	RH	AB	2135 NW FLANDERS ST	1.9974
1N1E33BD-10400-B1	1N1E33BD 10400	1926	26.420	RH	RH	AB	2136 NW JOHNSON ST	1.4800
1N1E33BD-9000-B1	1N1E33BD 9000	1905	29.318	RH	RH	AB	2136-2138 NW IRVING ST	1.0465
1N1E33CA-7200-B1	1N1E33CA 7200	1910	27.721	RH	RH	AB	2138 NW EVERETT ST	1.4609
1N1E33BD-8000-B1	1N1E33BD 8000	1889	28.150	RH	RH	AB	2139 NW HOYT ST	0.8267
1N1E33BD-11800-B1	1N1E33BD 11800	1981	54.924	RH	RH	AB	2140 NW KEARNEY ST	2.5149
1N1E33CA-70000-B1	1N1E33CA 70000	0	90.308	RH	RH	AB	2141 NW DAVIS ST	0.0000
1N1E33BD-9100-B1	1N1E33BD 9100	1905	24.989	RH	RH	AB	2142 NW IRVING ST	0.6400
1N1E33CA-9200-B1	1N1E33CA 9200	1880	34.437	RH	RH	AB	2144 NW FLANDERS ST	0.8427
1N1E33CA-700-B2	1N1E33CA 700	1908	8.423	RH	RH	AB	2145-2147 NW GLISAN ST	0.6618
1N1E33CA-7100-B1	1N1E33CA 7100	1908	28.520	RH	RH	AB	2146 NW EVERETT ST	0.8049
1N1E33BD-7100-B1	1N1E33BD 7100	1964	23.916	RH	RH	AB	2146 NW HOYT ST	0.9675
1N1E33BD-10500-B1	1N1E33BD 10500	1926	29.009	RH	RH	AB	2146 NW JOHNSON ST	1.9783
1N1E33BD-9900-B1	1N1E33BD 9900	1908	24.508	RH	RH	AB	2147 NW IRVING ST	0.5990
1N1E33CA-9100-B1	1N1E33CA 9100	1880	29.160	RH	RH	AB	2148 NW FLANDERS ST	
1N1E33BD-9200-B1	1N1E33BD 9200	1904	23.672	RH	RH	AB	2148 NW IRVING ST	0.7580
1N1E33CA-8100-B1	1N1E33CA 8100	1890	29.709	RH	RH	AB	2149 NW EVERETT ST	0.6458
1N1E33BD-7900-B1	1N1E33BD 7900	1889	34.928	RH	RH	AB	2149 NW HOYT ST	0.9995
1N1E33CA-5000-B1	1N1E33CA 5000	1909	27.341	RH	RH	AB	2149 NW HOYT ST	0.8300
1N1E33CA-3100-B1	1N1E33CA 3100	1923	34.189	RH	RH	AB	215 NW 22ND AVE	0.4120
							215 NW 22ND PL	2.0352

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1N1E33BD-11400-B1	1N1E33BD 11400	1926	40.571	RH	RH	AB	2151 NW JOHNSON ST	1.9527
1N1E33CA-9000-B1	1N1E33CA 9000	1896	27.615	RH	RH	AB	2152-2156 NW FLANDERS ST	0.9050
1N1E33BD-7800-B1	1N1E33BD 7800	1909	26.092	RH	RH	AB	2153-2159 NW HOYT ST	0.9532
1N1E33CA-7000-B1	1N1E33CA 7000	1895	21.209	RH	RH	AB	2154 NW EVERETT ST	0.5918
1N1E33CA-8200-B1	1N1E33CA 8200	1910	27.587	RH	RH	AB	2155 NW EVERETT ST	1.4888
1N1E33CA-10200-B1	1N1E33CA 10200	1967	26.218	RH	RH	AB	2155 NW FLANDERS ST	1.2846
1N1E33CA-800-B1	1N1E33CA 800	1886	33.946	RH	RH	AB	2155 NW GLISAN ST	0.6780
1N1E33BD-9300-B1	1N1E33BD 9300	1927	27.326	RH	RH	AB	2156 NW IRVING ST	1.7984
1N1E33BD-9800-B2	1N1E33BD 9800	1886	0.000	RH	RH	AB	2157-2159 NW IRVING ST	0.8198
1N1E33CA-8900-B1	1N1E33CA 8900	1903	26.569	RH	RH	AB	2158-2160 NW FLANDERS ST	1.2027
1N1E33CA-6900-B1	1N1E33CA 6900	1895	22.596	RH	RH	AB	2160 NW EVERETT ST	0.5903
1N1E33BD-10600-B1	1N1E33BD 10600	1954	22.063	RH	RH	AB	2160 NW JOHNSON ST	0.5533
1N1E33CA-6800-B1	1N1E33CA 6800	1910	32.696	RH	RH	AB	2162 NW EVERETT ST	2.4203
1N1E33BD-7200-B1	1N1E33BD 7200	1910	43.096	RH	RH	AB	2164 NW HOYT ST	1.8494
1N1E33CA-8800-B1	1N1E33CA 8800	1890	30.061	RH	RH	AB	2166 NW FLANDERS ST	0.5902
1N1E33BD-9400-B1	1N1E33BD 9400	1927	26.896	RH	RH	AB	2166 NW IRVING ST	1.7642
1N1E33CA-10300-B1	1N1E33CA 10300	1932	35.880	RH	RH	AB	2167 NW FLANDERS ST	2.1120
1N1E33CA-900-B2	1N1E33CA 900	1979	18.503	RH	RH	AB	2167-2171 NW GLISAN ST	0.4770
1N1E33BD-11200-B1	1N1E33BD 11200	1991	29.130	RH	RH	AB	2169 NW JOHNSON ST	0.7627
1N1E33BD-7500-B1	1N1E33BD 7500	1886	20.000	RH	RH	AB	2171 NW HOYT ST	1.1676
1N1E33CA-8400-B1	1N1E33CA 8400	1995	31.975	RH	RH	AB	2173 NW EVERETT ST	1.3856
1N1E33CA-5500-B1	1N1E33CA 5500	1951	59.059	RH	RH	AB	2174 NW DAVIS ST	1.7607
1N1E33BD-10801-B1	1N1E33BD 10801	1905	20.898	RH	RH	AB	2174 NW JOHNSON ST	0.6684
1N1E33CA-6600-B1	1N1E33CA 6600	1951	58.033	RH	RH	AB	2175 NW DAVIS ST	2.0843
1N1E33BD-12100-B1	1N1E33BD 12100	1898	22.385	RH	RH	AB	2176 NW KEARNEY ST	0.9190
1N1E33BD-9600-B1	1N1E33BD 9600	1940	12.104	RH	RH	AB	2176-2186 NW IRVING ST	0.5770

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1N1E33BD-7400-B1	1N1E33BD 7400	1902	27.160	RH	RH	AB	2179 NW HOYT ST	0.6930
1N1E33CA-4700-B1	1N1E33CA 4700	1908	23.791	RH	RH	AB	218 NW 22ND PL	0.6902
1N1E33CA-8700-B1	1N1E33CA 8700	1896	29.619	RH	RH	AB	2180 NW FLANDERS ST	0.6606
1N1E33CA-1000-B1	1N1E33CA 1000	1911	53.487	RH	RH	AB	2181 NW GLISAN ST	4.0368
1N1E33BD-66000-B1	1N1E33BD 66000	0	25.471	RH	RH	AB	2182 NW KEARNEY ST	0.0000
1N1E33CA-10500-B1	1N1E33CA 10500	1908	12.242	RH	RH	AB	2185 NW FLANDERS ST	1.5496
1N1E33CA-10700-B1	1N1E33CA 10700	1909	49.975	RH	RH	AB	2186 NW GLISAN ST	3.7928
1N1E33BD-7300-B1	1N1E33BD 7300	1890	26.445	RH	RH	AB	2187 NW HOYT ST	0.8079
1N1E33CA-8500-B2	1N1E33CA 8500	1952	78.498	RH	RH	AB	2199 NW EVERETT ST	3.3718
1N1E33CA-14100-B1	1N1E33CA 14100	1890	27.370	RH	RH	AB	220-224 NW 20TH PL	0.7407
1N1E33BD-14900-B1	1N1E33BD 14900	1890	12.582	RH	RH	AB	2202 NW JOHNSON ST	1.2081
1N1E33BD-15900-B1	1N1E33BD 15900	1942	12.755	RH	RH	AB	2202-2208 NW IRVING ST	0.5703
1N1E33BD-14500-B1	1N1E33BD 14500	1907	31.615	RH	RH	AB	2205 NW JOHNSON ST	0.8204
1N1E33CA-2100-B1	1N1E33CA 2100	1926	37.079	RH	RH	AB	2207 NW FLANDERS ST	2.5745
1N1E33BD-15100-B1	1N1E33BD 15100	1907	29.477	RH	RH	AB	2208-2212 NW JOHNSON ST	1.4500
1N1E33CA-2700-B1	1N1E33CA 2700	1931	0.000	RH	RH	AB	2209 NW EVERETT ST	3.1680
1N1E33CA-4900-B1	1N1E33CA 4900	1928	40.887	RH	RH	AB	2210 NW EVERETT ST	2.9329
1N1E33CA-2600-B2	1N1E33CA 2600	1894	25.861	RH	RH	AB	2210 NW FLANDERS ST	0.7260
1N1E33BD-15800-B1	1N1E33BD 15800	1926	27.878	RH	RH	AB	2215 NW IRVING ST	1.4331
1N1E33BD-15200-B1	1N1E33BD 15200	1908	29.128	RH	RH	AB	2216-2222 NW JOHNSON ST	1.2510
1N1E33BD-14600-B1	1N1E33BD 14600	1907	26.735	RH	RH	AB	2217 NW JOHNSON ST	0.4324
1N1E33CA-2200-B1	1N1E33CA 2200	1926	36.294	RH	RH	AB	2221 NW FLANDERS ST	2.3217
1N1E33BD-16700-B1	1N1E33BD 16700	1906	29.501	RH	RH	AB	2221-2227 NW HOYT ST	0.9996
1N1E33BD-44000-B1	1N1E33BD 44000	0	45.089	RH	RH	AB	2222 NW HOYT ST	0.0000
1N1E33BD-16100-B1	1N1E33BD 16100	1905	20.000	RH	RH	AB	2222-2224 NW IRVING ST	0.7336
1N1E33BD-15300-B1	1N1E33BD 15300	1902	19.115	RH	RH	AB	2224 NW JOHNSON ST	0.4326
1N1E33CA-1200-B1	1N1E33CA 1200	1903	28.818	RH	RH	AB	2225 NW GLISAN ST	0.5808

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1N1E33BD-16900-B1	1N1E33BD 16900	1911	39.260 RH	RH	RH	AB	2226 NW HOYT ST	2.2050
1N1E33BD-14700-B1	1N1E33BD 14700	1885	23.118 RH	RH	RH	AB	2227 NW JOHNSON ST	0.4756
1N1E33CA-2800-B1	1N1E33CA 2800	1899	34.487 RH	RH	RH	AB	2229 NW EVERETT ST	1.0286
1N1E33CA-1800-B1	1N1E33CA 1800	1926	13.170 RH	RH	RH	AB	2230 NW GLISAN ST	1.0000
1N1E33CA-1300-B1	1N1E33CA 1300	1905	25.438 RH	RH	RH	AB	2231-2235 NW GLISAN ST	0.8664
1N1E33CA-4800-B1	1N1E33CA 4800	1910	46.179 RH	RH	RH	AB	2232 NW EVERETT ST	3.7467
1N1E33BD-16200-B1	1N1E33BD 16200	1890	24.310 RH	RH	RH	AB	2232 NW IRVING ST	0.7185
1N1E33CA-2300-B1	1N1E33CA 2300	1890	11.133 RH	RH	RH	AB	2233-2243 NW FLANDERS ST	0.6776
1N1E33BD-17000-B1	1N1E33BD 17000	1898	7.105 RH	RH	RH	AB	2234 NW HOYT ST	0.6245
1N1E33BD-15400-B1	1N1E33BD 15400	1883	20.000 RH	RH	RH	AB	2234 NW JOHNSON ST	0.5420
1N1E33BD-15700-B1	1N1E33BD 15700	1901	30.203 RH	RH	RH	AB	2235 NW IRVING ST	0.5448
1N1E33BD-14800-B1	1N1E33BD 14800	1927	29.033 RH	RH	RH	AB	2235 NW JOHNSON ST	1.9680
1N1E33BD-13900-B1	1N1E33BD 13900	1910	30.728 RH	RH	RH	AB	2237 NW KEARNEY ST	1.2537
1N1E33DB-9300-B1	1N1E33DB 9300	1903	23.225 RH	RH	RH	AB	224 NW 20TH AVE	0.7547
1N1E33BD-16600-B1	1N1E33BD 16600	1908	33.234 RH	RH	RH	AB	2241 NW HOYT ST	1.5334
1N1E33BD-16300-B1	1N1E33BD 16300	1890	23.754 RH	RH	RH	AB	2242 NW IRVING ST	0.6628
1N1E33BD-16400-B1	1N1E33BD 16400	1890	28.018 RH	RH	RH	AB	2246 NW IRVING ST	0.6060
1N1E33CA-1700-B1	1N1E33CA 1700	1912	8.961 RH	RH	RH	AB	2246-2248 NW GLISAN ST	0.4785
1N1E33BD-15600-B1	1N1E33BD 15600	1891	19.868 RH	RH	RH	AB	2247 NW IRVING ST	0.4432
1N1E33BD-14000-B1	1N1E33BD 14000	1909	20.000 RH	RH	RH	AB	2247 NW KEARNEY ST	0.4944
1N1E33BD-16500-B1	1N1E33BD 16500	1890	22.698 RH	RH	RH	AB	2247-2251 NW HOYT ST	0.8923
1N1E33BD-17200-B1	1N1E33BD 17200	1898	34.798 RH	RH	RH	AB	2248 NW HOYT ST	1.1757
1N1E33BD-15500-B1	1N1E33BD 15500	1884	33.848 RH	RH	RH	AB	2248 NW JOHNSON ST	0.7560
1N1E33CA-1400-B1	1N1E33CA 1400	1893	19.612 RH	RH	RH	AB	2249 NW GLISAN ST	0.6108
1N1E33CA-2500-B1	1N1E33CA 2500	1964	33.912 RH	RH	RH	AB	2250 NW FLANDERS ST	0.6303
1N1E33BD-14100-B1	1N1E33BD 14100	1967	41.586 RH	RH	RH	AB	2250 NW KEARNEY ST	2.6230
1N1E33BC-3700-B1	1N1E33BC 3700	1908	24.107 RH	RH	RH	AB	2254 NW HOYT ST	0.5703

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1N1E33BC-2600-B1	1N1E33BC 2600	1886	30.405	RH	RH	AB	2254 NW IRVING ST	0.7608
1N1E33BC-1600-B1	1N1E33BC 1600	1927	29.538	RH	RH	AB	2255 NW JOHNSON ST	1.9680
1N1E33BC-1700-B1	1N1E33BC 1700	1906	25.760	RH	RH	AB	2256 NW JOHNSON ST	0.8510
1N1E33CA-1500-B1	1N1E33CA 1500	1894	28.223	RH	RH	AB	2257 NW GLISAN ST	1.0444
1N1E33BC-3600-B1	1N1E33BC 3600	1902	26.412	RH	RH	AB	2257 NW HOYT ST	0.7446
1N1E33BC-3800-B1	1N1E33BC 3800	1908	22.510	RH	RH	AB	2260 NW HOYT ST	0.6545
1N1E33BC-2700-B1	1N1E33BC 2700	1886	21.911	RH	RH	AB	2260 NW IRVING ST	1.0064
1N1E33BC-700-B1	1N1E33BC 700	1907	28.260	RH	RH	AB	2264 NW KEARNEY ST	0.6012
1N1E33BC-3500-B1	1N1E33BC 3500	1906	22.558	RH	RH	AB	2265 NW HOYT ST	0.9796
1N1E33BC-1500-B1	1N1E33BC 1500	1926	27.413	RH	RH	AB	2265 NW JOHNSON ST	2.0000
1N1E33BC-500-B1	1N1E33BC 500	1904	32.445	RH	RH	AB	2265 NW KEARNEY ST	0.6316
1N1E33BC-1800-B1	1N1E33BC 1800	1886	28.948	RH	RH	AB	2266-2268 NW JOHNSON ST	0.6734
1N1E33CB-100-B1	1N1E33CB 100	1928	30.148	RH	RH	AB	2267 NW GLISAN ST	1.9600
1N1E33BC-2500-B1	1N1E33BC 2500	1901	17.386	RH	RH	AB	2267 NW IRVING ST	0.5194
1N1E33BC-2800-B1	1N1E33BC 2800	1905	8.033	RH	RH	AB	2270 NW IRVING ST	0.5844
1N1E33CA-6700-B1	1N1E33CA 6700	1927	32.971	RH	RH	AB	228 NW 22ND AVE	2.4437
1N1E33DB-9200-B1	1N1E33DB 9200	1904	24.305	RH	RH	AB	230 NW 20TH AVE	1.0930
1N1E33CB-3600-B1	1N1E33CB 3600	1993	30.483	RH	RH	AB	2329 NW FLANDERS ST	0.7632
1N1E33CB-3200-B1	1N1E33CB 3200	0	23.327	RH	RH	AB	2330 W/ NW FLANDERS ST	0.0000
1N1E33CB-3700-B1	1N1E33CB 3700	1898	31.550	RH	RH	AB	2335 NW FLANDERS ST	0.8390
1N1E33CB-2700-B1	1N1E33CB 2700	1906	14.450	RH	RH	AB	2337 NW EVERETT ST	0.5434
1N1E33CB-2800-B2	1N1E33CB 2800	1904	28.901	RH	RH	AB	2341 NW EVERETT ST	0.7742
1N1E33CB-3800-B1	1N1E33CB 3800	1896	33.116	RH	RH	AB	2347-2349 NW FLANDERS ST	0.5476
1N1E33CB-2900-B1	1N1E33CB 2900	1898	26.003	RH	RH	AB	2356 NW WESTOVER RD	1.1281
1N1E33CB-3000-B2	1N1E33CB 3000	1906	10.591	RH	RH	AB	2360 NW WESTOVER RD	0.4945
1N1E33CB-3900-B1	1N1E33CB 3900	1902	27.091	RH	RH	AB	2363 NW FLANDERS ST	0.9909

This spreadsheet was extracted from June, 2011, GIS data provided to the Architectural Heritage Center

1N1E33CB-3100-B2	1N1E33CB 3100	1890	29.631	RH	RH	AB	2370 NW FLANDERS ST	0.3640
1N1E33CB-4000-B1	1N1E33CB 4000	1894	20.000	RH	RH	AB	2381 NW FLANDERS ST	0.6843
1N1E33DB-9100-B1	1N1E33DB 9100	1904	31.885	RH	RH	AB	240 NW 20TH AVE	1.0562
1N1E33CA-3900-B1	1N1E33CA 3900	1906	30.032	RH	RH	AB	26 NW 22ND PL	0.9125
1N1E33CA-7800-B1	1N1E33CA 7800	1928	25.032	RH	RH	AB	305 NW 21ST AVE	1.9284
1N1E33CA-12500-B1	1N1E33CA 12500	1906	35.305	RH	RH	AB	311 NW 20TH AVE	0.7286
1N1E33CA-8600-B1	1N1E33CA 8600	1941	14.729	RH	RH	AB	322-342 NW 22ND AVE	0.6998
1N1E33DB-2200-B1	1N1E33DB 2200	1950	27.737	RH	RH	AB	332-338 NW 20TH AVE	1.3793
1N1E33DB-3700-B1	1N1E33DB 3700	1981	21.665	RH	RH	AB	333 W/ NW 16TH AVE	1.1068
1N1E33DB-2700-B2	1N1E33DB 2700	1963	68.602	RH	RH	AB	335 NW 19TH AVE	2.4243
1N1E33DB-8400-B1	1N1E33DB 8400	1910	42.036	RH	RH	AB	37 NW TRINITY PL	2.9968
1N1E33DB-600-B1	1N1E33DB 600	1950	17.683	RH	RH	AB	407 NW 17TH AVE	0.7093
1N1E33CA-10600-B1	1N1E33CA 10600	1896	31.521	RH	RH	AB	414 NW 22ND AVE	1.0860
1N1E33CA-1900-B1	1N1E33CA 1900	1903	11.466	RH	RH	AB	435-439 NW 22ND AVE	0.9276
1N1E33CA-4000-B1	1N1E33CA 4000	2003	20.000	RH	RH	AB	46 NW 22ND PL	0.7245
1N1E33CA-400-B1	1N1E33CA 400	1940	22.842	RH	RH	AB	501 NW 21ST AVE	0.9800
1N1E33AC-2900-B1	1N1E33AC 2900	1906	29.750	RH	RH	AB	504 NW 18TH AVE	1.0112
1N1E33CA-40000-B1	1N1E33CA 40000	0	38.047	RH	RH	AB	507 NW 22ND AVE	0.0000
1N1E33AC-7800-B1	1N1E33AC 7800	1880	26.240	RH	RH	AB	513-515 NW 18TH AVE	0.6510
1N1E33AC-3000-B1	1N1E33AC 3000	1886	33.210	RH	RH	AB	516 NW 18TH AVE	0.7232
1N1E33AC-3700-B1	1N1E33AC 3700	1890	14.340	RH	RH	AB	525 NW 17TH AVE	0.8413
1N1E33AC-7700-B1	1N1E33AC 7700	1979	11.760	RH	RH	AB	525-529 NW 18TH AVE	0.5742
1N1E33AC-3100-B1	1N1E33AC 3100	1890	38.740	RH	RH	AB	526 NW 18TH AVE	1.5318
1N1E33AC-7600-B1	1N1E33AC 7600	1909	33.240	RH	RH	AB	533-535 NW 18TH AVE	1.5006
1N1E33AC-7500-B1	1N1E33AC 7500	1888	39.520	RH	RH	AB	607-611 NW 18TH AVE	2.1431
1N1E33AC-7100-B1	1N1E33AC 7100	1907	34.770	RH	RH	AB	608 NW 19TH AVE	0.9369
1N1E33BD-7600-B1	1N1E33BD 7600	1890	27.263	RH	RH	AB	610 NW 22ND AVE	0.7437
1N1E33AC-8400-B1	1N1E33AC 8400	1925	28.505	RH	RH	AB	612 NW 20TH AVE	1.3880
1N1E33AC-7400-B1	1N1E33AC 7400	1900	35.900	RH	RH	AB	615 NW 18TH AVE	0.8796

This spreadsheet was extracted from June, 2011, GIS data provided to the Architectural Heritage Center

1N1E33BD-5800-B1	1N1E33BD 5800	1981	29.552 RH	RH	RH	AB	615 NW 20TH AVE	1.3860
1N1E33BD-7700-B1	1N1E33BD 7700	1908	30.605 RH	RH	RH	AB	616 NW 22ND AVE	0.8160
1N1E33AC-4600-B1	1N1E33AC 4600	1902	30.000 RH	RH	RH	AB	617 NW 17TH AVE	0.8799
1N1E33BD-16000-B1	1N1E33BD 16000	1894	30.994 RH	RH	RH	AB	621-623 NW 22ND AVE	0.8485
1N1E33AC-8700-B1	1N1E33AC 8700	1965	12.587 RH	RH	RH	AB	623-633 NW 19TH AVE	0.3280
1N1E33AC-4300-B1	1N1E33AC 4300	1940	22.310 RH	RH	RH	AB	624 NW 18TH AVE	0.5731
1N1E33AC-9000-B1	1N1E33AC 9000	1925	28.545 RH	RH	RH	AB	624 NW 20TH AVE	1.3046
1N1E33BD-9500-B1	1N1E33BD 9500	1888	26.980 RH	RH	RH	AB	624 NW 22ND AVE	0.6025
1N1E33AC-9600-B1	1N1E33AC 9600	1929	34.813 RH	RH	RH	AB	707 NW 19TH AVE	2.2550
1N1E33AC-6500-B1	1N1E33AC 6500	1929	47.340 RH	RH	RH	AB	708 NW 19TH AVE	3.2688
1N1E33AC-9100-B1	1N1E33AC 9100	1929	27.970 RH	RH	RH	AB	708 NW 20TH AVE	1.5540
1N1E33AC-5000-B1	1N1E33AC 5000	1962	39.292 RH	RH	RH	AB	718 NW 18TH AVE	1.2895
1N1E33BD-15000-B1	1N1E33BD 15000	1905	26.622 RH	RH	RH	AB	723 NW 22ND AVE	0.7693
1N1E33BD-10700-B1	1N1E33BD 10700	1890	20.000 RH	RH	RH	AB	726 NW 22ND AVE	0.7880
1N1E33AC-10100-B1	1N1E33AC 10100	1928	24.835 RH	RH	RH	AB	730 NW 20TH AVE	
1N1E33BD-4600-B1	1N1E33BD 4600	1907	36.399 RH	RH	RH	AB	733 NW 20TH AVE	1.5540
1N1E33BD-11000-B1	1N1E33BD 11000	1991	30.368 RH	RH	RH	AB	808 NW 22ND AVE	0.5088
1N1E33BD-3500-B1	1N1E33BD 3500	1949	25.134 RH	RH	RH	AB	811 NW 20TH AVE	0.7885
1N1E33BD-11100-B1	1N1E33BD 11100	1907	37.492 RH	RH	RH	AB	814 NW 22ND AVE	0.6832
1N1E33BD-11900-B1	1N1E33BD 11900	1989	28.134 RH	RH	RH	AB	820 NW 22ND AVE	2.3328
1N1E33AC-10701-B1	1N1E33AC 10701	1996	63.621 RH	RH	RH	AB	824 NW 20TH AVE	0.7116
1N1E33BD-14400-B1	1N1E33BD 14400	1906	27.775 RH	RH	RH	AB	825 NW 22ND AVE	4.2000
1N1E33AC-11500-B1	1N1E33AC 11500	1905	37.700 RH	RH	RH	AB	930 NW 20TH AVE	0.6052
1N1E33BD-1600-B1	1N1E33BD 1600	1912	48.685 RH	RH	RH	AB	931 NW 20TH AVE	0.9100
1N1E33DB-60000-B1	1N1E33DB 60000	0	64.100 RH	RH	RH	AB	NW 18TH AVE	1.9804
1N1E33AC-40000-B1	1N1E33AC 40000	1962	40.455 RH	RH	RH	AB	NW IRVING ST	0.0000
								0.0000



760 SW Ninth Ave., Suite 3000
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www.stoel.com

STEVEN W. ABEL
Direct 503.294.9599
Facsimile 503.220.2480
steve.abel@stoel.com

July 26, 2016

VIA EMAIL psc@portlandoregon.gov

Planning and Sustainability Commission
Miscellaneous Zoning Amendments
1900 SW 4th Ave., Suite 7100
Portland, OR 97201

Re: Lewis & Clark College

Dear Members of the Commission:

This office represents Lewis & Clark College. The college has only recently learned that the proposed Miscellaneous Zoning Project (June 2016) has vastly increased its scope of proposed changes from the earlier draft issued by the City in April 2016. The new draft includes provisions which have a direct impact upon Lewis & Clark, its students and faculty.

Attached to this letter is a map showing the proposed path of the trail right through the middle of both the law school campus and the undergraduate campus. As you know Lewis & Clark College is a private educational institution privileged to be located in Portland, and very lucky to be located in such a beautiful part of the city. It acknowledges that there are trails through Tryon State Park, and the former cemetery land to its north, which naturally lead users to cross its property. The College does not object to this practice and generally welcomes visitors to our campus. However, because of security issues at colleges, it is simply imprudent for the City to require a public trail through a college campus. It creates safety concerns for faculty, students and members of the public far in excess of the kinds of impacts that might occur in trail segments located in other locations. Colleges must exclude those who the college believes constitutes a threat to the college community or its property. The security issue is accompanied by other issues related to liability, maintenance, and the like that must be resolved. This is a significant issue for colleges as evidenced by recent events on college campuses, including those in Oregon.

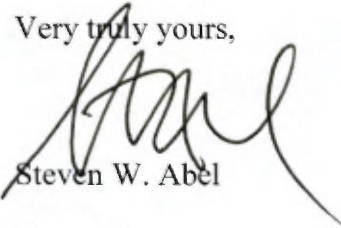
Planning and Sustainability Commission

July 26, 2016

Page 2

The College requests that you suspend consideration of the adoption of a public trail segment through its campus until a more deliberate process takes place and all the relevant issues can be identified and considered.

Very truly yours,

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

Steven W. Abel

SWA:pjn

Enclosure

cc: John Cole

Via email (John.Cole@portlandoregon.gov)

David Ellis, V.P. and General Counsel, Lewis & Clark College





July 26, 2016

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

Re: Comprehensive Plan Amendment, DLCD File 007-16: The Miscellaneous Zoning Project, allowing nurseries as conditional uses in residential zones and eliminating the requirement to address “no-net-loss” housing for quasi-judicial comprehensive plan amendments and zoning map changes.

Dear Planning and Sustainability Commission:

This letter is submitted jointly by Housing Land Advocates (HLA) and the Fair Housing Council of Oregon (FHCO). Both HLA and FHCO are non-profit organizations that advocate for land use policies and practices that ensure an adequate and appropriate supply of affordable housing for all Oregonians. FHCO’s concerns relate to a jurisdiction’s obligation to affirmatively further fair housing. Please include these comments in the record for the above-referenced proposed amendment.

Allowing nurseries as a conditional use in residential zones and deleting the “no-net-loss” of housing policies from the comprehensive plan may affect the City’s housing supply. Therefore, the staff report for this proposal must address the potential impacts of the proposed changes on the City of Portland’s obligations to comply with Statewide Planning Goal 10 (Goal 10) – the staff report does not address Goal 10. Goal 10 requires the City to inventory buildable lands for residential use and to use this inventory to show that an adequate number of needed housing units can be supported with the proposed change to the comprehensive plan.

The staff report needs to address how these two proposed changes may impact the availability of “adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.” See *Statewide Planning Goal 10*, OAR 660-015-0000(10). The City must demonstrate that its actions do not leave it with less than adequate residential land

1221 SW Yamhill Street, Portland, Oregon 97205



supplies in the types, locations, and affordability ranges affected. *Mulford v. Town of Lakeview*, 36 Or LUBA 715, 731 (1999) (rezoning residential land for industrial uses); *Gresham v. Fairview*, 3 Or LUBA 219 (same); see also, *Home Builders Assn. of Lane County v. City of Eugene*, 41 Or LUBA 370, 422 (2002) (subjecting Goal 10 inventories to tree and waterway protection zones of indefinite quantities and locations).

HLA and FHCO urge the Commission to defer adoption of the proposed amendment until its impact on the City's Goal 10 obligations is fully and adequately analyzed and documented. Thank you for your consideration. Please provide written notice of your decision to, FHCO, c/o Louise Dix, at 1221 SW Yamhill Street, #305, Portland, OR 97205 and HLA, c/o Jennifer Bragar, at 121 SW Morrison Street, 11th Floor, Portland, OR 97204.

Sincerely,

A handwritten signature in black ink that reads "Louise Dix".

Louise Dix
AFFH Specialist
Fair Housing Council of Oregon

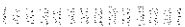



A handwritten signature in black ink that reads "Jennifer Bragar".

Jennifer Bragar
President
Housing Land Advocates

1221 SW Yamhill Street, Portland, Oregon 97205

Sharon Goldenworthy
Misc Code

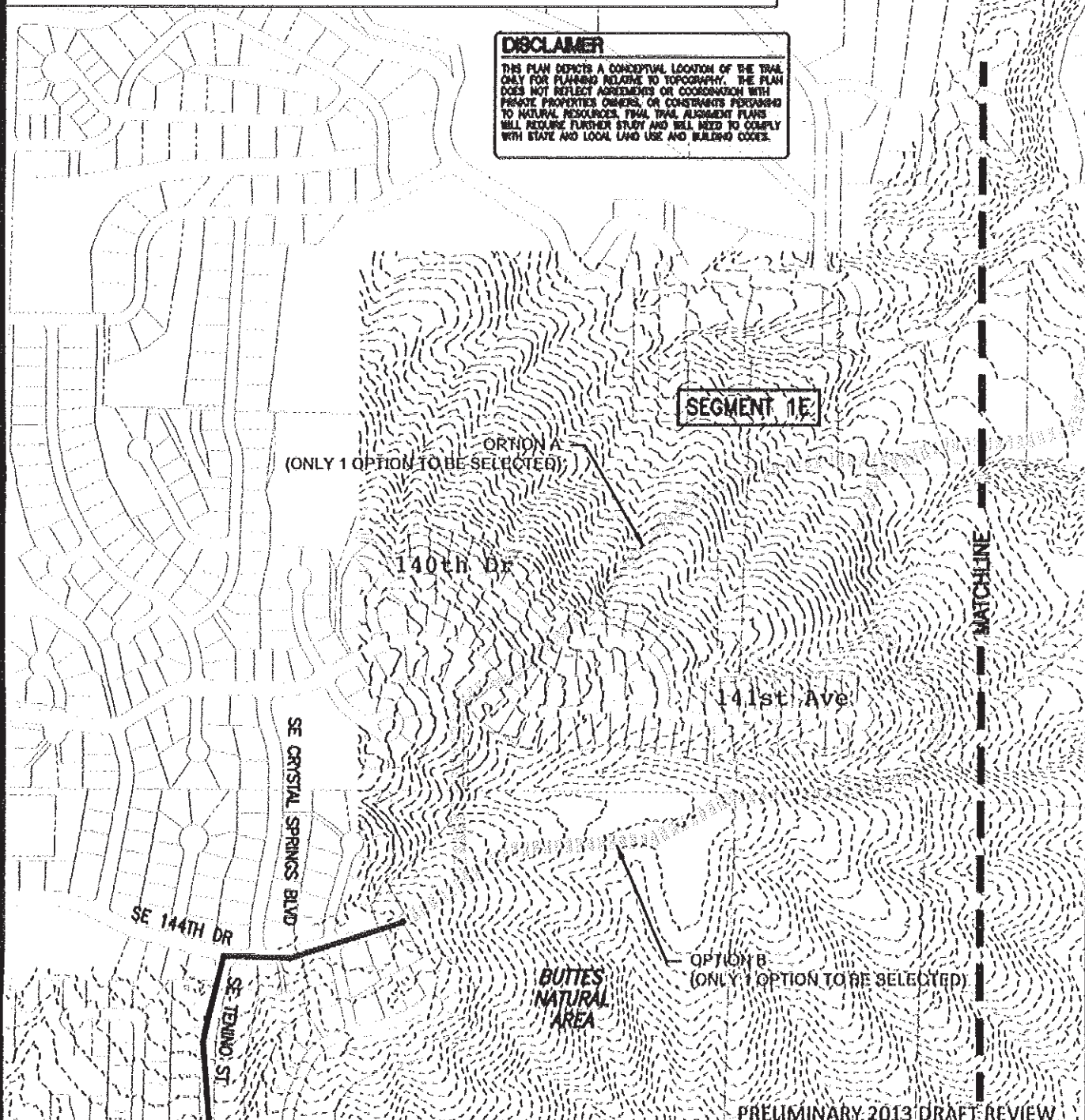
LEGEND

-  TRAIL OUTSIDE RIGHT-OF-WAY
-  TRAIL INSIDE RIGHT-OF-WAY
-  EXISTING TRAIL OUTSIDE R.O.W.
-  TRAIL SEGMENT LIMIT



DISCLAIMER

THIS PLAN DEPICTS A CONCEPTUAL LOCATION OF THE TRAIL ONLY FOR PLANNING RELATIVE TO TOPOGRAPHY. THE PLAN DOES NOT REFLECT AGREEMENTS OR COORDINATION WITH PRIVATE PROPERTIES OWNERS, OR CONSTRAINTS PERTAINING TO NATURAL RESOURCES. FINAL TRAIL ALIGNMENT PLANS WILL REQUIRE FURTHER STUDY AND WILL NEED TO COMPLY WITH STATE AND LOCAL LAND USE AND BUILDING CODES.



