

**From:** [Chris Crever](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** [User Approved] COMPREHENSIVE PLAN IMPLEMENTATION  
**Date:** Thursday, October 13, 2016 9:38:39 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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## Downzoning Objections for 2580 NW Upshur St

My name is Chris Crever and I have been a Portland resident since 1992. I have been a property owner, resident and business owner in NW Portland since 2000 and I am writing in response to the NWDA's recommendations to the Planning and Sustainability council in regards to the downzoning of specific areas in NW Portland.

I strongly disagree with **NWDA** and the latest proposal put forth by the **2035 Comprehensive Plan** to convert my property from **CM** to **CM1**. For decades, my location and surrounding locations have been deemed Medium-Scale Commercial Zones. I understand that with the recent growth of our city combined with a housing shortage and affordability concerns, change is inevitable.

That change should not come at the cost of reduced housing development or property devaluation.

### TRANSIT & EMPLOYMENT

- NW Upshur Street is proximate to two employment centers: NW 23<sup>rd</sup> Avenue, which has a large number of retail and dining establishments as well as Legacy Good Samaritan Hospital; and the NW Industrial Area
- The area is served by 2 bus routes:
  - The 15 to Gateway Transit Center, which runs through Downtown and the Central Eastside
  - The 77 to Troutdale, which runs through the Pearl District and the Lloyd Center
  - The North/Central Service Enhancement Plan, an extension of the 10 bus line would serve the northern part of the Pearl District and alphabet district via NW 12<sup>th</sup>, NW 14<sup>th</sup>, and NW Raleigh <http://trimet.org/future/pdf/north-central-final-report.pdf>
- It is also proximate to the N-S Line streetcar, which stops at NW 23<sup>rd</sup> and Marshall
  - The Streetcar goes through the Pearl District and Downtown Portland, and terminates at the South Waterfront
- According to walkscore.com this neighborhood is rated a 95, indicating that **"daily errands do not require a car."** It also is rated a 96 for bikescore
  - There are several new Biketown bike share stations within a few blocks of this property, including one on 24<sup>th</sup> and Thurman and one on 23<sup>rd</sup> and Savier
  - There are two supermarkets within walking distance of this location: Food Front (food co-op) on 24<sup>th</sup> and Thurman, and New Seasons on 21<sup>st</sup> and Raleigh

### POPULATION AND HOUSING

- According to Metro, the City of Portland gained 12,000 new residents (32 per day) in 2015
  - Since 2010, 46,882 people have moved to Portland

- In May 2016, Metro stated: “The [Portland Bureau of Planning and Sustainability], however, may be underestimating Portland’s growth” having “recently reported that about 5,800 new homes, apartments, and condos were built in the Portland city limits alone in 2015, up from 5,400 in 2014.” <http://www.oregonmetro.gov/news/census-bureau-says-hillsboro-crosses-100k-portland-still-booming>
- Another Metro article from May indicates, “All in all, Metro has brought some 42 square miles into the urban growth boundary since 1998, but fewer than 6,000 homes have been built in those areas.” <http://www.oregonmetro.gov/news/mayors-other-leaders-meet-metro-start-talking-land-use-reforms>
- A Portland Monthly article from September 2016 cites a Metro report indicating, “about 20,000 more people than predicted moved to Portland and its suburbs last year” and “Portland’s per capita gross domestic product grew 48 percent between 2001 and 2014.” <http://www.pdxmonthly.com/articles/2016/9/21/portland-is-growing-like-never-before-what-should-we-do-next>
  - The same article claims, “Portland has three times the land area of San Francisco, twice as much as Seattle, and is **half or less as dense** as either city.”
  - The article outlined six imperatives of Portland’s urban future. The first read as follows: “Build more—lots more—especially family housing. Now-trendy ideas like demolition taxes, tiny houses, and even inclusionary zoning are just political hyperventilating when it comes to keeping Portland affordable. We need to take deeper breaths. We’ll need major subsidies (bonds, tax breaks, and waived fees). **But most of all, we simply need to build more housing—so much that older buildings start to become affordable.**”

- According to REIS, in the 2<sup>nd</sup> Quarter of 2016 average rent in Northwest Portland was \$1,409, \$400 more than the average of \$1,099 for the whole Metro area

An article about the downzoning of NW Portland in the Willamette Week from Oct 4, 2016 quotes Martha McLennan of Northwest Housing Alternatives, who is “concerned at a more philosophical level that the city is reducing the apartments that can be built in a neighborhood that’s walkable and has good access to transit and services.”

