

**From:** [BJ Cefola](#)  
**To:** [Hales, Mayor](#); [Commissioner Fritz](#); [Commissioner Novick](#); [Commissioner Fish](#); [Commissioner Saltzman](#); [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 5:07:58 PM

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Portland City Council,

I'm writing to urge you to rescind the increase in minimum parking requirements passed in 2013 for Mixed Use zones. What good have minimums done?

Is there a neighborhood in Portland where parking is easier now than it was in 2013?

Is there a neighborhood in Portland where traffic is less now than it was in 2013?

Is the design of new construction more appealing now than it was in 2013?

Backers of parking minimums said they wanted to improve parking, improve traffic by reducing searching for parking, and see better looking housing. Parking minimums haven't delivered any of those things. What they have delivered, as opponents of minimums predicted, is higher housing costs. Parking minimums increase housing costs in two ways. They add directly to the cost of new construction, and they reduce supply.

The Bureau of Planning and Sustainability estimated the minimum cost per space for anything but surface parking at \$20,000. Assuming one space per 4 units, that's at least \$5,000 per unit (regardless of whether that unit gets the space or not). Some claim parking doesn't change rents, that developers just pay this out of the goodness of their hearts. But if that's the case, why stop at mandating parking? Why not mandate massage chairs in all units, or espresso makers, or gilded ceilings? If we can confidently say there's at least \$5,000 of free money from developers in every unit, why shouldn't we assume there is more? City Council could give renters whatever they wanted at no cost, just at the stroke of a pen. I don't think that's the case, because developers don't just eat arbitrary costs. They pass those costs on to renters, and if they can't they don't build.

That leads to the second way parking minimums raise costs, by reducing supply. When projects don't pencil out, when developers know they can't recover costs through rent, they don't build. Reduced supply means more competition for the spaces that are available and higher prices for everyone. Those with lower incomes who can't compete, have to leave.

Parking minimums don't make the city better. They don't solve parking congestion, they don't relieve traffic, and they don't make buildings look prettier. What they do is make housing more expensive, and the city more economically exclusive. With the Comprehensive Plan update, you have an opportunity to do better.

Thanks for your consideration,  
Brian Cefola  
3244 NE Schuyler Street  
Portland OR 97212

**From:** [Dragan Milosevic](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Zoning: Alphabet Historic District  
**Date:** Wednesday, October 12, 2016 5:05:32 PM

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October 9, 2016

Portland City Council  
Re: Comprehensive Plan Zoning Amendments Request re: Alphabet Historic District  
1221 SW Fourth Avenue  
Portland, OR. 97204

Dear Council Members,

My name is Dragana Milosevic. I'm the owner of the property located at 1731 NW Irving Street. I support amending the Comprehensive Plan from 4:1 FAR to 2:1 FAR in the RH zoned Alphabet District, because decreasing the zone capacity will help improve:

- 1) class sizes and overcrowding at our schools,
- 2) traffic conditions / congestion,
- 3) complete lack of available parking

Furthermore, changing the zoning to 2:1 FAR, will help maintain the historic integrity of our neighborhood, as well as help reinforce the mandate of the National Register of Historic Places, which is to maintain the look & feel of our neighborhood (I.e. it's structures, plant populations).

Please help us maintain our neighborhood's unique charm, by voting to amend the zoning code in the Alphabet District, from 4:1 FAR to 2:1 FAR. Thank you in advance for your help and consideration!

Kindest Regards,

Dragana Milosevic  
1731 NW Irving St  
Portland, OR 97209  
[dmlosevicd@gmail.com](mailto:dmlosevicd@gmail.com)

**From:** [Lucas Miller](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Jim Laubenthal](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 4:41:56 PM  
**Attachments:** [image001.png](#)  
[Riverside letter to city council Oct 2016.pdf](#)

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To whom it may concern,

I have attached a letter to Portland's City Council for to formally document our concerns and requests regarding our land use designation changes/modifications recently.

Thanks!

Lucas J. Miller  
*General Manager*

RIVERSIDE GOLF & COUNTRY CLUB  
8105 NE 33<sup>rd</sup> Drive | Portland, OR 97211  
503.288.6468 ext. 303 | 503.572.1931 (cell)



October 7, 2016

Mayor Charlie Hales  
Commissioner Nick Fish  
Commissioner Amanda Fritz  
Commissioner Steve Novick  
Commissioner Dan Saltzman  
City of Portland  
1221 SW 4th Avenue, Room 110  
Portland, OR 97204

### **Comprehensive Plan Early Implementation Zoning Code Changes**

Riverside Golf and Country Club would like to offer comments on the Draft Zoning Code Changes regarding the Industrial "I" overlay. In the recent comprehensive plan amendments, the City placed an IG2 designation on Riverside's property over our strong objection. We explained to staff and Council that Riverside has a strong and vibrant membership that is growing. We fully expect Riverside to operate as a private golf club for many years to come. One of the concerns we voiced was that the IG2 designation created a negative perception that Riverside would not continue to operate. One consolation from that process was staff's agreement that there would not be an involuntary zone change to Industrial.