PRELIMINARY 2013 DRAFT REVIEW

Mt. Scott/Scouter Mt. Trail Loop

TOPOGRAPHY OF THE CONCEPTUAL TRAIL LOCATION

Contour Interval: 10 feet

SEGMENT 1

SPRINGWATER CORRIDOR TO SE CLATSOP STREET

Otak, Inc

Alta Planning + Design

Metro
The Intertwine
Clackamas County
City of Happy Valley
Portland Parks & Recreation
North Clackamas Parks & Recreation District

Printed: Apr 14, 2013 - 12:55pm
L:\Project\16000\16000\Draw\160088S100-Bx11.dwg
Layout: Name: Plan
Scale: 1"=100'

SITE PLAN
1=10'-0"

General Information

Property ID: R90887
 County: MULTNOMAH
 State ID: INIEB8C 14400
 Alt Account #: R471923660
 Map Number: 2333
 Site Info
 Site Address: 2626 NE DEKUM ST
 City/State/Zip: PORTLAND OR 97211
 Owner Info
 Owner(s) Name: FOGLIO ROBERT C
 Owner Address: PO BOX 120
 City/State/Zip: GLADSTONE OR 97027-0120

ZONING REQUIREMENTS FOR CURRENT CAD ZONING

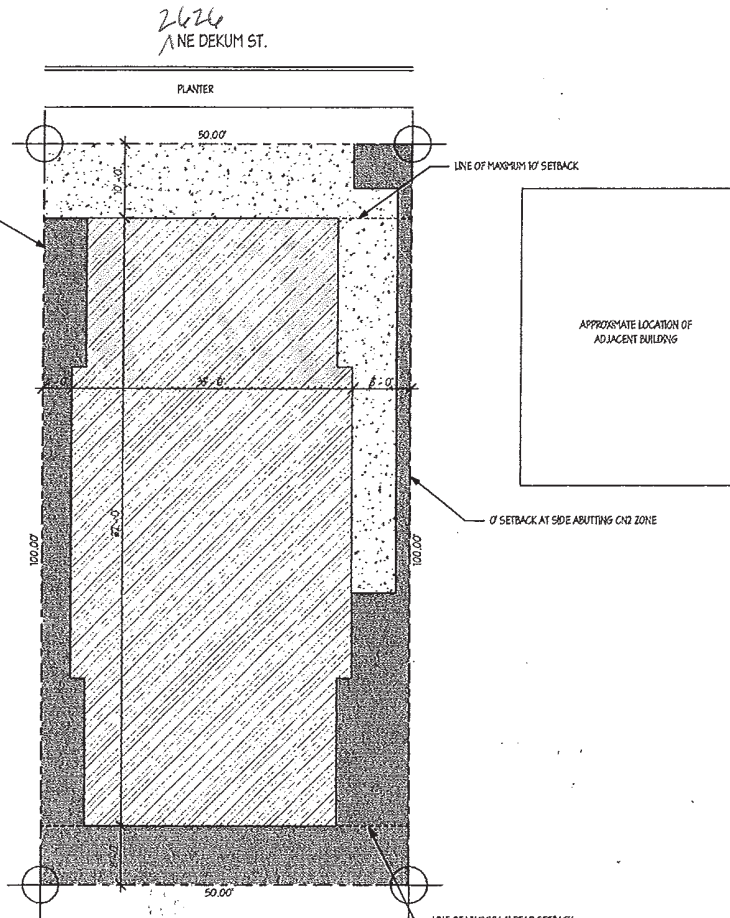
MAXIMUM FAR - 0.75 TO 1 (DOES NOT APPLY TO RESIDENTIAL USES)
 MAXIMUM HEIGHT - 30'
 MIN. BUILDING SETBACKS - 0' TO NORTH, 0' TO ALLEY (WEST), 0' TO EAST, 8' TO SOUTH (OR 5' W/ L3 LANDSCAPE)
 GARAGE ENTRANCE SETBACK - 5/8'
 MAX. BUILDING SETBACK - 10'
 BUILDING COVERAGE - MAX. 65%
 MIN. LANDSCAPED AREA - 15% OF SITE AREA
 GROUND FLR WINDOWS STDS - YES
 PEDESTRIAN REQUIREMENTS - YES

COVERAGE AREAS

LOT AREA - 5,000 S.F.
 LANDSCAPED AREA - 1,257 S.F.
 LANDSCAPE % - 25.1%
 BUILDING COVER AREA - 2,956 S.F.
 BUILDING COVERAGE - 59.1%



0' SETBACK AT SIDE ABUTTING ALLEY



BUILDERS DESIGN INC
 COMMERCIAL - RESIDENTIAL - REMODELING
 1111 NE 11TH AVE SUITE 100
 PORTLAND, OR 97232
 PHONE: 503-252-3443 • FAX: (503) 252-3444
 EMAIL: BUILDERSDESIGN@GMAIL.COM

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BOB FOGLIO
 - 2626 NE DEKUM ST
SITE PLAN

From: Ken Richardson [mailto:ken_richardson@ddsd40.org]
Sent: Tuesday, July 26, 2016 8:32 AM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: PSC Misc. Zoning Update Testimony

Dear Mayor Hales and City Commissioners,

David Douglas School District is comprised of 12 square miles in East Portland. Currently the district has 9 elementary schools, 3 middle schools and one high school. In fact, David Douglas High School is the largest in the state with over 3,000 students. We are currently at capacity in all our elementary schools with a projected growth in student population that will bring our total enrollment over the next 10 years above 13,000 students. I am writing today to provide testimony on behalf of the David Douglas School District in regards to the miscellaneous zoning updates. Specifically, I would like to share our support of the package of changes that includes giving the David Douglas School District the power to veto any land divisions (11 or more lots) or zone change requests. I see this as an essential change that will allow the District to be more proactive in planning for our growth.

Our hope is that this change will provide us the opportunity to be in the conversation and truly look at how development will impact our local schools. As you know we are currently at capacity within our District and have been in conversations with city, county and private entities to purchase land and and other partnerships to develop plans for the growth of our District. We believe this would add a needed tool for us us to help manage our school district and continue to provide a first class education.

Thank you for the opportunity to provide this information.

Ken

--

Ken Richardson
Superintendent
David Douglas School District
[503.261.8201](tel:503.261.8201)
Learn~Grow~Thrive

Dear Planning and Sustainability Commission,

Columbia Steel Casting Co., Inc, operates a foundry, pattern shop and machine shop in North Portland on land owned by Heron Leasing Company. I am CEO and President of Columbia Steel Casting Co., Inc and a shareholder and Director of Heron Leasing. We were on record with Metro during the trail alignment process as opposing the south shore route and continue to strongly oppose a public trail across private industrial property. Nothing has changed our position since a letter was provided to Jane Hart of Metro in September of 2005. A copy of that letter is attached.

Martha B Cox, CEO
Columbia Steel Casting Co., Inc.
PO Box 83095
Portland, OR U.S.A.
503-286-0685 ext 207
martha_c@columbiasteel.com



Columbia Steel Casting Co., Inc.
PO Box 83095
Portland, OR 97283-0095

September 29, 2005

Ms. Jane Hart
Metro Regional Parks and Greenspaces Dept.
600 NE Grand Avenue
Portland, OR 97232

RE: Smith and Bybee Wetlands Natural Area Trail Study

Columbia Steel Casting Co., Inc. remains strongly opposed to a trail alignment through our property for the following reasons.

Security – There is both a concern for public safety and security concerns for our property and employees. I continue to be amazed at the brashness of thieves entering the property to the East of ours. They have pulled our fencing out, four-wheeled over the bank, cut of fence locks with bolt-cutters, stripped electrical wiring in the unoccupied buildings and even brought in equipment to steal the gutters off the building and removed steel tanks. In response, we have taken measures to limit access to our property with employee passes, enforcing use of visitor badges, restricted access routes and security guards. Even with posted notices of private property, there are still occasions that people looking for boat launches, nature trails, or alternate street routes have to be asked to leave. At public meetings, individuals have bragged about gaining access to our property via canoe. Public access via the camouflaged north side of our property would increase our exposure to this risk, with or without fencing.

Wetlands impact – a trail alignment along the top of bank on the Slough would require removal of trees and could impact bank stabilization. As part of our mitigation plan for a fill permit, we are required to make extensive plantings between the Slough and a long side channel on our property, right where the path would go.

Cost - A trail alignment below and immediately south of the top of bank would run through the Wapato wetlands and would require construction in a wetland with either a floating or elevated trail because the area is often inundated with water. There are many ditches, side channels and mini-sloughs to be traversed by a south shore trail alignment making it a very expensive option to provide compliance with ADA requirements.

Sincerely,

Martha B Cox,
Chief Financial Officer

Dear Mayor Hales and Commissioners,

This is a further follow up to my brief testimony in front of the City Council on November 19, 2015, and my subsequent letter to the Portland Planning and Sustainability Commission dated November 23, 2015, which is attached. At the time of my testimony, the proposed Comprehensive Plan contemplated rezoning the above captioned properties on SW Main Street to R2 from R5. After numerous meetings and discussions with stakeholders in the Goose Hollow Neighborhood, including property owners, neighbors, tenants, the neighborhood association and Friends of Goose Hollow, it became apparent that virtually no one was in favor of the proposed change in zoning to R2. I think people realized that R2 zoning would have a negative impact on these handsome and now well-maintained former residences and on the surrounding neighborhood. In addition, it would cause serious financial hardship to the property owners. I think it is important to recognize that these structures were saved from demolition in the early 1970s because of a decision by the City Council to allow revocable permits for professional office use provided there would be no change in the external appearance and residential character of the buildings. That decision made it feasible for me and the other property owners to convert the buildings to professional office use at that time, subject to the terms of the revocable permits.

I am glad there now has been a realization of the benefits of retaining the R5 zone when compared to the potential negatives of the proposed R2 zone. In my opinion, thoughtful preservation of important historic areas and structures within the City is not only good for the surrounding neighborhood, but it also plays an important role in retaining the history and character of the City as a whole.

I would like to call to your attention the critical link between preservation of these former residences and the ability to rent them for

discreet office use. It was the rental income from office use that saved them from demolition in the 1970s, and it is that ongoing rental income that continues to preserve these buildings now. It is my understanding that the issue of the revocable permits for office use will not be addressed until after the Comprehensive Plan has been finalized. I think you should be aware that the revocable permits have created some difficulties for the owners and tenants of these buildings. Because of the tenuous nature of the permits, the owners haven't been able to assure renters of continuing occupancy. This has been a worry and has created uncertainty for both the land lords and the tenants. Also, I have heard that the revocable permits have at times caused problems for the City. To help eliminate these problems, I would urge that you give careful consideration to replacing the revocable permits in this case by creating a special R5 zone on the South half of our block that will allow discreet office use to run with the property, rather than the owner.

Thank you for considering my comments and suggestion.

Respectfully,
Phil Brown

Philip F. Brown, MBA, CPA
Brown/Armstrong, A Professional Corporation
2177 S.W. Main Street
Portland, OR 97205
Phone: (503) 221-1776
Fax: (503) 223-6918
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www.brownarmstrong.com

BROWN/ARMSTRONG
A PROFESSIONAL CORPORATION
CERTIFIED PUBLIC ACCOUNTANTS/FINANCIAL CONSULTANTS

November 23, 2015

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

Re: Proposed Comprehensive Plan Map Change

To Whom It May Concern:

This is a follow up to my testimony before the City Council on November 19, 2015.

My wife and I own the former residences at 2187 and 2177 SW Main Street. These former residences were converted to office buildings in 1972 at a time when they were terribly rundown and vacant. The two residential structures next door, 2165 and 2153 SW Main Street, had been in a similar deteriorating state when they were acquired by new owners a year or two prior to our purchase. Revocable permits, allowing office use of these four buildings, were issued by the City at that time. The buildings were renovated and converted to office space and have been rented as professional offices ever since - over 40 years. The ability to turn these former residences into viable income producing properties made it possible to save these buildings that otherwise very likely would have been demolished, as happened to many fine old homes in the area in the late 1960's and early 1970's. Our understanding is that, due to the proposed Comprehensive Plan changes, the revocable permits will cease, and that the present R5 zone will be changed to R2, which we understand does not allow office use. It appears that these buildings may have to revert to single family residences, unless the existing non-conforming office use will be "grandfathered."

The possible loss of the permitted office use is a huge financial threat to the building owners and their tenants, and we also think it is a significant threat to this historical neighborhood. If the use of these buildings as offices were to cease, all of our tenants would be required to vacate. This would result in a row of four vacant office buildings. Our well-established professional tenants who have served individuals, families, and small businesses in the surrounding area for more than 40 years will be gone. It is unlikely that they would be able to find comparable office space in the same area and at the same reasonable rental rates because virtually none is available.

A condition of the revocable permits is that the residential appearance and character of the buildings cannot be altered. Therefore, many people who pass by do not realize that these buildings are used for offices rather than single family residences. The buildings and grounds are well maintained and there are parking spaces behind the buildings, out of sight.

The cost of converting these office buildings to residential use would not be financially feasible for the owners. The two office buildings that my wife and I own have combined usable space of 13,500 sq. ft. I obtained an estimate recently from a reputable contractor who does quality remodeling of old residences. His estimate for converting these buildings was \$120 to \$150 per sq. ft., which translate to \$1.6 to \$2.0 million for our two buildings. At first blush that seems very high until you consider that these structures no longer have kitchens, full bathrooms, dining rooms, laundry rooms and many other features that they once had or would be required in a nice home today. The walls would have to be stripped to the studs and rearranged in order to recreate living spaces that existed over 40 years ago. In addition, the parking areas in back would have to be removed in order to replace the garages and landscaping that once existed.

Lisa Joerin, who manages the buildings at 2153 and 2165, and I met recently with representatives of the Goose Hollow Foothills League, Friends of Goose Hollow, and Joan Frederiksen, at the City Planning Bureau. We also met separately with the president of Friends of Goose Hollow and a planner who is on the board of the Goose Hollow Foothills League. Everyone agreed that we share common goals and that the revised Comprehensive Plan should allow for the following:

- Retention of these four structures on Main St.
- Retention of the residential appearance and character of these structures.
- If the non-conforming office use is not grandfathered, retention of the office use by some other means.

We believe that the members of the City Council appreciate the multiple benefits of preserving these fine old structures that are an integral part of this historic neighborhood, and recognize that the objectives of the stakeholders in this matter coincide with the objectives described in the Comprehensive Plan. We think it may be possible for them and the experts at the City to craft a solution in line with the desires of the major stakeholders, even if it requires inserting a special exception due to these unique circumstances.

Thank you for considering this matter. I am happy to provide any additional information that you feel would be helpful. Also, I have attached a small street map showing the location of our block and some recent photographs of the houses in question, as well as nearby houses on Main Street.

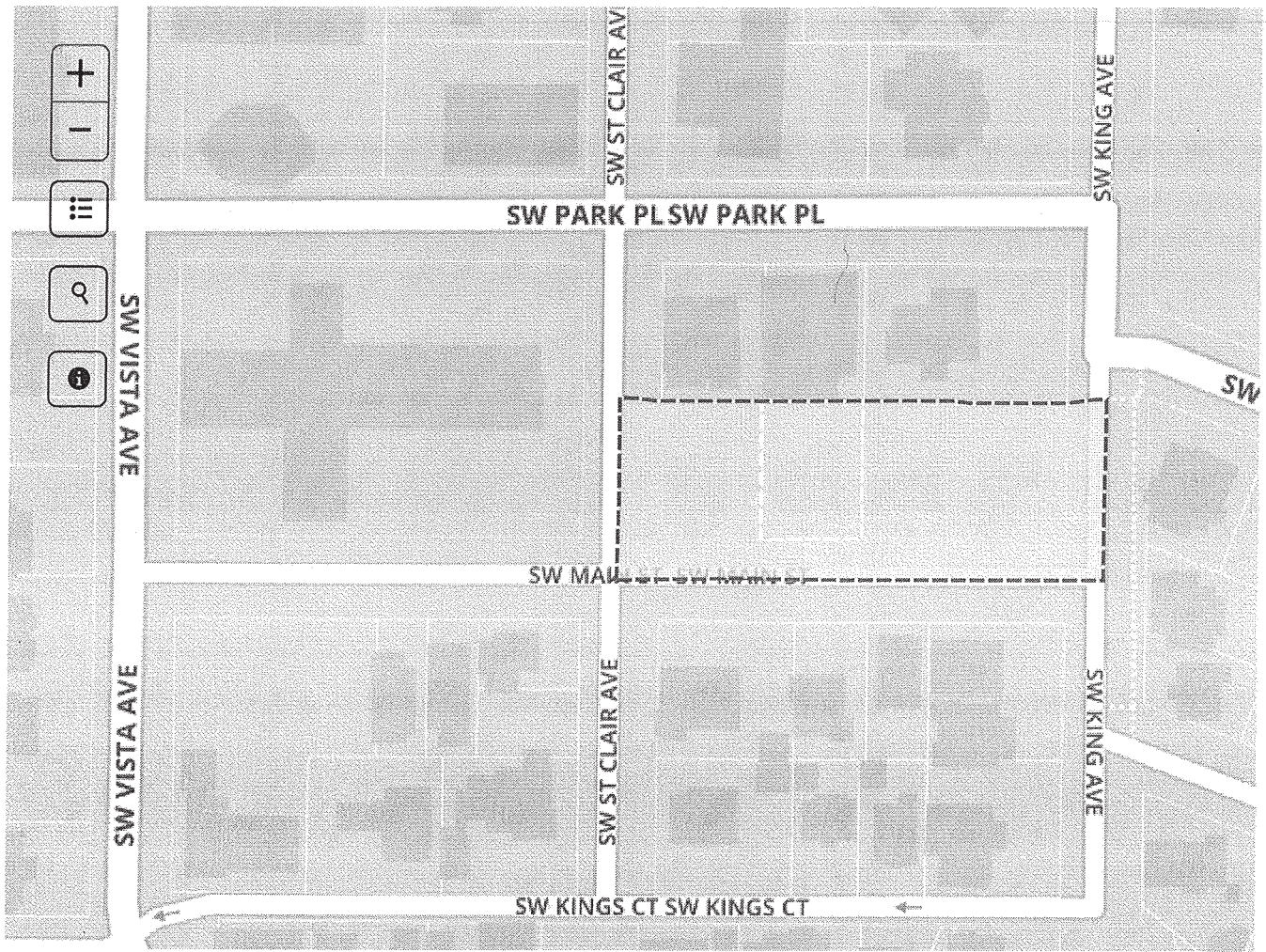
Respectfully,



Philip F. Brown

Enclosures

c: Lisa Joerin
Simpson & Company, PC
2165 SW Main Street
Rhododendron House, Ltd



Steven L. Pfeiffer
SPfeiffer@perkinscoie.com
D. +1.503.727.2261
F. +1.503.346.2261

July 26, 2016

VIA EMAIL (PSC@PORTLANDOREGON.GOV)

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201-5380

**Re: Miscellaneous Zoning Amendments Project (Proposed Draft, June 2016)
Joseph W. Angel's Request to Include Amendment to PCC 33.563.410 and
Remove the Future Urban (f) Overlay Zone**

Dear Chair Shultz and Members of the Commission:

This office represents Joseph W. Angel with regard to his property located at 5100 NW Skyline Road (the "Property") within the Northwest Hills Plan District. For over six years we have worked with the City to find a solution to long-standing regulatory uncertainty surrounding this specific Property, and believe that the Miscellaneous Zoning Amendments Project is the appropriate code amendment tool. Mr. Angel requests:

1. Amend PCC 33.563.410 so that "Rural Lands Outside of the Urban Services Boundary" that are divided may be served by septic systems and private water sources; and
2. Remove the future urban (f) overlay from the Property.

Requested Amendment to PCC 33.563.410

The Property is one of relatively few properties within the City's boundaries but outside of the Urban Growth Boundary ("UGB"). The 2035 Comprehensive Plan characterizes the Property as "Rural Lands Outside of the Urban Services Boundary." See Figure 8-1. Urban, Urbanizable, and Rural Lands, attached.

The code requires all land divisions in the Northwest Hills Plan District to be served by public sewer, but state law prohibits the extension of public sewer outside of the UGB. *Compare* PCC 33.563.410 and Goal 11. This discord between regulations can be resolved by allowing

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
July 26, 2016
Page 2

properties within the City limits but outside of the UGB to be served by septic systems and private water sources.

The following amendment to an existing regulation in the Northwest Hills Plan District solves the issue (deletion in ~~strike through~~, additions underlined):

"33.563.410 Land Divisions and Planned Developments

The following regulations apply to land divisions that will create four or more lots and to all Planned Developments within the Skyline subdistrict. Adjustments are prohibited.

* * * * *

B. Additional requirements for approval. In order to be approved, proposed land divisions and Planned Developments must meet the following requirements:

1. Public sewer and water service must be available to ~~the sites~~ located within the Urban Growth Boundary; and"

The requested amendment is consistent with many elements of the 2035 Comprehensive Plan, including (emphasis added):

Policies -- Service provision and urbanization

The policies in this section support the maintenance of an urban services boundary to coordinate planning and provision of public facilities. These policies also identify which urban facilities and services are and will be provided by the City of Portland within this boundary. This section supports Statewide Planning Goal 11 — Public Facilities.

The Portland Comprehensive Plan addresses three distinct types of land: rural, urbanizable, and urban. Some rural land is within the City Limits, having been annexed prior to establishment of the Regional Urban Growth Boundary. This land must maintain its rural character, and public facilities and services in this area should be planned accordingly. Urbanizable land is beyond the City Limits, within the Regional Urban Growth Boundary and within the City's Urban Services Boundary. Urbanizable land will eventually be annexed to the City of Portland, and full urban services may then be extended. Urban land is within the City Limits, the Regional Urban Growth Boundary, and the City's Urban Services Boundary.

Policy 8.2 Rural, urbanizable, and urban public facility needs. Recognize the different public facility needs in rural, urbanizable and urban land as defined by the Regional Urban Growth Boundary, the City Urban Services Boundary, and the City Boundaries of Municipal Incorporation. See *Figure 8-1 — Urban, Urbanizable, and Rural Lands.*

Policy 8.19 Rural service delivery. Provide the public facilities and services identified in Policy 8.3 in rural areas only at levels necessary to support designated rural residential land uses and protect public health and safety. Prohibit sanitary sewer extensions into rural land and limit other urban services.

Requested Removal of Future Urban (f) Overlay

Because the Property is not designated as an Urban Reserve, it is unlikely to be included in the Urban Growth Boundary (“UGB”) in the next fifty years, if ever. Therefore, the future urban (f) overlay zone should be removed from the Property.

Background

The history of the circumstances involving the Property provides useful context for these requests. The Property consists of 48 contiguous acres comprised of five parcels in single ownership located entirely within the City of Portland, with only a limited portion of the Property located within the UGB. Starting in 1965, the City of Portland began providing water service to the Property, replacing well water as the source of water to the Property. In 1971, the Property was annexed to the City of Portland at the request of the City based, in large part, upon the City's commitment to provide additional City services. At the time, we understand the Property was designated to accommodate residential densities of 4.5 units per gross acre, or 10,000 square foot lots, and such zoning remained in place until 1977.

At the time Mr. Angel purchased the Property in 1978, the applicable zone map designation was Farm/Forest, which allows a minimum lot size of two (2) acres. In 1981, a new Natural Resources (NR) overlay zone was adopted by the City, which required a 20 acre minimum lot size. The NR overlay zone applied to the part of the Property located outside of the UGB. In 1991, an exception to Statewide Planning Goal 4 was taken for four of the five lots to allow continuation of the 2 acre residential zoning of the Property through the Northwest Hills Natural Areas Protection Plan, which also applied the Environmental overlay zone designation to limited portions of the Property. Also in 1991, the City of Portland required that all NR zoned land be changed to a future urban (f) overlay zone. It is worth noting that the future urban overlay zone has the sole effect of increasing the minimum lot size applicable to the Property under the acknowledged comprehensive plan and zoning designations from 2 acres to 20, thereby reducing

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
July 26, 2016
Page 4

the number of available lots from approximately 24 to 2 notwithstanding the base zone density allowance and availability of City water. The stated basis for this mapping was to retain the potential for future urbanization of the property through inclusion within the Urban Growth Boundary.

Metro included the Property within its Urban Reserve areas designated to be future locations for UGB expansion in 1997. In 2002, Metro voted to include all of the Property within the UGB and the Land Conservation and Development Commission ("LCDC") affirmed Metro's decision; but in 2005, the Court of Appeals remanded Metro's decision for reasons wholly unrelated to the Property. Since Metro declined to respond to the Court's ruling through readoption of the amendment, the Property has yet to be addressed again by Metro. Thus, the bulk of the Property remains outside of the UGB notwithstanding the earlier policy choice of Metro and LCDC. Further, the Property is not included as an Urban Reserve area, so it is unlikely to be included in the UGB for decades, if ever. Obviously, this fact further underscores the inappropriateness today of the (f) overlay designation.

In order to reconcile the Property's regulatory history and resolve the regulatory uncertainty surrounding the property, Mr. Angel requests that the future urban (f) overlay zone be removed from the Property because it is highly unlikely that the Property will be included within the UGB.

Following the removal of the future urban overlay, Mr. Angel intends to apply for a land division or planned development establishing the specific development plan for the Property, consistent with the existing RF base zone designation. In addition, Mr. Angel has worked over the years with Metro to undertake a land trade or acquisition to facilitate improvements to the Saltzman Road frontage and enhance this key access portal to Forest Park. Further, previously the Portland Parks Bureau was interested in acquiring a portion of the Property as a neighborhood park. However, it is necessary to resolve the final development scenario of the Property through this Miscellaneous Zoning Amendment Project and subsequent land division prior to incorporating proposed acquisitions by Metro and the Parks Bureau.

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
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Page 5

Thank you for your consideration of these requests.

Very truly yours,

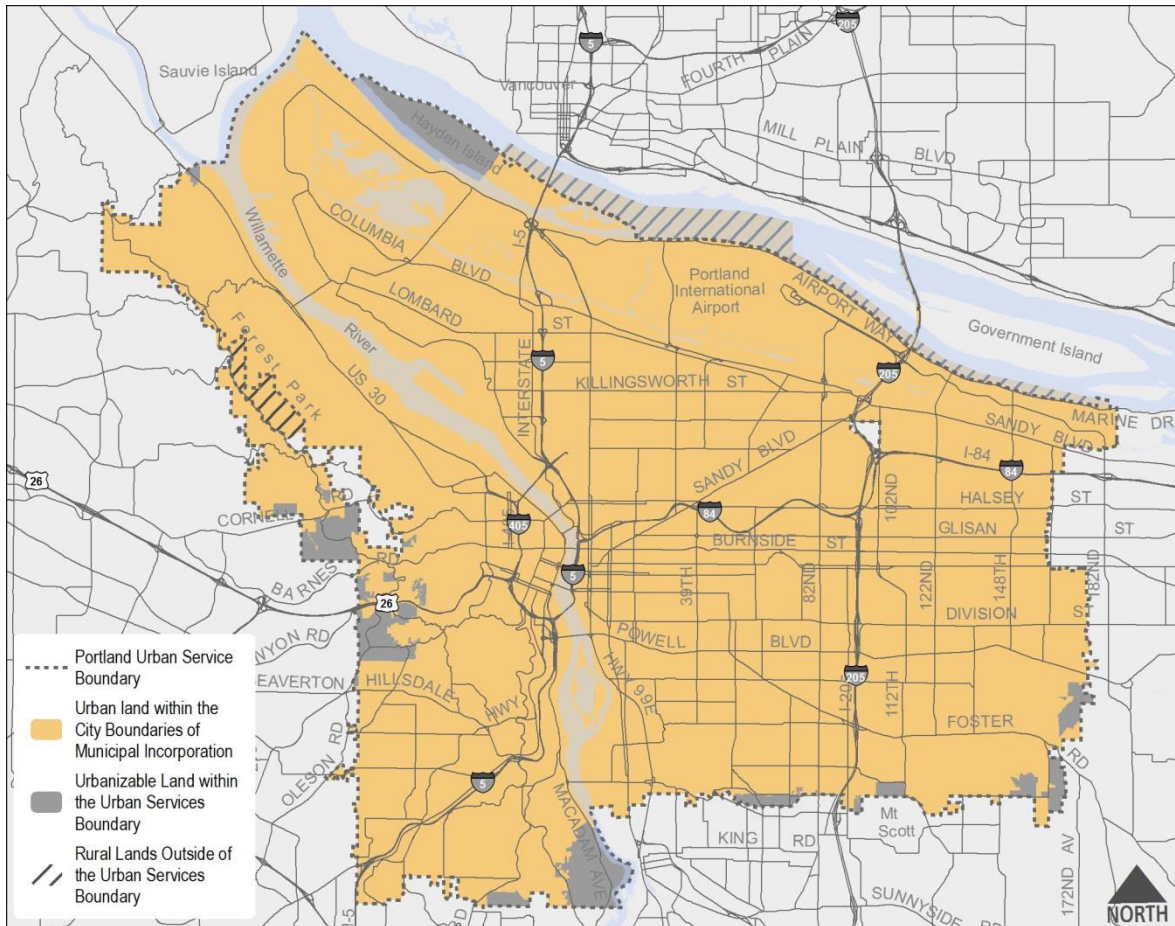
A handwritten signature in blue ink, appearing to read "Steven L. Pfeiffer".

Steven L. Pfeiffer

SLP:crl
Enclosure

cc: Mr. Joseph W. Angel (with enc.) (via email)

Figure 8-1. Urban, Urbanizable, and Rural Lands





Dorothy S. Cofield,
Attorney at Law

July 25, 2016

Planning and Sustainability Commission
c/o Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

**Re: Task 5 – Miscellaneous Zoning Code Amendments
Proposed Public Trail Alignment
Property at NW Saltzman Rd., Portland
State ID: 1N1W22AA 603**

Dear Members of the Planning and Sustainability Commission,

I represent David Himmelberger and Louise Ericcson, the owners of the above-referenced residential vacant lot (hereinafter “Owners”). The Owners received a letter from the Bureau of Planning on May 18, 2016 advising them that a future public recreational trail was proposed to be sited through their vacant lot, which is presently being developed through the City’s environmental review and building permit process. *See Attached “A-2” Site Plan and EA 14-236148 APPT.*

Upon further investigation with Metro and the City of Portland Parks Department, the Owners were told that the trail does not go on the Owners property but is sited in the right-of-way of Saltzman Road. *See Attached Westside Trail Master Plan Map 15, Segment 5.*

John Cole with the Bureau of Planning and Sustainability is recommending the Commission remove the public trail from the Owners’ property from the trail map as shown in staff’s proposed powerpoint slide. *See Attached Draft Slides E-Mail.*

The Owners are also proposing an amendment to Portland City Code (PCC) Title 33.430.080 that would allow a private, residential property in an environmental zone that is adjacent to a public trail to completely fence their property with a six-foot fence.

Allowing a private property owner to permanently fence their property adjacent to a public trail is a necessary measure to keep the public out of undesignated trail areas and keep private property safe, secure and clean.

PCC 33.430.080 only allows a temporary fence. PCC 430.22.080(D)(7). Title 33 is not clear whether a fence is allowed because it requires environmental review. *See Attached* Electronic Mail from Kathy Harden. At any rate, even if a fence is allowed after environmental review, the fence is restricted to 3.5 feet, which is not high enough to protect private property in the manner Metro suggests. *See Attached* Robert Spurlock Memo on Trail Design Best Practices p. 91 “Privacy of Adjacent Property Owners.” The Safety Recommendations on Table 26 of the Memo recommend, “Encourage the use of neighborhood friendly fencing and also planting of landscape buffers.” It seems that the issue of the height of the fence has to be that which is necessary to provide a reasonable measure of safety and to act as a sufficient deterrent to unwanted intrusion. The problem with public trails and private property are well documented in the Springwater Corridor and need to be addressed so that private property owners who are adjacent to public trails are not subject to these documented impacts.

Proposed PCC 430.22.080.(D)____ (Items Exempt from These Regulations)

“Installation of permanent fencing up to six feet tall around the perimeter of the private property when such property is adjacent to a public trail to protect private property from the public’s entry;

- (a) The added disturbance area is exempted from the maximum disturbance area standards in Table 430-1;**
- (b) and the disturbance area is located at least 30 feet from the top of bank of a stream or drainage and at least 50 feet from the edge of a wetland.”**

Staff has not included the proposed fence amendment in this Miscellaneous Zoning update on the theory that it should be done in a “broader review” than this trail zoning amendment process affords.

We believe public trail designation process is the right process to concurrently amend Title 33 so that fences, which are not allowed outright at a sufficient height, will be able to adequately protect adjacent private property. The attached documents demonstrate that private property next to public trails must have secure fences. *See e.g.* Springwater Corridor Shooting; Robert Spurlock Memo on Trail Design Best Practices p. 91 “Privacy of Adjacent Property Owners”; Safety Issues Continue to Plague Springwater Corridor Trail; PBOT Publication - “A Path to Trail Safety.”

All of these exhibits point out that fencing to secure private property adjacent to public trails is key to decreasing criminal accessibility as well as protecting the health and safety of the private property owner and allowing them use and enjoyment of their property while at the same time promoting the City’s public trail system.

The Owners have an existing wire fence that partially surrounds the property. *See Attached* Photographs. As such, allowing the existing fencing to be replaced by amending Title 33 as suggested above will not create a substantially greater impact on the environmental resources on the property that are zoned “EC.”

We urge the Commission to adopt the proposed fencing amendment. I will be at the hearing on July 26th to testify and answer any questions the Commission may have.

Very Truly Yours,

COFIELD LAW OFFICE


Dorothy S. Cofield

DSC:dsc
CC: Robert Spurlock
Emily Roth
Client

Springwater homeless will be shifted elsewhere

By Tony Hernandez
The Oregonian/OregonLive

Officials who serve homeless populations in Portland say the pending cleanup of the Springwater Corridor means hundreds of people will be dispersed into an area without enough shelter space or other indoor options to accommodate them.

Outdoor camping will continue; it will just be more visible in other parts of the city.

Portland Commissioner Dan Saltzman prepares to move forward on a proposed homeless facility along the Willamette riverfront | **A6**

After Portland Mayor Charlie Hales' July 15 announcement that outdoor camping will be off limits to people on the trail, service providers began preparing for an onslaught of people in need of a new place to set up camp. An estimated 500 homeless people lived on the trail that spans Multnomah and Clackamas counties, connecting Gresham, Portland and Milwaukie.

Last year, Multnomah County had 1,887 unsheltered people sleeping on the streets, according to a one-night count. "Dispersing hundreds of people into the city is absolutely ridiculous and inhumane and won't actually solve anyone's problem," Israel Bayer, director of Street Roots, wrote in an online post Thursday. "It certainly won't help people on the road to recovery or being able to access housing."

Jessie Sponberg, a former mayoral candidate and activist, said he plans to move homeless campers from Springwater to the Eastmoreland neighborhood near Reed College, he told the TV station.

See *Homeless*, A6



Hundreds of people live along the 21-mile Springwater Corridor that stretches from downtown Portland through portions of Milwaukie and Gresham before ending in Boring in Clackamas County.

TONY HERNANDEZ/STAFF

Homeless

Continued from A1

neighborhood near the homes of Hales and Multnomah County Chair Deborah Kafoury. He's eyeing a grassy median near Reed College, he told KGW.

Sponberg believes there's money to create small, self-governed homeless camps in each of Portland's neighborhoods, like Hazelnut Grove in North Portland's Overlook neighborhood, he told the TV station.

Homelessness on the Springwater Corridor

Officials estimate about 500 homeless people camp along the Springwater Corridor that stretches 21 miles through Portland, Gresham and Milwaukie.

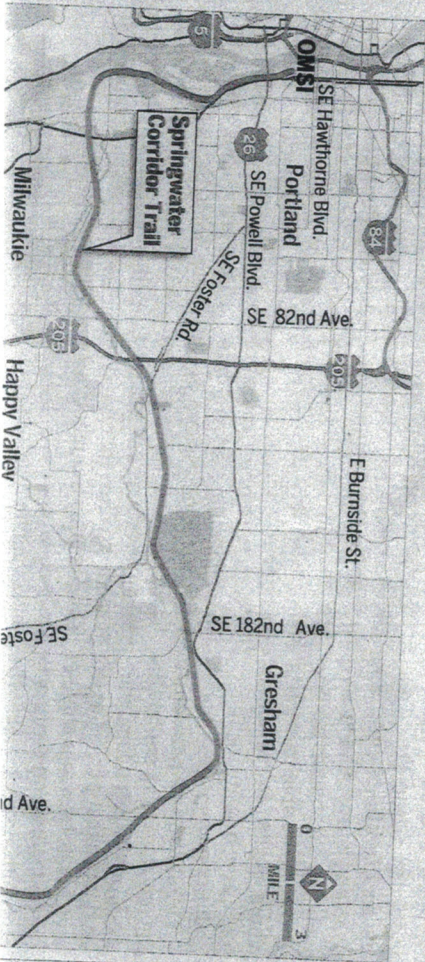


EXHIBIT
A 1-2
tabbler

The Joint Office of Homeless Services, an agency funded by the city and county, held a meeting Wednesday with local organizations to discuss the Aug. 1 cleanup. Ree Kaarhus, executive director of Boots on the Ground PDX, said she left the meeting staggered by the lack of resources and the scope and scale of the work that needed to be done.

"Everybody is on the same page, as far as being concerned about the community," Kaarhus said. "At this point, the city-contracted service providers will be joining with the volunteer service providers to make sure nobody falls through the cracks."

Hales said the city is willing

to reimburse city-contracted agencies for extra expenses needed to prepare homeless campers on the trail, such as motels for people on the cusp of finding permanent housing, or additional staffing. Sara Hottman, a city spokeswoman, said on Friday.