<http://www.wweek.com/news/2016/10/04/new-rules-would-preserve-a-ritzy-portland-neighborhood-and-block-apartments-for-low-income-seniors/>

- According to Metro, the Urban Growth Readiness Task Force is working with the Metro Technical Advisory Committee to find a way to provide more flexibility to the Metro Council to grant modest expansions to the UGB to provide housing <http://www.oregonmetro.gov/news/task-force-eyes-options-more-growth-flexibility>
- Vacancy rates in Portland are still very low, and in September 2016 the City Council voted unanimously to extend the Housing State of Emergency by 1 year
  - The Spring Multifamily NW report stated that the average Vacancy Rate for the Portland Metro Area was 3.52%
- The White House Development Toolkit, which was released September 2016 and is a guide to help cities provide more affordable housing, states: “Barriers to housing development are exacerbating the housing affordability crisis, particularly in regions with high job growth and few rental vacancies.”
- The White House report also encourages cities to build housing where there are a number of transportation options, saying: “Smart housing regulation optimizes transportation system use, reduces commute times, and increases use of public transit, biking, and walking.”
- ***A stated goal of Portland’s 2035 Comprehensive Plan is “Connecting housing and jobs with transit”***

## PROPOSED DOWNZONING

- In April, proposed zoning for my site was **CM2**, however that proposal was changed on the recommendation of the NWDA to **CM1**

- The latest proposal also recommends a CM2 zoning proposal for the intersection of NW 26th and NW Thurman; the current location of Lost Sock Laundry Mat and Thurman St Mini Market. This particular location/intersection is significantly closer to the core NW residential neighborhood.
- **2580 NW Upshur** is only 1 block from NW Vaughn, the NW Industrial District and surrounded by The Historic Fairmount Apartments, low income housing apartments, La Torre Condos and several live/work condo-retail buildings on NW Upshur between NW 25 and NW 26th. The rationale to convert NW Upshur to CM1 and leave NW 26<sup>th</sup> and Thurman CM2 seems unjustified and unwarranted.
- According to the Bureau of Planning and Sustainability's 2014 plan for Commercial Mixed Use Zones, the following guidelines are given for CM1 and CM2:
  - CM1 is for "small-scale commercial mixed use" and is "intended for sites in neighborhood Centers and Corridors, at the edges of town centers and regional centers"
  - CM2 is "medium-scale commercial mixed use" and "is intended for sites in a variety of centers and corridors, and in smaller mixed use areas that are **well served by frequent transit** or **within a larger area zoned for multi-dwelling development**"

As stated above, this area is very well served by transit, and is within just a few blocks of 23<sup>rd</sup> avenue, which is a dense residential and commercial area. Neighborhoodnotes.com cites Northwest Portland's proximity to the city center and shopping and dining opportunities as just some of the reasons "it is a favorite of students, young professionals and families, which also makes it one of the city's most densely populated districts."

<http://www.neighborhoodnotes.com/nw/>. CM2 is generally limited to "three to four stories, unless bonuses are used to provide additional community benefits" and many of the residential buildings in this area are 4 stories, and thus a 4 story development would not be out of character for the neighborhood. An example of surrounding buildings are:

- Footprint Thurman, a micro-unit building 3 blocks from this site, is 5 stories (CS)
- Savier Street Flats, 4 blocks from this site, is 4 stories (CS)
- The Benevento, 5 blocks from this site, is 4 stories (CS)
- The Vaux Condos, 3 blocks from this site, is 4 stories (CM)

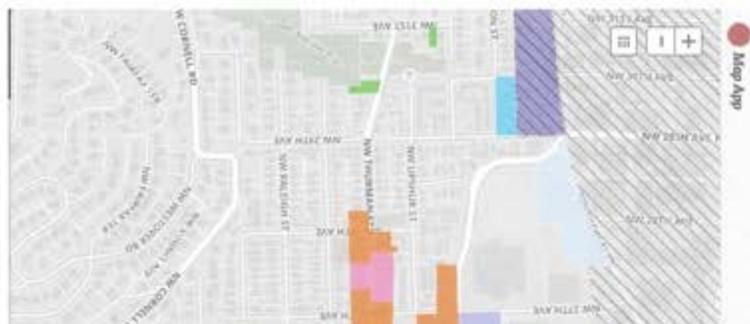
Clearly we are a city that is experiencing a crisis in housing, traffic, and affordability that comes from growth, prosperity and desirability. Circumstances like this are why we have such a need for affordable housing right now and there simply is not enough housing to meet the demand for people living or moving here.

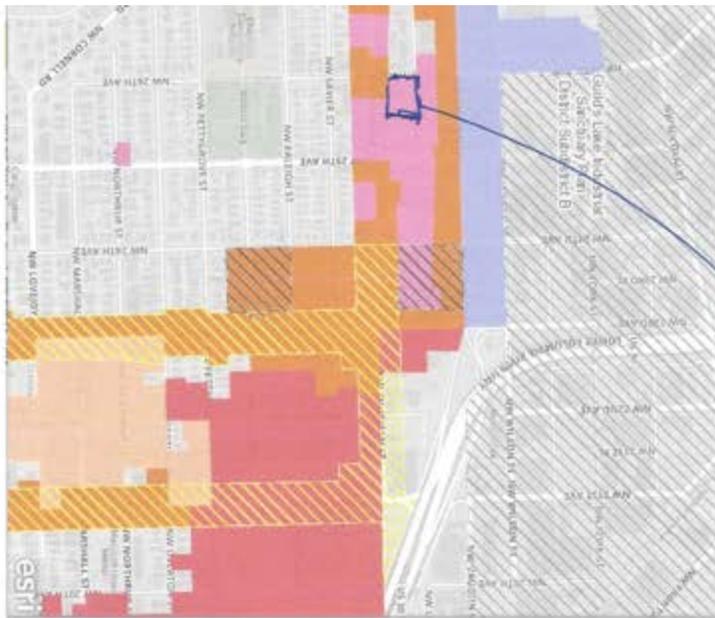
Downzoning a commercial property, like mine, in the heart of the city that is highly walkable, close to employment centers, transit services and retail amenities, and which is able to maximize investments the city has already made in all of those systems, is simply short sighted.