In the current process, the proposal included leaving Riverside zoning as Open Space, but applying an "I" overlay. We are concerned that the overlay creates unintended consequences on our operation. In trying to assess impacts, it has been a confusing process trying to figure out how it would work. These are a few of our concerns:

1. First we note that the current base zone is Open Space (OS), which seems inconsistent with an "I" overlay. It suggests to Riverside that the City may have plans to rezone Riverside which is inconsistent with the assurances we received during the comprehensive plan amendment process.
2. Even more concerning though is that the overlay will cause Riverside to become a non-conforming use with non-conforming development. As we read PCC, Chapter 258. The stated purpose of that Chapter is to work in the future to bring such used further into conformance with the zoning. We do not see how Riverside can apply for any future permits needed to operate its course and be found to be heading in the direction consistent with the I overlay. Also, Chapter 258 makes it very difficult to obtain approval to alter or expand a non-conforming use.
3. We are concerned that some normal facility improvements may be prohibited with this overlay. Examples might include a main building or pool facility expansion, or remodel, or other major capital improvements. By the way, Columbia Edgewater is undertaking a plan for a number of major facility upgrades.



8105 NORTHEAST 33RD DRIVE PORTLAND, OR 97211-2095 PHONE: (503) 288-6468 FAX: (503) 282-1383

4. We are confused about whether it would still allow on-site tree mitigation.
5. The "I" zone also triggers Additional Development Standards (33.565.410) in the Middle Columbia Slough Subdistrict of the Airport Plan District. These are standards that are applicable to industrial uses and not for our current situation. We are having difficulty figuring out how they would work on our site.

We have discussed this matter with staff and they agree with our assessment of an NCU and that this was not the intent of the overlay. A solution we discussed was removing the current "I" overlay from the Riverside property. And, if and when we request an IG2 zone change, the overlay would be applied. That seems like a workable solution that meets both the City's and Riverside's long term goals.

We would request that Council support this modification to the "I" overlay.

Sincerely,



Lucas Miller, General Manager  
Riverside Golf and Country Club

cc: Tom Armstrong  
Steve Kountz



**From:** [Rob Laing](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 4:37:28 PM

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I'm a Cathedral Park Resident with interest in promoting the study of the need for a new bridge from US Highway 30 to Rivergate (North Willamette River Crossing). I believe a crossing will be beneficial to the long-term livability and economic success of St Johns and the surrounding neighborhoods.

Thanks!

Cheers,

Rob Laing  
9727 N Willamette Blvd  
Portland, OR 97203

**From:** [Mike Connors](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation - Transportation System Plan Stage 2 Update - Hayden Island Manufactured Home Park Comments  
**Date:** Wednesday, October 12, 2016 4:35:17 PM  
**Attachments:** [image001.png](#)  
[City Council Letter dated 10-6-16 re TSP Stage 2 Update - Hayden Island Bike Path.pdf](#)

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This firm represents Hayden Island Enterprises, the owners and operators of Hayden Island Manufactured Home Community ("HIMHC"). We submitted the attached letter to the City Council at their October 6, 2016 hearing for the Comprehensive Plan Implementation. Since I do not see our letter listed among those documents submitted to the City Council through October 6, I am submitting this letter via email to ensure that it is included in the record for this matter. Please include this letter as part of the record for the City Council's consideration. Please provide E. Michael Connors written notice of the City Council's final decision at the address below. Thank you for your assistance.

E. Michael Connors  
Hathaway Koback Connors LLP  
520 SW Yamhill Street, Suite 235  
Portland, OR 97204  
503-205-8401 (direct)  
503-205-8400 (main office)  
503-781-0280 (mobile)  
[mikeconnors@hkcllp.com](mailto:mikeconnors@hkcllp.com)  
[www.hkcllp.com](http://www.hkcllp.com)



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Hathaway Koback  
Connors LLP

520 SW Yamhill St.  
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Portland, OR 97204

**E. Michael Connors**  
503-205-8400 main  
503-205-8401 direct

[mikeconnors@hkcllp.com](mailto:mikeconnors@hkcllp.com)

October 6, 2016

**VIA HAND DELIVERY**

City Council  
City of Portland  
c/o Bureau of Planning & Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Re: Transportation System Plan Stage 2 Update – Hayden Island Bike Path  
Hayden Island Manufactured Home Community

Dear Mayor and Commissioners:

This firm represents Hayden Island Enterprises, the owners and operators of Hayden Island Manufactured Home Community ("HIMHC"). HIMHC consists of 440 manufactured home sites, 169 RV sites and 1,500 residents located on Hayden Island and has been consistently recognized by the City as a vital affordable housing resource. We are submitting these comments regarding the Transportation System Plan ("TSP") Stage 2 Update, in particular the proposed City Bikeway path through the HIMHC property as shown in the attached portions of the TSP Stage 2 Update. Hayden Island Enterprises is very concerned about and vehemently opposed to this bike path for several reasons.