Outreach workers at JOIN, an organization contracted by the city and Multnomah County, have traversed the Springwater Corridor about once a week, and that hasn't changed since Hales' announcement, said Executive Director Shannon Singleton.

However, "it impacts the

workload for the staff," Singleton said. "They're feeling some pressure as folks are not only trying to figure out where to go but their long-term plan as well."

Hottman said Friday that the city still doesn't have a cost estimate for the massive cleanup.

It will depend on how much refuse is left behind, including trash and people's belongings, she said.

The joint office continues to search for new places for potential shelters, said David Austin, a county spokesman. He said 650 shelter beds will be added by the end of the

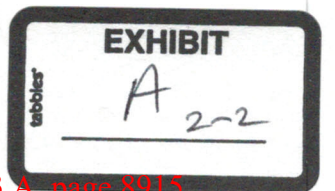
year. That's more new beds this year than in the last decade combined, he said.

Finding new options for shelters — and getting support from neighborhoods for those shelters — remains incredibly difficult, he said. Meanwhile, the county will continue to focus on services for addiction and mental health services.

"Are they going to seek services and link up with case managers? That question remains to be answered," he said.

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therrandez@oregonian.com
503-294-5928

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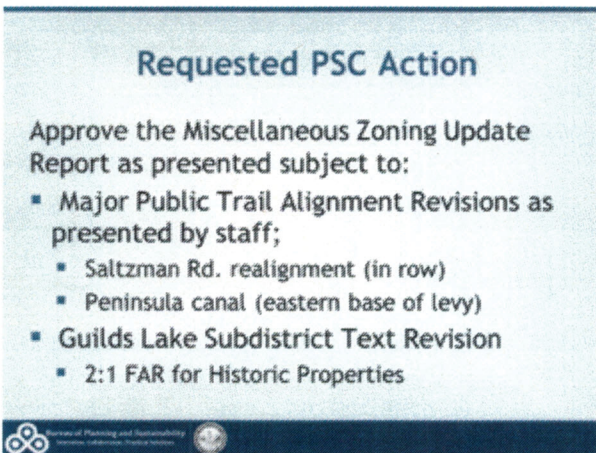
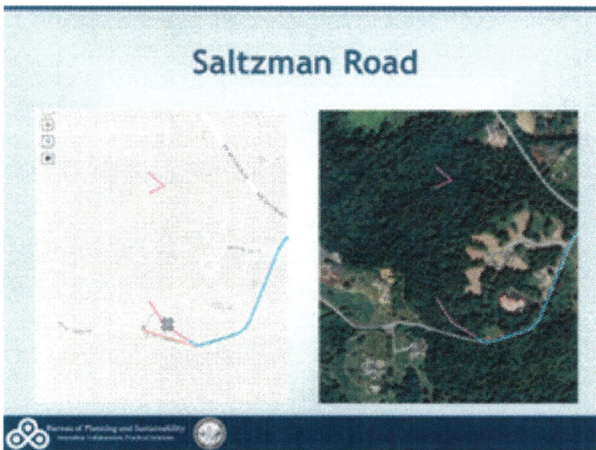
Dorothy Cofield

From: Cole, John <John.Cole@portlandoregon.gov>
Sent: Monday, July 25, 2016 10:44 AM
To: Dorothy Cofield
Cc: david_himmelberger@healthoutcomesgroup.com; Imerricson@yahoo.com
Subject: RE: Misc Zoning Amendment Public Trail

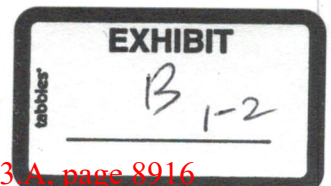
Dorothy,

These may be edited a bit prior to the meeting tomorrow but below please see the Powerpoint slides that will be presented to the commission regarding the Saltzman Rd Property and then the slide that describes Staff's larger request of the Planning Commission at the conclusion, of their meeting.

John



From: Dorothy Cofield [mailto:cofield@hevanet.com]
Sent: Monday, July 25, 2016 9:51 AM
To: Cole, John <John.Cole@portlandoregon.gov>
Cc: david_himmelberger@healthoutcomesgroup.com; Imerricson@yahoo.com
Subject: Re: Misc Zoning Amendment Public Trail



Thank you for letting me know.

Dorothy S. Cofield
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1001 SW 5th Ave.
Suite 1100
Portland, Oregon 97204
T: [503 675-4320](tel:5036754320)
C: [503 709-9859](tel:5037099859)
E: cofield@hevanet.com
www.cofieldlanduse.com

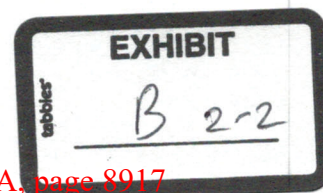
On Jul 25, 2016, at 8:42 AM, Cole, John <John.Cole@portlandoregon.gov> wrote:

There is no staff report beyond the proposed draft online. Changing the trail alignment on Saltzman road will be part of the staff presentation

From: Dorothy Cofield [<mailto:cofield@hevanet.com>]
Sent: Monday, July 25, 2016 7:36 AM
To: Cole, John <John.Cole@portlandoregon.gov>
Cc: david_himmelberger@healthoutcomesgroup.com; lmerricson@yahoo.com; cofield@hevanet.com
Subject: Misc Zoning Amendment Public Trail

Hi Mr. Cole,
Is there a staff report to the Planning Commission for the revised map you are proposing for Saltzman Road? I looked under the PSC agenda on line but did not find it.

Dorothy S. Cofield
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Existing Fencing
at
Saltzman Road Property
1N1W22AA 603



As Springwater Corridor shooting shows, homelessness on the rise in East Portland



By [Anna Griffin](#) | [The Oregonian/OregonLive](#)

[Email the author](#) | [Follow on Twitter](#)

on June 13, 2014 at 5:55 PM

Nothing surprises the officers in Portland's East Precinct anymore.

Not buckets of human waste left by the side of the Springwater Corridor. Not a snake slithering mere feet from a homeless man's campsite. Not reports of people being robbed or even assaulted along the idyllic isolated bike and pedestrian trail.

Officers Robert Brown and Matthew Nilsen were responding to a report of a robbery on the Springwater Corridor early Thursday when 23-year-old transient Nicholas Glendon Davis swung a three-foot-long crowbar at them, police said. The officers began backing away, but Brown fell. When Davis continued to advance, **Brown shot him in the chest.**

It's the latest and highest profile reminder of something police and an increasing number of East Portlanders already knew: When city and county leaders pushed to annex large swaths of east Multnomah County almost three decades ago, they promised residents all the perks of city living. But as poverty spreads east from gentrifying neighborhoods closer to downtown, east Portland is getting the worst of urban life.

Scientific studies and anecdotal evidence show homelessness, along with other forms of extreme poverty, moving east from downtown Portland into communities beyond 82nd Avenue. The **Springwater Corridor** is a focal point.

The bike and pedestrian path, 21 miles from the central city to Boring, cuts a gentle, sloping path through some of the noisiest and ugliest stretches of the city. The attributes that make it so appealing – the sense of seclusion and privacy created by surrounding shrubs, trees, tall grass and blackberry bushes – also make it a magnet for homeless people seeking campsites.

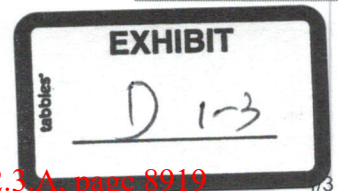
Greg Sargent, who owns a business near the corridor, called it a "thief's getaway route," on Thursday. Police say it's a "homelessness highway." **Mike Davis**, a pastor who ministers to homeless men and women and lives near the trail, says it's an escape route for people who, for various reasons, do not want to stay in a shelter or get a free meal at one of downtown's many charities.

"People go downtown first and realize that it's crazy. Most shelters won't let you keep a dog, they won't let you drink, and if you're traveling with someone of the opposite sex, they'll make you separate," said Davis, who has worked along the corridor for seven years. "It's easy to see why this area is attractive: You take a bike up the Springwater or you ride MAX out, and you're just a few footsteps from the middle of nowhere."

More on East Portland

Read The Oregonian's continuing series on the troubles of **East Portland**. So far, we've written about:

- The lost vision for **Gateway**
- The high-density **housing explosion**
- The dangers of
- The lack of **grocery stores and parks**
- Failed redevelopment in **Lents**



The problem is that the trail – along with Rocky Butte, the Johnson Creek watershed and other bits of quasi-suburban green space that have become popular camping spots – merely *feels* like the middle of nowhere. It's actually quite close to homes and businesses. From most spots on the trail, getting basic supplies is as easy as walking out of the woods to the closest Plaid Pantry, Taco Bell ... or residential neighborhood.

"Homelessness equals car prowls, graffiti, vandalism, all those little petty crimes that make a lot of people feel unsafe. That's why you can't just leave people alone to camp," said Officer Jason Lemons, part of the East Precinct neighborhood response team. "Everyone who camps isn't an issue. Probably most people aren't. But the more people you have out here doing that, the more likely you are to have neighbors notice problems."

On any given night, it's hard to tell how many people are sleeping outdoors in East Portland and East County. In the **2013 point-in-time homelessness count**, 11 percent of the people surveyed in Multnomah County planned to spend the night east of 82nd Avenue. But the count is voluntary and only calculates people actually contacted by census-takers.

One or two people occupy most of the illegal or unauthorized campsites police find. But officers have cleared out tent villages that were home to as many as 50 people. One Johnson Creek camp had a vegetable garden. At another, on Kelly Butte, clean-up crews needed almost 1,000 trash bags to pack up all the personal belongings and garbage they carted away, officers said.

ADVERTISING

On a recent spring morning, Lemons and several colleagues took a reporter and photographer on patrol. Finding campsites wasn't difficult.

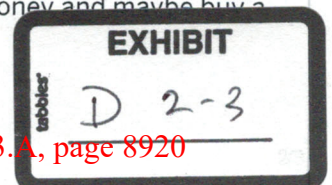
Lemons parked his police SUV in the back of an industrial park off Foster Road near Southeast 111th Avenue, half a mile from Thursday's shooting scene. The Springwater Corridor runs just behind the industrial park, and from it, officers saw a flash of blue tarp amid some blackberry bushes. They ducked under the limb of a small tree, rounded the bush and spotted a campsite: A wooden pallet served as a front porch, a tent and a tarp draped over it as a front door. Next to the tent were a collection of camping-sized propane bottles, a few pots, a disassembled shopping cart, a few full trash bags and two painters' buckets filled with something that didn't look or smell like paint.

"There's the toilet," Lemons said.

An officer shouted out identification-- "Anybody in there? This is the Portland Police." -- and three people emerged from the tent, squinting in the sunlight.

A man and a woman -- the man, who identified himself as Derrick, came out with his sweatshirt open to reveal a chest covered in tattoos -- travel together and shared the tent together. They had a guest, 31-year-old Loren Kurth, who had set up his own camp about 15 yards away under a small patch of trees. As officers examined Kurth's campsite a snake slithered by a few feet away.

"I don't really think I'm doing anything wrong out here," Kurth said. "I'm just trying to save up some money and maybe buy a house."



Derrick and Kruth's shelters were situated on a low, marshy stretch of open space just east of **Beggars Tick Wildlife Refuge** and on public property, where **camping is not allowed**. Officers found three more abandoned campsites within a 50-yard radius. Several had flooded during spring rains – soggy, mildew-smelling clothes and blankets rested atop the remains of one ripped tent. At another spot, the previous occupant had left behind a twisted bike wheel, more empty propane bottles, an assortment of fast-food wrappers and a child's sleeping bag bearing the face of actor Zac Efron and the logo from the movie "High School Musical."

"Imagine that you're here with your kids on a nice sunny summer day, you're having a nice bike ride, and you run into somebody like Derrick?" Lemons said.

Neither officers nor activists have an answer. Park rangers, who patrol the trail itself, have taken to writing more exclusions barring people caught camping from the trail. And agencies that own land along it are doing more regular grooming of the shrubs and trees that block views. The Police Bureau has increased its enforcement of camping – officers use ATVs to patrol harder-to-reach spots, and this summer will use airplane surveillance to look for larger camps.

Few shelters or services exist for homeless men, a bulk of the population of campers, in east Multnomah County. When officers force campers to move, they're shifting the problem rather than solving it.

They know that.

"Usually when we interact with campers, all we're trying to do is see if they want to get into services, if there's some way we can help them, just build a relationship. We could arrest them, but they'd be back here in maybe a few hours," said Officer Robert Brown, another member of the neighborhood response team who shares the same name with the night-shift officer involved in Thursday's shooting.

"It's frustrating for us, because it's this big, complicated, messy issue that we can't solve. It's frustrating because you have kids out here who are growing up thinking this is normal: people living in a tent off a trail in a swamp."

-- **Anna Griffin**

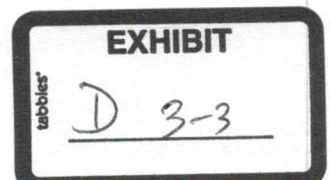
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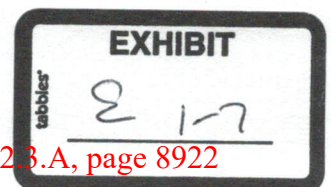
Metro | Memo

Date: Thursday, June 05, 2014
To: Metro Council
From: Robert Spurlock, Regional Trails Planner
Subject: Ordinance No. 14-1329B / Trail design best practices in industrial areas

At the public hearing on May 29, 2014, I described some of the types of design elements that are often implemented to ensure that trails are compatible with adjacent industrial uses, including signage, striping, lighting, and landscaping. Attached is a list included in Metro's Trolley Trail Master Plan that provides a more detailed description of the types of design features and improvements that may be included along trails to address potential safety concerns. These features were specifically recommended for the Trolley Trail between Milwaukie and Gladstone, which also crosses through industrial areas. These types of safety recommendations are often implemented to minimize potential conflicts with adjacent uses and ensure compatibility with other property owners, including industrial operations.

A similar list of safety recommendations was not included in the Ice Age Tonquin Trail Master Plan because the primary focus of the project was to determine the trail's alignment. The Trolley Trail planning effort was different from the Ice Age Tonquin Trail in that the entire six-mile alignment of the Trolley Trail followed a streetcar line that had been acquired by the North Clackamas Parks and Recreation District and Metro. Therefore the alignment of the trail had already been determined and was not a proposed alignment as with the Ice Age Tonquin Trail. With the trail alignment already determined, the Trolley Trail Master Plan was able to provide more detail regarding design and traffic control recommendations.

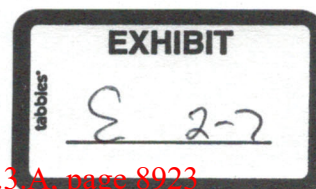
While the Trolley Trail does cross through industrial areas, it does not pass through any RSIA's. Other examples of trails that have been planned and developed by Metro in the last 20 years through RSIA's include the Peninsula Crossing Trail, which passes through an RSIA in North Portland and was completed in 2002, and the Springwater Trail, which includes a section that passes through an RSIA in southeastern Gresham that was completed in 2000. Also, the Port of Portland built a 1.7 mile trail in 2008 near North Lombard Street in the Rivergate Industrial Area, which is designated an RSIA under Title 4. And an existing portion of the North Portland Willamette Greenway includes an approximately two-mile-long trail that crosses directly through the Swan Island Industrial Area RSIA. Much of the trail through Swan Island has been in place since the 1980s, but portions have been built through the RSIA more recently, including a portion along North Ballast Street that was built in 2012.



Another example is the Marine Drive Trail, which includes approximately 8.5 miles crossing through an RSIA along the Columbia River in North and Northeast Portland. That trail has been in place since the 1980s, and industrial land owners have generally welcomed the trail. One industrial landowner, Staples, Inc., actually donated land in 2011 to facilitate the completion of a new segment of the trail. More than a dozen other industrial landowners have sold land to Metro since 2008 for completion of the trail. Many of these landowners have expressed their appreciation of the trail and their desire for its completion. They see it as an asset because it draws bicyclists off busy roads like Marine Drive, and because it offers employees a place to walk during breaks.

The design of each of these trails incorporates elements similar to those included on the attached list of safety features. Using safety features such as these, and the types of traffic safety features described in Chapter 4 of the Ice Age Tonquin Trail Master Plan, the Ice Age Tonquin Trail and other trails to be developed in the future through industrial areas can be designed to minimize potential conflicts with industrial operations and ensure the trail will be compatible with industrial uses.

An excellent example of the use of signage and design to ensure compatibility was provided at the hearing by the photographs and description of the Springwater Corridor intersection with the Ross Island Sand and Gravel (RISG) cement batch plant in Portland's central eastside industrial area. As described at the hearing, that portion of the Springwater Corridor was opened in 2005 and currently has 5,000 daily users, which equates to approximately 28,000 per week and 1.5 million per year. The RISG plant operates from dawn to dusk and involves significant heavy cement mixer and flatbed truck traffic. As shown in the photos, the RISG access point approaches the trail from a challenging angle and must directly cross the trail to enter and exit the facility. However, data provided by the City of Portland show that there has been only one accident in that area involving a bicycle since 2003, and that crash was not at the RISG location.



VI. Trail Safety Recommendations

Public Safety Audit

As part of this planning effort, the consultant team preformed a Safety Audit of the Trolley Trail right-of-way in conjunction with a Clackamas County law enforcement officer. The intent of this audit was to review field conditions from law enforcement's prospective and apply recommended crime prevention methods through environmental design. The corridor was walked the majority of its length, conditions noted and photographed.

Table 26 summarizes key safety issues, location(s) of concern and recommended improvements.

Table 26. Safety Recommendations

Safety Issue	Recommended Improvements	Location on Trail
Unwanted vehicle access on the trail The use of the right-of-way by 4-wheel drive activity was noted at three locations along the trail. Area one is from Silver Springs to Torbank. Area two is in the double SE Arista section from SE Creighton to SE Concord Road. Area three is just north of SE Park Avenue.	1. Utilize landscaping to define the corridor edge and trail, including earth berms and large boulders.	All, with emphasis on Segment 5, Creighton to Concord, and segment 2 just north of Park.
	2. Use bollards at intersections.	All
	3. Pass a motorized vehicle prohibited ordinance and sign the trail.	All
	4. Where autos share access along the Trolley Trail for private property access, separate the auto use from the trail use and provide a vegetative buffer between the trail and the driveway.	Segment 3, Park to Torbank.
	5. Close off opportunity for driving through between Silver Springs & Torbank with a physical barrier and "no outlet" signage.	Segment 3, Park to Torbank.
	6. Create a Trail Watch program and encourage citizens to photograph report illegal vehicle use of the corridor.	All
	7. Lay the trail out with curves that allow bike/ped passage, but are uncomfortably tight for automobile passage.	Segment 5, Creighton to Concord.
Privacy of adjacent property owners This was one of the biggest concerns expressed by neighbors in the Creighton area. Concern is that the trail will bring people into areas that have for decades been quasi-private. Trail users will be able to peer into people's backyards and homes.	1. Encourage the use of neighborhood friendly fencing and also planting of landscape buffers.	All
	2. Clearly mark trail access points.	All
	3. Post trail rules that encourage respect for private property.	All
	4. Strategically placed lighting.	All

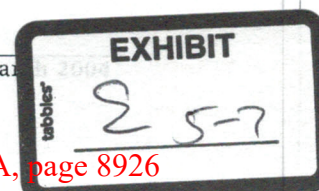
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TRAIL SAFETY RECOMMENDATIONS

Safety Issue	Recommended Improvements	Location on Trail
Litter and dumping Incidental dumping was noted throughout the right-of-way, the majority of which was yard debris that appears to be dumped over property line fences.	1. Post trail rules encouraging pack it in pack it out etiquette.	All, post rules at access points.
	2. Place garbage receptacles at trailheads.	All
	3. Provide good visual access to the trail.	All
	4. Strategically-placed lighting, utilizing light shields to minimize unwanted light in adjacent homes.	All
	5. Manage vegetation within the right-of-way to allow good visual surveillance of the trail from adjacent properties and from roadway/trail intersections.	All
	6. Encourage local residents to report incidents as soon as they occur.	All
	7. Remove dumpsites as soon as possible.	All
	8. Encourage use of yard debris recycling service.	All
Trespassing Trespassing through people's backyards was a concern expressed by some members of the public.	1. Clearly distinguish public trail right-of-way from private property through the use of vegetative buffers and the use of good neighbor type fencing.	All; Special emphasis on Creighton area in segment 5.
	2. Post trail rules that encourage respect for private property.	All
	3. Place good neighbor fencing between trail and residence immediately north of Park.	Segment 2, single resident just north of Park.
Crime Creighton area neighbors expressed concern about potential loitering, burglary, muggings, kidnapping, etc. Neighbors stated there were issues several years ago that went away once the right-of-way became impassable due to dense vegetation. Undesirable transient activity should be handled following these recommendations as well.	1. Manage vegetation so that corridor can be visually surveyed from adjacent streets and residences.	All, special noted emphasis on segments 1, 2, and 6.
	2. Select shrubs that grow below 3' in height and trees that branch out greater than 6' in height.	All
	3. Place lights strategically and as necessary.	Light all of segments 1 and 2 (where necessary). Add lights at intersections and where necessary between intersections for segments 3-8.
	4. Place benches and other trail amenities at locations with good visual surveillance and high activity.	All, two sites were identified one at 28th as an access point, second at just south of Concord. Both are suitable bench locations.
	5. Provide mileage markers at quarter-mile increments and clear directional signage for orientation.	All
	6. Create a "Trail Watch Program" involving local residents.	All
	7. Proactive law enforcement. Utilize the corridor for mounted patrol training.	All
Private use of corridor Private use of the corridor includes parking, vehicle access to private property, landscaping, and placement of small buildings on the right-of-way.	1. Attempt to negotiate win/win solution with property owners.	All Parking noted at Concord, Hull, and Glen Echo. Encroachment activity in segment 2, 3, 7, and 8.
	2. Eliminate where detrimental impact to trail cannot be reasonably ameliorated.	All

TRAIL SAFETY RECOMMENDATIONS

Safety Issue	Recommended Improvements	Location on Trail
Intersection safety Roadway and trail crossings present a potential safety concern between trail users and cars. Naef and Roethe were both noted as higher level safety concerns due to local high school traffic.	1. Require all trail users to stop at public roadway intersections through posting of stop signs.	All
	2. Provide cross walk striping and trail crossing warning signs for vehicle drivers. Put Trolley Trail logo on warning signs.	All
	3. Install flashing yellow lights at Naef, Roethe, and Concord.	Segment 6 and 7
	4. Utilize existing signal at SE Jennings and SE McLoughlin Boulevard crossing. Widen sidewalk at west and east side of SE McLoughlin Boulevard.	Segment 7
	5. Manage vegetation at intersections to allow visual access at crossings.	All
	6. Redesign 22nd to force vehicles to slow down as they exit SE McLoughlin Boulevard.	Segment 1
	7. Redesign 26th & Sparrow to narrow pavement area and slow vehicles down as they exit SE McLoughlin Boulevard	Segment 2
Local on-street parking A concern in the Evergreen, Silver Springs and Torbank area.	1. Post local residential streets as parking for local residents only to discourage trail user parking. Place "no outlet" and "no parking" signs prior to trail access points.	All
Trailhead safety	1. Clearly identify trailhead access areas.	All trailheads.
SE McLoughlin Boulevard impacts The proximity of the trail to SE McLoughlin Boulevard in segments 1 and 2 was identified as a concern. Though adequate setback is present, greater separation should be encouraged.	1. Deepen and widen the drainage ditch at the roadway shoulder while still allowing surveillance through and across ditch. 2. Place a small earth berm between trail and road.	Segment 1 and 2
Vandalism	1. Select benches, bollards, signage and other site amenities that are durable, low maintenance and vandal resistant.	All
	2. Respond through removal or replacement in rapid manner.	All
	3. Keep a photo record of all vandalism and turn over to local law enforcement.	All
	4. Encourage local residents to report vandalism.	All
	5. Create a trail watch program; maintain good surveillance of the corridor.	All
	6. Involve neighbors in trail projects to build a sense of ownership.	All
	7. Place amenities (benches, etc.) in well used and highly visible areas.	All



Community Involvement with Safety on the Trail

Creating a safe trail environment goes beyond design and law enforcement and should involve the entire community. The most effective and most visible deterrent to illegal activity on the Trolley Trail will be the presence of legitimate trail users. Getting as many “eyes on the corridor” as possible is a key deterrent to undesirable activity on the Trolley Trail. There are several components to accomplishing this as outlined below:

Provide good access to the trail

Access ranges from providing conveniently located trailheads along the trail, to encouraging the construction of sidewalks to accommodate access from private developments adjacent to the trail. Access points should be inviting and signed so as to welcome the public onto the trail.

Good visibility from adjacent neighbors

Neighbors adjacent to the trail can potentially provide 24-hour surveillance of the trail and can become NCPRD’s biggest ally. Though some screening and setback of the trail is needed for privacy of adjacent neighbors, complete blocking out of the trail from neighborhood view should be discouraged. This eliminates the potential of neighbors’ “eyes on the trail,” and could result in a “tunnel effect” on the trail.

High level of maintenance

A well maintained trail sends a message that the community cares about the public space. This message alone will discourage undesirable activity along the trail.

Programmed events

Community events along the Trolley Trail will help increase public awareness and thereby attract more people to use the trail. The Friends of the Trolley Trail can help organize numerous public events along the trail which will increase support for the trail. Events might include a day-long trail clean up or a series of short interpretive walks led by long time residents or a park naturalist. The Friends of the Trolley Trail can also generate public support for future funding applications.

Community projects

The support generated by the Friends of the Trolley Trail could be further capitalized by involving neighbors and friends of the trail in a community project. Ideas for community projects include volunteer planting events, art projects, interpretive research projects, or even bridge building events. These community projects are the strongest means of creating a sense of ownership along the trail that is perhaps the strongest single deterrent to undesirable activity along the trail.

Adopt-a-Trail Program

Nearby businesses, community institutions, and residential neighbors often see the benefit of their involvement in the trail development and maintenance. Businesses and developers may view the trail as an integral piece of their site planning and be willing to take on some level of responsibility for the trail. The Elks Club may provide an excellent opportunity to make contact with local business leaders. Creation of an adopt-a-trail program should be explored to capitalize on this opportunity and build civic pride.

Trail Watch Program

The Clackamas County's Sheriff's office is pursuing the development of a "Trail Watch" program along the Trolley Trail. This program would provide an opportunity for local residents to become actively involved in crime prevention along the trail. Similar to Neighborhood Watch programs, residents are brought together to get to know their neighbors, and are educated on how to recognize and report suspicious activity.

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Get neighbors involved

Activity support is an effort to promote the presence of responsible pedestrian users in a given area. What you can do:

- Encourage immediate neighbors to walk the trail on a regular basis.
- Start a Foot Patrol trained by the City of Portland's Crime Prevention Program. Neighbors volunteer to walk in a small group along the trail, be a friendly presence and report problems, where necessary.
- Call the police when you see suspicious activity. Call 9-1-1 for immediate threats to life or property or a crime in progress. Otherwise, contact the police non-emergency number at 503-823-3333.

Maintain the trail

The strategies that you employ above are only as good as your commitment to maintain them. Steps you can take:

- Repair burned out lights, trim vegetation regularly, and pick up litter and debris.
- Eliminate trip hazards along the path whether that includes uneven surfaces, rocks, or ruts along the path.
- Work with PBOT to see if a dog bag dispenser and garbage receptacle can be installed to discourage waste being left on the path.
- Report all graffiti. If it's on your property, take a picture, report it and remove it immediately. See www.portlandoregon.gov/oni/graffiti for more info.

City of Portland Contacts

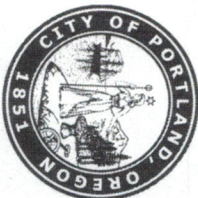
For questions and information about the Community Initiated Neighborhood Trails Process:

- Visit www.portlandoregon.gov/transportation/trails
- Contact the Trails Program with the Portland Bureau of Transportation at 503-823-7736

For help with crime and livability issues in Portland, contact the City of Portland's Crime Prevention Program:

- Visit www.portlandoregon.gov/oni/cp
- Call 503-823-4064
- Email onicpa@portlandoregon.gov

For ADA Title II or Civil Rights Title VI accommodations, translation/interpretation services, complaints, or for additional information, call 503-823-5266, TTY: 503-823-6868, or use Oregon Relay Service: 711.



PBOT

PORTLAND BUREAU OF TRANSPORTATION

A Path to Trail Safety

What volunteers and homeowners do to improve their neighborhood trail



This brochure applies to Portland Bureau of Transportation Community Initiated Neighborhood Trails

EXHIBIT

F 1-2

The City of Portland encourages neighbors and community volunteers to incorporate safety in the design of a trail to attract more neighbors and deter potential issues. Ideally the design will encourage users to:

- Move along the path,
- Stay on the trail and not unknowingly trespass onto private property,
- Engage in appropriate behaviors and be mindful of the residents living in the area.

The following recommendations are intended to create safer trails for users and neighbors, but not to prevent people from using trails on public rights-of-ways.

Improve trail visibility

Opening up sightlines on the trail eliminates hiding places for people and allows neighbors and trail users to observe and report suspicious activity. The following are ways to improve visibility:

- Trim vegetation and limb up trees on your property and on the path so that trail activities can be observed. Volunteers must obtain permission from the owner to trim vegetation on private property. If the trail is located in an Environmental Zone, you will need to contact the Bureau of Development Services for guidance at 503-823-7526.
- Remove any structures or features that block visibility to the trail such as a shed or wood pile.
- If possible, light pathways that are adjacent to a dwelling. Add motion detector lighting that illuminates the

pathway, but doesn't encroach onto your neighbors' property. Because you are lighting a natural area, consider limiting the detection area and sensitivity so that lighting isn't activated by woodland critters and there is a minimal impact on their habitat.



Secure your property

By securing your property, you are decreasing criminal accessibility. Some steps you can take:

- Consider installing a wrought iron, good neighbor-style, or chain link fence that allows you to see the adjacent trail.
- Secure gates to your yard that are accessible from the trail.
- Control access by planting non-invasive shrubs along entry points to your private property; see the Portland Plant List at portlandoregon.gov/bes/plantlist. You must maintain these plants so that they don't block the trail or visibility. Some home owners will install a fence a few feet in from the property line and plant vegetation against the structure. Choose

thorny vegetation to mitigate gra prevent access.

- For sheds or storage units accessible to a trail, install locks and secure to ladders as you would in your front y

Define the trail

When you provide a clear designation between public, private, and semi-private areas, it defines an area's intended use and makes it clear when someone trespasses. Taking care of your property and the area around it conveys a sense of active "ownership" and communicates that illegal acts will be noticed and addressed.

- Clean up the area by weeding, picking up litter and pruning bushes and trees so that the trail looks well-kept. For permitted trails, there will be designated group who will maintain the trail. Contact information for this group will be posted on trailhead signs.
- Create uniformity along the trail so that it is well-defined. For example, if gravel is used on one part of the trail, it should be used throughout the path. Maintaining a consistent width will also further define where the path starts and ends.
- For a home near the trail, add some low growing non-invasive vegetation, fencing, or texture changes at the property line to indicate the transition to private property.

For crime prevention advice, contact the City of Portland's Crime Prevention Program at 503-823-4064, onicpa@portlandoregon.gov.

EXHIBIT

F 202

July 25, 2016

Dana L. Krawczuk
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F. +1.503.346.2036

VIA EMAIL (PSC@PORTLANDOREGON.GOV)

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201-5380

Re: Broadmoor Inc.'s Objection to Proposed Major Public Trail Designation Across Broadmoor Golf Course (3509 NE Columbia Boulevard) – Miscellaneous Zoning Amendments Project (June 2016)

Dear Chair Shultz and Members of the Commission:

This firm represents Broadmoor Inc. (“Broadmoor”), which is comprised of a family that has owned and operated the Broadmoor Golf Course located at 3509 NE Columbia Boulevard (the “Property”) for over 100 years. Please include this testimony in the record of the Miscellaneous Zoning Amendments project proceedings, and provide us with notice of the final decision.

Broadmoor provided the attached testimony to the PSC at its July 12, 2016 public hearing regarding the Zoning Composite Map. That testimony related to zoning map issues, including the proposed Major Public Trail designation across the Property. The Major Public Trail designation is also a part of the Miscellaneous Zoning Amendments Project, so we resubmit the July 12th testimony into the record for these proceedings.

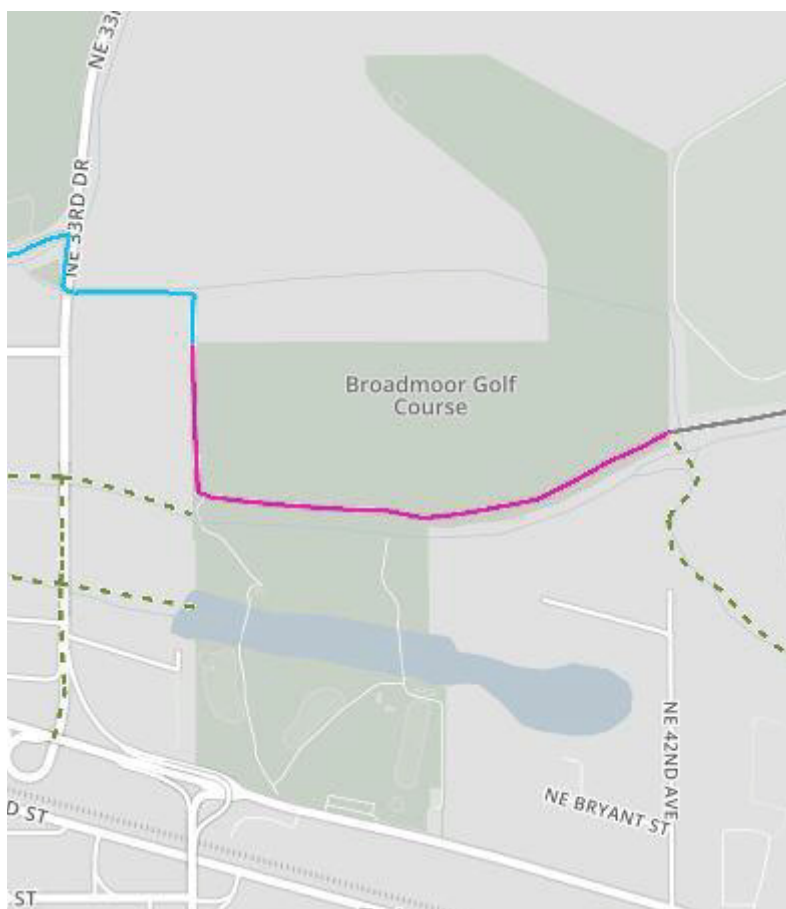
The Major Public Trails function on the Portland Map App as applied to the Property is depicted below, and illustrates the trail immediately adjacent to active fairways running east-west, and then making a 90-degree turn so that it cuts through two active greens and two active tee boxes as it runs north-south. Most of this area is in a “p” or “c” environmental overlay zone.

As detailed in our testimony, we request that the PSC remove the proposed Major Public Trail that crosses the Property, for the following reasons:

- Broadmoor received no notice of, and was not aware of any discussion relating to, the new major public trail that the Comprehensive Plan process that proposed to bisect the Property. The lack of notice and public dialogue is inconsistent with Policies 2.39 (Notification) and 8.55 (Trail coordination).

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
July 25, 2016
Page 2

- The trail has devastating negative consequences on the ongoing operation of the Property as a public golf course, which is recreational use. Limiting the recreational opportunities of the Property as a golf course are inconsistent with Goal 8.H (Parks, natural areas, and recreation), Policies 8.92 (Acquisition, development, and maintenance), 8.99 (recreational facilities) and 8.101 (Self-sustaining and inclusive golf facilities).
- The new trail requirement also has an outsized impact on Broadmoor's Property because of the Code's triggers for dedicating and constructing trails. Requiring Broadmoor to dedicate a trail easement for small structural improvements that do not provide large amounts of value to its operation makes the new trail requirement particularly egregious.



Source:

<https://www.portlandmaps.com/bps/mapapp/maps.html#mapTheme=majorTrails>

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
July 25, 2016
Page 3

For all of these reasons, Broadmoor requests that the zoning map be amended so that the Major Public Trail does not cross the Property. There are two alternative and more suitable locations for the trail:

- **Relocate the trail so that it crosses the Metro-owned open space, which is already publicly-owned land, or so that it follows the right of way.** A Metro-oriented realignment would be more consistent with Goal 8.H (Parks, natural areas, and recreation) and Policies 8.54 (Trail system connectivity) and 8.59 (Trail and Habitat Corridor coordination) related to connecting trails to recreational opportunities and natural areas, such as the publically owned, but not currently publically accessible, 54-acre Catkin Marsh Natural Area.
- **Relocate the trail so that it is within the right-of-way.** This alignment is consistent with Goal 8.D (Public rights-of-way), because it would enhance the right of way by providing a “multi-purpose, connected, safe and healthy physical space for movement and travel...” as well as Policies 8.40 (Transportation function) and 8.47 (Flexible design).