I sincerely hope City Council and Planning/Sustainability Commission will take my position under advisement and reconsider **2580 NW Upshur to be zoned CM2.**

Thank you for your time and continued energy effort and commitment to building a better city.

Regards-  
Chris Crever  
2580 NW Upshur St  
[chris@cinerentwest.com](mailto:chris@cinerentwest.com)  
503.709.1755





*Subject Property:  
2580 NW Upshur St.*

Proposals - Explore - FAQ - About

Q Address Search

Map - Proposal - Comments

### ZONING MAP CHANGES

This map combines Zoning Map changes from four Comprehensive Plan Entry Implementation Projects: Mixed Use, Employment, Campus, and Residential and Open Space. The Planning and Sustainability Commission (PSC) has voted on these changes and has forwarded this map to the City Council as the PSC's Recommended Draft. You may provide testimony on this map to City Council through October 13, 2018 via the Map App, email, US mail, or in person at a public hearing. Please see the FAQs for answers to most commonly asked questions, and how do I provide testimony to City Council for more details on submitting testimony.

**FOR MORE INFORMATION, VISIT THE PROJECT WEBSITE:**  
[www.portlandoregon.gov/psd/projects/psd](http://www.portlandoregon.gov/psd/projects/psd)



Chris Crever | 2580 NW Upshur St Portland, OR 97210 [cinerentwest.com](http://cinerentwest.com) | T: 503.228.2048 | F: 503.228.1789

**From:** [M Sean Green](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** [User Approved] Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 9:38:02 AM

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Dear Councilors,

I am writing regarding the proposal in the stage 2 update to designate 7th Ave a “major city bikeway.” It is unfortunate that I cannot testify in person, as I have more than one point I would like to bring to the council’s attention.

1. PSC proposal regarding NE 7th Ave.

The PSC proposal to designate NE 7th Ave as “...the preferred route..” for the proposed greenway and a "Major City Bikeway" is premature and conflates completely different traffic concepts. Myself and neighbors have testified before council before about this issue, with the result that council deferred a decision about the greenway alignment pending further study. As PBOT puts it:

"Staff response is that we need to conduct a proper study of the effects of various diverter treatments on traffic patterns in the area of question and a detailed traffic analysis. PBOT would need to conduct a full public process to assess various options and weigh the benefits and impacts to the public. During the TSP Major Projects List adoption process earlier in 2016, City Council amended the 7th/9th Neighborhood Greenway project to identify both routes as potential alignments, subject to further study."

The “proper study” referred to above has never taken place.

Designation of 7th Ave as the preferred route and bikeway is inappropriate, premature, and may even skew the results of subsequent study or interpretation of traffic data.

2. Bicycle route classifications and harmful conflation of concepts.

The PBOT brief, and presumably the PSC proposal, conflates city greenways and bikeways in a problematic way. Greenways have been defined as streets that allow safety and priority to both bicyclists and pedestrians. In order to fulfill this function, these streets must have sufficiently low motor vehicle speeds and volume. This is a critical issue for the proposed 7th Ave greenway, as 7th Ave is much more like N. Williams (a major city bikeway but not a greenway) than it is like N. Rodney (a greenway and NOT a major city bikeway).

Other cities facing these problems have come up with useful and consistent descriptions for the different types of routes - London, for example, has both “quietways” and “cycle superhighways,” reflecting the very different types of streets and the different traffic treatments needed.

Because the current transportation infrastructure is already strained to the limit by motor vehicle traffic, modifications to encourage safe multi-modal transport are extremely important. I am very disappointed in the planning provided by PBOT, BPS, and PSC, which seems distant from the world-class planning we desperately need.

3. Lack of any community involvement or public disclosure from PBOT, BPS, and BDS

I made 2 formal public records requests in January and February of this year to all the involved agencies - PBOT, BPS, and BDS - and all six requests were completely ignored. There was no response of any kind. Despite assurances from PBOT that we would be kept informed, we were never told of the stage 2 draft that received public comment earlier this year. I have been entirely unable to access relevant documents that are supposed to be available online; the PBOT liaison attempted to obtain these records but they were “too big to email” and PBOT was unwilling or unable to use an alternative delivery mechanism such as dropbox, or repair the broken links through City IT.

The statements by PBOT that a full public process is necessary are correct; but this needs to be a reality, not empty words.

Sean Green

2618 NE 8th Ave  
Portland, OR 97212

**From:** [Marilynn Rhodes](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan  
**Date:** Thursday, October 13, 2016 9:32:19 AM

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Good morning,

I need to respond to your plan to put a trail through from SW 64th Place to Hideaway Park. I live on SW 64th Place two houses up from the creek. There are some practical things you need to take into account. The creek and surrounding area is swamplike six months of the year at least. A few years ago there were beavers in the area who built a dam. That causes big backup in wet weather and the area becomes a lake at least four times a year in heavy rains. Because of the beaver dams and wetness, trees are dying or are dead and three or four fall each year. In the spring, I'm quite sure there is a coyote den in the creek area. I, and neighbors, have seen the pups playing in the streets for a few months each spring. I have their "songs" on my phone and there are many of them. This could be a safety issue for dogs and children.

I was going to try to get to your meeting, today, but it seems you are busy there with demonstrations. I would be happy to chat with you or show you around.

Take care,  
Marilynn Rhodes  
7528 SW 64th Place  
Portland  
503-891-2538  
Jedsummer @ aol.com

Sent from my iPhone

**From:** [Dale Crawford](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 9:11:00 AM

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As an Arbor Lodge neighborhood resident, frequent pedestrian in my neighborhood and regular bicyclist throughout Portland, the segment of North Greeley between Rosa Parks and Lombard is a concern. I have routinely witnessed heavy traffic patterns, both north and southbound; platoons of drivers speeding from light to light at Rosa Parks and at Lombard ignoring pedestrians and bicyclists attempting to cross at Bryant and at Buffalo (Bryant is designated and signed as a neighborhood greenway); and careless drivers crossing into oncoming traffic to pass Trimet buses stopped to drop off and pick up passengers. Additionally, there was pedestrian hit and run fatality earlier this year at North Greeley and Bryant.

It has come to my attention North Greeley from Lombard south to Rosa Parks does not have any special designation even though the next section of Greeley to the south from Rosa Parks to Killingsworth is designated as a "Community Collector" and has, thus, seen upgrades commensurate with its designated status. From Rosa Parks to Lombard, the Greeley has no special designation and lacks such improvements creating a speedway in the drivers eyes.

As previously mentioned North Buffalo and North Bryant are both major crossroads of Greeley, between Rosa Parks and Lombard hosts two major crossroads for the neighborhood for both local residents, school children, bicyclists, transit users and commuters. Locally, Buffalo and Bryant provide direct linkage across Greeley for all users to Gammans Park, Arbor Lodge Park, Harper's Playground and Chief Joseph School, and ultimately east and west to and from the MAX Yellow Line light rail stations at Rosa Parks and at Lombard. Additionally, North Bryant provide neighborhood greenway access to the Dekum bicycle/pedestrian bridge over I-5 and feeds directly to the bike lanes on Willamette Boulevard and the University of Portland.

The crosswalks along Greeley and the intersections at both Rosa Parks and Lombard are confusing due to there inconsistent design from intersection to intersection, chaotic due to inconsistent curb and crosswalk treatments, and consistently busy. Extending the collector status through the Rosa Parks and Lombard intersections with Greeley should promote better design solutions to assist people in traveling east and west, as well as encourage connections to the burgeoning commercial center at N Greeley/N Peninsula & Lombard with many existing and new small businesses like Green Zebra, Fang and Feather, Bandinis Pizza, VCA Veterinary Hospital, King Burrito, Arts and Craftsman Supply, three branch ban locations and more. As this area of Lombard continues to develop, I want to see it well connected and safe for all users.

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**Dale Crawford**  
**6125 N Detroit Ave**  
**Portland OR 97217**

**From:** [Denise Lafond](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 9:08:15 AM

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Hello

I have lived in St Johns for 12 year and have seen a large increase in traffic over the St Johns Bridge in recent years. I strongly believe traffic studies and implementation of traffic safety measures in the Cathedral Park Neighborhood is imperative and that there is a need for a new Willamette freight crossing.

Denise Lafond  
6818 N Pittsburg Ave  
[Lafond.d@gmail.com](mailto:Lafond.d@gmail.com)

**From:** [Lee Buhler](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Zoning Map Testimony  
**Date:** Thursday, October 13, 2016 8:47:27 AM  
**Attachments:** [ags\\_f560c628279142b9aa0dd895725eb9cd.png](#)  
[plan.png](#)

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Dear Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman:

Re: 018 & 04 SW Hamilton St.

I own a property next to the intersection of SW Barbur and Hamilton. This property along with my neighbor's were slated to change to Mixed-Use with the Comprehensive Plan. But we were notified in late June that they had changed their mind and it would not be mixed use. No reason was given. We think it should be stay as Mixed Use for the following reasons:

Directly adjacent to these properties are heavily used bus stops and a very busy intersection. I have attached an aerial view of the properties so you can see how close it is to the intersection.

The properties are not currently suitable for residential use due to traffic noise and congestion.

The properties are on a busy street (Hamilton) and between two other busy streets (Barbur and Corbett)

The mixed use designation for these properties went through public review with no objection. The South Portland Neighborhood Association knew about the zone and did not object. It does not make sense to make last minute changes after public review.

All other properties on Hamilton, Barbur and Corbett are zoned mixed use. It does not make sense to leave a small island of residential next to a very busy corner.