Thank you for your consideration of these requests.

Very truly yours,



Dana L. Krawczuk

DLK:dlk

Enclosure

cc: Scott Krieger, Broadmoor, Inc. (with enc.) (via email)
Erik Krieger, Broadmoor Inc. (with enc.) (via email)
Steve Kountz, Senior Economic Planner, BPS (with enc.) (via email)
Tom Wright, Mackenzie (with enc.) (via email)
Gabriela Frask, Mackenzie (with enc.) (via email)

July 12, 2016

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VIA EMAIL (PSC@PORTLANDOREGON.GOV)

Ms. Katherine Schultz, Chair
Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201-5380

**Re: Broadmoor Inc.'s Testimony Requesting Zoning Map Amendment for
22.08 Acres at Broadmoor Golf Course (3509 NE Columbia Boulevard)**

Dear Chair Shultz and Members of the Commission:

This firm represents Broadmoor Inc. ("Broadmoor"), which is comprised of a family that has owned and operated the Broadmoor Golf Course located at 3509 NE Columbia Boulevard (the "Property") for over 100 years. Please include this testimony in the record of the Composite Zoning Map proceedings, and provide us with notice of the final decision.

We have three requests:

1. Amend the zoning of the Property's 22.08-acre frontage on NE Columbia Boulevard General Employment 2 (EG2) (see attached map); or
2. In the alternative, amend the zoning of the Property's 22.08-acre frontage on NE Columbia Boulevard to General Industrial 1 (IG1); and
3. Remove the proposed Major Public Trail that crosses the Property.

Rezone the Property's 22.08-Acre Frontage on NE Columbia Boulevard

In June 2016, the City Council adopted an Industrial Sanctuary Comprehensive Plan designation over the Property's 22.08-acre frontage on NE Columbia Boulevard. During that process, the PSC was supportive of Broadmoor's October 27, 2015 request to have the zoning map designation amended concurrently with the Comprehensive Plan designation. However, the current Composite Zoning Map does not make that change and retains OS zoning for most of the 22.08-acre area.

We request that the 22.08-acre area depicted on the attached map be rezoned to support employment uses. The issue then becomes a question of which zoning designation, EG2 or IG1,

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Planning and Sustainability Commission
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is most appropriate for the 22.08-acre area. No change to the proposed Prime Industrial overlay is requested.

As Broadmoor has evaluated the feasibility of redeveloping the Property's frontage, we have determined that the topography of that area is better suited for the slightly more flexible uses allowed in the EG2 zone than the limited uses in the IG1 zone. For example, the steep topography makes truck access from NE Columbia Boulevard challenging, and significant fill would be required to provide level building pads suitable for industrial uses. The EG2 zone is more appropriate because it allows all of the IG1 uses (except for Railroad Yards and Waste-Related) but also allows slightly more office and retail sales and service uses. See Code Table 140-1. Zoning the 22.08-acre portion of the Property EG2 would allow job-intense uses; particularly those that support nearby industrial uses. Also, EG2 uses would provide the economic lift necessary to facilitate natural resource enhancement on the remaining 111 acres of open space on the Property.

Broadmoor acknowledges that the Comprehensive Plan designation approved by City Council for the 22.08-acre area is Industrial Sanctuary, which is not compatible with the EG2 zone. Broadmoor believes that the more appropriate Comprehensive Plan designation for this area is Mixed Employment, which corresponds to the EG2 zone, but also allows IG1 zoning. Broadmoor requests that, in consideration of the practical infeasibility of developing IG1 uses on the Property, that the Commission recommend rezoning this property to EG2 with a recommendation to the City Council to consider reconciling the Comprehensive Plan designation to allow this more appropriate zoning.

Removal of Major Public Trails Designation

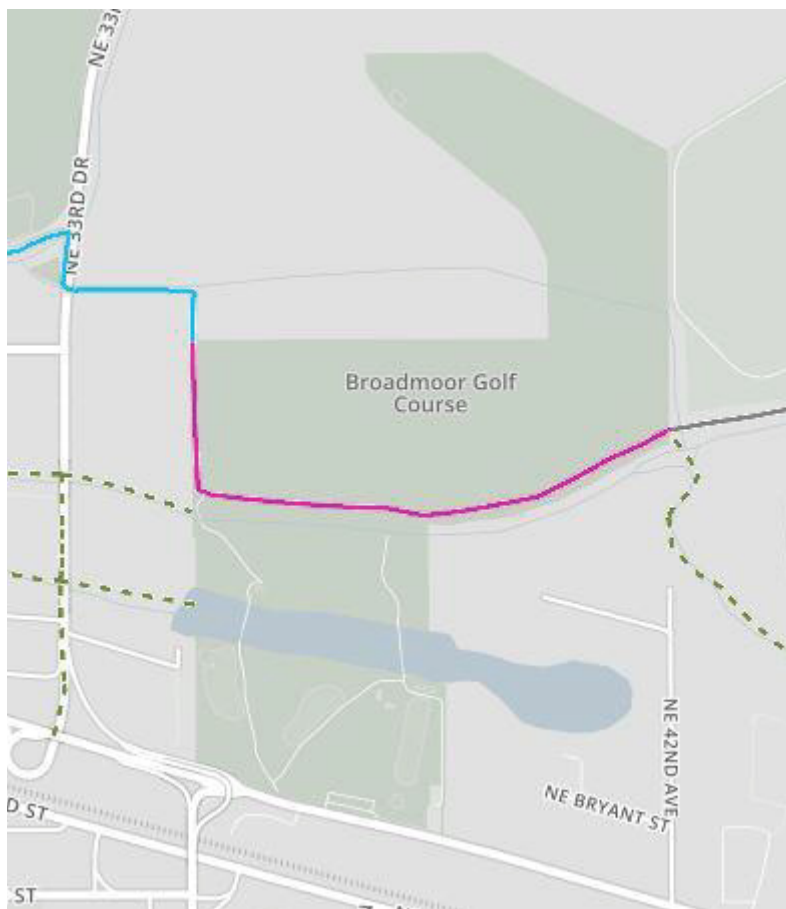
Broadmoor participated in the Comprehensive Planning process. During that extensive process, Broadmoor received no notice of, and was not aware of any discussion relating to, the new major public trail that is proposed to bisect the Property. Broadmoor's lack of awareness is not surprising. No mailed notice was provided, and the sole reference to the trail across the Property is buried on the "Major Trails, Public Trails" map; a single map located on the last page the Comprehensive Plan's "Chapter 8: Public Facilities and Services" (Figure 802, page GP 8-29, attached). Broadmoor first learned of this proposed trail when it received a notice of this public hearing, which occurred *after* the public record was closed on the Comprehensive Plan.

This single map and faint "future public trails" line that runs through the golf course was not subject to any public discussion, and yet it has devastating negative consequences on the ongoing operation of the Property as a golf course, and further reduces the likelihood that the frontage

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acreage will redevelop with IG1 uses. Broadmoor strongly objects to the zoning map amendment designating a Major Public Trail through the Property.

The Major Public Trails function on the Portland Map App is depicted below, and illustrates the trail immediately adjacent to active fairways running east-west, and then making a 90-degree turn so that it cuts through two active greens and two active tee boxes as it runs north-south. Most of this area is in a “p” or “c” environmental overlay zone.



Source:

<https://www.portlandmaps.com/bps/mapapp/maps.html#mapTheme=majorTrails>

At least five of the golf course's 18 holes are directly impacted by the trail's alignment. Not only are more than a quarter of the golf course's holes encroached upon by the trail, but

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Broadmoor's ability to operate the golf course is significantly impacted. It is unreasonable to require Broadmoor to bear the risk of inviting the public to cross through an active golf course where they may be injured by golf balls that are propelled at great rates of speed. Members of the public using a public trail would not be engaged in the sport of golf (and therefore unaware of the risks of the game) and would likely be distracted (e.g., jogging with headphones on), presenting even greater risk of injury.

The new trail requirement also has an outsized impact on Broadmoor's Property because of the Code's triggers for dedicating and constructing trails. The Code requires dedication of the mapped trail if a building permit is issued, and the trail must be constructed (including permitting through the environmental overlay zone) for any "new development" or improvements to the exterior of an existing development in excess of 35% of the assessed value of the existing improvements. For most types of development that derive their value from *structured* improvements, the trail costs are triggered by activities that simultaneously provide a large amount of value (e.g., building a new office development). Broadmoor's use is on undeveloped land and involves some necessary, but not high value-enhancing, structures (such as a golf cart storage shed). Requiring Broadmoor to dedicate a trail easement for small structural improvements that do not provide large amounts of value to its operation makes the new trail requirement particularly egregious.

For all of these reasons, Broadmoor requests that the zoning map be amended so that the Major Public Trail does not cross the Property. An alternative, more suitable location would be for the trail to be relocated so that it crosses the Metro-owned open space, which is already publicly-owned land, or so that it follows the right of way.

Thank you for your consideration of these requests.

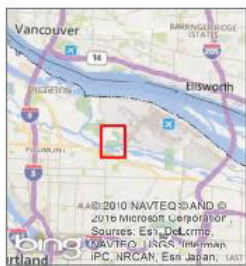
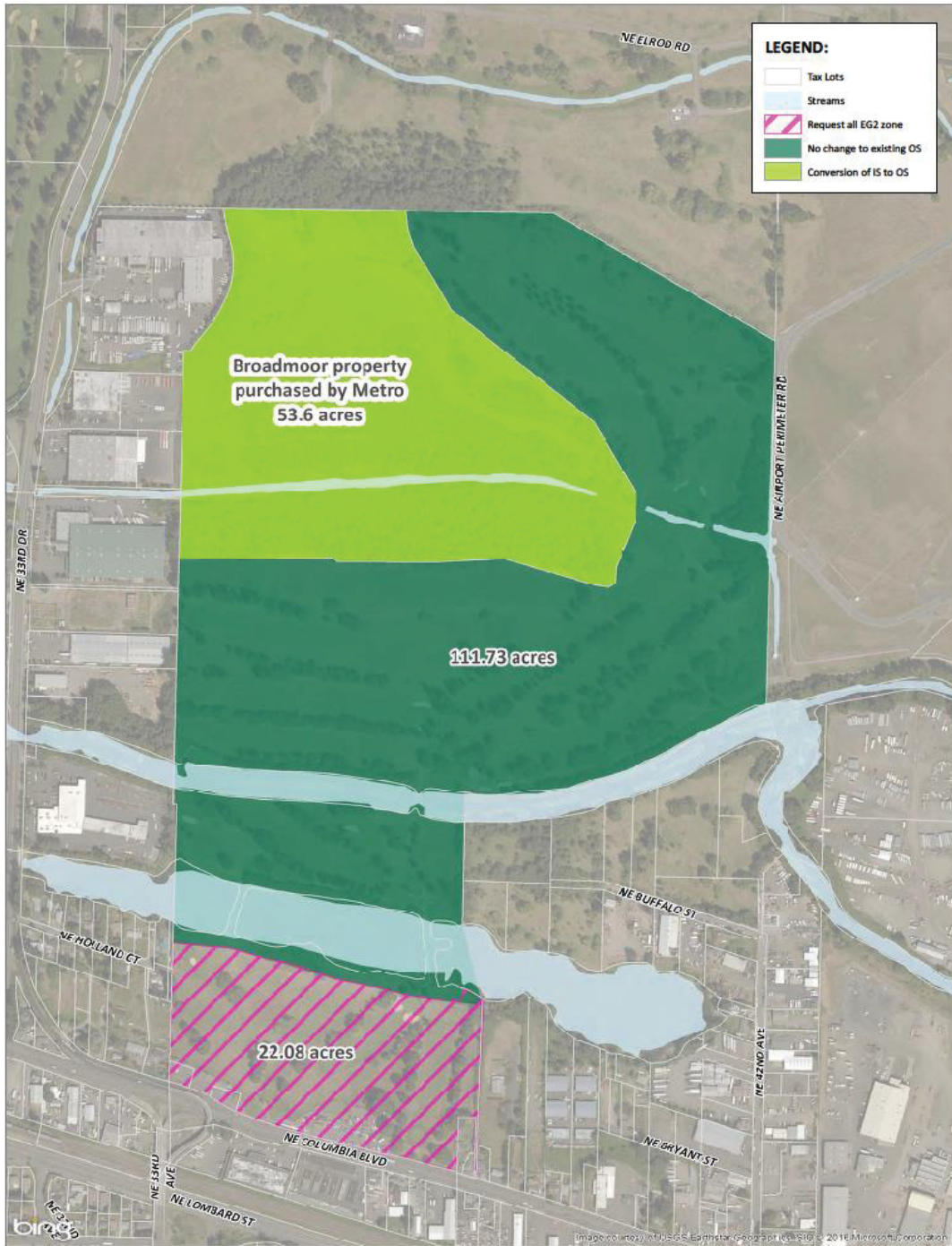
Very truly yours,



Dana L. Krawczuk

DLK:dlk

cc: Scott Krieger, Broadmoor, Inc. (via email)
Erik Krieger, Broadmoor Inc. (via email)
Steve Kountz, Senior Economic Planner, BPS (via email)
Tom Wright, Mackenzie (via email)
Gabriela Frask, Mackenzie (via email)



BROADMOOR GOLF COURSE **Portland, Oregon**
Zoning Map Amendment Request (July 12, 2016)

0 200 400 800 Feet
 1 inch = 400 feet

SOURCE DATA: Metro GIS Data, Aug 2015
 GEOGRAPHIC PROJECTION: NAD 83 WGS 84, Oregon North Lambert Conformal Conic

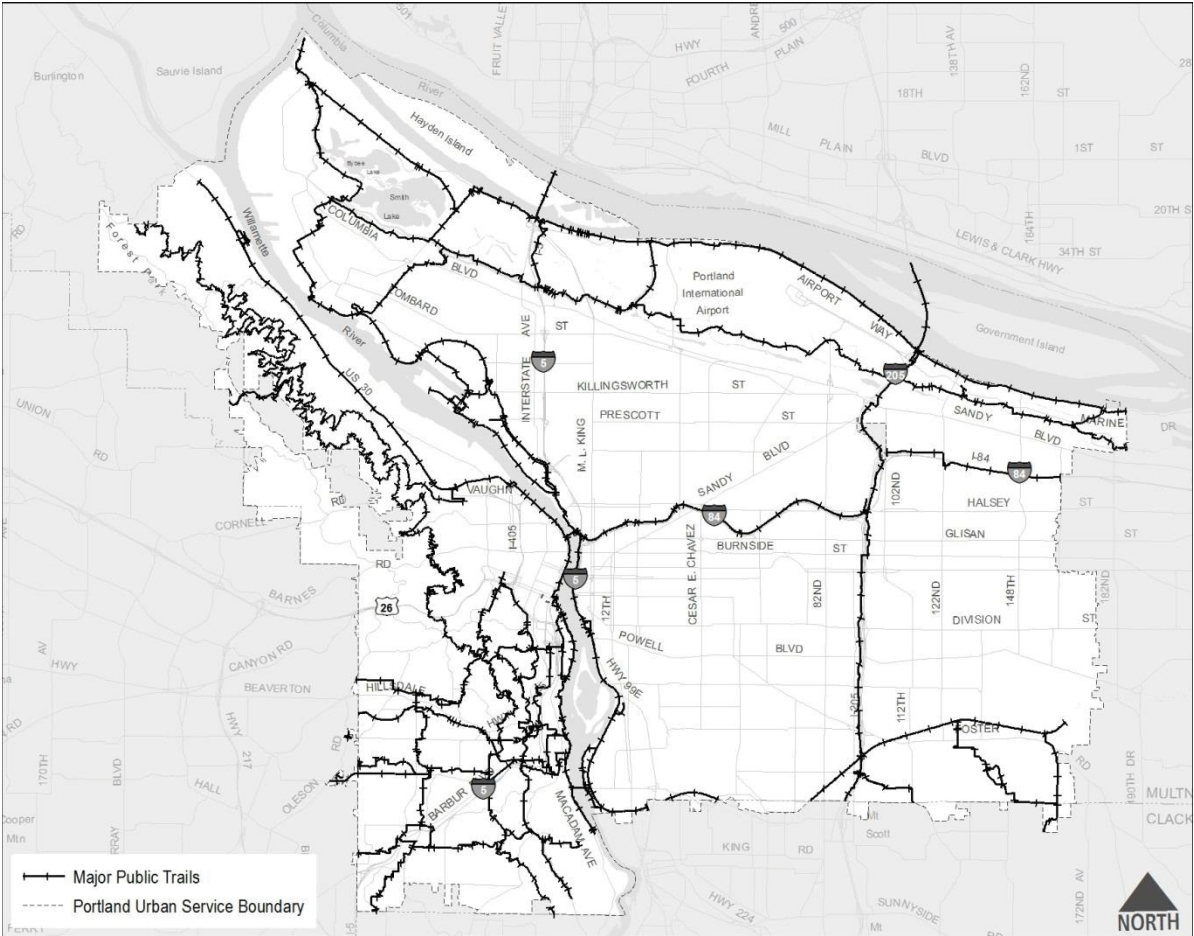
Date: 07/12/2016 Map Created By: GP
 File: ProposedZone_05_2016.aprx Project No: 20160220

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Figure 8-2. Major Public Trails



PROPOSED MAJOR PUBLIC TRAIL-

TESTIMONY OF OWNER OF ANCHOR PARK, LLC- JAN W. YOST- MEMBER AND MANAGER

Property Address: 5036 N Lagoon Ave. Portland Oregon 97217. State ID No. 1N1E20A 402

Siting of Proposed Major Public Trail. The attached map shows the new area of the trail (in pink) bisecting Anchor Park's property, directly in the path of the movement of the trucks, and through the fence on both ends of the property.

Use of Property. Anchor Park's property consists of 3.96 acres on Swan Island. This property has been leased since its acquisition in 2003 by Anchor Park, LLC to a neighboring business, D.S. U. Peterbilt & GMC, Inc. ("DSU") located at 4810 North Basin Ave. Portland, Oregon 97217. A portion has also been leased since 2013 to Environmental Fibers International, Inc., ("EFI") located at 4325 North Commerce St. Portland, Oregon 97217. DSU leases the property to temporarily park trucks, trailers and other large vehicles in connection with DSU's business of selling and repairing heavy duty, medium duty and light duty trucks. DSU's trucks and trailers temporarily parked on Anchor Park's property are very large, up to 65 feet in length, and together constitute millions of dollars of its customer's assets that have been entrusted to DSU for repair. EFI leases another part of the property for parking of vehicles and storage of its equipment.

These trucks and trailers are driven or towed continuously in and out of Anchor Park's property, to D.S.U.'s sales, repair and rental facilities on its nearby properties located at 5555 North Lagoon Ave. Portland, Oregon 97217, and 4630 North Basin Ave. Portland, Oregon, 97217. The property is completely fenced to protect the trucks, trailers and equipment from theft, (whether of the whole truck or its parts and tires), and vandalism. Keeping its customer's trucks secure is essential to DSU and to Anchor Park for liability and insurance issues.

I believe that siting of the proposed Major Public Trail across Anchor Park's property, allowing the public to cross this private property, would make it impossible or economically difficult to obtain insurance for theft and vandalism of the trucks. There is no night watchman on duty, and the property has no employees working on it, except when DSU's employees, or EFI's employees, are driving the trucks in or out, which happens both during the day and at night. In short, Anchor Park objects to the siting of the public trail across its private property because to do so would:

- (a) Render the property reasonably unsuitable for the purposes for which it is leased and allow the two tenants to terminate their leases. Anchor Park would lose all of its income from the property, which it uses to pay the debt secured by a mortgage on the property;
- (b) Pose a constant risk of injury to the public of being hit by a truck;
- (c) Significantly increase the risk of theft and vandalism (such as punctured tires, stealing accessories; spray paint or graffiti, etc.) to the vehicles and equipment stored on the property;

- (d) Significantly increase the cost of insuring the vehicles and equipment on the property;
- (e) Take away the owner's right to develop the property for future industrial use, or any use, as the proposed trail cuts the property in half;
- (f) Burden this property above and beyond the current two easements over the property, owned by the City of Portland, for a sewer line and sanitary sewer; and
- (g) This property is within AOPC 17 of the EPA's Portland Harbor Superfund site designation and its future is uncertain.

Option for Planning Commission Consideration. The trail could and should be located to the south, where there is an existing paved road, which has almost no traffic, between Anchor Park, LLC's property and the warehouses to the south/southwest.

SUBMITTED BY JAN W.YOST

Member- Anchor Park, LLC
C/o William E. Scarborough, Jr.
5 Centerpointe Drive, Suite 240
Lake Oswego, Oregon 97035



Address Search

Map Proposal Comments

MAJOR PUBLIC TRAILS

The Major Public Trail designation and accompanying regulations in Zoning Code 33.272 are intended to increase recreational opportunities and access to the City's rivers, natural areas, and open spaces; support active modes of transportation; and connect the city's regional trail system. This draft proposal, a part of the Comprehensive Plan Update's Miscellaneous Zoning Amendments project (<http://www.portlandoregon.gov/bps/70647>), updates the public trail designation on the zoning map to correspond to the Major Public Trail alignments generally described in the 2035 Comprehensive Plan. The Discussion Draft report (<http://www.portlandoregon.gov/bps/article/574333>) provides more information about the status and implementation of the Major Public Trail designations.

TIMELINE

DD PD REC A



July 24, 2016

TO: City of Portland, Planning & Sustainability Commission

FROM: 40 Mile Loop Land Trust

RE: Comprehensive Plan Trails Map

The 40 Mile Loop Land Trust is a non-profit volunteer organization that has been working on creating and implementing the vision of a regionally-connected recreational trail system for more than 35 years. We have a history of working collaboratively with the City of Portland, primarily with Parks & Recreation but also with the Office of Transportation and the Bureau of Planning. We appreciate being able to provide input into the Comprehensive Plan process from our board members' 188 years of collective trails experience.

Attached to this letter is our detailed review of the currently proposed Comp Plan Trails Map. Our input is organized by 'reach' of trail and specific comments are identified by trail segment numbers.

Our specific comments fall into 4 categories:

- Support the action (proposed Comp Plan addition, removal, no change)
- Oppose the action (with rationale)
- Oppose the action (with an alternative and rationale)
- Propose an action not included in the Comp Plan (with rationale)

When the stars were originally placed on the Comp Plan map, every trail designation was hard-earned, and each trail designation deserves serious consideration before being proposed for removal. One lesson our decades of experience has taught us: **Until you have the trail easement you don't have a trail.** When new alignments are proposed to replace old alignments, the 40 Mile Loop recommends that both alignments remain designated until easements are acquired and the trail connection is actually built.

In addition to our specific comments, we offer some general considerations. Should the trails map show the proposed Green Loop and other proposed downtown trails? Would the trails map be more understandable if connectivity with trails outside of the City's jurisdiction was shown?

We realize that evaluating our comments may require an extension of the Comp Plan process time line. We are willing to meet and work diligently with City staff to incorporate this input from the 40 Mile Loop Trust Board Members in order to make the Comprehensive Trails Plan best serve the city for the next 20 years.

Sincerely Submitted,

p.p. Jessie Maran, Secretary
40 Mile Loop Land Trust Board

40-Mile Loop Land Trust
P.O. Box 262
Portland, OR 97207-0262
www.40mileloop.org

Ord. 188177, Vol. 2.3.A, page 8943

Citywide							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
Citywide	WILLAMETTE GREENWAY:	in general, industrial zoning along the Willamette River frequently precludes a waterfront trail. However, some industrial uses are not river dependent and in these cases a waterfront greenway trail should be considered and allowed when feasible. An example is Wacker Sitronics in NW Portland. There a trail was built in the 1980's but, oddly, was never opened to the public. There are more examples on both sides of the River (such as some properties on Swan Island and Benz Springs in SW). In addition, there are river-dependent uses that are not incompatible with a riverfront greenway trail. Examples include boat moorages and landings seen in public parks including Willamette Park, Cathedral Park, and Tom McCall Waterfront Park.					
Citywide	WILLAMETTE GREENWAY:	When land along the Willamette River is taken out of industrial use, as a condition of the required accompanying zone change, a waterfront trail should always be added. This imperative needs to be included in the City's comprehensive plan, if not on a map, then in the narrative.					
Citywide	TRAILS OUTSIDE CITY LIMITS:	The 40 Mile Loop questions the removal of the trail from the City-owned Springwater Corridor east of SE 23rd Avenue, the odd-looking gaps in NW Portland at the end of the Wildwood Trail, and in NE Portland on the Banfield Trail (think in City of Maywood Park). Rather than show these areas as mysterious gaps, we propose that they be included using another color and with proper notation. In our view, there is great value in showing a complete system on Portland's Comprehensive Plan and avoiding confusion about unexplained gaps.					
Citywide	CONNECTIVITY OF TRAILS TO NEIGHBORHOODS and TO OTHER SIGNIFICANT TRAIL SYSTEMS:	The 40 Mile Loop supports strong, safe connectivity of trails to neighborhoods and to other major recreational trails. Many of these linkages that have been shown on past City Comprehensive Plans are now proposed for removal. This is especially the case in N and NE Portland where removal of several linkages to the Columbia Slough and Marine Drive trail systems are proposed. We have concerns about the proposed removals. In addition, there are other needs for connectivity. For example, Brooklyn Neighborhood in SE Portland has long sought a safe link to the Willamette Greenway. (A former Mayor is said to have promised one.) We don't understand the thinking behind removing and not including additional needed connections.					
Citywide	PRIVATE PROPERTY:	The reality of completing an extensive system of major trails does include working with private property owners. Easements across private property are already in place in many areas. The 40 Mile Loop believes that an indication of a proposed trail crossing private property does not mean that the City intends to take property. It simply conveys the reality that an alignment that crosses a private parcel is considered to be the most usable and safe of all potential alignments and is recommended in the long term. The City's record in these instances is a record of fairness and extreme patience.					

Westside							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
SW	HOYT ARBORETUM, COUNCIL CREST, MARQUAM NATURE PARK: The 40 Mile Loop supports nearly all of the alignments shown that link Hoyt Arboretum to Council Crest and Council Crest to Marquam Nature Park. These appear to be a more accurate rendering of existing trails in this area. We do oppose the removal of segments in the Marquam NP area that have traditionally been included in the 40 Mile Loop and on previous editions of the Comprehensive Plan. These are some of the earliest, hard-earned segments of the 40 Mile Loop resulting from the work of our founder, Barbara Walker. In addition we call for the completion of a link from the Marquam Trail to Duniway Park at Terwilliger Blvd.						
SW	2643	south end of Hoyt Arb. to SW Patton	removal	inaccurate alignment of existing trail replaced by accurate alignment	support		
SW	2517	Marquam Trail at Hoyt Arb. from VVOMF to private easement	addition on public property	more accurately shows existing trail; southern portion replaces north portion of 2843	support		
SW	2873	Hoyt Arb. to SW Patton	addition on private property	more accurately shows existing trail; replaces south portion of 2843	support		
SW	2334	Wildwood Trail at Hoyt Arb. from VVOMF to Pittock	addition on public property		support		
SW	2872	SW Patton to top of Council Crest	addition on public property		support		
SW	2514	top of Council Crest to Marquam NP	addition on public property		support		
SW	2645-2651	Marquam Trail from Council Crest to SW Sherwood Drive	removal from public & private	?	oppose	Historic Linkage: Also needs a more accurate rendering of existing Marquam Trail on public property & public R.O.W..	
SW	XXXX	Marquam Trail from SW Sherwood Drive to SW 14th & Gibbs			ADDITION	Historic Linkage: This long and critical section of existing Marquam Trail should be added.	
SW	2507	Marquam Trail from SW 14th & Marquam Hill Road to Terwilliger Blvd.	no change - keep on map		support		Upper and lower portions of this segment do not appear to align with existing trail.
SW	2654-2656	incomplete connection between Marquam Trail in Marquam NP and Terwilliger & Duniway Park	removal from public property	?	oppose	Retain on map. Extend to Terwilliger Blvd. and extend via Shelter Trail to Marquam Trail in Marquam NP.	
NW	FOREST PARK AREA: We applaud the repositioning of 40 Mile Loop trails in Forest Park to more accurately reflect the actual locations of Leif Erikson and Wildwood. However, the 40 Mile Loop is nothing without connectivity. It seems very odd to us that connectivity to and from Forest Park is weakened by the proposal and that obvious opportunities to strengthen connectivity have been overlooked. We strongly recommend the addition of connecting links toward the US Highway 30 bike paths and sidewalks in 3 locations: NW Saltzman Road (from Skyline Blvd.), NW Springville Road (from Skyline Blvd.), and Ridge Trail (from Wildwood to NW Bridge Ave.). And for the same reason, we oppose the removal of trail segments from NW Bridge Avenue, the St. Johns Bridge, and from NW Thurman (NW 27th to NW Naito Parkway).						
SW, NW	2533	Hoyt Arb. Existing Wildwood Trail into Forest Park just beyond Chestnut Trail.	addition on public property		support		
SW	2534	Hoyt Arb. Existing Wildwood Trail to LTR station in parking lot	addition on public property		support		
NW	2557	Forest Park existing Wildwood Trail from Chestnut Trail to NW Saltzman Road	addition on public property		support		Appears that some minor alignment discrepancies exist
NW	2576	Forest Park existing Wildwood Trail from NW Saltzman Road to city limit approaching NW Newberry Road	addition on public property		support		

Westside							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
NW	2619	north end of Forest Park on existing Wildwood Trail near Newberry Road	addition on public property		support		
NW	2543	NW 28th & Thurman via Thurman to Leif Erikson to NW Germantown	addition on public property		support		
NW	XXXX	Forest Park NW Saltzman Road to NW St. Helens Road	addition on public property		ADDITION	This a good existing route to link to St. Helens Road.	
NW	XXXX	Forest Park NW Springville Road to St. Johns Bridge Ramp (NW Bridge Ave.)	addition on public property		ADDITION	This is another existing route to link Leif Erikson and Wildwood Trail to St. Helens Road.	
NW		Forest Park Ridge Trail from Wildwood Trail to St. Johns Bridge ramp (NW Bridge Ave.)	addition on public property		ADDITION	Ridge Trail was constructed less than 10 years ago with the intention of providing this 40 Mile Loop link to the St. Johns Bridge and the Willamette Greenway.	
NW	2819	NW Bridge Avenue	removal from public property	?	oppose		
NW	2820	NW Bridge Avenue	removal from public property	?	oppose		
NW						The St. Johns Bridge is a critical link for the 40 Mile Loop and the Willamette Greenway Trails on both sides of the River.	
NW	2817	St. Johns Bridge	removal from public property	?	oppose		
NW	2818	St. Johns Bridge	removal from public property	?	oppose		
NW	2801	St. Johns Bridge	removal from public property	?	oppose		
NW	2798	St. Johns Bridge	removal from public property	?	oppose		
NW	2802	St. Johns Bridge	removal from public property	?	oppose		
NW	2804	St. Johns Bridge	removal from public property	?	oppose		
N		St. Johns Bridge connections to Willamette Greenway on east side of River.	removal from public property	?	oppose	Why remove this links to the Willamette Greenway on the east side of the St. Johns Bridge?	The only "trouble spot" is between NW 19th Ave. & NW 20th Ave. and there is ample right-of-way available to make this connection work.
NW	2635, 2636, 2637	NW Thurman from NW 27th to NW 15th	removal from public property	?	oppose	Why remove this link between Forest Park and the Willamette Greenway?	
NW	XXXX	From NW 15th (see above) across NW Naito Pkwy / Front Ave. to Willamette Greenway Trail	addition on public property		ADDITION	Completes link between Forest Park and the Willamette Greenway.	
SW		RED ELECTRIC ALIGNMENT: The former Red Electric alignment in SW Portland is Portland's best opportunity to provide an east-west connection from the Willamette Greenway & downtown Portland to the Fanno Creek trail system operated by Tualatin Hills Park & Recreation District. Many of the obvious segments are now proposed as additions to the Comp Plan Trails Map and we strongly support that. The proposal does fail to include a strong connection to the Greenway and to downtown on the east end of the alignment and this oversight should be corrected.					
SW	2856	Red Electric alignment	addition on private property		support		
SW	2290	Red Electric alignment	addition on public property		support		
SW	2288	Red Electric alignment	addition on public property		support		
SW	2859	Red Electric alignment	addition on public property		support		

Westside							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
SW	2858	Red Electric alignment	addition on private property		support		
SW	2497	Red Electric alignment	addition on public property		support		
SW	2287	Red Electric alignment	addition on public property		support		
SW	2493	Red Electric alignment	addition on public property		support		
SW	2283	Red Electric alignment	addition on public property		support		
SW	XXXX	A safe connection through Hillsdale area for bicyclists to Willamette Greenway and to downtown Portland, location TBD	additions on public and property		ADDITION		
SW	2286	SW Slavin & SW Corbett	addition on public property		support		
SW	GEORGE HIMES PARK TO WILLAMETTE GREENWAY: The 40 Mile Loop supports the historic linkages from SW Terwilliger to the Willamette Greenway and welcomes additional linkages.						
SW	XXXX	<u>Historic Linkage</u> . Existing trail from SE Terwilliger to a junction with segment 2486.			ADDITION		
SW	2486	Terwilliger at George Himes Park to Willamette Greenway (upper)	addition on public property		support		
SW	2484	<u>Historic Linkage</u> . Terwilliger at George Himes Park to Willamette Greenway (middle)	addition on public property		support		
SW	2481	<u>Historic Linkage</u> . Terwilliger at George Himes Park to Willamette Greenway (lower)	addition on public property		support		
SW	TERWILLIGER TRAIL: We strongly support including the Terwilliger Trail on the Comp Plan Trails Map. This scenic north-south connection is important for recreationalists and commuters. Along with the Willamette Greenway Trail on the River, the Terwilliger Trails offers the safest north-south connection from the south edge of Portland to downtown.						
SW	2506	Terwilliger Parkway Trail (existing - north of SW Barbur Blvd.)	addition on public property		support		
SW	2485	Terwilliger Parkway Trail (existing - north of SW Barbur Blvd.)	addition on public property		support		
SW	2515	Terwilliger Parkway Trail (existing - north of SW Barbur Blvd.)	addition on public property		support		
SW	2519	Terwilliger Parkway Trail (existing - north of SW Barbur Blvd.)	addition on public property		support		
SW	2522	Terwilliger Parkway Trail (existing - north of SW Barbur Blvd.)	addition on public property		support		
SW	2642	Terwilliger Parkway Trail (south)	addition on public property		support		
SW	2861	Terwilliger Parkway Trail (south)	addition on private property		support		
SW	2862	Terwilliger Parkway Trail (south)	addition on private property		support		
SW	2439	Terwilliger Parkway Trail (south)	addition on public property		support		
SW	2237	Terwilliger Parkway Trail (south)	addition on public property		support		
SW	2433	Terwilliger Parkway Trail (south)	addition on public property		support		
SW	WILLAMETTE GREENWAY (SW): A parallel trail system is ultimately needed along the Willamette Greenway in SW Portland. The number of recreational and commuter users is already high and will be higher still when the entire system is completed (meaning all of South Waterfront, a strong Sellwood Bridge connection, and a trail to Lake Oswego). Large numbers of higher speed commuters combined with recreational strollers is not always a happy mix. Therefore, the 40 Mile Loop supports retention of all current trail alignments in the Willamette Greenway in SW Portland, and proposes the addition of the entire length of the Willamette Shore Trolley to the City's Comprehensive Plan Trails map. An exception may be the proposed abandonment of some trail segments around the mouth of Stephens Creek, an environmentally sensitive area.						
SW	2704	Willamette Greenway immediately north of Willamette Park	removal from private property		oppose		This segment is needed to mitigate a "blind corner" at south end of condos.