Please note the picture below from the Portland Comprehensive Plan documentation. In the first picture the house is my neighbor's and in the second house it is replaced by mixed use. Why use this as an example of mixed use and then change it back to residential at the last minute.

(My neighbor and I both disagree on the scale of the development in this picture. However, we think it would be good place for shops or offices in the existing houses.)

People do not want more commercial and density in residential areas. Why not put it where people do want it. Next to transit corridors.

Having mixed use in this location is in-line with the goals of the Comprehensive Plan such as 20 minute neighborhoods and concentrating commercial and density next to transit corridors. The goal statement says: "The Plan's Urban Design Framework focuses growth in centers and corridors"

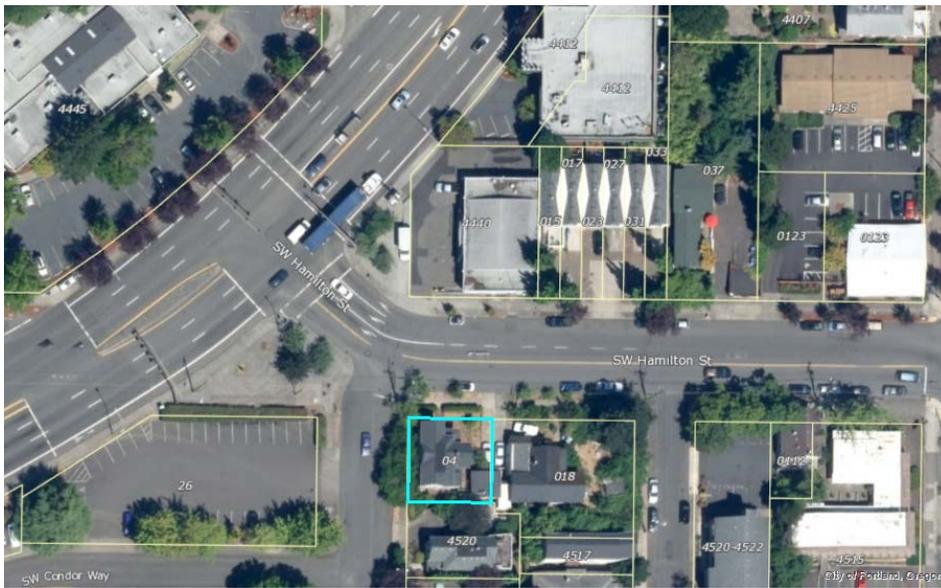
Thank you for considering our request to keep the zoning as mixed use.

Sincerely,

Lee Buhler

018 SW Hamilton St.

Portland, OR 97239



**Western neighborhoods**



**Today**



**Future**

*This visualization shows one way to transform SW Barbur Boulevard, with more housing and retail, high capacity transit, landscaping, and prominent bike and pedestrian crossings to increase safety and access to services.*

**From:** [mark1ross@comcast.net](mailto:mark1ross@comcast.net)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 8:45:18 AM

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City Council Members,

My name is Mark Ross and I own the property at 1311 NE Schuyler St. I oppose the FAR zoning code change from 4:1 to 2:1.

I purchased the property with the future intent to develop the property and create more housing in this desirable Irvington neighborhood. The Irvington neighborhood already has a shortage of housing and it's trending to get worse. This change in part will increase that shortage and decrease the affordability of the area. Our inner city needs more housing. Cutting the FAR in half reduces my ability to create more affordable newer housing. Especially for small families that need spacious 2-3 bedroom units. Not only would a new building be a better use of our limited space. The building would be more energy efficient and have the most up to date safety code requirements. This reduction financially changes my ability to invest in the neighborhood and help with our housing shortage.

My property is in the middle of the block and is surrounded by apartment buildings. The adjacent property to my east and north is the large 6 story Grace Peck building with 95 apartments. The property to my west is a box shaped 4-6 plex. A building across the street is a 3 story 23,000 sq ft apartment complex. The future development of my property using a 4:1 FAR would be proportional or smaller in scale to other properties on the block. Please see attached photos my property and immediate neighbors.

The decision to reduce a property owners FAR by 50% should not be determined by a one fits all approach. This decision should be determined on a case by case basis. In this case I feel the city block my property is on should be reconsidered to stay at the current 4:1 ratio and ultimately removed from the PSC recommend change.

Please take a second look at my property and thank you for your consideration.

Mark Ross

NE 14th Ave

NE 13th Ave









**From:** [Phil Barber](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 8:11:12 AM

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Dear City Council members,

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

Thanks!

Phil Barber  
5630 SE Yamhill St  
Portland, OR 97215

Portland City Council  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

c/o Council Clerk  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)

**Re: Planning for Multnomah Village**

Multnomah Village is an area of Portland with major historical design significant that needs to be protected. The current scale of this business district is appropriate for its narrow main street, making it an inviting place for people to shop and eat out in unique locally-owned businesses.

With the exception of one 3-story building, the Village consists of one-story and two-story buildings, many of which are the original buildings from the earliest days. The Village is covered by a Design District Overlay under the current Comprehensive Plan and this D Overlay states that new development must be consistent with the scale and character of the existing businesses, but the current zoning code does not provide this protection.

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan proposes to change Commercial Storefront properties in Multnomah Village to either Commercial Mixed Zones 1 (CM1) or 2 (CM2). The CM2 designation would allow out-of-scale buildings of up to 4-stories to be built in this historic area.

I am requesting that the City Council change the designation of all properties in the business district of Multnomah Village that are covered by the current D overlay to CM1. The new CM1 designation is a better fit for the historic Village because it will limit building heights in this area to 35 feet, the approximate height of three-story buildings.

I am also requesting that building heights for lots that are bounded by two streets be measured from the lower street. This will prevent the construction of additional stories that could result if heights are measured from the higher street on these steep lots.

Lastly, I am requesting that a Plan District be implemented as part of the Comprehensive Plan for the Multnomah Village Business District to further protect the scale and character of this special place that has major design significance in the City of Portland.

Please add this to the record.

Thank you,

Julie A. Mulley

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2758 SW Moss ST 97219

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

**From:** [Derek Smoots](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Derek Smoots](#); [McKenzie Kudrna](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:55:53 AM

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Testimony to Portland City Council regarding proposed zoning changes for our home property:

We are opposed to the proposed change to the zone code for our property. We believe it will ultimately cost us potential rental income dollars or resale value in the long term. We are also concerned, as are other Portland tax-payers, about how this zone change may result in an unfair property tax increase.

We would like to request that our property remain zoned R2.

Thank you for your consideration.

Derek Smoots and McKenzie Kudrna  
212 NE Fremont St  
Portland, OR 97212



October 13, 2016

Mayor Charlie Hales  
Commissioner Dan Saltzman  
Commissioner Amanda Fritz  
Commissioner Nick Fish  
Commissioner Steve Novick

RE: WRITTEN TESTIMONY TO COUNCIL HEARING – OCTOBER 13, 2016  
Mixed Use Zones Project  
Comprehensive Plan Amendment 2035

Dear Mayor and Commissioners

I am a commercial general contractor and development services provider, who has worked throughout the Portland Metro area for over 40 years. I am a native Portlander who appreciates the diversity of our culture, the beauty of our region and the opportunity to build a business that creates many family wage jobs. My firm is heavily engaged in the development and construction of multifamily housing throughout the City. I also serve as a Commissioner for Home Forward over the last six years.

One of my clients is the Yoshida Group and I was recently copied on a letter of testimony to today's Council hearing from Mr. Junki Yoshida. Their concern for the down-zoning of their property located at **836 & 904 SW Gibbs Avenue** is very understandable. I am intimately familiar with their property because I have been involved in the development concept planning for several months. Their development site is immediately adjacent to the Marquam Hill Campus of OHSU.

I am writing, not just because of the impact of the proposed rezoning of the Yoshida Parcel, but because of an overwhelming concern that I have about the impact of this proposed re-zoning on the future production of housing units throughout the entire City of Portland. Yoshida's property is a prime example of the impact that will only make our affordable housing crises more severe. In their case changing the current CS zone to CM1 will result in at least a 50% reduction of housing units which the property could provide under current zoning. The reduction in FAR from 3:1 to 1.5:1, the reduction in height from 45 to 35 feet, and the inclusion of housing units in the FAR calculation are only the most impactful changes in the zoning. Further requirements contained within all three of the new CM designations add other bureaucratic hurdles to slow down the process. This Mixed Use Zoning Proposal, which was funded by a Metro Grant, was intended to reduce development barriers. However, like the Yoshida property, development capacity for districts throughout Portland will be significantly reduced. In the midst of a **declared housing crisis** it is paradoxical that the City Council would approve such an idea.

The Yoshida parcel is part of an approximate 5 block area adjacent to the Marquam Hill OHSU campus, all zoned CS or CM. All of these properties are mapped for down-zoning. As you consider the down-zoning plan for these critical property, there are a few factors which I hope you will take into account.

- **Traffic** – has long been a concern of the Homestead Neighborhood association. With over 12,000 OHSU employees and students associated with OHSU, there is a critical shortage of housing within the Marquam Hill area. Reducing the potential housing stock in the immediate vicinity will force more employees and continuing care patients to commute from other area. Having greater housing yield from existing development land will reduce traffic because employees, residents and students will be able to walk or bicycle to OHSU rather than drive or bus to Marquam Hill; a net reduction in our CARBON FOOTPRINT.