Westside							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
SW	XXXX	Willamette Shoreline Trolley alignment from downtown Portland through Powers Marine Park (to south City Limit.)	addition on public property		ADDITION		
SW	2254, 2253, 2442, 2836, 2701 and others	Trail segments on Sellwood Bridge and its west and east end connections.			??? Hard to know ???	Map should first accurately reflect the new ramps and routes connecting to trails on both sides of the River and should also allow the under-passage of a Shoreline Trolley alignment to the south City Limit on the west side.	
NE		SULLIVAN'S GULCH / BANFIELD TRAIL: The 40 Mile Loop strongly supports the addition of the Sullivan's Gulch Trail parallel with Interstate 84 in NE Portland. This alignment will be a very important connection of the I-205 Bikeway & BANFIELD Trail to the Eastbank Esplanade / downtown Portland with access links to and from residential areas near the alignment. When completed, it will have user numbers similar to the Springwater Corridor and the Eastbank Esplanade.					
SE		Springwater Corridor east of SE 23rd Avenue where the trail "dips" south of the City Limit.				As suggested above, show all routes that run outside the City Limits in another color with a notation that the City has no land use jurisdiction.	
SE	2837	Link between Brooklyn neighborhood and Springwater Corridor	removal		oppose	This link between the Springwater Corridor and Brooklyn neighborhood is important to retain.	
SE		Existing stairway southward off the east side of the Burnside Bridge. Also extends southward to junction with designated trail (approx. SE Ash).			oppose	This is an important link between Burnside Bridge & eastside neighborhoods and the Eastbank Esplanade.	
SE	XXXX	Link on SE 17th Ave. between Springwater Corridor and Milwaukie's Trolley Trail.	addition on public property		ADDITION	The Trolley Trail, currently under construction, will stop 1 block short of connecting to the Springwater Corridor. This connection must be shown.	
SE	XXXX		addition on public property		ADDITION		
SW		SW TRAILS: The 40Mile Loop applauds the efforts of SW Portland citizens to include what appears to be the entire system of SW Trails in the City's Comprehensive Plan. However, since the rest of the City looks impoverished by comparison, it may beg the question of whether bike boulevards and significant walkways should be added in the long term on a City-wide basis.					
Downtown		DOWNTOWN CONNECTIONS: It seems odd that some trails lead to downtown but don't actually get into downtown. Why isn't there a north-south connection using the park blocks? Why isn't there an east west connection on SW Salmon? Terwilliger Trail stops abruptly at SW Sheridan, but could connect to the South Park Blocks, and SW Trails segment 2657 could extend another block to SW Salmon. SW Salmon could connect Wildwood Trail in Washington Park to the Willamette Greenway & Tom McCall Waterfront Park. Why aren't the Hawthorne Bridge and the Tilikum Crossing included as links between the east and west Willamette Greenway Trails? The 40 Mile Loops proposes a couple of "low hanging fruit" as immediate additions.					
SW	XXXX	Hawthorne Bridge and connections to Willamette Greenway on east and west sides of River.	addition on public property		ADDITION	Important link between east and west Willamette Greenway Trails	

Westside							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
SW	XXXX	Tilikum Crossing and connections to Willamette Greenway on east and west sides of River.	addition on public property		ADDITION	Important link between east and west Willamette Greenway Trails	

npGreenway

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
<p>NORTH PORTLAND GREENWAY: We are happy with the very significant set of additions to the Comp Plan Trails Map that will help make the North Portland Greenway a reality. However, we oppose removals where the exact route is either not certain or has not been secured. Until such time a preferred route is secured, we believe it best to keep viable options open. See our specific comments below to see where this applies. In addition, we strongly support the addition of the BNSF Railroad Bridge crossing over the Willamette and we strongly oppose the removal of the St. Johns Bridge. We support an additional route on North Basin Avenue. We support a trail alignment into Willamette Cove recommended by Parks in 2009. We support an alignment through Baltimore Woods and offer technical adjustments for an existing trail alignment in Pier Park.</p>							
N	2710	Former Thunderbird Hotel/Paul Allen Prop	no change - keep on map		support		
N	2907	From waterfront to Interstate toward Laramie	addition on private property		support		
N	2318	From Interstate on grassy land between Interstate and Larrabee North under flyover back to Interstate	addition on public property		support		
N	2711a	On Broadway Bridge From railroad tracks to Larrabee	removal from public property		support		
N	2711b	Larrabee and North past flyover back to Interstate	removal from public property	?	oppose		
<p>Lower Albina: Keep alternatives through Lower Albina and North of Rose Quarter until one of the options is built. We need to keep our options open in these locations.</p>							
N	2712	Lower Albina Alternatives	removal from public		oppose		
N	2713	Lower Albina Alternatives	removal from public property		oppose		
N	2715	Lower Albina Alternatives	removal from public property		oppose		
N	2821	Lower Albina Alternatives	removal from public property		oppose		
N	2822	Lower Albina Alternatives	removal from public property		oppose		
N	2823	Lower Albina Alternatives	removal from public property		oppose		
N	2824	Lower Albina Alternatives	removal from public property		oppose		
N	2825	Lower Albina Alternatives	removal from public property		oppose		
N	2826	Lower Albina Alternatives	removal from public property		oppose		
N	2338	Cement Road to Swan Island	no change - keep on map		support		

npGreenway							
Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
N	2718	Going Street area Loop	removal from public property		oppose	Need to connect on N Basin between N Anchor and N Emerson	
N	XXXX	N Basin from N Anchor to N Emerson	new addition to public property		ADDITION	Need to connect on N Basin between N Anchor and N Emerson for faster commuter cyclists and more direct walking route for pedestrians to and from Overlook Bowl	
N	2377	Around Bluff below U of Portland	addition on private property		support		
N	2788	In front of U of Portland on Willamette	removal from public property		support		
N	2789	In front of U of Portland on Willamette	removal from public property		support		
N	2792	In front of U of Portland on Willamette	removal from public property		support		
N	XXXX	BNSF Railroad Bridge from McCormick & Baxter under BNSF along UPRR toward Willamette Cove	new addition to private property	don't know why this was not added? It was part of the River Plan North Reach and the npGREENWAY Vision which City Council supports	ADDITION	This is analogous to the Steel Bridge Pedestrian path cantilever facility. It is needed as a connection to Walker Siltronic West Willamette Greenway and Forest Park. Also has potential to create a North Portland/St Johns Loop like Esplanade downtown	
N	2915	from BNSF R.O.W. into Willamette Cove	new addition to public property		support		
N	2916	from BNSF R.O.W. into Willamette Cove	new addition to public property		support		
N	2719	along UPRR R.O.W. through Willamette Cove	no change	old existing route along railroad is less difficult than cleaning up Willamette Cove? And avoids wildlife conflict concerns?	oppose	This alignment needs to follow the alignment that is in the PPR Study completed in the Summer of 2009. Willamette Cove will be cleaned up enough to support a trail through this area and the public deserves to see this beautiful eco-system up close.	

npGreenway

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
N	2799	St Johns Alternatives On Street	removal from public property		support		
N	2806	St Johns Alternatives On Street	removal from public property		support		
N	2805	St Johns Alternatives On Street	removal from public property		support		
N	2807	St Johns Alternatives On Street	removal from public property		support		
N	2800	St Johns Alternatives On Street	removal from public property		support		
N	2795	St Johns Alternatives On Street	removal from public property		support		
N	2803	St Johns Alternatives On Street	removal from public property		support		
N	2812	St Johns Alternatives On Street	removal from public property		support		
N	2811	St Johns Alternatives On Street	removal from public property		support		
N	2804	St Johns Alternatives On Street	removal from public property		support		
N	2802	St Johns Alternatives On Street	removal from public property		support		
N	2796	St Johns Alternatives On Street	removal from public property		support		
N	2797	St Johns Alternatives On Street	removal from public property		support		
N	2810	St Johns Alternatives On Street	removal from public property		support		
N	2809	Edison to Reno on Street	removal from public property		support		
N	2398	Decatur through Baltimore Woods to Reno	new addition to public property		support	Baltimore Woods is Critical	

npGreenway

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
N	2911	Baltimore Woods through Crown Cork & Seal	new addition to private property	? Different from North Reach and npGREENWAY VISION plan. Those plans keep trail on south side of Crown Cork and Seal. Suspect change to North side of CCS&S is to avoid trail section on Lombard from N Weyerhaeuser to N Bruce Avenue	support with comments	Perhaps a pedestrian trail through the forested area of Baltimore Woods would be a good addition. Could keep the orthogonal trail on the property edge as shown for bicycles and skateboards (round off corners to a workable radius-- great access point for skateboarders to skate park)	
N	2910	N Bruce to Pier Park	new addition to public property		support		
N	2613	Pier Park to Pier Park to Chimney Bridge	no change		oppose	This segment needs to be removed and realigned to show actual trail that was built around other side of softball fields	
N	2415	Pier Park to Pier Park to Chimney Bridge	no change		oppose	This segment needs to be removed and realigned to show actual trail that was built around other side of softball fields	
N	2616	Pier Park to Pier Park to Chimney Bridge	no change		oppose	This segment needs to be removed and realigned to show actual trail that was built around other side of softball fields	
N	2419	Chimney Park	no change		support		
N	2720	Landfield Road	no change		support		
S	2244	Spingwater	New				The link between SE 13th and SE 19th needs to be connected and a connection south along SE 17th to the Trolley Trail.
S		3 Bridges	new addition to public property		ADDITION	Need to show the existing 3 bridges section of the Sprinwater between segments 2245 and 2247	

npGreenway

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
S	2684	SE Johnson Creek Blvd	removal from public property	Outside Portland City Limits	oppose	The existing segments of trail the run just outside of the City limits need to be shown in a different color to show overall conductivity of the system.	
S	XXXX	SE 73rd Ave	new addition to public property	None	ADDITION	Need to show the existing section of the Sprinwater between segments 2684 and 2458	This segment is currently in place.
S	2698	I-205	new additional in public right-of-way		support		This segment is currently in place.
S	2459	I-205	new additional in public right-of-way		support		This segment is currently in place.
S	2453	I-205	new additional in public right-of-way		support		This segment is currently in place.
S	XXXX	I-205	new addition to public property	None	ADDITION		Need to show that trail continues to south outside City limits from 2453
S	XXXX	SE Mt Scott Blvd	new addition to public property	None	ADDITION		Need to show that trail continues to south outside City limits from 2255
S	XXXX	SE Vradenburg Road	new addition to public property	None	ADDITION		Need to show that trail continues to south outside City limits from 2243
S	XXXX	Springwater	new addition to public property	None	ADDITION		Need to show that trail continues to east outside City limits from 2490

Springwater Corridor

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
N	2810	St Johns Alternatives On Street	removal from public property		support		
N	2809	Edison to Reno on Street	removal from public property		support		
N	2398	Decatur through Baltimore Woods to Reno	new addition to public property		support	Baltimore Woods is Critical	
S	2244	Springwater	New		support		The link between SE 13th and SE 19th needs to be connected and a connection south along SE 17th to the Trolley Trail.
S		3 Bridges	new addition to public property		ADDITION	Need to show the existing 3 bridges section of the Sprinwater between segments 2245 and 2247	
S	2684	SE Johnson Creek Blvd	removal from public property	Outside Portland City Limits	oppose	The existing segments of trail the run just outside of the City limits need to be shown in a different color to show overall conductivity of the system.	
S	XXXX	SE 73rd Ave	new addition to public property	None	ADDITION	Need to show the existing section of the Sprinwater between segments 2684 and 2458	
S	2698	I-205	new additional in public right-of-way		support		This segment is currently in place.
S	2459	I-205	new additional in public right-of-way		support		This segment is currently in place.
S	2453	I-205	new additional in public right-of-way		support		This segment is currently in place.
S	XXXX	I-205	new addition to public property	None	ADDITION		Need to show that trail continues to south outside City limits from 2453
S	XXXX	SE Mt Scott Blvd	new addition to public property	None	ADDITION		Need to show that trail continues to south outside City limits from 2255
S	XXXX	SE Vradenburg Road	new addition to public property	None	ADDITION		Need to show that trail continues to south outside City limits from 2243

Springwater Corridor

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
S	XXXX	Springwater	new addition to public property	None	ADDITION		Need to show that trail continues to east outside City limits from 2490

Marine Drive Trail

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
	<p>MARINE DRIVE TRAIL: We are very pleased with the alignments shown on the proposed Comp Plan Trails Map. However, we do caution that the alignment near NE 13th Avenue is tricky with several unresolved issues regarding exact placement. In addition, we are opposed to the removal of many north-south segments that serve as important connecting routes to adjacent neighborhoods. Why build a system if you can't get there?</p>						
NE	2353	Marine Dr @ NE 185th	no change		support		
NE	2561	Marine Dr	no change		support		
NE	2352	Marine Dr	no change		support		
NE	2562	Marine Dr @ 122nd	no change		support		
NE	2955	Marine Dr	new addition on Private property		support		
NE	2956	Marine Dr	new addition on Public property		support		
NE	2375	Marine Dr @ 112nd	new addition on Private property		support		
NE	2579	Marine Dr @ I-205	no change		support		
NE	2727	Marine Dr under I-205	no change		support		
NE	2582	Marine Dr to Broughton Beach	no change		support		
NE	2757	Marine Dr on Shoulder	remove	clean up - trail is built along river	support		
NE	2756		remove		support		
NE	2755		remove		support		
NE	2751		remove		support		
NE	2749		remove		support		
NE	2750		remove		support		
NE	2748		remove		support		
NE	2744		remove		support		
NE	2752		remove		support		
NE	2753		remove		support		
NE	2743		remove		support		
NE	2745		remove		support		
NE	2747		remove		support		
NE	2746		remove		support		
NE	2728	Broughton Beach grade crossing Marine Dr	no change		support		
NE	2401	Marine Dr under 33rd Dr	no change		support		
NE	2605	Marine Dr along Golf Course	no change		support with comments	This is a unbuild tricky part of the Marine Dr Trail. This is the original designation. Is the alignment specific enough?	

Marine Drive Trail

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
NE	2403	Marine Dr Trail on Bridgeton Road	no change		support		
NE	2606		no change		support		
NE	2407		no change		support		
NE	2408		no change		support		
NE	2607		no change		support		
NE	2409		no change		support		
NE	2609		no change		support		
N	2410		no change		support		
N	2610		no change		support		
N	2411		no change		support		
N	2412		no change		support		
N	2612		no change		support		
N	2413	End Trail on Bridgeton Road	no change		support		
N	2615	Start Bridgeton Trail	no change		support		
	2729	New Connector	new addition on Private property	The way trail connects without CRC	support		
	2414	Cross N Anchor Way	new addition on Public property	The way trail connects without CRC	support		
	2614	Hook up to ODOT Intersection Sidewalk	new addition on Private property	The way trail connects without CRC	support		
	2416	ODOT intersection Sidewalk	no change		support		
	2418	Marine Dr @ Expo	no change		support		
	2421	Marine Dr @ Expo	no change		support		
	2724	Marine Dr @ Expo	new addition on Public property	Clean up - Trail is already constructed	support		
	2620	Marine Dr @ Heron Moorage	new addition on Private property	Clean up - Trail is already constructed	support		
	2422	Marine Dr @ Utility crossing	new addition on Public property	Clean up - Trail is already constructed	support		
	2623	Marine Dr @ Diversified Marine Storage	new addition on Private property	Clean up - Trail is already constructed	support		
	2427	Marine Dr @ Utility crossing	new addition on Public property	Clean up - Trail is already constructed	support		
	2624	Marine Dr @ Diversified Marine Storage	new addition on Private property	Clean up - Trail is already constructed	support		
	2426	Marine Dr under Railroad bridge	new addition on Public property	Clean up - Trail is already constructed	support	Railroad owned property is public?	

Marine Drive Trail

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
	2723	Northern Terminus of Peninsula Crossing Trail	no change		support		
	2425	Peninsula Crossing Trail	no change		support		
	2420	Peninsula Crossing Trail connection Marine Dr	no change		support		
	2721	Marine Dr by Bybee	new addition on Public property	Clean up - Trail is already constructed	support		
	2626	Marine Dr Trail Head	new addition on Public property	Clean up - Trail is already constructed	support		
	2627	Marine Dr	new addition on Public property	Clean up - Trail is already constructed	support		
	2628	Marine Dr	new addition on Public property	Clean up - Trail is already constructed	support		
	2630	Marine Dr	new addition on Public property	Clean up - Trail is already constructed	support		
	2631	Marine Dr @ Columbia Slough	new addition on Public property	Clean up - Trail is already constructed	support		
	2632	Columbia Slough	new addition on Public property	Clean up - Trail is already constructed	support		

MLK Connections

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
<p>Connections: The CRC proposed TWO Exceptional BIKE connections from the new arterial bridge. One to the Vancouver/Williams Corridor and a second connection to the Interstate Corridor. Neither of these formerly high priority connections are shown in the new plan. Instead a new trail is proposed through Delta Park and along Whitaker. This new trail would connect to the Columbia Slough trail and then connect to Interstate or Vancouver-Williams. The trail through Delta Park is a nice addition, but the MLK to Vancouver-Williams needs to remain, too.</p>							
N	2608	Marine Drive Interchange	no change		support		
N	2781	MLK Route	Remove		oppose		
N	2783	Connection to Vancouver/Williams	Remove		oppose		
N	2725	Under MLK	new addition on Public property		support		
N	2396	Through Delta Park	new addition on Public property		support		
N	2785	Along Whitaker the Street	Remove		support		
N	2784	Route Between Whitaker and I-5 remove	Remove		support		
					Question		

Columbia Slough

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
<p>COLUMBIA SLOUGH TRAILS: In general, we applaud the effort to realign trails where they already exist on tops of levees, rather than to continue to show alignments in the middle of Columbia Slough. However, the 40 Mile Loop cannot support many of the proposed trail segment removals from the Columbia Slough Trail System. The system's proposed trail alignments have long been documented including the detailed Columbia South Shore Slough Trail Master Plan produced by Parks & Recreation in 1993 and adopted by City Council. There appear to be two significant impacts of the many trail segment removals proposed. A reduction in pedestrian access to natural resource areas along the Slough and a reduction in connectivity with neighborhoods to the south as well as with the Marine Drive Trail to the north. We are willing to hear from City staff to gain an understanding why proposals for removal have been recommended, but we cannot agree with any removals at this time. As with other major trail systems, we particularly oppose removals where an alternative preferred alignment has not been secured. In addition, we do not prefer pedestrian trail alignments along roadways where other, safer alignments are already on the map. See our specific comments below.</p>							
NE	2553	Columbia Slough @ Marine Dr East	no change		support		
NE	2558		no change		support		
NE	2351	Airport way and 138th	no change		support		
NE	2737	Connector to Marine Drive	no change		support		
NE	2740	Airport Way Crossing	no change		support		
NE	2957	Airport Way Crossing	no change		support		
NE	2742	Sandy Crossing	remove		oppose	Not sure why removed	
NE	2738	Sandy Crossing	remove		oppose		
NE	2739	Sandy Crossing	remove		oppose		
NE	2741	Sandy Crossing	remove		oppose		
NE	2565	Columbia Slough @ Airport Way	no change		support		
NE	2356	Columbia Slough	no change		support		
NE	2736	Connector to Airport Way	remove		oppose	Replaced with New Connector	
NE	2361	New Connector	new addition on Public property		support		
NE	2367	New Connector	new addition on Public property		support		
NE	2368	New Connector	new addition on Private property		support		
NE	2566	Columbia Slough	no change		support		
NE	2359	Columbia Slough	no change		support		
NE	2360	Columbia Slough @ 122nd Ave	no change		support		
NE	2733	Remove 122nd Ave	remove		oppose		
NE	2734	Remove 122nd Ave	remove		oppose		
NE	2735	Remove 122nd Ave	remove		oppose		
NE	2369	Columbia Slough	no change		support		
NE	2570	Columbia Slough	no change		support		
NE	2569	Columbia Slough	no change		support		

Columbia Slough

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
NE	2368	Columbia Slough to NE Holman	no change		support		
NE	2573	Under I-205 along Streets to 82nd	no change		oppose	There are two existing trail routes designated now. This update keeps the designation entirely along the roadway and removes the trails along the slough	
NE	2732	Alternate Trail Route	remove		oppose	Notice problem going under elevated 82nd	
NE	2379	On Street Route for most of Cornfoot	no change		oppose	more two already designated routes	
NE	2730	Along Slough Route	remove		oppose		
NE	2731	Along Slough Route	remove		oppose		
NE	2726	Boardmore Golf Course	new addition on Private property		oppose		
NE	2926	Connector to 33rd	new addition on Public property		oppose		
NE	2584	Along Elroad Rd	new addition on Public property		oppose	This is already built and is a trail parallel to narrow road	
NE	2778	Alternate Slough Trail Route	remove		oppose		
NE	2768	Alternate Slough Trail Route	remove		oppose		
NE	2769	Alternate Slough Trail Route	remove		oppose		
NE	2772	Alternate Slough Trail Route	remove		oppose		
NE	2774	Alternate Slough Trail Route	remove		oppose		
NE	2775	Alternate Slough Trail Route	remove		oppose		
NE	2766	Alternate Slough Trail Route	remove		oppose		
NE	2767	Alternate Slough Trail Route	remove		oppose		
NE	2771	Alternate Slough Trail Route	remove		oppose		
NE	2770	Alternate Slough Trail Route	remove		oppose		
NE	2780	Alternate Slough Trail Route	remove		oppose		
NE	2779	Connection to East Columbia	remove		oppose		
				Marine Dr @ Levee along Columbia Slough to Kelly Point Park			
NE	2762	Columbia Slough Trail Marine Dr @ Pen 2 Plug	East to West remove		support		
NE	2761	In Slough	remove		support		
NE	2766	In Slough	remove		support		
NE	2764	In Slough	remove		support		

Columbia Slough

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
NE	2767	In Slough	remove		support		
NE	2765	In Slough	remove		support		
NE	2763	In Slough	remove		support		
NE	2760	In Slough	remove		support		
NE	2759	In Slough	remove		support		
NE	2758	In Slough	remove		support		
NE	2782	In Slough to Vancouver	remove		support		
NE	2787	In Slough to I-5	remove		support		
NE	2399	Columbia Slough - New Route	new addition on Public property		support		
NE	2922	Columbia Slough - New Route	new addition on Private property		support		
NE	2923	Columbia Slough - Over Plug	new addition on Public property		support	Drainage District Property?	
NE	2924	Elrod Connector	new addition on Public property		support		
NE	2385	North Side of Slough	new addition on Private property		support		
NE	2381	End of 13th	new addition on Private property		support		
NE	2382	End of 13th	new addition on Private property		support		
NE	2586	End of 13th	new addition on Private property		support		
NE	2383	Slough	new addition on Private property		support		
NE	2591	Slough	new addition on Private property		support		
NE	2918	Slough	new addition on Private property		support		
	2921	Under MLK	new addition on Public property		support		
	2919	Slough	new addition on Private property		support		
	2920	At Grade Crossing @ Vancouver	new addition on Public property		support		

Columbia Slough

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
	2386	Slough	new addition on Public property	This is Built	support		
	2389	Slough	new addition on Private property	This is Built	support		
	2388	Slough	new addition on Private property	This is Built	support		
	2392	Slough	new addition on Private property	This is Built	support		
	2393	Slough	new addition on Private property	This is Built	support		
	2394	Slough	new addition on Private property	This is Built	support		
	2395	To I-5	new addition on Private property	This is Built	support		
	2601	Under I-5	no change		support		
	2397	To Denver	no change		support		
	2603	Golf Course Columbia Slough Trail	no change		support		
	2912	Route Preferred	new addition on Public property		support with comments		
	2423	Route Preferred	new addition on Private property		support with comments		
	2913	Route Preferred	new addition on Public property		support with comments		
	2842	Alternative Route to Remain Too	remove		support with comments	Keep this alternative until the preferred route has been constructed	
	2840	Alternative Route to Remain Too in Slough	remove		support with comments	Keep this alternative until the preferred route has been constructed	
	2841	Alternative Route to Remain Too in Slough	remove		support with comments	Keep this alternative until the preferred route has been constructed	
	2839	Alternative Route to Remain Too in Slough	remove		support with comments	Keep this alternative until the preferred route has been constructed	


Columbia Slough

Quad	Segment	Location	Comp Plan Proposed Action	Comp Plan Rationale	40 ML Position	Alternative Proposal	Comment
	2836	Alternative Route to Remain Too in Slough	remove		support with comments	Keep this alternative until the preferred route has been constructed	
	2843	Alternative Route to Remain Too in Slough	remove		support with comments	Keep this alternative until the preferred route has been constructed	
N	2424	Landfill Trail	no change		support		
N	2629	Landfill to Marine Drive Connection	no change		support		
	2632	To Kelley Point Park	no change		support		
	2633	To Kelley Point Park	no change		support		
	2429	To Kelley Point Park	no change		support		
	2634	Kelley Point Park	new addition on Public property	Clean up	support		

From: Jan Yost [mailto:jyost@dsutrucks.com]
Sent: Thursday, July 21, 2016 9:28 AM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: proposed zoning map change

We received this notice for our property 5036 N. Lagoon Ave. State ID # 1N1E20A
The city is proposing major public trails near this property
This property is a 4+ acre fenced property that has class 8 tractors, trucks and trailers being moved in and out throughout the day and night.
It would be extremely dangerous to allow the public near this property
The class 8 trucks would also pose a liability to the city as an attractive target for theft and vandalism
If the city wants to have a public trail there are other areas that would be safer for the public

Thank You

	<p>Jan Yost President (503) 535-3002 jyost@dsutrucks.com</p> <p>DSU Peterbilt & GMC Inc 4810 North Basin Avenue Portland, Oregon 97217 www.dsutrucks.com</p>
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From: Beverly_Metz@homedepot.com [mailto:Beverly_Metz@homedepot.com]
Sent: Tuesday, July 19, 2016 12:32 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: Portland Trails Project / The Home Depot

While HD is supportive of Portland's trail project, it has concerns surrounding the landscaping and slope areas affected by the trail location. HD requests confirmation that the City will construct a retaining wall to support HD's property, move trees in the slope area, assure that HD's landscaping requirements are still met after removal/relocation of trees on the slope, and provide compensation to HD for any lost property. Please feel free to contact me to discuss. Thank you.

Beverly Metz
Senior Real Estate Manager
Northwest Region (AK, ID, MT, OR, WA)
Pacific North Region (Northern CA, Northern NV, UT)
Pacific Central Region (Central CA, Los Angeles County, Southern NV)
Pacific Mountain Desert Region (AZ, CO, NM, WY)
THE HOME DEPOT
3800 W. Chapman Ave. | Orange, CA 92868

July 12, 2016
Comments from Dean Gisvold
Irvington Land Use Chair
To Planning and Sustainability Commission
Re: Composite Zoning Map

Corner lots at 15th and NE Brazee

The Composite Zoning Map before you today does NOT change the current R-5 zoning for these three 50 x 100 lots on the northeast corner of 15th and Brazee, which I, the nearby neighbors and the ICA applaud. But the adopted comp plan map designates the three lots as mixed use dispersed. As you know, mixed use dispersed allows mixed use, multi-dwelling, or commercial development.

Given the above description of the adopted comp plan map and the proposed current zoning map, I have two requests.

1. I understand that several southeast neighborhoods, facing the same situation, have asked the PSC to limit subsequent development to small commercial nodes similar in scale to what is there now. **If my understanding is accurate, the ICA would support this effort.** I understand that this topic will be discussed during the work session on Mixed Use.

2. You will remember that the neighbors and the ICA asked for the hours of operation restrictions to be applicable to areas up to 15,000 sq feet, which would include the 15th and Brazee area. I understand that this topic will be discussed by the Commission during the work session on the Mixed Use Project, but no testimony will be taken.

The neighborhood continues to ask the PSC to increase the threshold for the limitation on hours (no operations or deliveries from 11pm to 6 am) found in Section 33.130.100 B 2 c from 7,500 sq feet to 15,000 sq feet.

I previously supplied zoning maps and pictures showing only single family dwellings surrounding this commercial node.

Thanks for your consideration.

Dean Gisvold, ICA Board member and ICA land use chair
2225 NE 15th Ave, 97212, Irvington resident

dpg\ica\mixed use zone\testimony composite zoning map 7 12 16



July 12, 2016

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

Dear Members of the Portland Planning Commission:

Nineteen of our properties zoned General Commercial or Neighborhood Commercial will be changed to Mixed Use – Civic Corridor, per recent decisions made by the Commission. In addition, all of these properties currently allow a drive-thru, but will lose this allowance under the proposed guidelines.

We ask the Commission to permit four of the impacted property clusters to retain the drive thru designation:

1. 3511 NE 82nd – Popeye's – R300347, R300348, R300349
3607-3615 NE 82nd – Domino's, Lotos Deli, Plaid Pantry – R300346
2. 3427 NE 72nd – Rooster Roc, Crown Castle – R142501
3435 NE 72nd – Warehouse – R142502
3449 NE 72nd – Annie's Donuts – R142503, R142504
7126 NE Sandy – Daddies – R142484
3. 10750 NE Sandy – Oak Furniture Warehouse – R235028
4. 14425-47 SE Division – Jaded Soul, Valley Coin Wash, All Stop – R331790

Retention of the drive thru status is important to our current and future commercial tenants to conduct business in a competitive market. We appreciate your attention and consideration of our request.

Best regards,

William Frank Bitar
Managing Member

From: [Peter Collins](#)
To: [Planning and Sustainability Commission; Stark, Nan](#)
Subject: Zoning change request for 3436 NE 47th Ave
Date: Tuesday, July 12, 2016 10:00:10 AM

Dear Commissioners

I am requesting that my property located at 3436 NE 47th Ave be rezoned so that the entire block between Ne 47 and NE 48th along the south side of Fremont is one commercial zone.

It does not make sense to rezone the double lot which is a non conforming use while the two remaining homes remain residential.

That section of Fremont would look very strange with half the block commercial (4 story building) and then two small residential houses.

I would like my house to be rezoned in the update of the comp plan to reflect the zoning change that is being applied to the non conforming use (so CM).

Please let me know if you have any questions

Thanks

Peter Collins

3436 NE 47th Ave
Portland, OR 97213

Sent from my iPhone

From: [BPS Comprehensive Plan Testimony](#)
To: [Planning and Sustainability Commission](#)
Subject: FW: Zoning Map Testimony
Date: Tuesday, July 12, 2016 10:41:28 AM

From: Terry Dublinski-Milton [mailto:terry.dublinski@gmail.com]
Sent: Tuesday, July 12, 2016 10:02 AM
To: BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>
Subject: Zoning Map Testimony

To Whom it May Concern,

As we are in a housing crises, our household believes that the recommended comprehensive upzoning of the entire city should be done.

Every strategy to increase housing supply should be used including

Encouraging The missing middle
Eliminating single family zone in all transit communities thus allowing duplexing everywhere,
tri-plexing on comers
Second ADUs

Specifically, all the R1 and R2 around the 60 th MAX station should be implemented immediately. Affordable housing should be included in the mixed use buildings.

The blocks between 53 Rd and 58 th on the NORTH side of NE Glisan should be zoned for whole block developments minimally 7 stories, preferably 10.

Our property at the below address we have requested R1. If it is not given, as we butt up to a mixed use zone and other R1 properties, we will require clear legal reasons as to why not.

Thank you for your work,

Terry Dublinski-Milton and Krystofer Dublinski-Milton
6111 East Burnside Portland 97215
503 867 7723

From: Jennifer Kapnek
To: Planning and Sustainability Commission
Subject: Zoning map changes
Date: Tuesday, July 12, 2016 1:48:57 PM

Hello,

The Comprehensive Plan Designation for my property, 7401 N. Albina Ave, 97217, is proposed to change from Residential (R-1) to Mixed Use Dispersed. The zoning, however, is proposed to remain Residential (R-1).

Currently, the property has a grandfathered storefront, and for the past 10 years, it has been operative with a non-conforming use. I am requesting a commercial zoning to go with the commercial designation. I would very much like to eliminate the non-conforming status of the property.

Although I do not have plans to re develop the property at this time, I would most like a CM2 designation, which would allow for a structure of up to 45 feet. However, if the zoning were changed to CM1 I would be happy with that as well.

Sincerely,

Jennifer Kapnek
7401 N. Albina Ave
Portland OR 97217

(503) 957-9683

Maryann Schwab - 1908 Remnant lot.
2519 E. Burnside > what is it in comp plan
R205 NE / R5 to R2

4606 Colbett - R2 \Rightarrow CM2 make zone Δ now.

Broadmoor complex - ~~the~~ comp plan - Δ on zoning.
public trail on golf course. - 4 to mile ^{to} loop

Sol Terra - Vance Williams RX \Rightarrow RH and RI
will become nonconforming ^{use} after

Fremont - keep CM1 not CM2 \Rightarrow not emf transit

311 N. Fremont - mixed use + CM2 - Δ zoning map to meet
comp. plan.

(CM1 - CM2)

From: vskryha@aol.com
To: [Planning and Sustainability Commission](#)
Subject: Testimony on Composite Zoning Proposal
Date: Tuesday, July 12, 2016 8:28:23 AM

Planning and Sustainability Commissioners:

I am a property owner in the Eastern Edge of the Northwest Plan District, also in the Alphabet Historic District. I served as a member of the Mixed Use Zones Policy Advisory Committee and appreciate your consideration of zoning adjustments.

I urge support of the NWDA Planning Committee's position that the proposed CM3 zoning in the Alphabet Historic District be rezoned to CM2. NWDA members have carefully analyzed the impact of proposed mixed use zone changes with respect to the district plan, historic preservation and maintenance of employment concerns in the neighborhood.

The requested CM2 zoning is consistent with Comp Plan Policy 4.49 which directs that base zoning in historic districts be refined to take into account the character of the historic resources. The Northwest District Plan and Alphabet Historic District guidelines outline desired characteristics for the Eastern Edge area more consistent with CM2 zoning.

Maintaining and expanding zoning supportive of businesses that provide employment and community amenities is also important. Please consider NWDA's proposed changes that will retain traditional employment areas and historic character in the eastern portion of the Northwest District.

Thank you,

Vicki Skryha
1728 NW Hoyt Street
Portland, OR 97209

From: [BRIGHTMAN Darrin W * DAS](#)
To: [Cole, John; Planning and Sustainability Commission](#)
Subject: Testimony for PSC July 12 Composite Zoning Map Hearing
Date: Tuesday, July 12, 2016 1:11:29 PM
Attachments: [das-testimony-cm2_201607121255.pdf](#)

Hello!

The attached letter is testimony in reference to the composite zoning map.

The Oregon Department of Administrative Services owns a block bounded by Albina, Vancouver, Webster, and Williams. This block has a proposed zoning of CM1. DAS requests that it be zoned CM2.

Neighbors immediately to the south across Albina have requested that their properties, also proposed to be zoned CM1, be zoned CM2. DAS has no objection to their request.

The letter provides more detail.

Please contact me if there is any further information you need, and please add me to the email contact list for this project.

Thank you!

Darrin Brightman, AICP, OPMA
Real Estate Project Manager
Real Estate Services
Oregon Department of Administrative Services
1225 Ferry Street SE, U100
Salem, OR 97301-4281
Tel: 503-373-7065
Fax: 503-373-7210

My Email address is now Darrin.W.Brightman@oregon.gov.

Please update your records. Thank you.



Oregon

Kate Brown, Governor

Department of Administrative Services
Enterprise Asset Management – Administration Office
1225 Ferry Street SE
Salem, OR 97301-4281
PHONE: 503-378-2865
FAX: 503-373-7210

July 12, 2016

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

Re: Mixed Use Zones Testimony

Members of the Commission:

The Oregon Department of Administrative Services (DAS) owns the block bounded by North Webster Street, North Williams Street, North Alberta Street, and North Vancouver Avenue. The property consists of four contiguous parcels with the address of 30 North Webster Street:

Property ID	Legal Description	Area
R298052	WALNUT PK, BLOCK 20, LOT 7-9	15,900 SF
R298051	WALNUT PK, BLOCK 20, S 45' OF E 40' OF LOT 5, S 45' OF LOT 6	4,050 SF
R298050	WALNUT PK, BLOCK 20, LOT 4, LOT 5 EXC S 45' OF E 40', LOT 6 EXC S 45'	10,950 SF
R298049	WALNUT PK, BLOCK 20, LOT 1-3&10-12	29,180 SF

The block currently carries CN2 zoning. Under the 2035 Comprehensive Plan Update, this block and surrounding area are designated Neighborhood Mixed Use, with a proposed CM1 zone.

DAS fully supports the comprehensive plan designation.

The property includes a full block face frontage along North Vancouver Avenue, which is home to higher density development than permitted under CM1 zoning. Neighbors on the northern half of the block south of the DAS-owned parcels (fronting on Vancouver, Alberta, and Williams) have requested CM2 zoning be applied to their properties.

DAS requests that the CM2 zone be applied to the DAS block and has no objection to the neighbors' request for CM2 zoning for their parcels.

Sincerely,

Shannon Ryan
Administrator

From: [Mark Haines](#)
To: [Planning and Sustainability Commission](#)
Subject: 1435 NE 62nd Ave
Date: Tuesday, July 12, 2016 9:23:47 AM

Hi there,

My name is Mark Haines. I own the house at 1435 NE 62ND AVE and noticed the comp plan shows our property as being re-zoned to commercial mixed use yet the zoning plan shows us remaining at R2. I'd like to see the zone plan match the comp plan now so we can close the awkward gap between the two commercial zones that surround our property.