- **Affordable Housing** – is a critically needed component of housing throughout Portland and especially near OHSU. The proposed downzone will substantially reduce the number of units a property in the vicinity will produce, which will make it much harder to incorporate a set aside of units for rent burdened students and service employees. Inclusionary zoning can have a positive outcome for affordable housing if appropriately paired with well thought out incentives. However, downzoning properties throughout Portland’s current Commercial zones will make the operation of inclusionary zoning infeasible in those areas. Reducing the overall unit yield by over 50% will make projects financially unattractive to private and non-profit developers, since the income stream will no longer have adequate coverage for debt service. The very likely outcome is that no housing units will be developed for a very long time where the down-zone is being applied in current CS and CM zones. And, there will be serious negative impact on property values.
- **20 Minute Neighborhoods** - is a concept that most Portlanders embrace so that they can live, work and shop without driving. The area under consideration for rezoning on Marquam Hill is designated within the **Marquam Hill plan** as **Village Center**. I suggest that the area has clearly not achieved the commercial development and services to fulfill this concept because there is not sufficient density in the surrounding area. Down-zoning the property designated to provide commercial and mixed use development opportunities will certainly not contribute to achieving this goal.
- **The 2040 Growth Concept Plan** which was adopted about 20 years ago created a regional agreement as to how the greater Portland area would grow. Creating density in city centers, transit corridors and employment areas is intended to protect foundational farm lands and make the most efficient use of infrastructure and public services. The Marquam Hill area near OHSU simply does not have an adequate housing supply adjacent to one of the largest employers in Portland. Parents and relatives of continuing care patients are unable to find short term housing. Large numbers of employees and students must commute to work and classes. Down-zoning the Yoshida property and adjacent parcels is inconsistent with The 2040 Plan.

In consideration of these factors, it is my belief that the Yoshida property and adjacent parcels should **not** be down-zoned, but rather they should be up-zoned. I respectfully request that you direct these parcels to be **designated CM3** under the new Mixed Use Zone designations.

Thank you for your thoughtful consideration as you make this critically important decision. If you would like to discuss this matter in person, I would be happy to expand on my thoughts. I may be reached through email at ([brian@pdginc.com](mailto:brian@pdginc.com)) or by phone at 503.674.3232.

Kind Regards,



Brian Lessler  
President/ CEO  
PDG Construction Services, Inc.

**From:** [Bethany Rohdy](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:44:57 AM

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Greetings,

I am writing to show my support for a possible new truck route that would include a bridge for the truck route that comes from highway 30 and over the St Johns bridge into the residential area. Not only are the fumes overwhelming and unsafe in the St Johns neighborhood at the Lombard and St. Louis intersection, that intersection is dangerous. The trucks are so loud it is hard for pedestrians to hear their surroundings. The increased traffic from the trucks cause backups over the St Johns bridge, up highway 30, and Germantown Rd. both directions at peak times. A new bridge from Highway 30 to the industrial ports would make traffic flow lighter during peak times and also lessen the air and noise pollution in the residential area of St Johns. Thank you for the consideration.

Best,  
Bethany Rohdy

**From:** [Sara L](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Tony Jordan](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:29:46 AM

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To Whom It May Concern:

I'm writing in support of removing minimum parking requirements in mixed use zones.

Many people, including myself, see the streetcar era prior to widespread vehicle ownership as the ideal to which society should return. We envision a future with all surface parking made back into what it once was, residential and commercial structures. Indeed, it is often said that the streets, such as Division, on which many buildings now have a four-story height are emulating the look and feel of that era. Proactive and planned, not reactive and inadequate, measures are needed (and are being worked on) to handle what happened in the meantime - an extremely deadly car culture in which each individual expects to own and drive a gasoline-powered automobile daily.

Minimum parking requirements were always a faulty band aid that should have been addressed with paid street parking and enforcement of parking rules on streets - a task that pays for itself when properly implemented. More measures can be taken, such as requiring buildings that do build new parking to make their spaces available to nonresidents at elevated rates. There are at least a dozen empty parking garages I can think of that have been newly built in the past three years that would match any perceived need, especially in NW.

Minimum parking requirements do not get us closer to our goal of being a car-free city, but many other options as part of a well planned transportation grid do.

Please remove these minimums.

Thank you,

Sara Long

**From:** [montuckyliberal@gmail.com](mailto:montuckyliberal@gmail.com) on behalf of [Matt Singer](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:21:06 AM

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As both a resident of Portland and director of a small nonprofit that works nationally, employing 5 people in our Portland office, I'm writing to encourage trading minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones. These sorts of moves are important for ongoing quality of life for people like me, as well as to drive our considerations of whether Portland is a city where our employees can afford to live.

Matt Singer  
134 NE 72nd Ave  
Portland, OR 97213

**From:** [Roger Joys](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Lynn Feinstein](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 6:21:23 AM

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To Whom it May Concern:

We are writing to express both our opposition and concern over proposed zoning changes that would impact our primary residence at 7404 SE Washington St, 97215.

We live in a small pocket of homes built between 1900 and the 1970's. This small "pocket neighborhood" includes families of various demographics. Each house currently occupies a significant percentage of their lots, but we have been able to maintain a significant amount of privacy due to the preservation of many old and established trees. And the significantly varied elevations of the lots.

Our opposition to the change from R5 to R2.5 is both from a quality of life and a public safety perspective.

From a quality of life perspective:

- Our neighborhood is what we would consider dense already. While there is privacy attributed to the thoughtful preservation of trees, our residences are already close quarters. We do not see how the types of buildings allowed in R2.5 could be built without significant removal of established trees, which would materially alter the neighborhood character and privacy.
- Parking is already problematic due to the width and curve of Washington St (the dog-leg Washington, not the main Washington) and the fact that 74th is single lane gravel with no possibility of on-street parking.
- With the current layout of 74th and dog-leg Washington, getting on the main Washington during busy times is challenging with the current density.
- We generally feel that any altering of the neighborhood with the addition of homes allowed in R2.5 would reduce our current property values due to the impact of both density increases and aesthetic destruction.

From a public safety perspective:

- Access in and out of our neighborhood is already challenging when on-street parking is maximized. We have often been concerned that emergency vehicles may not be able to get to specific residences given the layout. Adding density will exacerbate this issue.
- We are close to a church/school. During high activity church and school times, the residents adjacent to the school/church see quite a bit of traffic which at "prime time" is overly congested. Adding density will only increase the tension as well as the probability of an accident.

We strongly feel that this proposed zoning change is in nobody's interest and hope that this is not approved.

Thank you for your time and consideration

Roger Joys and Lynn Feinstein  
7404 SE Washington St



Roger Joys  
Portland, OR

**From:** [Tim Davis](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 12:53:22 AM

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Dear Portland City Council,

This is Tim Davis, and I urge the City to greatly improve housing affordability by 1) dramatically increasing our urban density (which is embarrassingly suburban) and 2) trading our 1960s-era minimum parking requirements (especially in mixed-use zones) for more affordable housing.

Recent studies have shown that requiring parking in apartment buildings raises the average rent by \$400 (a previous estimate was \$200-300) per month!

I'm also blown away that we continue to \*reward\* those who DRIVE to work. On-street parking is unbelievably cheap, and off-street parking is required in far too many buildings. This means that the easiest option is generally driving from A to B and parking very easily and cheaply near B. We instead need far better \*demand management\* that are at least somewhat reflective of the 21st century.

I realize that affordable housing might be exempted from parking requirements, but a) that doesn't solve much, and b) it is a distraction from the REAL issue: our \*housing\* shortage (not a \*parking\* shortage). Our current policies favor storing cars over housing \*people\*.

Thank you so much for your consideration,  
Tim

**From:** [E.L. SKAGGS](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [chair@handpdx.org](mailto:chair@handpdx.org); [adawson@juno.com](mailto:adawson@juno.com); [handboard@googlegroups.com](mailto:handboard@googlegroups.com)  
**Subject:** RE: Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 12:27:42 AM

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Re: Hosford-Abernethy, near SE 21<sup>st</sup> and Powell

I am writing to request that the existing zoning of R2.5 not be changed to R1 on my block or the adjacent block. My property, 3109 SE 20th Ave, is zoned R2.5. I feel this is the appropriate designation. The proposed zoning identified in the Residential and Open Space Zoning Map is R1.

I have asked for, and received, the Hosford-Abernethy Neighborhood District Association's (HAND's) support of this request.

The justification for this is proximity to amenities and services. Yes, this area is within ¼ mile of the SE17th/Rhine Station on the Max Orange Line, but just barely and the effort required to cross Powell Boulevard makes it uncommon that the Rhine Station is the station used by those in this neighborhood. As HAND has noted, proximity doesn't equal accessibility. Further, there are a number of other properties within this ¼ mile proximity that would remain zoned R2.5.

The next justification given is infrastructure availability. Again, most of the other properties within the area have the same availability and retain their R2.5 zoning. Further, the properties on this block facing SE 20<sup>th</sup> Avenue actually do not have sufficient infrastructure to support R1 zoning. There is no standard sewer line along 20<sup>th</sup> between Tibbetts and Powell. What there is, is a grandfathered party line that runs north from 3115 SE 20<sup>th</sup> to Tibbetts west of 20<sup>th</sup>.

Again, stating that this area is adjacent to an employment area, is nothing different from the many properties around us zoned 2.5.

Under additional factors considered, is given the fact that to the north and the west there are apartments (R1). It should be noted, though, that this immediate area, as built up, is very stable. The **mix** of single dwelling units with multiple dwelling units is part of the reason for that. Changing the zoning to R1 is likely to have the unintended consequence of turning an area with interspersed types of housing and a neighborhood feel into a large, contiguous block of apartments. Like HAND, I believe that when an area includes a mix of incomes, it can lead to better integration of affordable housing with more access to job leads and other benefits to tenants.

These are some of the most affordable houses in the neighborhood. Further, these smaller, single dwelling units are suitable for raising families within the city, unlike R1 zoning. There are few families whose ideal is to raise children without yards and have little, if any, place for a garden.

One of the goals of the Comprehensive Plan Update is to allow the continuation of the residential scale and characteristics of Portland's residential neighborhoods. R2.5 zoning our property allows such a continuation and is in keeping with the goal of affordable middle

housing.

The Hosford-Abernethy Neighborhood Action Plan desires to encourage the improvement and maintenance of residential properties, especially those that are non-owner occupied (Objective 2.1) and protect the fragile residential area within which my property lies. I feel that the R2.5 zone does this better than an R1 zone would.

I have spoken with my neighbors and HAND and there is agreement that R2.5 zoning suits this stable block much better than R1 zoning would.

Again, I request that my properties zoning remains R2.5

Thank you for your consideration of this matter.

Sincerely,

Elizabeth L. Skaggs