Thank you,
Mark Haines

From: [Joy Jaquillard](#)
To: [Planning and Sustainability Commission](#)
Subject: Against Rezoning of the 60th Ave. Station Area to Comprehensive Plan Density
Date: Tuesday, July 12, 2016 12:04:53 AM

We can't keep adding density without preparing for it. Earlier hearings led to the conclusion that increasing density in this area with the then-existing infrastructure would make the area more unsafe for pedestrians. The infrastructure hasn't changed; the results of the hearing should not change.

Joy Jaquillard
2725 NE Cesar E Chavez Blvd
Portland, OR 97212

Doug Klotz
1908 SE 35th Place
Portland, Or 97214

July 12, 2016

Katherine Schultz, Chair
Portland Planning and Sustainability Commission
1900 SW Fourth Ave.
Portland, OR 97201

Re: Composite Zoning Map

Dear Ms. Schultz and Commissioners:

Here are my thoughts on the **Composite Zoning Map**:

1. Areas where CM-1 should be changed to CM-2. (Formerly areas of Low-Rise Commercial)

It is my understanding that this is a “zoning” issue, and thus open for testimony at this time. The following areas, which are now listed as CM-1 on the Composite Zoning Map, should be changed to CM-2 to reflect their location in the heart of Neighborhood Centers, to allow greater residential and commercial density where it is needed the most.

- A. NE Alberta (NE 17th to 19th)
- B. Roseway area (NE Sandy from NE 67th to 70th, and Fremont and NE Sandy, from NE 71st to 73rd, as well as properties just north of Sandy on NE 73rd)
- C. Parkrose (NE Sandy from NE 105th to 108th)
- D. Kerns (NE 28th from Burnside to Davis)
- E. SE Belmont (SE Belmont from SE 33rd to approx. 36th, and SE Yamhill from SE 34th to 35th.)
- F. SE Hawthorne (SE Hawthorne from SE 35th Ave. to SE 38th, and SE Clay from SE 37th to 38th)
- G. SE Division (SE Division from SE 35th Ave. to SE 38th)
- H. SE Foster (SE Foster from SE 63rd to approx 68th)
- I. SE Woodstock (SE Woodstock from SE 44th to 47th, including one property on SE Martins St.)
- J. Montavilla (SE Stark from SE 78th to approx 82nd)
- K. Sellwood (SE 13th from SE Harney to Nehalem)
- L. Moreland (SE Milwaukie from Claybourne to Rural, SE 16th from Glenwood to Rural, and SE Bybee from approx. 15th to 17th)
- M. Multnomah Village (SW Capitol Hwy from SE 34th to 37th, SW Troy from 34th to 37th, Multnomah Blvd. from 36th to 37th)

2. Other areas where zone should be changed from CM-1 to CM-2

NE 28th from Davis to Everett, both sides. This would be a one block gap in the CM-2 zoning along 28th. There are 3 residences and 4 commercial or mixed use buildings here. It makes sense to zone this block CM-2 for continuity with the rest of the 28th corridor, rather than CM-1.

SE Milwaukie Ave. from Center to Holgate, and SE Holgate from SE 12th to Milwaukie. Since no zoning is being changed right at the 17th and Holgate Max Station, Milwaukie Ave. is the closest opportunity for Transit-Oriented Development, to maximize the public investment in the Max line. I realize that the neighborhood supported CM-1, but think CM-2 is more appropriate here.

3. Upzoning from R-5 to R-2.5 in compliance with Comp. Plan Designation

I support the upzoning of R-5 to R-2.5 wherever it is proposed. This change will help add needed density near Centers and Corridors. A lot of this occurs near SE Division, Hawthorne, Cesar Chavez Blvd. and Powell Blvd., and is in ideal locations for new growth.

4. Upzoning from R-5 to R-1 in compliance with Comp. Plan Designation

I support the upzoning of R-5 to R-1 wherever it is proposed. This will confirm the multifamily zoning along Corridors such as SE Cesar Chavez, where it makes the most sense.

5. More Appropriate zoning in Upzoned Areas near Hawthorne and Chavez node:

I support an increase in proposed zoning, to encourage higher density near this important transit node and in the Hawthorne Neighborhood Center. While CM-2 is the goal, I think even CM-1 would be an improvement over what is proposed.

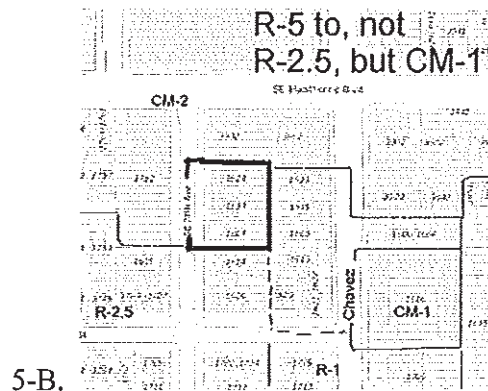
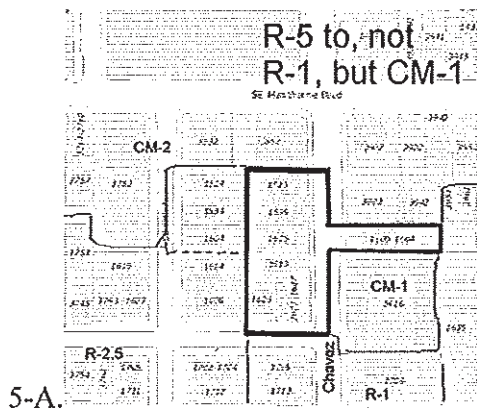
5-A. Area with MU-UC and R-5 Zoning which are being upzoned to R-1. These lots, on Chavez south of Hawthorne, were Designated NC, and will be MU-UC. R-1 zoning is proposed. To facilitate more density near the Chavez/Hawthorne node, they should be zoned at least CM-1, which matches the old NC designation, rather than the residential-only R-1 designation. CM-1 also matches the adjacent large properties on Chavez.

1523-1727 SE Chavez, and 3829 SE Market, as well as 1600-1604 SE Chavez.

5-B Area with MU-UC and R-5 Zoning which area being upzoned to R-2.5

These lots on the east side of 38th Ave. south of Hawthorne, were also NC, and will be MU-UC. They are currently R-5 and are being upzoned to R-2.5. Instead, they should be zoned at least CM-1, the closest equivalent to the NC designation they formerly had, to help add to the density at the Chavez/Hawthorne node. (I also support zoning the parking lot of the Wells Fargo Bank at 3782 Hawthorne as CM-2, as proposed)

1524 to 1604 SE 38th Ave.



Summary:

I understand the staff philosophy of incremental change, but would argue that leaving some properties with a lower classification for the 20 years until the next update, will actually result in new development that is underbuilt for these important nodes and corridors. I believe now is the time to adopt the denser zones, to guide fast-moving development pressures to the result desired.

Thank you.

Sincerely,

Doug Klotz

From: [Jan Holibaugh](#)
To: [PDX Comp Plan](#)
Cc: [Lee Buhler; Planning and Sustainability Commission](#)
Subject: Proposed zoning changes for 04 Hamilton Street
Date: Monday, July 11, 2016 10:47:44 PM

To the PSC:

I have received the mailer informing me that my property at **04 Hamilton Street** is no longer being considered for a zoning change and **I would like to strongly request that the decision be reconsidered. I want my house to be zoned Mixed Use/Commercial now.**

1) There are only TWO houses in the two blocks between Barbur and Corbett that are not presently zoned Mixed Use/Commercial - mine being one of them. My house at 04 Hamilton is off the corner of Barbur and across from the Swan Island Market and is considered one of the busiest corners in Portland - especially during rush hour. The residential zoning of my house is puzzling and impractical because all of the other houses and townhouses in this two block area are commercially zoned and not on this very busy corner like mine.

2) I had discussions last year with a staff person who agreed that this review of the neighborhood and zoning for the future is the perfect time to CORRECT this zoning glitch. I was required to request this change in writing and check with my neighbors regarding their feelings for my house being zoned like the rest of the street, and they all were supportive of it. They didn't understand the discrepancy in zoning either.

3) Two years ago I was contacted by a Portland staff person who was working on the proposal for light rail down Barbur who told me that my corner would be the ideal one to put the transit stop at. Whether or not this will happen, it is an indication of the amount of traffic around my street corner.

I do not understand why my house is not being brought in to Mixed Use/Commercial Zoning like the rest of the street. I see no reason why this should not be rectified. Please consider my request. I am perplexed because I thought this request was taken care of last year.

Thank you,

Jan Holibaugh
04 Hamilton Street
Portland, Or.

503-490-1884

From: [lee](#)
To: [Planning and Sustainability Commission](#)
Cc: [Jan Holibaugh](#)
Subject: 018 SW Hamilton
Date: Monday, July 11, 2016 10:48:37 PM

I own the property at 018 SW Hamilton. This property is designated to change to mixed use in the comprehensive plan. I think the property should be changed to mixed use now. My house and my neighbor's house are the only properties on the block not zoned commercial. My property and my neighbor's adjacent to a major transit stop at Hamilton and Barbur. It does not make sense to keep this property residential.

Lee Buhler

From: Rick Peterson
To: Planning and Sustainability Commission
Subject: Central City 2035 Comprehensive Plan
Date: Monday, July 11, 2016 7:46:01 PM

Petition for Zoning Change for 3 tax lots

- 1) 3430 NE 50th Ave., 97213
- 2) Vacant lot on 50th & NE Fremont St.,
97213

Both parcels are designated as CM1 according to the 2035 Comprehensive Plan, and we are requesting that the zoning be changed on both parcels to CMI.

- 3) 5024 NE Fremont St., 97213

This parcel is currently zoned R-2 and we are requesting a zoning change to CM1, because we would like to develop all three properties as one project. If this parcel were to stay as currently R-2 zoned and developed into 2 units, it would require additional driveways on Fremont, which already has a nearby bus stop, a crosswalk, and is a transit corridor. To access this property as currently zoned would be unsafe and not practical, due to the high volume of vehicle and pedestrian traffic. I hope you will take these concerns seriously when you make your decision.

Thank you for your consideration of these matters.

Rick A. Peterson
Blair J. Peterson
Jason M. Peterson
Sara J. Peterson

Phone contact 971-276-2734



133 SW 2nd Ave, Suite 201 • Portland, OR 97204 • (503) 497-1000 • www.friends.org
Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155
Willamette Valley Office • PO Box 51252 • Eugene, OR 97405 • (541) 520-3763

NO JLD
not
testf

July 11th, 2016

Updesignation in mixed-use zones: a critical value-capture & anti-displacement tool

Dear Portland Planning & Sustainability Commission,

1000 Friends of Oregon writes to urge you to consider updesignation – changing a parcel's Comprehensive Plan designation without modifying the underlying zoning, typically on the condition that developers give back in some way to the surrounding community – as a core density-promotion strategy in the Mixed Use Zones project, as opposed to the current emphasis on upzoning to allow density by right.

The reality is that our city has precious few tools to promote density while ensuring that the benefits of that density accrue to existing communities in ways which prevent residential and commercial displacement. Updesignation gives the City a way to do just that; as we face the likelihood of explosive population growth in our city over the next decades while experiencing an unprecedented housing crisis, we must protect every tool in our toolbox.

Retaining updesignation as a tool also furthers several of the Anti-Displacement PDX (ADPDX) policy goals built into the City's new Comprehensive Plan. First, updesignation is a form of value-capture, allowing existing residents to share in the benefits that density brings, particularly absent a general citywide community-benefits agreement for new development. Second, by building updesignation into the Mixed Use Zones project, we ensure that there are at least some anti-displacement provisions proactively included on the front end.

We urge the Planning & Sustainability Commission to focus on updesignation as a value-capture tool instead of simply upzoning to promote density.

Respectfully submitted,

Andrew Riley
Community Engagement Coordinator
1000 Friends of Oregon
andrew@friends.org
Office: (503) 497-1000 ext. 129
Cell: (503) 936-9430

From: [Elizabeth Adams](#)
To: [Planning and Sustainability Commission](#)
Subject: "Testimony on Composite Zoning Map Update"
Date: Monday, July 11, 2016 11:14:25 PM

Dear Committee,

I am in agreement with the Rose City Park Neighborhood Association in requesting postponement of the rezoning of the 60th Ave. Sta. Area. In the future, if rezoning is under consideration, appropriateness of any rezoning should be reassessed.

Thank you very much for working on this issue.

Regards,
Elizabeth Adams
1817 NE 54th Ave
Portland, OR 97213



801 NE 21st Avenue
Portland, Oregon 97232
Phone: 503-234-7526
E-Mail: jfrank@sunshinedairyfoods.com
Web: www.sunshinedairyfoods.com

July 8, 2016

Bureau of Planning and Sustainability
City of Portland, Oregon
1900 SW 4th Avenue
Suite 7100
Portland, Oregon 97201

Dear Planning and Sustainability Commissioners:

I am writing in regards to four properties (State ID: 1N2E33BB 2100, 1N1E35AD 1302, 1N1E35AD 1301, 1N1E35AD 2400) currently zoned CG, EXd, EXd, and EXd, respectively. The properties are owned by Karamanos Holdings, Inc. the parent company of Sunshine Dairy Foods. The purpose of this letter is threefold. First, I would like to paint the picture of who Sunshine is and its history. Second, I hope to describe some of Sunshine's relevant strategic plans as they relate to the proposed land use and proposed zoning initiatives in front of this Commission. Third, I would like to provide our recommendation for adjustments to the proposed zoning map.

With that said, Sunshine Dairy Foods was founded in Oregon on May 17, 1935; 81 years ago. Sunshine has continued its storied tradition of producing and serving the highest quality dairy products to local food service customers, food manufacturer partners, retailers and co-packing partners. The company has built its business around producing the highest quality, best tasting, and natural dairy products. Sunshine's products are produced at two separate facilities, both located in Portland, and products are generally distributed out of a leased facility in Clackamas.

With 81 years of history in Portland, Sunshine has become a large local employer and has given back to its community in a number of ways. Sunshine's dedication is to its hundreds of Portland-area consumers, thousands of hours of volunteer work by its employees and owners, tens of thousands of dollars in donated products to local charities and food banks, and community support through over 100 living-wage jobs. The history of Sunshine has helped to craft and solidify Portland's unique spirit.

Sunshine is unique in Portland because we use a cold bowl separation process for our fluid milk products that may take longer, but results in superior products since the milk is only heated at the pasteurization step. The taste is clean and fresh, never over processed. Sunshine's growing number of chefs, café owners, bakeries, hospitals, retailers and consumers who are concerned about the quality and source of their ingredients continue to choose Sunshine.

We have concerns about the proposed zoning changes affecting our properties. Like most, if not all, private businesses, Sunshine is subject to many separate and powerful market influences: Commodity prices for fluid milk, labor markets, macro-economic trends, and consumer tastes and preferences, just to name a few. Historically, the close-in location of Sunshine was a tremendous asset for us and was a major competitive advantage that allowed us to serve our food service customers better than anyone else. As the city grows and the market changes, this value will increasingly be offset by the inconvenience of operating a dairy processing facility within a densely populated area mixed with housing and other commercial enterprises. The surrounding area has grown in intensification with commercial and residential uses. These uses increasingly create conflict with Sunshine dairy's operation. As some point, the area will simply not allow the operation of an employment use in its midst.

Our facilities in Portland handle five to seven tanker trucks of raw milk and 12 or more semi-truck loads of product in and out every day. It is our long-term plan to consolidate facilities and re-locate the operation to a manufacturing and distribution friendly location within Portland. This is not a plan that can be executed within a year or two. It is a long-term plan that will unfold over the course of ten to fifteen years. This will leave the properties vacant and in a condition that is not their highest and best use. In this scenario, the properties will need to be re-developed and converted into neighborhood-consistent developments and not used by another dairy or similar enterprise.

The EXD zoning allows us to operate the dairy and not foreclose the ultimate redevelopment of the site consistent with the surrounding neighborhood.

This location zoned EG1 for the 2035 plan is inconsistent to the newly adopted Portland Comprehensive Plan Goals and Objectives. The Comprehensive plan describes the zone as "typically in a low-rise, flex-space development pattern". "Residential uses are not allowed ... to limit the proximity of residents to truck traffic and other impacts." The development uses surrounding this proposed General Employment zone are commercial and residential uses that will be adversely impacted by a low-rise and truck generating employment use. These surrounding uses also adversely impact the operation of Sunshine dairy and would be the primary reason the dairy is forced out of the site despite the underlying zoning.

The application of general employment at this location is completely inconsistent with the surrounding land use patterns and creates conflicts between the closely proximate zones.

Employment uses need to be in an industrial park, campus, or sanctuary to ensure proximity of compatible uses, synergy between businesses, and the public's ability to provide appropriate and cost effective infra-structure

The location as EG1 violates the Transportation Element as it is located on a secondary neighborhood collector, limited offsite parking, difficult for truck maneuvering, and remotely located from arterials and the interstate system.

The EXd and CM3 allow outright a wide range of residential and retail use. The EG1 zone prohibits residential and limits retail making existing and future similar uses of the property non-conforming or prohibited. The current zoning allows an entitlement of intensity for traffic, sewer, water, and other services. The General Employment changes that service entitlement without any analysis of impact on the subject property or surrounding uses. The property developed as residential has a much

different service impact than a property limited to employment uses. For example, residential uses do not generate truck traffic.

The property owner could request a zone change back to the CM3 (similar to the EXd). The applicant would have to prove that services exist for the change in intensity; services that did exist in 2016 for the property designated EXd. A prudent property owner would immediately request the quasi-judicial zone change in conformance with the Comprehensive Plan before the surrounding growth in intensification consumed all the available services.

The General Employment zone was processed in the Employment/Industrial project not the Commercial/Mixed Use project. The application of an employment zone in the Commercial/Mixed Use project entirely lacks the process of the Employment/Industrial project. The misapplication of the general employment zone is an extremely probable outcome.

Finally, and with all of that in mind, we respectfully request the following changes to the proposed zoning changes. Please, keep in mind that our recommendation is for the three close-in properties: 1N1E35AD 1302, 1N1E35AD 1301, and 1N1E35AD 2400.

- 1) Consistent zoning for all adjacent properties.
- 2) A zone with the same entitlements as the existing EXd zone.

We appreciate your consideration of our request and recommendation. We look forward to your response.

Sincerely,



Jason Frank
Executive Vice President
Karamanos Holdings, Inc.

July 8, 2016

Portland Planning and Sustainability Commission
City of Portland
1900 SW Fourth Avenue #7100
Portland, OR 97201

Re: Request for CE Zoning at 5810 N. Lombard

Dear Chair Schultz and Commissioners:

I own property at 5810 N. Lombard. This letter is to request that the property be zoned CE instead of CM2. Please make this letter a part of the record.

This site is currently developed with an existing, multi-tenant commercial building with parking between the building and the street to accommodate automobile traffic from the adjacent traffic street, a District Collector. Please understand that the area is not yet ready to develop to urban densities, so the zoning should not be CM2, but should be CE as the most similar zone to the current CG zoning. I attach an aerial photo to show the existing development.

For the reasons set out above, please zone the property at 5810 N Lombard CE.

Respectfully submitted,

Timothy J. Secolo



July 8, 2016

Attention: Composite Zoning Proposal Testimony
Planning and Sustainability Commission (PSC)
City of Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

Re: **Proposed zone changes at 1208 SE Boise Street & 4214 SE 12th Avenue**

Dear Planning and Sustainability Commission Members:

As part of the City's Comprehensive Plan update, my landlord Jerry Baker and I submitted testimony requesting a commercial plan designation on the two parcels located at 1208 SE Boise Street & 4214 SE 12th Avenue. This would allow for property line adjustments to separate the two residential structures from the lower, eastern portions of the rear yards which are partially paved and utilized by the adjoining commercial properties for parking and storage. As a result, Commissioners Fritz and Saltzman sponsored a change to *Mixed Use - Neighborhood* during the Council hearings on the Comprehensive Plan amendments. This plan designation was proposed to be implemented with the Commercial Employment (CE) zone.

Having recently met with the Brooklyn Action Corps (BAC) regarding our businesses and this site, I've learned of their concerns regarding the four-story buildings that would be allowed in the CE zone and their preference for the Commercial Mixed Use 1 (CM1) zone, which would only allow 3-story buildings. As my primary interest is in completing the property line adjustment rather than replacing the existing houses, we have explored other options with the BAC and with staff from the Bureau of Planning and Sustainability (BPS) and Bureau of Development Services. BPS planner Marty Stockton recently suggested that the City could impose two separate zoning designations on the properties, with the west portion (containing the houses) zoned CM1 and the east portion (containing a retaining wall and the paved commercial area) zoned CE. Then, once the new zoning is in effect, we could complete the property line adjustments as the lower portion of the properties would then have the same base zone as abutting commercial property to the east.

The BAC and I support this approach and would request that the PSC recommend this change to the City Council. The attached diagram illustrates the approximate location of the two proposed zone designations on these properties. At this time we do not have the survey data necessary to determine the precise location of the zoning boundary that would allow the property line adjustment. However, I propose to hire a surveyor in the coming months and to coordinate with BPS staff to define the zoning boundary alignment prior to the City Council hearing in October.

This approach will protect my business interests, support jobs in southeast Portland, and provide transition between the CE zone and residential properties to the west. Thank you for your consideration and your support.




Sincerely,

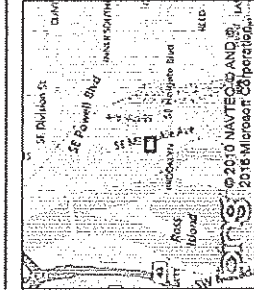
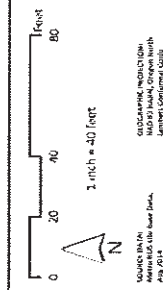
Matt Thomas
Townshend's Tea Company
Brew Dr. Kombucha

Enclosure: Zone Change Concept Diagram, dated 7/8/16

**Zone Change
Concept Diagram
Portland, Oregon**

LEGEND

-  Existing CG zone to be changed to CE zone
-  Proposed CE zone
-  Proposed CM1 zone



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 Mackenzie Central, LLC • 503.224.8840 • 1801 224 2245
 Portland, Oregon • Project: Washington • Seattle, Washington
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From: Matney, Julie
Sent: Friday, July 08, 2016 1:50 PM
To: Cole, John <John.Cole@portlandoregon.gov>; Wright, Sara <Sara.Wright@portlandoregon.gov>
Cc: Roth, Emily <Emily.Roth@portlandoregon.gov>; Hendrickson, Nancy <NANCY.HENDRICKSON@portlandoregon.gov>; Walkiewicz, Marie <Marie.Walkiewicz@portlandoregon.gov>; Guderyahn, Laura <Laura.Guderyahn@portlandoregon.gov>
Subject: Peninsula Canal Trail

John and Sara,

BES and PP&R would like to make a recommendation to the Planning and Sustainability Commission regarding the Peninsula Canal Trail alignment.

Peninsula Canal is home to one of the largest remaining populations of native western painted turtles in the state of Oregon (Conservation Plan for Native Turtles in the Columbia Slough, 2012 Oregon Wildlife Institute). The western painted turtle is identified as “Sensitive-Critical” by the Oregon Department of Fish and Wildlife. Therefore, the importance of Peninsula Canal to the present and future conservation of western painted turtles in the Portland Metro region is paramount. Western painted turtles are very sensitive to recreational impacts. Regardless of the alignment of the trail, a trail along Peninsula Canal will have a negative impact on the turtle population.

The Lower Willamette Turtle Working Group includes representatives from Oregon Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Metro, City of Portland, Oregon State Parks, Clean Water Services, Port of Portland, and Oregon Wildlife Heritage Foundation. In 2012 the Working Group wrote a letter (attached) to Metro, Portland Parks and Recreation, and the Port of Portland. The letter voices the Working Groups’ concerns regarding the negative impact the planned trail and resulting recreation would likely have on the native turtles present in Peninsula Canal and recommendations to minimize such impacts.

If the trail must be constructed, constructing it on the lowest flank of the levee (see attached map), avoiding line-of-sight to the waterway, would lessen the impact on the turtle population. Portland Parks and Recreation (per 6/6/16 conversation with Emily Roth) approves of this recommendation to move the trail alignment to the lowest point on the levee. Also, for your information, the most recent version of “Metro Trails Inventory” layer on the hub shows the northern part of the trail at the bottom of the levee, along Port of Portland property.

Julie Matney : [City of Portland Environmental Services](mailto:julie.matney@portlandoregon.gov)
(503) 823-2774 : julie.matney@portlandoregon.gov

Lower Willamette Valley Turtle Working Group

July 18, 2012

To: Leif Anderson, Metro
Emily Roth, Portland Parks & Recreation
Travis Ruybal, Portland Parks & Recreation
Robert Spurlock, Metro
Mark Witsoe, Port of Portland

From: Lower Willamette Turtle Working Group

RE: Sensitive turtle populations and the planned Peninsula Canal Trail

On June 7, 2012 Metro trails planning staff met with the Lower Willamette Turtle Working Group (LWTWG) to discuss the trail planning process and specifics related to the development of the Peninsula Canal Trail in northeast Portland. This collaborative meeting resulted in productive information sharing and identification of opportunities to better align trail and natural resource regional priorities, including conservation of Oregon's native turtles.

Peninsula Canal is home to regionally significant turtle populations. This letter identifies several concerns LWTWG members have related to trail development along the Canal and prioritized recommendations aimed at avoiding and minimizing potential adverse impacts of the planned trail development on Oregon's turtles.

The western painted turtle (*Chrysemys picta bellii*) and the western pond turtle (*Actinemys marmorata*) are Oregon's two native turtle species and are classified by ODFW as "Sensitive-Critical". Both turtle species are considered semi-aquatic in nature, seeking out quiet backwater habitats with ample sun exposure and basking structures. Nesting occurs on the land in sunny, sparsely vegetated soils near suitable aquatic habitats. In recent years, research and field surveys have determined that Peninsula Canal is home to one of the largest remaining populations of western painted turtles in the state of Oregon (Conservation Plan for Native Turtles in the Columbia Slough, 2012 Oregon Wildlife Institute). These surveys have confirmed multiple age classes are present at the site, indicating the turtle populations are breeding and nesting successfully. Relatively few reproducing native turtle populations have been confirmed in the Willamette Valley, especially in urban areas where most upland habitats adjacent to suitable aquatic turtle habitat have been subject to development. Thus, the importance of Peninsula Canal to the present and future conservation of western painted and western pond turtles in the Portland Metro Region is further elevated.

The City of Portland and Metro have been working to close many gaps in the 40-Mile Loop Trail system. Our understanding is the trail alignment along Peninsula Canal dates as far back as the 40-Mile Loop Master Plan developed in 1983. While the LWTWG recognizes the multiple benefits of trails including access to nature, the planned alignment along Peninsula Canal raises serious concerns relative to native turtle conservation.

The planned alignment is on the top/centerline of the levee along the east side of the canal. Five easements are required to move to the design phase and four of these are acquired. The final easement needed is from the Port of Portland along the north end of the canal.



Western Painted Turtles in Peninsula Canal May 2011. Photo Credit: Oregon Wildlife Institute

LWTWG members are in agreement that the planned trail and resulting recreation would likely have many negative impacts on native turtles present in Peninsula Canal. As a result of surrounding land uses, this water channel has had essentially no public access to date, allowing turtles to prosper un-disturbed. Western painted and western pond turtles are very sensitive to recreational impacts. These species are relatively defenseless and depend on camouflage, hiding, and relatively undisturbed places to survive. When threatened, their main behavioral response is to quickly dive into the water. As a result of this flight response, natural behaviors/functions are disrupted, primarily thermoregulation, digestion, egg development, and shell health. Disturbance resulting from trails and recreation are considered a major threat to turtle conservation in the Portland Metro Area (Conservation Plan for Native Turtles in the Columbia Slough, 2012 Oregon Wildlife Institute). Expected negative effects from the new trail include:

- Loss of available nesting habitat from habitat conversion (e.g., conversion of existing gravel road to paved surface)
- Increased disturbance / interruption of basking behavior resulting from walkers, runners, and bikers causing repeated flushing of turtles from basking logs
- Increased interference with nesting attempts from trail users
- Disturbance from dogs of basking and nesting efforts
- Direct mortality from dogs (note: this has been documented in Portland)
- Disturbance from presence of anglers
- Direct injury and mortality from fishing by-catch
- Disturbance from boaters including kayakers
- Increased risk of illegal trapping and capture / removal from the wild
- Increased risk of exposure to non-native invasive turtles (e.g., red-eared slider) resulting from increased access

The cumulative effects of the planned trail have the potential to have significant negative impacts on these important remnant populations of native turtles. In order to avoid, minimize and reduce impacts to native turtles, the LWTWG would like to make the following recommendations. These are in prioritized order, with the most productive actions listed first.

Recommendations:

1. Consider an alternate route for a north-south connector trail between the Slough trail and the Marine Drive trail.
2. Recognizing that four out of five easements have already been finalized, the Port of Portland easement provides the best opportunity to take meaningful action to reduce impacts on the turtles. Eliminating and minimizing line-of-sight between the open water turtle habitat and the trail is the best way to avoid the myriad impacts listed above. For the length of levee within the Port tax lot, we propose dropping the trail down onto the east flank of the levee low enough to eliminate line-of-sight to the canal. This will create a “turtle refuge” along approximately 1000 feet of canal at the north end. The intended result would be to have a small portion of the channel free from continual disturbance. See attached map.
3. Although the easement has been finalized with the City of Portland Bureau of Maintenance, we suggest initiating a conversation with that facility about implementing the same design described in Recommendation 2 above for the length of their property. This would extend the north end turtle refuge another 800 feet.
4. Although the easement has been finalized with the Riverside Golf and Country Club, we recommend re-initiating a conversation with that facility about implementing the same design described in Recommendation 2 above for the length of their property. The levee would then be able to provide a visual barrier at the south end of the trail.

5. Whenever the trail is on top of the levee, we recommend a solid fence 6-12 inches from the ground be installed to provide a visual barrier while trail users are on top of the levee. One lookout point or a couple of wildlife blinds could be constructed in the fence to allow for wildlife viewing.

The LWTWG first and foremost desires that Recommendation 1 be implemented. In an urban area, it is extremely significant that native species classified as “Sensitive-Critical” not only exist, but are successfully breeding. Good stewardship of rare and sensitive resources is the only way to maintain the relatively high level of biodiversity Portland has experienced thus far within its boundaries. While allowing residents to experience nature is very important, it is equally important to consider the species that will be ‘experienced’. If the populations declines, stop breeding, or leave, user’s experiences will be less meaningful.

Understanding that there has been much work to come to this point for this particular trail project, the LWTWG feels that implementing Recommendations 2-5 above may be an acceptable alternative. Re-aligning the trail as much as possible while installing solid fencing next to the trail that would be installed on top of the levee would alleviate some of the visual disturbance issues. However, the LWTWG would like to reiterate that this alternative would not address the other indirect impacts to the population such as illegal capture, fishing by-catch, disturbance from dogs, release of pet turtles (disease and competition), and human off-trail disturbance. Cumulatively, these indirect impacts, with road kill mortality, have already led to the drastic decline of native turtles across the region.

Regardless of which trail alignment is constructed, we suggest the following Best Management Practices be implemented during the construction phase to reduce short-term negative impacts to native turtles in the area:

Construction Best Management Practices:

1. Reduce the size/width of this segment of trail if possible.
2. Build the trail of compact gravel instead of asphalt.
3. Construct the trail during winter months, while turtles are hibernating to reduce the number of turtles that will flee the site from sound, vibrations, and visual disturbance.
4. Use a qualified biologist to survey for turtle nests along the alignment before construction begins or install silt fencing or other barriers in mid-May to prevent turtle nesting within the construction area.
5. Install visual barriers (e.g., plantings) well before turtles emerge in the spring (typically March-April).

In addition, we recommend the following actions be implemented as part of the long-term site operations/maintenance plan to further reduce impacts to native turtles after the trail is built.

Recommendations for Trail Operation / Maintenance:

1. No dogs in this segment of trail.
2. No fishing allowed on canal.
3. Adequate signage displaying reasons for the above restrictions.
4. Closing the trail during the most critical turtle breeding/basking/nesting season (March 15th to August 1st).

The LWTWG is aware that any and all design considerations for this trail must meet with approval from the Multnomah County Drainage District (MCDD) because this is a federally certified levee. It's worth noting that in 2008, MCDD removed cottonwood trees along this levee to comply with federal standards. The presence of native turtles was known at the time and the District proactively placed the trees in the channel for basking habitat. This highlights the fact that local agencies have invested in turtle conservation at this site.

The LWTWG also acknowledges that some of our recommendations may be in conflict with trail designs intended to provide the ideal user experience.

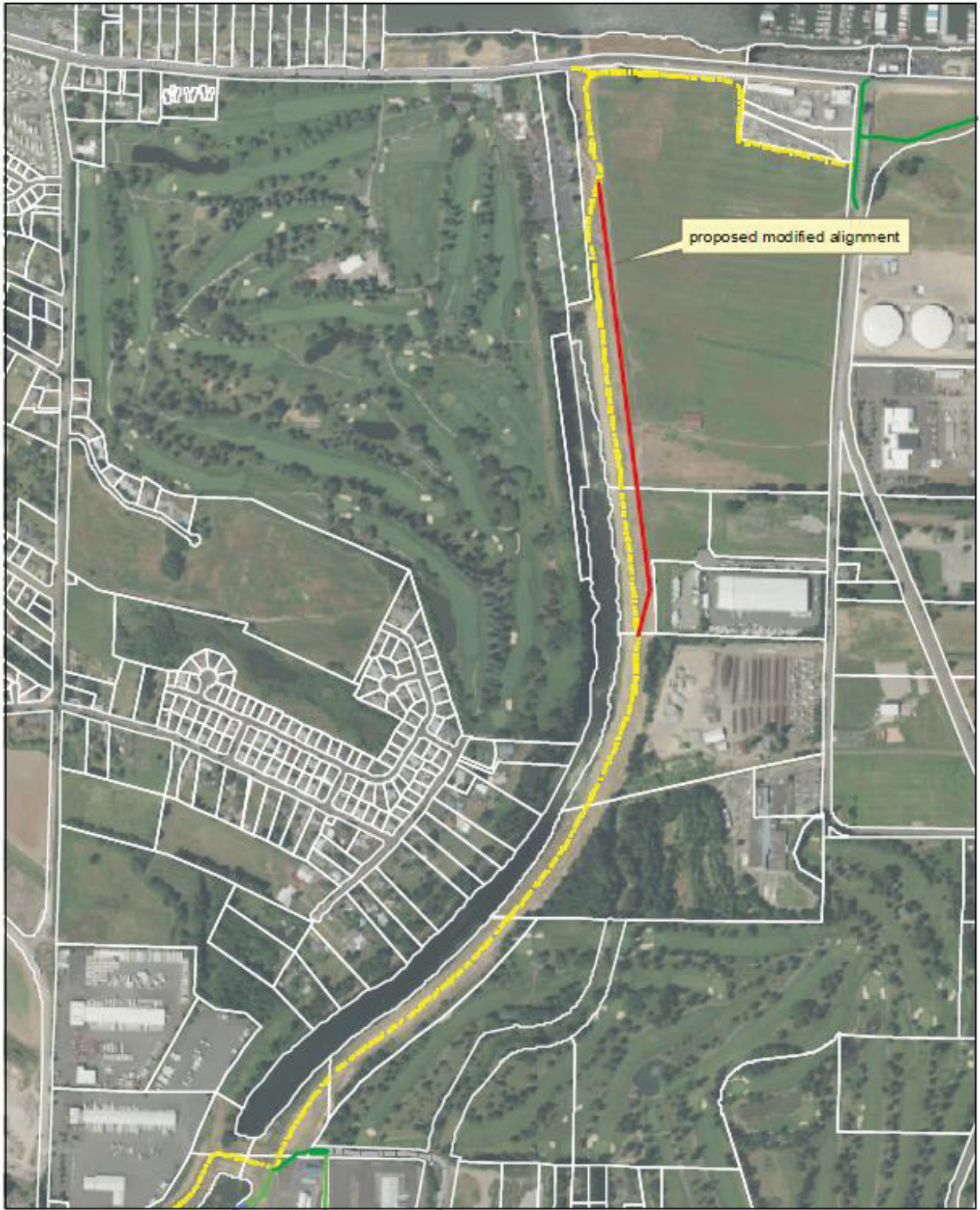
If you have any questions about the above comments or recommendations please contact me or another member of the LWTWG.

Sincerely,

Susan Barnes
Oregon Department of Fish and Wildlife
Co-Chair, Lower Willamette Turtle Working Group

CC: Dave Hendricks, MCDD
Byron Woltersdorf, MCDD

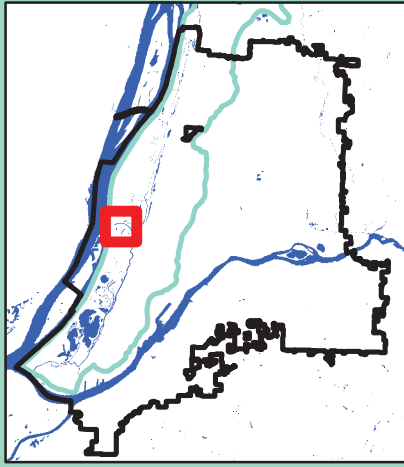
The Lower Willamette Valley Turtle Working Group was formed by agencies and organizations with an interest in conserving Oregon's native turtles and their habitats. Members include Oregon Department of Fish and Wildlife, U.S. Fish and Wildlife Service, Metro (including the Oregon Zoo), the City of Portland, Oregon State Parks and Recreation Department, Clean Water Services, City of Gresham, Tualatin Hills Park & Recreation District, the Port of Portland and Oregon Wildlife Heritage Foundation.



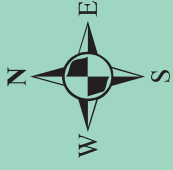
DRAFT

Proposed alternate trail alignment
Lower Willamette Turtle Working Group
6.29.12





Portland Parks and Recreation
and Bureau of Environmental Services
Proposed Peninsula Canal Alignment



1 inch = 825 feet



City of Portland, Oregon

Date: July 7, 2016

To: Portland Planning and Sustainability Commission

RECEIVED
PLANNING & SUSTAINABILITY

2016 JUL 11 A 8:39

From: Dennis M. Harper, Architect DMH
221 NW 18th Avenue
Portland, OR 97209

Subject: PSC MISC. Zoning Update Testimony

Distribution: Portland Historic Landmarks Commission
John Bradley, Chairman, NWDA Planning Committee

Upon reviewing the Miscellaneous Zoning Amendments – Proposed Draft – June 2016, I was alarmed to find that a vast swath of Northwest Portland has been/will be zoned RH with FAR of 4:1. I am referring to the first two attachments, Maps 120-6 and 120-7, pages 75 and 77 of the referenced document. Almost ALL of the FAR 4:1 area occurs within the Historic Alphabet District. Please refer to the third attachment, Map 1 of Historic Alphabet District, and compare it to Maps 120-6 and 120-7. Basically most property east of NW 21st Avenue has RH zoning with FAR 4:1, while areas of the Historic Alphabet District west of NW 21st Avenue are spared this higher density designation.

The RH zoning with a maximum FAR of 4:1 is a threat to the future of the eastern half of the Historic Alphabet District. Property owners and developers will certainly be enticed to demolish smaller historic buildings in the Alphabet District in order to replace them with larger, taller buildings up to FAR 4:1. The PSC MISC. Zoning Update is strongly advised to reduce the FAR to 2:1 in all areas of the Historic Alphabet District in order to eliminate the owner/developer enticement to tear down and build bigger. A similar revision was advocated by the Irvington Community Association for the Irvington Historic District. Refer to pages 78 and 79 of the Miscellaneous Zoning Amendments.

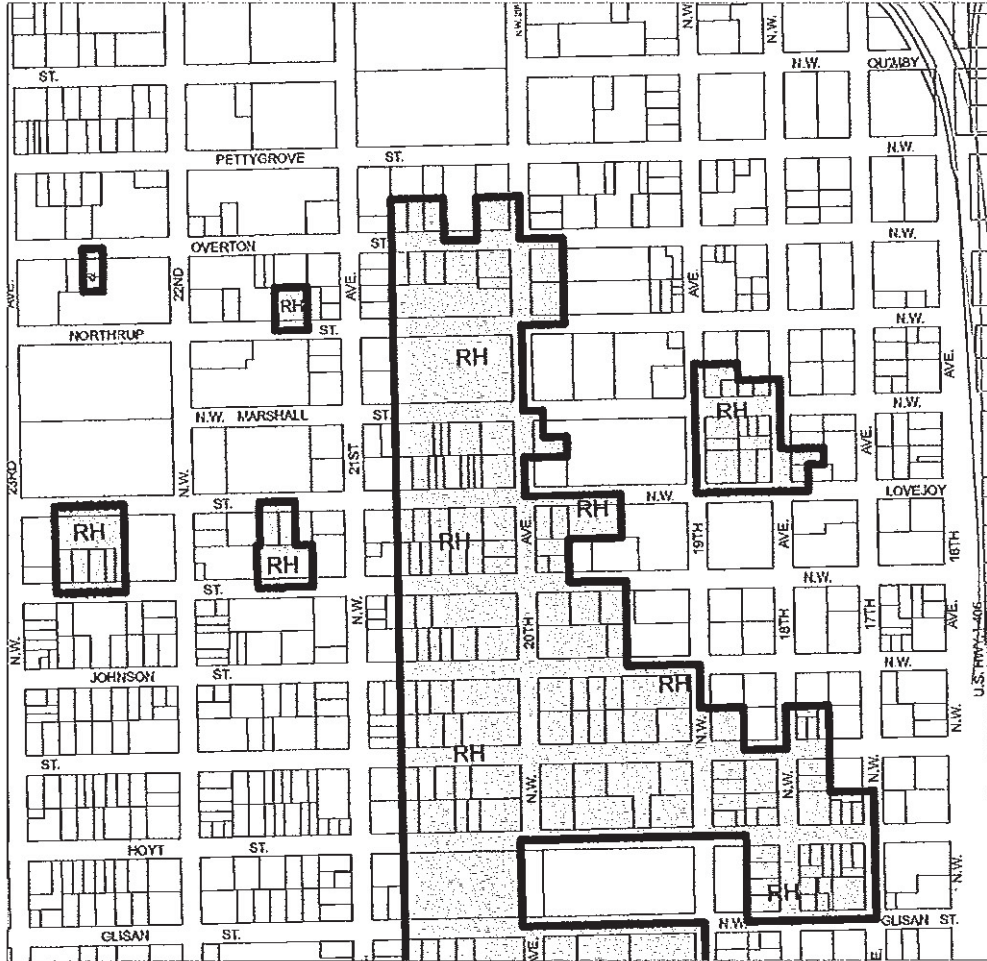
Furthermore, a maximum FAR of 2:1 would be a better fit for properties currently with no structures, such as parking lots. Tall, out of scale new buildings near such prominent older buildings as St. Mary's Catholic Cathedral, the NW Childrens' Theater, and Trinity Episcopal Cathedral would damage the character of the Historic Alphabet District.

If one assumes that the RH zoning with a maximum FAR of 4:1 is necessary to sustain an adequate supply of housing units in the city, then refer to page 120 of the Miscellaneous Zoning Amendments. The Commentary states that due to the large surplus of residential capacity in the city, the code provisions for No Net Loss of Housing and a Housing Pool are to be deleted. Under the proposed zoning amendments, a reduction of FAR to 2:1 in the Historic Alphabet District would not contend with a requirement to maintain residential capacity.

Proposed RH Areas with
Maximum FAR of 4:1

Map 120-6

Map Revised Xxxxx X, 201X



- City Boundary
- Boundary of Existing/Potential RH - Zoned Area

Quarter Section(s): 2927, 2928, 3027, 3028




Proposed RH Areas with
Maximum FAR of 4:1

Map 120-7

Map Revised Xxxx X, 201X



- City Boundary
-  Boundary of Existing/Potential RH - Zoned Area

Quarter Section(s): 2927, 2928, 3027, 3028



Map 1: Historic Alphabet District



The Historic Alphabet District is located in Northwest Portland. Its boundary is irregular following the temporal concentrations of contributing properties. Generally, the district's boundaries are: West Burnside on the south, NW 17th Avenue on the east, NW Lovejoy Street on the north and NW 24th Avenue on the west.

July 7, 2016

34

MEMORANDUM

TO: Portland Planning and Sustainability Commission
FROM: Peter Finley Fry
RE: 820-830 NW 18th Avenue and 839 NW 17th
1N1E33AC 5400 & 5500

OBJECTION

We object to the City's proposal to change our zoning from EXD to EG1. We support the earlier staff recommendation to change the zone to CM3.

REASONS

1) The location as EG1 is inconsistent to the newly adopted Portland Comprehensive Plan Goals and Objectives. The Comprehensive plan describes the zone as "typically in a low-rise, flex-space development pattern". "Residential uses are not allowed ... to limit the proximity of residents to truck traffic and other impacts." The development uses surrounding this proposed General Employment zone are high rise residential uses that will be adversely impacted by a low-rise and truck generating employment use.

The application of general employment at this location is completely inconsistent with the surrounding land use patterns and creates conflicts between the closely proximate zones.

Employment uses need to be in an industrial park, campus, or sanctuary to ensure proximity of compatible uses, synergy between businesses, and the public's ability to provide appropriate and cost effective infra-structure

The location as EG1 violates the Transportation Element as it is located on a secondary neighborhood collector, limited offsite parking, difficult for truck maneuvering, and remotely located from arterials and the interstate system.

3) The EXd and CM3 allow outright a wide range of residential and retail use. The EG1 zone prohibits residential and limits retail making existing and future similar uses of the property non-conforming or prohibited. The current zoning allows an entitlement of intensity for traffic, sewer, water, and other services. The General Employment changes that service entitlement without any analysis of impact on the subject property or surrounding uses. The property developed as residential has a much different service impact then a property limited to employment uses. For example, residential uses do not generate truck traffic.

The property owner could request a zone change back to the CM3 (similar to the EXd). The applicant would have to prove that services exist for the change in intensity; services that did exist in 2016 for the property designated EXd. A prudent property

**303 NW Uptown Terrace #1B
Portland, Oregon USA 97210
peter@finleyfry.com**

owner would immediately request the quasi-judicial zone change in conformance with the Comprehensive Plan before the surrounding growth in intensification consumed all the available services.

4) The site is and has been occupied by retail uses with longer term leases. The owner plans, at the appropriate time, to redevelop the site as mixed use retail/commercial and residential consistent with the surrounding uses and location.

5) There is not a stated reason for rezoning this area to employment except that the area has employment uses and the neighborhood wants employment zoning. Employment uses are significantly north of the site. This location leans toward the residential and retail character of the neighborhood. This area does not have significant employment uses.

6) The General Employment zone was processed in the Employment/Industrial project not the Commercial/Mixed Use project. The application of an employment zone in the Commercial/Mixed Use project entirely lacks the process of the Employment/Industrial project. The misapplication of the general employment zone is an extremely probable outcome.

This apparent last minute change was advocated by the Mayor's office and the neighborhood prior to a hearing before a public body and without any real public process. The change appears to be a political accommodation rather than a thoughtful placement of uses. The designation of GE zoning on a property is driven by the political persuasion of less than .05% of the businesses and residents in the area.

Hartinger, Kathryn

From: Dorothy Cofield <cofield@hevanet.com>
Sent: Wednesday, July 06, 2016 7:16 AM
To: Cole, John; Planning and Sustainability Commission
Cc: 'David Himmelberger'; lmerricson@yahoo.com; robert.spurlock@oregonmetro.gov; Roth, Emily
Subject: Miscellaneous Zoning Amendments Testimony
Attachments: CCF07062016_0002.pdf

Mr. Cole,

We spoke last month about this public trail on my clients' Saltzman Road property. Since we spoke, I have found out from Metro the trail location is a mapping error.

Please review the attached public testimony on behalf of David Himmelberger and Louise Erricson and submit a copy of it into the record of the planning commission proceeding.

When you have reviewed the map correction letter and proposed amendment, please get back to me on how you will proceed. My clients would like to see the mapping error corrected as soon as possible and before the planning commission hearing on July 26, 2016. Thank you for all your assistance.

Best,

Dorothy S. Cofield
Attorney at Law
1001 SW 5th Avenue
Suite 1100
Portland, Oregon 97204
COFIELD LAW OFFICE
T: 503.675.4320
C: 503.709.9859
www.cofieldlanduse.com

Your message is ready to be sent with the following file or link attachments:

CCF07062016_0001

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



Dorothy S. Cofield,
Attorney at Law

VIA ELECTRONIC MAIL

July 6, 2016

John Cole
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

**Re: Proposed Public Trail Alignment
Property at NW Saltzman Rd., Portland
State ID: 1N1W22AA 603**

Dear Mr. Cole,

I represent David Himmelberger and Louise Erricson, the owners of the above-referenced residential vacant lot (hereinafter "Owners.") The Owners received a letter from you on May 18, 2016 advising them that a future public recreational trail was proposed to be sited through their vacant lot, which is presently being developed through the City's environmental review and building permit process. *See Attached "A-2" Site Plan and EA 14-236148 APPT.*

Upon further investigation with Metro and the City of Portland Parks Department, the Owners were told that the trail does not go on the Owners property but is sited in the right-of-way of Saltzman Road. *See Attached Westside Trail Master Plan Map 15, Segment 5.*

In discussing the trail location with Robert Spurlock at Metro, he advised the Owners that the proposed trail does not go through the Owners' property which is confirmed in the final version of the Westside Trail Master Plan 2012, approved by Metro and the City of Portland. Mr. Spurlock sent the attached Resolution No. 14-4522 packet for the Owners to include in their written testimony to you.

I also spoke to Emily Roth of the Parks Department on June 28, 2016 who told me that the Parks Department is in favor of whatever trail location Metro has adopted. Ms. Cole felt that the trail location shown on the Owners' property was undoubtedly a mistake which can easily be cleared up in this Miscellaneous Zoning Amendment process by your office before the matter is heard by the Planning Commission on July 26, 2016.

Accordingly, please amend the Bureau's draft Major Public Trails Map to remove the public trail from the Owners' property and send me a draft of the corrected map (and any other

corresponding document) prior to the Planning Commission's July 26th public hearing for our review and comment.

The Owners are also proposing an amendment to Portland City Code (PCC) Title 33.430.080¹ that would allow a private, residential property in an environmental zone that is adjacent to a public trail to completely fence their property with a six-foot fence. Allowing a private property owner to permanently fence their property adjacent to a public trail is a necessary measure to keep the public out of undesignated trail areas and keep private property safe, secure and clean. Currently, PCC 33.430.080 only allows a temporary fence. PCC 430.22.080(D)(7).

Proposed PCC 430.22.080.(D)____ (Items Exempt from These Regulations)

“Installation of permanent fencing up to six feet tall around the perimeter of the private property when such property is adjacent to a public trail to protect private property from the public's entry;

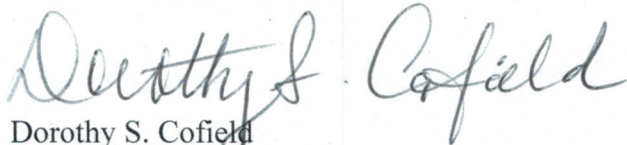
- (a) The added disturbance area does not exceed ____ square feet;
- (b) the total disturbance area on the site does not exceed standards in Table 430-1;
- (c) and the disturbance area is located at least 30 feet from the top of bank of a stream or drainage and at least 50 feet from the edge of a wetland.”

If you have any questions about this testimony, please contact my law office. Please place a copy of this written testimony and all exhibits into the record of this proceeding and put my law office on your notice list. I would appreciate your draft staff report to the Planning Commission via electronic mail seven days prior to the public hearing.

Thank you for your assistance.

Very Truly Yours,

COFIELD LAW OFFICE


Dorothy S. Cofield

DSC:dsc

CC: Robert Spurlock
Emily Roth
Clients

¹ If there are other regulations within the Zoning Code that regulate fences, those corresponding regulations should be identified and amended for consistency. PCC 33.430.030.

Dorothy Cofield

From: David Himmelberger <david_himmelberger@healthoutcomesgroup.com>
Sent: Tuesday, June 21, 2016 2:24 PM
To: 'Robert Spurlock'
Cc: Imerricson@yahoo.com; 'Dorothy Cofield'
Subject: Trail on NW Saltzman Road
Attachments: Map of proposed trail_Himmelberger-Erricson.pdf; 18May16_OR trail letter_Himmelberger-Erricson.jpg

Dear Robert,

Thank you for your returning my call and for clarifying the information about the proposed location of the trail continuing down NW Saltzman Road south of NW Skyline.

I am sending you two items that we discussed:

1. Letter we received from Portland Bureau of Planning and Sustainability concerning the proposed trail going through our property
2. Map showing the location of the proposed trail through our property (line in magenta)

As we discussed, you said that the location of the proposed trail that was approved by Metro and the City of Portland continues down NW Saltzman Road into the unincorporated part of Multnomah Country and does not pass through any part of our property. I would be very grateful if you can send me a message restating that this is indeed the case.

With kind regards,
David Himmelberger

tel: +1 650 691.9810
david_himmelberger@healthoutcomesgroup.com
www.healthoutcomesgroup.com



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

May 18, 2016

RE: Property at NW SALTZMAN RD, PORTLAND
State ID: 1N1W22AA 603

HIMMELBERGER, DAVID U & ERRICSON, LOUISE
525 MARIPOSA AVE
MOUNTAIN VIEW, CA 94041-1705

Dear Property Owner,

You are receiving this letter because your property described above is among those identified to include a segment of a proposed public trail alignment. This trail alignment will be reflected on the official zoning map applied to your property. Such identified trail alignments will be considered in future development proposals submitted on this property and in any future trail easement acquisition programs undertaken by the City.

This proposed Zoning Map amendment revising the Public Recreational Trail System alignments is part of the larger Miscellaneous Zoning Amendment package scheduled for a public hearing by the Planning and Sustainability Commission on July 26th. You will receive formal notice of the public hearing approximately 35 days in advance of this meeting including instructions how to submit public testimony.

Background information and a description of the proposed zoning map amendments pertaining to the public trail alignments are included as Section 5 of the *Miscellaneous Zoning Amendment Report*. Specific trail alignment locations are presented on the Bureau's *Major Public Trails Map (Interactive)*. Both the report and interactive map are available on the City of Portland Bureau of Planning and Sustainability's website at <https://www.portlandoregon.gov/bps/70647>.

Please contact me if you have any questions or comments regarding the proposed trail alignments.

Regards,

John Cole

John Cole | Senior Planner | Portland Bureau of Planning & Sustainability
1900 SW 4th Avenue | Suite 7100 | Portland, OR 97201 | 503.823.3475
John.cole@portlandoregon.gov



City of Portland, Oregon | Bureau of Planning and Sustainability | www.portlandoregon.gov/bps
1900 SW 4th Avenue, Suite 7100, Portland, OR 97201 | phone: 503-823-7700 | fax: 503-823-7800 | tty: 503-823-6868

Printed on 100% post-consumer waste recycled paper.

EXHIBIT 1
PAGE 2 OF 14

Ord. 188177, Vol. 2.3.A, page 9011

[Map](#) | [Proposal](#) | [Comments](#)

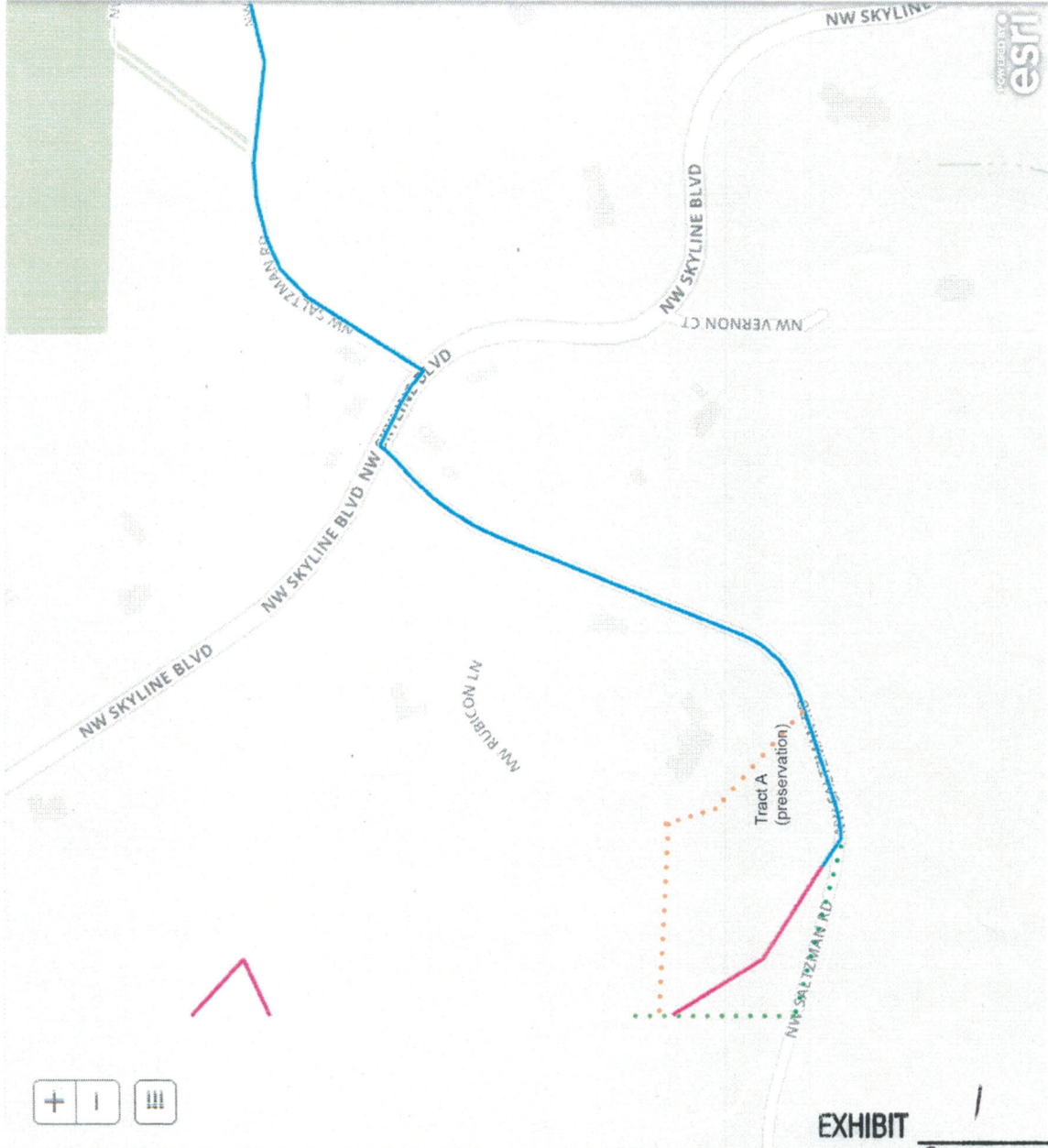
MAJOR PUBLIC TRAILS

The Major Public Trail designation and accompanying regulations in Zoning Code 33.272 are intended to increase recreational opportunities and access to the City's rivers, natural areas, and open spaces; support active modes of transportation; and connect the city's regional trail system. This draft proposal, a part of the Comprehensive Plan Update's Miscellaneous Zoning Amendments project, updates the public trail designation on the zoning map to correspond to the Major Public Trail alignments generally described in the 2035 Comprehensive Plan. The Discussion Draft report provides more information about the status and implementation of the Major Public Trail designations.

TIMELINE

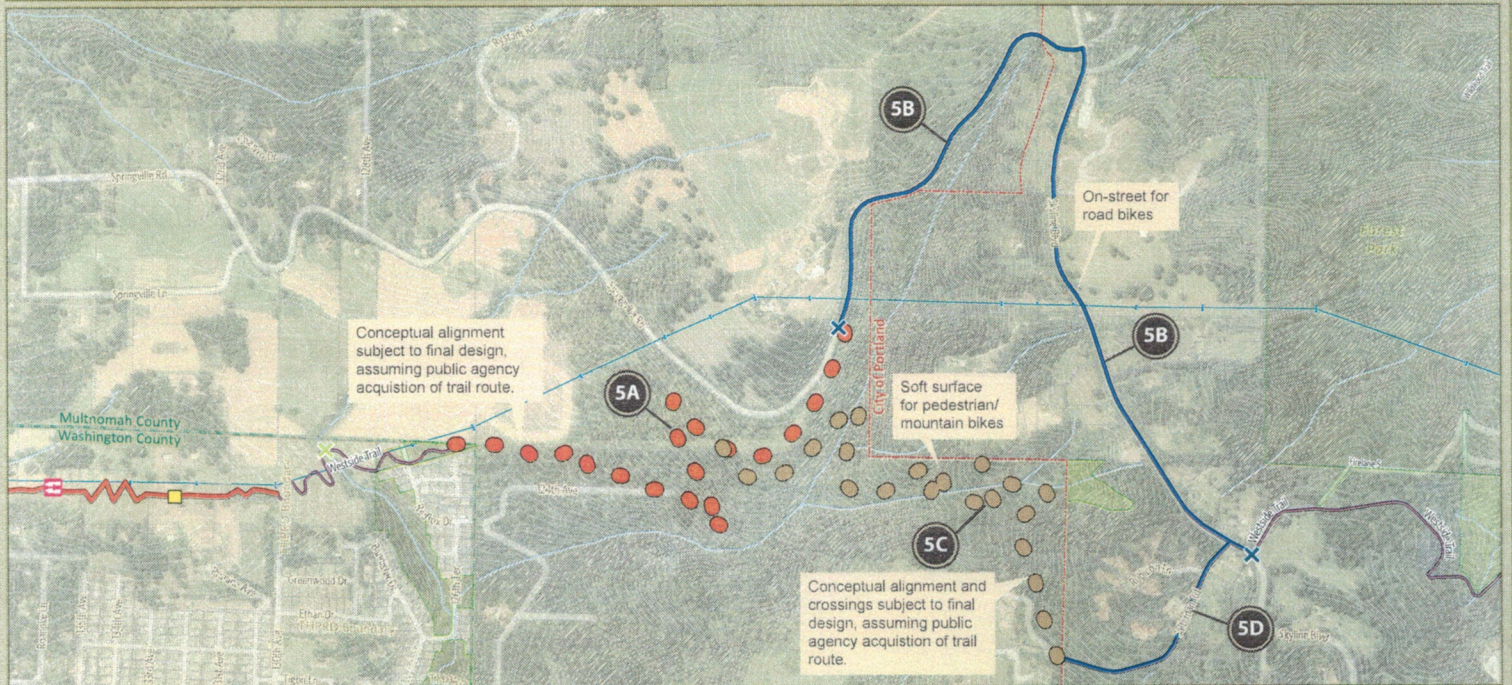


Comments on the Discussion Draft are open until May 20, 2016.



Westside Trail Master Plan

Map 15 Segment 5
Washington Co. line to Skyline Blvd



Westside Trail Recommended Alignment

- | | | | | |
|------------------------------------|-------------------------|--------------------------------|-------------------------|---------------------|
| Multi-user | Existing Westside Trail | Schools | Wetlands | Powerlines & Towers |
| Soft surface | Other Trails | Potential Viewpoints | Taxlots | Streams |
| On-street | Midblock Crossings | Potential Trailheads | Parks and natural areas | 10 foot contours |
| Bridge | Wetland Crossings | Potential Prairie Restorations | Publicly owned | City Boundaries |
| Recommended Access Connector Paths | Minor Stream Crossings | Subsegment number | Privately owned | County Boundaries |



All illustrated alignments subject to change based on final design, permitting, and engineering.

EXHIBIT 1
PAGE 4 OF 14

BEFORE THE METRO COUNCIL

FOR THE PURPOSE OF APPROVING THE) RESOLUTION NO. 14-4522
WESTSIDE TRAIL MASTER PLAN)
) INTRODUCED BY COUNCILOR
) KATHRYN HARRINGTON

WHEREAS, on July 23, 1992, the Metro Council adopted Resolution No. 92-1637, "For the Purpose of Considering Adoption of the Metropolitan Greenspaces Master Plan", which included the Regional Trails and Greenways Map (amended December 1992, July 2002 and October 2008); and

WHEREAS, the 1992 Metropolitan Greenspaces Master Plan and Regional Trails and Greenways Map identified the Powerline Trail (now known as the Westside Trail) as a regionally significant trail connecting the Willamette and Tualatin Rivers and the cities of Portland, Beaverton, Tigard, King City, and parts of Multnomah and Washington Counties; and

WHEREAS, over ten miles of the Westside Trail are already built in Tualatin Hills Park & Recreation District (THPRD) and the City of Portland; and

WHEREAS, on November 7, 2006, voters approved Metro's Natural Areas Bond Measure, authorizing Metro to issue \$227.4 million for bonds to purchase land in 27 regional target areas, including the Westside Trail target area; and

WHEREAS, pursuant to Metro's Natural Areas Bond Measure, Metro will only acquire interests in private property for the Westside Trail from willing sellers; and

WHEREAS, in 2007, Metro, in partnership with THPRD and the City of Tigard, applied for and was awarded a planning grant from Metro's Metropolitan Transportation Improvements Program to retain consultant services to conduct the Westside Trail master planning process; and

WHEREAS, the Westside Trail project advisory committee was created in 2012 and included staff and citizens from Multnomah and Washington counties, the cities of Portland, Tigard, and King City, THPRD, Bonneville Power Administration and Portland General Electric, to advise Metro and the consultant team throughout the master planning work; and

WHEREAS, Metro and its partners conducted extensive public outreach during the master planning work in order to identify a potential trail alignment and trail design that is widely supported by the trail partner jurisdictions and residents throughout the trail study area; and

WHEREAS, the Westside Trail master plan has been successfully completed and received approval from the project advisory committee; and

WHEREAS, the Metro Council's endorsement of the Master Plan via this Resolution does not establish a final trail alignment and is not intended to be a final land use decision that creates binding requirements on local governments, but rather provides a set of recommendations to guide Metro staff and other jurisdictions as they explore trail acquisition and continue design work on the Westside Trail; and

WHEREAS, the Westside Trail Master Plan will be considered for approval by Tigard City Council on May 13, 2014, and was approved by King City City Council, the THPRD Board of Directors, and the Boards of Commissioners of Multnomah and Washington counties in April and May 2014, and

those jurisdictions will subsequently decide whether to implement the trail through the adoption of final land use decisions that include a final Westside Trail alignment in their transportation system plans; now therefore

BE IT RESOLVED that the Metro Council hereby approves the Westside Trail Master Plan, appended hereto as Exhibit A.

ADOPTED by the Metro Council this 19 day of MAY, 2014.



Tom Hughes, Council President



Approved as to Form:



Alison R. Kean, Metro Attorney

STAFF REPORT

IN CONSIDERATION OF RESOLUTION NO. 14-4522, FOR THE PURPOSE OF APPROVING THE WESTSIDE TRAIL MASTER PLAN

Date: May 15, 2014

Prepared by: Robert Spurlock, 503-813-7560

BACKGROUND

The goal of the Westside Trail Master Plan is to recommend a comprehensive strategy for the completion of a 25-mile north-south trail from Forest Park to the Tualatin River. In many ways the west side's equivalent of Portland's popular Springwater Corridor, the Westside Trail has been anticipated since as early as 1992 as a major component of the regional trail system. Since that time, Tualatin Hills Park and Recreation District (THPRD) has built over six miles of the trail in Beaverton.

Project objectives include engaging project stakeholders, identifying a final trail alignment, and producing construction cost estimates necessary to extend the existing trail north to Portland and south to Tualatin. The master plan provides direction as local and regional partners embark on efforts to fund, design and build the trail.

The master planning process started in January 2012, and its \$334,000 budget comes from a Regional Flexible Funds grant from Metro, and matching funds provided by Tualatin Hills Park & Recreation District (THPRD) and the City of Tigard. A Stakeholder Advisory Committee made up of 14 members representing neighborhood groups and local agency staff met six times to review project deliverables and give feedback to staff.

The trail has garnered strong support from project partners including the cities of King City, Tualatin, Tigard, and Portland; Multnomah and Washington Counties; Bonneville Power Administration (BPA) and Portland General Electric (PGE); THPRD; and Metro. Public input and the participation of local community organizations has been a strong influence on refining and adapting the trail alignments and options illustrated in the master plan.

The project team engaged stakeholders and the public at 60 events over the course of 27 months. The project team directly engaged approximately 1,400 people at these events, and also distributed 18,000 postcards and received over 200 completed surveys. The extensive public involvement resulted in a master plan that is widely supported by the partner jurisdictions and residents of the region. The Draft Westside Trail Master Plan was available for public comment from February 6 to February 28, 2014. Comments are summarized in the public engagement summary available on the Metro website.

The region's voters passed the Natural Areas Bond Measure in 2006, which identified acquisition priorities in the Westside Trail target area for the purposes of assembling a continuous trail corridor. Metro staff and project partners met with landowners where trail easements are needed to explain Metro's willing-seller program for trail acquisition and to gauge landowner interest in the project. Negotiations with landowners will continue on an as-needed, case by case basis.

In July 2011, Metro entered into an Intergovernmental Agreement (IGA) with the Oregon Department of Transportation (ODOT), whereby Metro managed a contract with a professional planning and engineering firm to conduct the master planning process and prepare the trail master plan. The Westside Trail Master Plan has been successfully completed and meets the intent of the IGA between ODOT and Metro.

The master plan recommends that partner jurisdictions (the three cities and two counties) amend their respective transportation system plans and that Metro amend its 2035 Regional Transportation Plan to include the master plan's recommended trail alignment in those documents. Adopting the trail alignment

in these and other land use and transportation plans will allow it to be eligible for local, regional, state and federal funding sources.

ANALYSIS/INFORMATION

1. Known Opposition

During the project advisory committee meetings, public open houses, stakeholder meetings and landowner interviews, concerns and issues were raised related to the trail's location and design, and adjustments in the alignment were made as appropriate. An extensive, thorough and transparent analysis was conducted to address these issues as they came up during the master planning process.

Following this initial process, at the request of the Forest Park Neighborhood Association (FPNA), staff committed project contingency funds and additional time to further analyze wildlife and stormwater impacts on the segment of the trail that links Bethany with Forest Park. Analysis findings show that the proposed alignment would have less impact than alternate routes.

Notice of the public review draft was widely distributed through e-mail, social media, and print advertising. Fifty public comments were received, mostly favorable about the project, with the exception of several comments from the FPNA voicing opposition. With the exception of the FPNA's representative, the project advisory committee unanimously endorses the resulting master plan.

King City, and Multnomah and Washington Counties passed resolutions in support of the plan in April. THPRD and Tigard will be voting on resolutions in early May. Portland submitted a letter supporting the plan.

2. Legal Antecedents

Metro Council Resolution No. 07-3835 approving the Westside Trail Target Area Refinement Plan and confidential tax lot specific map, adopted on September 6, 2007.

Intergovernmental Agreement (#27275) between the Oregon Department of Transportation and Metro, dated July 20, 2011, for administration of the federal grant to prepare the Westside Trail Master Plan.

3. Anticipated Effects

Located on the west side of the metropolitan Portland region, the Westside Trail will provide a regional active transportation link for pedestrians and bicyclists between the Tualatin and Willamette Rivers. Spanning approximately 25 miles, this trail will connect dozens of neighborhoods, businesses, schools and parks as it passes through King City, Tigard, Beaverton and Portland, as well as THPRD and unincorporated portions of Washington and Multnomah Counties.

The trail will provide a convenient, comfortable, and safe atmosphere for trail users of all types, ages, and abilities. Users will be able to recreate and commute using the trail, which has the potential to become an important corridor for wildlife habitat and movement. By primarily following the power transmission corridor owned or controlled by BPA and PGE, the trail will extend through highly urbanized areas with relative ease and few land acquisition costs.

The availability of the power corridor for trail development opens up the opportunity to establish a 25-mile-long trail, through highly developed urban lands, serving recreational and commuter bicyclists, pedestrians and, in some areas, equestrians. The trail will connect neighborhoods to major westside commercial and employment areas and to schools and open spaces. The major parks and natural areas connected by the Westside Trail will include the Tualatin River National Wildlife Refuge, Tualatin River Greenway, Tualatin Hills Nature Park, Terpenning Recreation Center, Bronson and Rock Creek Greenways, Forest Park, and the Willamette River Greenway, as well as numerous local parks.

The master plan proposes distinctive practices and standards for establishing the Westside Trail as a corridor for people and nature. Approaches to restoring and conserving habitats along the trail and within power corridors, as well as approaches to wildlife-friendly siting and design of trail pathways, crossings, bridges, and boardwalks, are an integral part of the master plan.

4. Budget Impacts

The Westside Trail is divided into 29 segments running south to north (see Map 1 of the master plan). 10.5 miles of the trail is built, leaving about 13.5 miles to build, including bridges and overcrossings where needed. The total cost to design and build the undeveloped sections of the trail is estimated at \$36.6 million. This represents a planning level cost estimate in 2014 dollars, and is intended to provide an order of magnitude opinion to inform future funding requests for trail development.

THPRD received a \$2.4 million grant from Metro's Regional Flexible Funds program to design and build a mile of the trail from Hansen Ridge Park to Kaiser Woods Park, with expected completion in 2015. Other jurisdictions will build remaining sections as funding becomes available.

Acquisition opportunities identified in proposed amendments to the Tonquin Geologic Area target area refinement plan would be funded primarily with funds from the 2006 Natural Area Bond Measure and grants that have been secured from other agencies.

RECOMMENDED ACTION

Chief Operating Officer Martha Bennett, with the concurrence of Metro Council President Tom Hughes, recommends approval of Resolution No. 14-4522.



PORTLAND PARKS & RECREATION

Healthy Parks, Healthy Portland

April 21, 2014

Council President Hughes and Metro Councilors
600 NE Grand Avenue
Portland, OR 97232

Dear Council President Hughes and Metro Councilors,

On behalf of Portland Parks & Recreation (PP&R), I would like to express my support for the Westside Trail Master Plan. The plan will do an excellent job guiding the Westside Trail's north and south expansion from Beaverton to Portland and Tualatin.

I am pleased that the trail alignments are consistent with Portland's existing plans and policies, including the Recreational Trails Strategy, the 2030 Bicycle Master Plan, and the Forest Park Natural Resource Management Plan. We look forward to working with Metro and the adjacent community to ensure that impacts to wildlife are minimized, and that the trail design does not adversely impact wildlife corridor connectivity in and adjacent to Forest Park. We recommend that Metro establish a baseline understanding of the wildlife utilization and movement in the area prior to any trail development in segments 5A and 5C, identify good points along the route for wildlife crossings, use wildlife-friendly culverts, minimize stream crossings, and avoid lighting on the trail.

Planners and natural resource specialists from PP&R were part of the planning team and have fully participated throughout the process. Their participation in public open houses, site visits with neighbors and stakeholder interviews shows the continued coordination between Metro and PP&R on moving the region forward for active transportation, wildlife connectivity and recreation. PP&R comments on draft materials are reflected in the final plan for the alignment within the City of Portland.

My understanding is that this project included extensive public engagement, and that Portland residents are excited about the alignment and the opportunities for their communities and schools. Metro has done a good job listening to local residents to understand their concerns, which have been clearly outlined in letters. I encourage Metro to continue to work closely with partnering organizations, interested individuals, and adjacent property owners through design and construction to resolve issues and questions that have arisen with the proposed trail's development.

Administration

1120 S.W. 5th Ave., Suite 1302
Portland, OR 97204
Tel: (503) 823-7529 Fax: (503) 823-6007

Sustaining a healthy park and recreation system to make Portland a great place to live, work and play.



www.PortlandParks.org
Amanda Fritz, Commissioner
Mike Abbaté, Director

EXHIBIT 1
PAGE 10 OF 14

PP&R is committed to supporting Metro and other partners as they implement the Westside Trail Master Plan. We look forward to working with you to seek funding for the alignment within the City of Portland.

Sincerely,



Mike Abbate, Director

Cc: Kia Selley, Portland Parks & Recreation
Brett Horner, Portland Parks & Recreation
Emily Roth, Portland Parks & Recreation
Jim Desmond, Metro
Mark Davison, Metro
Robert Spurlock, Metro

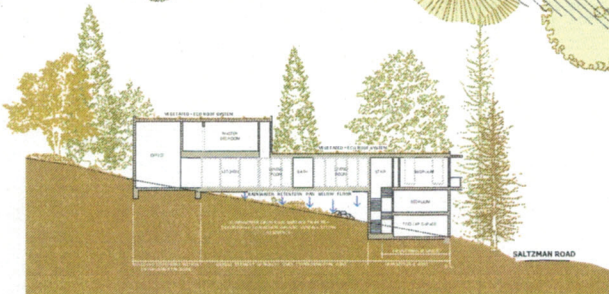
EXHIBIT 1
PAGE 11 OF 14

PROJECT DESCRIPTION

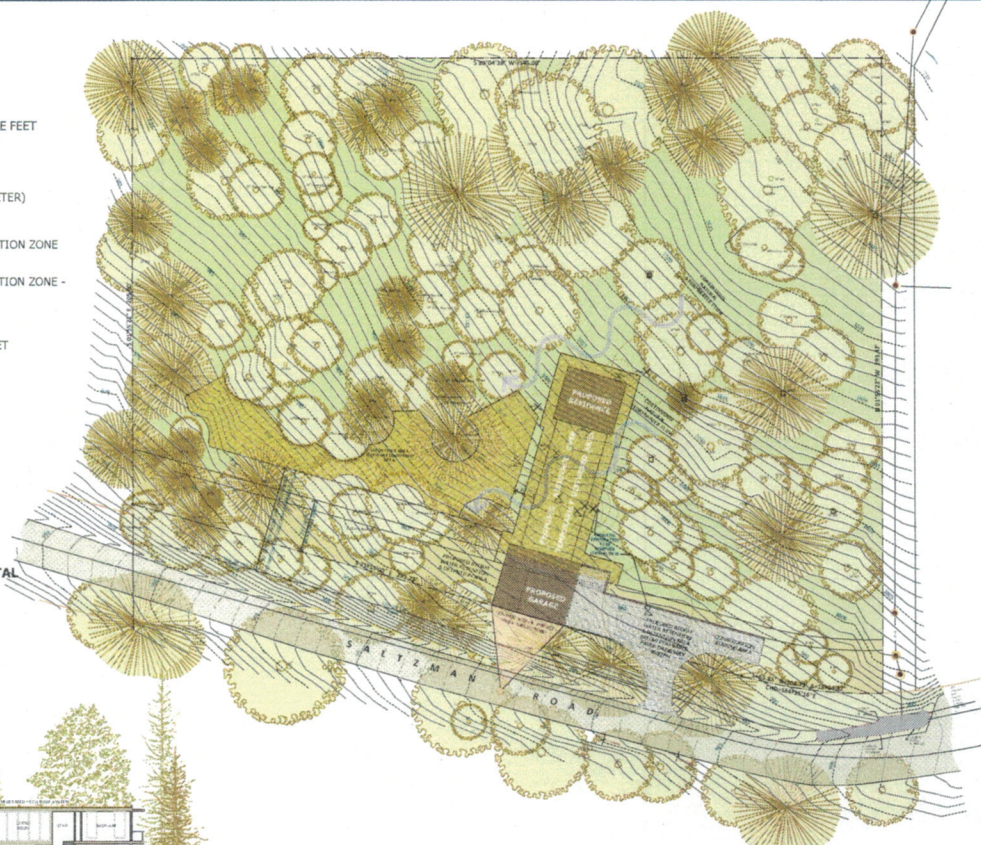
ZONING DESIGNATION - RFC
 PROPOSED USE - SINGLE FAMILY DWELLING
 PROPERTY AREA - 2.01 ACRES 87,599 SQUARE FEET
 SITE AREA WITHIN ENVIRONMENTAL ZONE - 78,668 SQUARE FEET
 SITE AREA WITHIN TRANSITION ZONE - 8,931 SQUARE FEET
 PROPOSED TREES TO BE REMOVED - 12 (211" DIAMETER)
 ALLOWABLE TREE DIAMETER TO BE REMOVED - (225" DIAMETER)
 PROPOSED DISTURBANCE AREA
 PERMANENT DISTURBED AREA W/I THE ENVIRONMENTAL PROTECTION ZONE
 875 SQUARE FEET BUILDING FOOTPRINT (1% COVERAGE)
 TEMPORARY DISTURBED AREA W/I THE ENVIRONMENTAL PROTECTION ZONE -
 3,658 SQUARE FEET MINUS 875
 2,783 SQUARE FEET OPEN SPACE
 AREA OF SANITARY DISPOSAL SYSTEM - 3,970 SQUARE FEET
 TOTAL DISTURBANCE AREAS - 8.7% (7,628 SQ.FT.)

LEGEND

- TEMP. DISTURBED AREA
- ENVIRONMENTAL PROTECTION ZONE
- DISTURBED AREA UNDER OVERHANG
- PERMANENT DISTURBED AREA
- RIGHT OF WAY AREA
- TRANSITION AREA W/I ENVIRONMENTAL PROTECTION ZONE
- TREE TO BE REMOVED
- TREE TO REMAIN



CROSS - SECTION



SITE PLAN



ARCHITECTURAL PLANNING DIVISION
 455 HIGHLAND AVENUE, SUITE 100
 OAKLAND, CALIFORNIA 94612
 (415) 764-1000
 WWW.METRODESIGNGROUP.COM

PROJECT NAME
HIMMELBERGER & ERRICSON RESIDENCE
 LOT 3 TL 803
 PARTITION PLAT 2000-40
 APR 8-628555

REVISIONS

SITE PLAN CROSS-SECTION

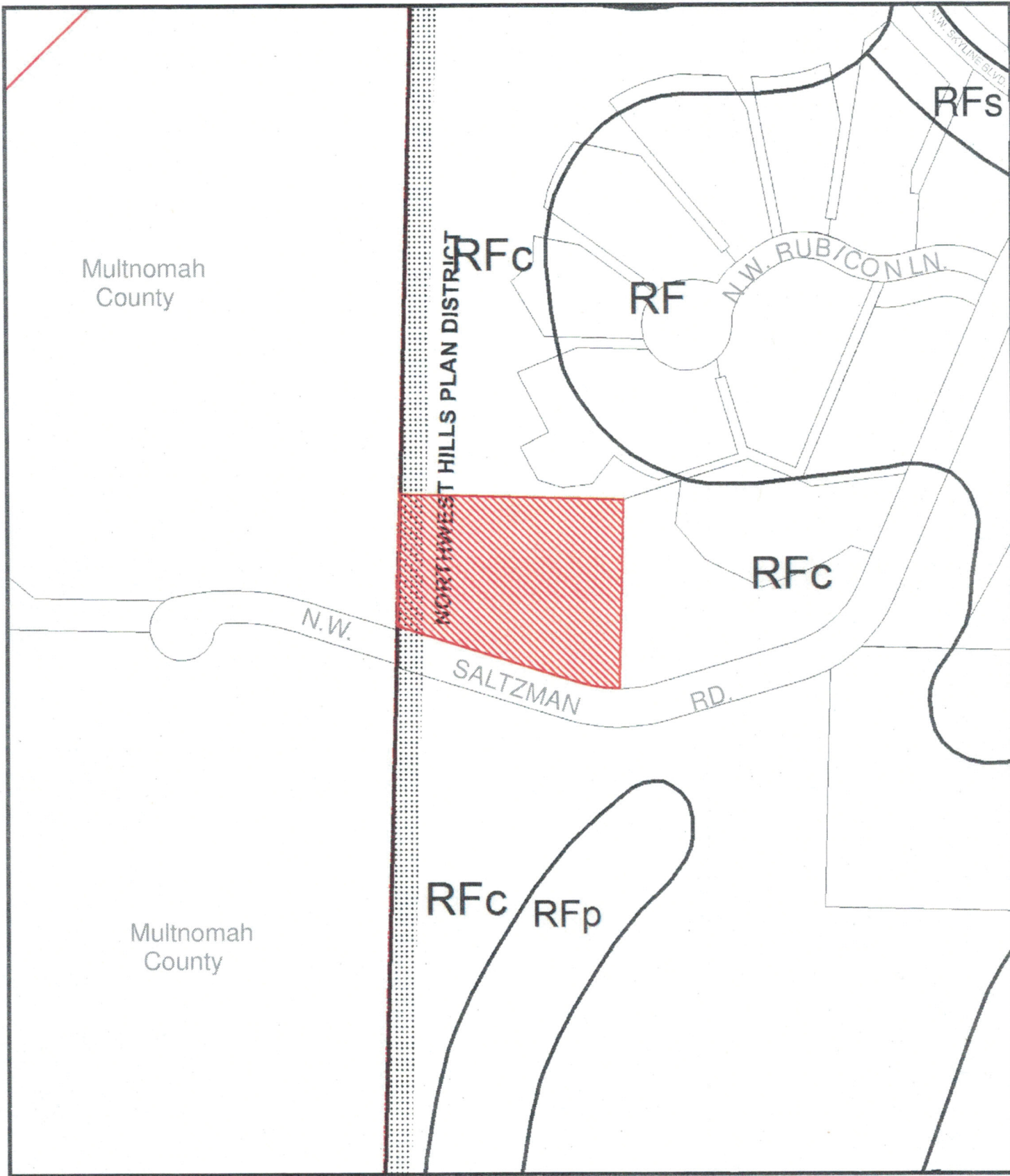
DATE : 06-15-16
 SCALE : 1/16" = 1'-0"
 DRAWN BY : TS
 CHECKED BY : TS
 ARCHITECT : TOM SLOAN
 PROJECT NO : 16626

SHEET NUMBER
A-2

EXHIBIT 1
 PAGE 12 OF 14



EXHIBIT 1
PAGE 13 OF 14



ZONING  Site



EXHIBIT 1
PAGE 14 OF 14

File No. EA 14-236148 APPT
1/4 Section 2518
Scale 1 inch = 200 feet
State_Id 1N1W22AA 603
Exhibit B (Nov 12, 2014)

NOTICE OF A PROPOSED ZONING MAP CHANGE THAT MAY AFFECT THE PERMISSIBLE USES OF YOUR PROPERTY AND OTHER PROPERTIES

What does this mean for me?

You received this notice because a segment of a Major Public Trail alignment is proposed on your property. This may affect the permissible uses of your property. This may affect the value of your property.

One of the properties that may be affected is your property at: NW SALTZMAN RD
State ID #: 1N1W22AA 603

New Major Public Trails will be reflected on the City's official Zoning Map. No actual trail acquisition or construction is proposed at this time. Proposed Major Public Trail regulations will apply to private and publicly owned properties that have the Major Public Trail symbol shown on the Zoning Map.

If you choose to develop your property in the future, your individual trail segment will be considered in the review process. When a proposed development will increase the use of the trail system or contribute to the need for additional trail facilities regulations may apply. Individual segments may be considered as part of any future easement acquisition programs undertaken by the City.

Why are these changes proposed?

State law requires periodic Comprehensive Plan updates. The City is updating Portland's Comprehensive Plan as part of the state's periodic review. The 2035 Comprehensive Plan is a 20-year plan to shape the growth and development of the city. It is scheduled for adoption this summer.

The proposed Major Public Trail Alignment is one of several updates to the City's Zoning Code and Zoning Map. These updates implement the 2035 Comprehensive Plan.

How can I learn more about this proposal?

1. **Visit the project webpage** at www.portlandoregon.gov/bps. Proposed changes to the Major Public Trails Alignment are part of the Miscellaneous Zoning Amendments Project viewable at www.portlandoregon.gov/bps/70647. See Section 5 of the Proposed Draft report for a discussion of Major Public Trails.
2. **View the interactive Map App** at www.portlandmaps.com/bps/mapapp on any computer, tablet or smart phone and click on **Major Public Trails**. All Multnomah County libraries have public access computers. Type the property address to see proposed Major Public Trail Alignment that may affect your property.
3. **Ask City staff a question.** We are happy to help. Call 503-823-0195 or email us at pdxcompplan@portlandoregon.gov.

The Bureau of Planning and Sustainability is committed to providing equal access to information and hearings. If you need special accommodation, translation or interpretation please call 503-823-7700, the City's TTY at 503-823-6868, or the Oregon Relay Service at 711.

How can I provide feedback to decision-makers?

You may testify about proposed changes to the Planning and Sustainability Commission (PSC) in the following ways:

Testify in person at the PSC public hearing

You may speak for two minutes to the Commission, and your testimony will be added to the public record.

Tuesday, July 26, 2016 at 4:00 p.m.*
Portland Building, Room C
1120 SW 5th Avenue, Portland, OR

*To confirm the date and time, check the PSC calendar at www.portlandoregon.gov/bps/35452

If you need special accommodation, translation or interpretation, please call 503-823-7700 by July 19, 2016.

Testify in writing between now and July 26, 2016

You must provide your full name and mailing address.

- **Email:** psc@portlandoregon.gov with subject line "Miscellaneous Zoning Amendments Testimony"
- **U.S. Mail:** Portland Planning and Sustainability Commission, Miscellaneous Zoning Amendments Testimony, 1900 SW 4th Ave., Suite 7100, Portland OR 97201
- **Map App:** www.portlandmaps.com/bps/mapapp, click on Major Public Trails, and use the comments tab to provide your testimony

All testimony to the Planning and Sustainability Commission (PSC) is considered public record, and testifiers' name, address and any other information included in the testimony will be posted on the website.



May 5, 2016

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

Re: Residential and Open Space Zoning

Dear Planning Commissioners:

The Maplewood Neighborhood Association (MaNA) met on May 3, 2016, to discuss the zoning changes proposed as part of the Comprehensive Plan 2016. There are two zoning changes that are the subject of this letter. One is the proposed zoning change for property located at 6825 SW 45th Avenue from R7 to R1 as designated in the Residential Zoning Map. The other is Amendment #25 that proposes to change the zoning from R7 to R1 on property located at 4545 SW California.

The meeting was attended by XX neighbors who are all voting members as well as the developer/owner of 6925 SW 45th and some of his consultants. After an hour of discussion, the members of the MaNA voted 10 to 7 to oppose the proposed zoning changes on both of these properties. There were many reasons for this opposition. The biggest concern was the increase in traffic that would result from a multi-unit structure to be built. There was also concern about having adequate parking for all the residents and their guests. Parking is already a problem at the Southwest Community Center, located across the street, and thus there would be no other area for overflow parking for the apartments. Other issues included: removal of trees and other environmental impacts, safety of pedestrians crossing 45th, the lack of adequate infrastructure to accommodate so many additional cars and residents, and the allowable height that would be out of scale with the rest of the neighborhood. Additional comments from residents included a sense that large multi-family apartments don't fit the character of the neighborhood and that moving from R7 to R1 would be a big change. We should note that Maplewood is almost entirely zoned R7 or R10 except for two small Commercial zones and one property zoned R2.

Conversely, there were a number of neighbors that were more supportive of the zoning changes. Some of them felt that a multi-family dwelling was preferable to more McMansions. In addition, they thought that these two sites were the best locations for multi-family units in the neighborhood because of the commercial zoning to the north and northeast, the availability of a bus line and existing apartments in the vicinity.

Respectfully,

Maplewood Neighborhood Association

Cc: Joan Fredericksen

Commented [B1]: Not sure that this should be in the letter. Let me know what you think.

NNEBA

N/NE Business Association



The Soul of Portland

Headquarters Address: 311 N Ivy Street
Portland, Oregon 97227

Phone: 503-841-5032

Website: www.NNEBAportland.org

Mailing Address:

PO Box 11565

Portland, Oregon 97211

July 5, 2016

Dear Planning and Sustainability Commission:

We are writing to you with regards to your upcoming meeting to review recommended changes for the citywide zoning map.

In particular we would like to advocate on behalf of supporting the changing of the zoning from R1 to CM2 for the property located at 311 North Ivy/Freemont (97212). This support would match the support of what City Council has already approved.

Alem Gebrehiwot, has been a long standing property owner and community developer/supporter in the North/Northeast Business Association district for several decades. He continues to work with the business and residential neighbors to bring progress and improvement with equity and diverse lenses.

We support this zone change with confidence that it will also work to meet one of the City's current strategies of assisting in the "creation of wealth for disadvantage and minority communities." Alem has demonstrated time and again his willingness to work with others in an inclusive matter, ie donating land to Parks and Rec for use as the Boisie Elliott community Garden along with many other contributions.

Thank you for considering our request of this support. We appreciate your commitment to our City's development and thank you for your service.

Sincerely,

Kenneth Doswell

Kenneth Doswell, NNEBA Chair

Hartinger, Kathryn

From: Judith Huck <judith.huck@comcast.net>
Sent: Sunday, July 03, 2016 11:55 AM
To: Planning and Sustainability Commission
Subject: PSC MISC Zoning Update Testimony

To Portland Planning and Sustainability Commission,

Our family has lived in the Eastridge Park neighborhood for 22 years and in Portland for 56 years.

We have great concern regarding the proposed trail being created through the middle of our neighborhood. While we are hikers and love to explore new areas none of the hiking trails we've been on run through neighborhoods. Having trails that lead to our neighborhood could lead to more crime than we already have. Crime in our neighborhood has increased considerably in the last 5 years.

Our neighborhood offers no public amenities for hikers, the same as most residential neighborhoods in Portland or Gresham.

There is an alternative route around the north end of our neighborhood leads to the same end, Eastridge Park park, as the trail that's proposed to go through our neighborhood. So the trail through our neighborhood is not necessary for hikers to enjoy access to Eastridge Park from the Springwater Trail.

We request that trail segment #'s 2252, 2888, 2889, 2890 and 2891 through our neighborhood be removed from consideration.

Respectfully,

Judith and Joe Huck
7636 SE 140th Drive
Portland, OR 97236

Judith: 503-936-6661
Joe: 503-953-3073

Weston Investment Co. LLC

A Real Estate Holding Company

Administrative Office

2154 N.E. Broadway, Suite 200 * Portland, Oregon 97232-1590
Mailing Address: P.O. Box 12127 * Portland, Oregon 97212-0127
Phone 503-284-9005 Fax 503-284-5458
E-Mail: joe@westoninv.com

RECEIVED
PLANNING & SUSTAINABILITY

2016 JUN 17 A 8:47

June 14, 2016

Mr. John Cole, Senior Planner
City of Portland
Bureau of Planning & Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

Dear Mr. Cole,

Thank you for the maps on the proposed Sullivan's Gulch trail alignment.

Weston Investment Co. LLC acquired the former Furniture Factory from the Federal Bankruptcy Court in 1979.

The Furniture Factory, originally known as Doernbecher, was the largest employer in the State of Oregon in the 1920's.

All of their goods, both raw materials and finished case goods furniture were moved by rail box cars. On the property there were rail spur lines to facilitate the placement of box cars.

In the 1950's when trucking became the dominate method of transportation, they cut off the east end of the administration office building and put in level dock platforms, which allowed for truck loading. At this time the spur lines were asphalted over.

The railroad right of way is 100 feet in width, measuring 50 feet from the center line of the tract, 50 feet to the south, and 50 feet to the north.

The advocates for the trail system is fully aware of this fact and they have repeatedly come to me and said all you have to do is cut 10 feet off of the south front of the buildings and this will give us a bike path outside of the railroad ownership of land.

I think they now believe me when I have told them it is easier to deal with the Pope of Rome than the railroad.

Weston Investment Co. LLC, at their expense, provided the rail crossing gate and the maintenance of that gate equipment. If you look at the mechanical boxes it will state Weston Investment crossing.

The City of Portland owns the street from NE 28th Avenue to the railroad right of way.

There is no way a bike trail is going to be practical along the stretch of the Gulch from NE 33rd to the Lloyd Center. The trail should come out of the Gulch at 37th and follow a surface street to the bridge head.

I request that on your mapping of the property you do not show a proposed bike trail on the railroad property or our property. As in so doing you are encumbering our properties with a restriction that may, at a future date, limit any building modification we may want to do.

As you may be aware of, I have been involved in development construction for our own account for a term in the excess of 50 years, and during this time I have gone through two major comprehensive plans. The one that is being developed now is by far the most difficult and complex.

In working with staff, for the most part we have agreed on the basic base zoning designations on property help for future development, but now we are being inundated with the overlay zoning restriction then cover buffer, scenic, parking, height, FAR, inclusionary zoning, retail placement, design review and many more.

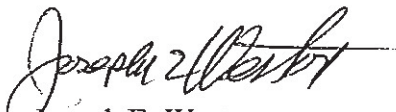
Many of the chief planners are not in agreement as to the effect of the new comp plan and overlay assigned. They reply, that is not in my jurisdiction, I think, I believe, we haven't made a decision, that will be reviewed at a later date, etc., etc.

I strongly recommend you do not "push" this comprehensive plan through until everyone is in agreement as to the effectivity of what the plan is going to accomplish.

In closing, my main request is to get the overlay bicycle path off of the map on parcel 1100-1130 NE 28th Avenue, Portland, State ID INIE36B-200.

Your written assurance of my request is requested.

Yours truly,
Weston Investment Co. LLC



Joseph E. Weston

JW/ts

CC: Keith Vernon, Senior Vice President, Weston Investment Co. LLC
Mayor Charlie Hales, City of Portland, 1221 SW 4th Avenue, Room 340, Portland, Oregon 97204
Commissioner Dan Saltzman, City of Portland, 1221 SW 4th Avenue, Room 230, Portland, Oregon 97204
Commissioner Amanda Fritz, City of Portland, 1221 SW 4th Avenue, Room 220, Portland, Oregon 97204
Commissioner Nick Fish, City of Portland, 1221 SW 4th Avenue, Room 240, Portland, Oregon 97204
Commissioner Steve Novick, City of Portland, 1221 SW 4th Avenue, Room 210, Portland, Oregon 97204
Barry Manning, Senior Planner
City of Portland
Bureau of Planning & Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, Oregon 97201

May 29, 2016

Portland Mayor Charlie Hales
 Commissioner Steve Novick
 Commissioner Amanda Fritz
 Metro Commissioner Bob Stacey
 Metro Commissioner Shirley Craddick
 Metro Commissioner Sam Chase

Re: Rose Quarter to Gorge Trail (RQGT) Funding Plan

I'll be brief and to the point. I believe we understand how Sullivan's Gulch Trail (now RQGT) can be a real asset for commuters, recreationalists, tourists and bike-oriented development dwellers if we build it between the Rose Quarter and Multnomah Falls. The Comprehensive Plan is now including the SGT on the official land-use map, which is a good start and requires developers to recognize it in their plans along the SGT corridor.

Metro, Portland Parks and PBOT need to decide if they wish to see the Trail developed by prioritizing funding. To make it easier for you to decide, RQGT Advocates propose the following funding plan:

Basically, the needed financial plan will be proactive by proposing a public/private partnership:

1. Preliminary Engineering/Negotiating Right of Way: \$2.5 million of \$5 million first phase from the Willamette River to Gateway Green. \$1.25 million will be raised by Rose Quarter to Gorge Trail Advocates.* The \$1.25 City of Portland match can be funded by Convention Center Urban Renewal District Funds.
2. Final Engineering/Negotiating Right of Way: \$2.5 million second phase from the Hollywood Transit Station to Gateway Green. \$1.25 million will be raised by Rose Quarter to Gorge Trail Advocates. The \$1.25 million match can be funded by the City of Portland, Metro and/or State of Oregon.
3. Construction: \$36 million derived from new urban renewal district funds.**

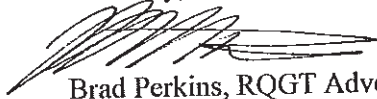
*Possible private funding sources: Nike, Addidas, Under Armor, Providence, Legacy, etc.

**Create a new urban renewal district from NE 16th to 181st Avenues along I-84 and use the tax increment financing for trail construction costs. Call it a "string of pearls," with the pearls being the bridgeheads across I-84, where bike-oriented development is planned or will be developed adjacent to I-84.

Over a dozen neighborhoods adjacent to the RQGT have registered their overwhelming support. I and five others wish to meet with you regarding our commitment to work with your public jurisdiction to make it happen. We are open to your suggestions for a better financial plan.

We look forward to a healthier and more robust communication with you in advancing the Rose Quarter to Gorge Trail. (See Trails:cascadiahighspeedrail.com)

Sincerely,



Brad Perkins, RQGT Advocates
 503-317-6455

cc: Ted Grund, Garlynn Woodsong, Daniel Pirofsky, Jim Parker, DJ Heffernan, Art Pearce, Lake McTigue, Jillian Detweiler.



101 SW Main Street, Suite 1100
Portland, Oregon 97204
balljanik.com
t 503.228.2525
f 503.295.1058

RECEIVED
PLANNING & SUSTAINABILITY

2016 MAY 32 A 7 30

Stephen T. Janik
sjanik@balljanik.com

May 25, 2016

Mr. John Cole
Bureau of Planning and Sustainability
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Rich's / Angel LLC

Dear Mr. Cole:

We represent Rich's/Angel LLC (the "Client"). This is in response to your letter of May 18, 2016 to our Client. In that letter you state that the proposal is to imprint on a portion of our client's property a "segment of a proposal trail alignment."

On behalf of our Client, we object to this proposal. Our Client's property is at the intersection of MLK Blvd. and NE Lloyd Blvd. First, as the attachments show, our Client's property is all of Block 111. However, only Lots 400 and 500 of Block 111 are at the grade of MLK Blvd. and Lloyd Blvd. The balance of Block 111 slopes dramatically downward to the south to the bottom of Sullivan's Gulch, the railroad tracks and the I-84 freeway. It is not feasible or prudent to put a public trail along the side of this dramatic slope. We do not understand your proposal unless you are actually proposing a public trail along very active railroad tracks.

Second, by imprinting this unfeasible trail on private property, our Client will have to deal with this in any future land use proceedings on the development of the developable portion of our Client's property, as you have made clear in your letter. That is an unfair and unnecessary regulatory imposition on our Client, for a public trail that is ill-conceived.

Third, our Client is not willing to give the City a trail easement on its property. The City will have to condemn such an easement. If and when the City condemns such an easement, you can then impose a trail designation on our client's property, if you so choose.

1063182\v1



Mr. John Cole
May 25, 2016
Page 2

If you would like to discuss this, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Stephen T. Janik".

Stephen T. Janik

STJ:pgm
Enclosure
cc: Mr. Joseph W. Angel

MOUNT-TABOR
NEIGHBORHOOD ASSOCIATION

May 20, 2016

Portland Bureau of Planning & Sustainability
1900 SW 4th Avenue, #7100
Portland, OR 97201

Attn: John Cole, Project Manager
Miscellaneous Zoning Amendments Project

We are writing in support of proposed Miscellaneous Zoning Amendment Number 1 to the zoning code and zoning map, allowing plant nurseries in residential zones as conditional use, and to support the proposed changes to the zoning code — 33.110.100 and 33.120.100 — that would accomplish that goal.

One business that would benefit from this change is Portland Nursery at 5050 SE Stark Street, a thriving family-owned business that is wholly within the boundaries of the Mount Tabor Neighborhood. We understand that the 1991 code revision that changed nurseries from conditional use to nonconforming use has limited Portland Nursery's ability to grow and adapt, and we applaud the City's effort, with this amendment, to provide existing retail nurseries with more flexibility to expand their operations in a way that is appropriate to the surrounding residential area, and to make it easier for existing businesses like Portland Nursery to stay and grow on their current sites.

At the May 18, 2016, meeting of the Mount Tabor Neighborhood Association, the board voted unanimously to support this amendment, and we respectfully request that the Bureau and the City approve it.

Thank you,

Stephanie Stewart
John Laursen
For the Mount Tabor Neighborhood Association



900 S.W. Fifth Avenue, Suite 2600
Portland, Oregon 97204
main 503.224.3380
fax 503.220.2480
www.stoel.com

May 9, 2016

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

VIA EMAIL AND REGULAR MAIL

John Cole, Project Manager
Miscellaneous Zoning Project
City of Portland, Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: Amendments to Guiles Lake Industrial Sanctuary Plan District

Dear John:

As you may know, this office represents the Bill Naito Company. The Bill Naito Company owns Montgomery Park and adjacent properties located general to the east of Montgomery Park. Those properties include a 3-story 140,000 square foot former manufacturing facility that is used presently in conjunction with Montgomery Park as a parking garage, a 3-story 18,000 square foot office building which is used as an office for NBC Grimm and a 6,000 sq. ft. storage building, leased by NBC Grimm (the "Subject Sites"). All of the properties have historical listings on the National and State Registers of Historic Places.

During the first part of this year, the Bill Naito Company actively participated in seeking to retain EX zoning on the Montgomery Park site. Attached as Exhibit "A" you will see the location of the EX portion of the overall site. Concurrent with the retention of EX zoning, properties to the east of the EX designated site are set to be rezoned to EG from the existing IH designation. See Exhibit A. The new designation is consistent with the existing uses at the Subject Sites.

Under the City's now proposed Miscellaneous Zone Amendment to the Guild's Lake Industrial Sanctuary Plan, an FAR cap is proposed to be imposed on the Subject Sites. The Bill Naito Company does not support the proposed FAR caps for the following reasons:

1. The existing development at the Subject Sites have FARs in excess of 1:1 and thus, imposing a restriction of 1:1 FAR on the properties sends the properties into nonconforming status. Nonconforming status would mean that the properties would not have the ability to fully develop in the existing buildings.



John Cole, Project Manager
Miscellaneous Zoning Project
City of Portland, Bureau of Planning and Sustainability
May 9, 2016
Page 2

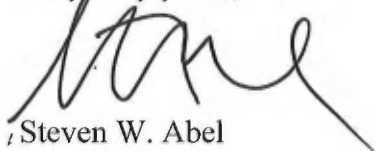
2. Options to tear down the buildings in order to achieve a 1:1 FAR with new development are restricted by the fact that the properties are designated on the historical register. It is unlikely that the buildings will be demolished at any time in the near future. The zoning code should recognize the existing historically designated buildings and maximize their utilization.
3. The dividing line between the EX and EG bifurcates the Subject Sites and creates a dual-zoned parcel. It is inappropriate to have the City's zoning line bifurcate an existing legal lot of record.

The Proposal

The Bill Naito Company proposes that the proposed amendment the Industrial Sanctuary Plan not be amended in such a way that it imposes the FAR cap on the subject sites. That can be accomplished by excluding the Subject Sites from the Industrial Sanctuary Subdistrict B restriction.

Of course, I'd be happy to discuss these issues with you at your earliest convenience.

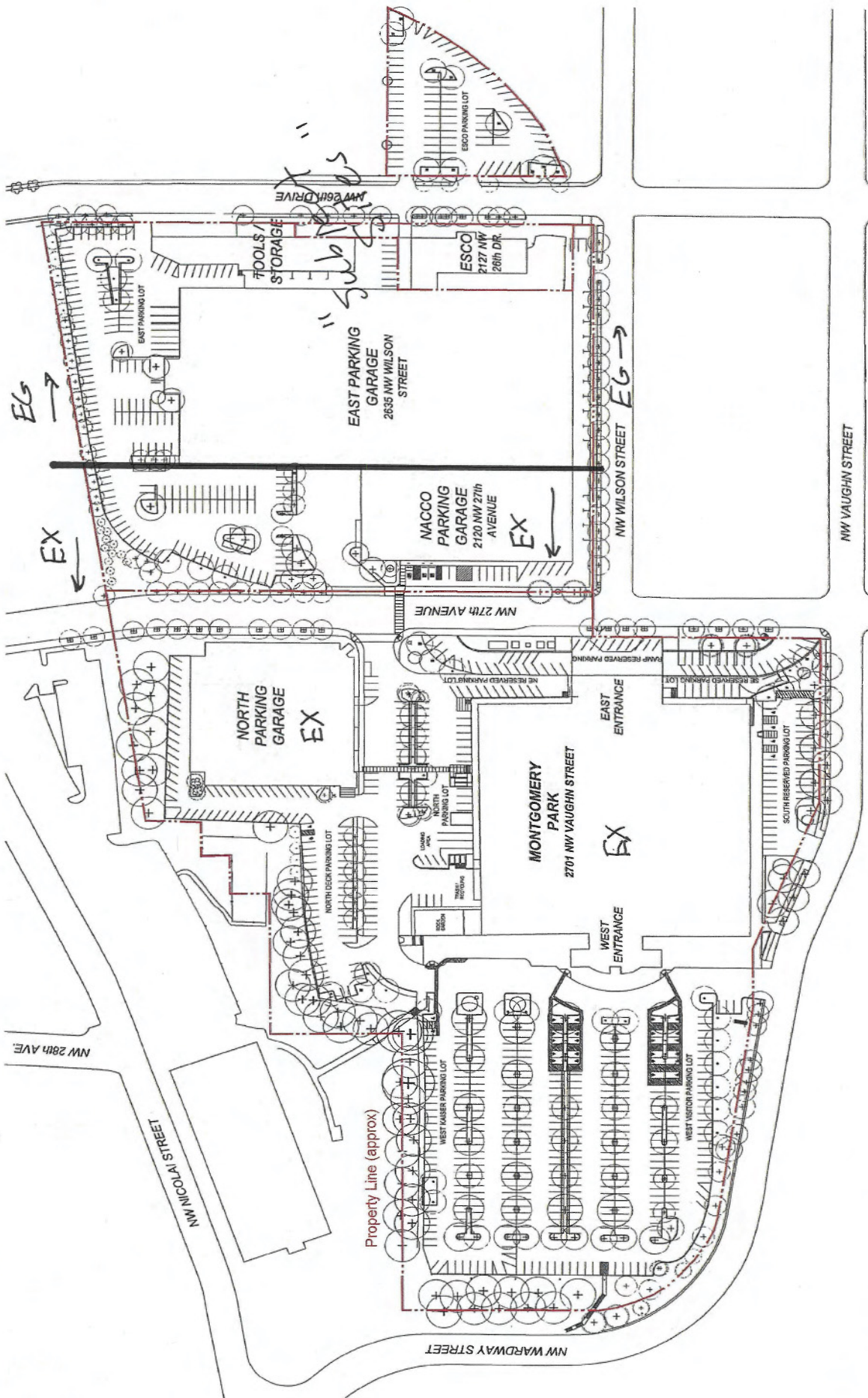
Very truly yours,



Steven W. Abel

Enclosure

cc: Mr. Marc Fazio - Bill Naito Co.



10.19.2010
NOT TO SCALE

Site Map

Montgomery Park



Exhibit "A"