The bike path will impact several manufactured homes located along the Columbia River and will require their removal when the bike path is built. HIMHC residents are extremely concerned about the potential impact and uncertainty the bike path will create for those affected manufactured homes. Although PBOT staff advised the public that the bike path won't actually be built unless and until the park is redeveloped, the staff memo to the Planning & Sustainability Commission stated that these "improvements would not likely occur unless a property redevelops." Memorandum from Denver Igarat, PBOT, to Planning & Sustainability Commission, dated April 6, 2016. (Emphasis added). Saying something "would not likely occur" is not the same as saying it won't happen. The potential loss of numerous manufactured homes, no matter how unlikely, is not acceptable. Additionally, there is nothing in the TSP Stage 2 Update that limits its construction to the redevelopment of the property. The potential loss of any manufactured home spaces should be very concerning to the City Council since HIMHC plays such a vital role in providing affordable housing to the community.



The bike path is inconsistent with the recently adopted 2035 Comprehensive Plan and the City's policy of protecting affordable housing resources such as HIMHC. For example, Policy 5.37 of the 2035 Comprehensive Plan provides:

“Encourage preservation of mobile home parks as a low/moderate-income housing option. Evaluate plans and investments for potential redevelopment pressures on existing mobile home parks and impacts on park residents and protect this low/moderate-income housing option. Facilitate replacement and alteration of manufactured homes within an existing mobile home park.”

Proposing a bike path in a location that would require the removal of several manufactured homes located along the Columbia River is inconsistent with Policy 5.37 because it clearly undermines the preservation of the park. Even if the City intends to only require the bike path be constructed if the property is redeveloped, approving the bike path sends a very strong signal that the City wants the property to be redeveloped so the bike path can be constructed. Encouraging the redevelopment of the park is inconsistent with Policy 5.37 and the common desire to preserve this affordable housing resource.<sup>1</sup>

Hayden Island Enterprises, HIMHC residents and other residents of Hayden Island are adamantly opposed to this bike path. At the Planning & Sustainability Commission level, there was overwhelming community testimony from HIMHC and other island residents in opposition to this bike path. Indeed, we are not aware of anyone who testified in favor of this bike path. We anticipate significant opposition to the bike path at the City Council hearings as well. The Planning & Sustainability Commission ignored the community opposition and voted for the bike path because a couple of commissioners thought it would be nice to have a bike path along the Columbia River. We do not understand why the City would impose a bike path when the Hayden Island residents, property owners and businesses are strongly opposed to it.

The bike path is being proposed across private property against the wishes of the property owner and therefore constitutes an unconstitutional taking. See *Loretto v. Teleprompter Manhattan CATV Corp.*, 458 US 419 (1982); *Brown v. City of Medford*, 251 Or App 42, 283 P3d 367 (2012). Since the bike path is being proposed for the general benefit of the public and is not necessary to address impacts from HIMHC, the City cannot establish the nexus and rough proportionality requirements necessary to justify a taking. See *Dolan v. City of Tigard*, 512 US 374 (1994); *Nollan v. California Coastal Comm'n*, 483 US 825 (1987). The bike path will not only significantly affect the HIMHC property when it is actually improved, the mere designation of it as part of the TSP will immediately affect the value of the property and make it more difficult to plan and obtain financing in the future.

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<sup>1</sup> As part of the 2009 Hayden Island Plan, Hayden Island Enterprises agreed to the City's proposal to downzone the eastern portion of the park property from General Commercial (CG) to Residential (R2) as to further the preservation of the manufactured home park. During the 2035 Comprehensive Plan process, Hayden Island Enterprises requested a policy similar to Policy 5.37 to further that goal. Approving a bike path clearly undermines these previous efforts and sends a strong signal that the City does not value Hayden Island Enterprises' willingness to support the preservation of the park.

We understand that a portion of a path was approved on the HIMHC property as part of the 2009 Hayden Island Plan, but neither Hayden Island Enterprises nor its residents were aware of that previous proposal. Moreover, the TSP Stage 2 Update recommendations propose to significantly expand both the nature and scope of the path. The recommended TSP amendments propose to change the prior designation from an "off street path" to a "City Bikeway". The City Bikeway classification is a higher classification and more intense bike path than an off street path. Additionally, the TSP Stage 2 Update proposes to significantly extend the bike path to the east along the entire stretch of the Columbia River. Since the recommended TSP amendments propose to significantly change the nature and scope of the bike path, we believe you should use this opportunity to remove the bike path altogether.

The City should not impose a public bike path across private property against the will of the property owners, residents of this community and the Hayden Island residents whom uniformly oppose this bike path. Please understand that if the City approves this bike path as part of the TSP Stage 2 Update amendments, Hayden Island Enterprises will have no choice but to protect its interests by all legal means necessary, including but not limited to appealing the City's approval of the TSP Stage 2 Update amendments and/or filing an action in court for the unconstitutional taking.

We appreciate your consideration of our comments. We look forward to working with the City further on this matter.

Very truly yours,

HATHAWAY KOBACK CONNORS LLP



E. Michael Connors

EMC/pl

cc: Hayden Island Enterprises

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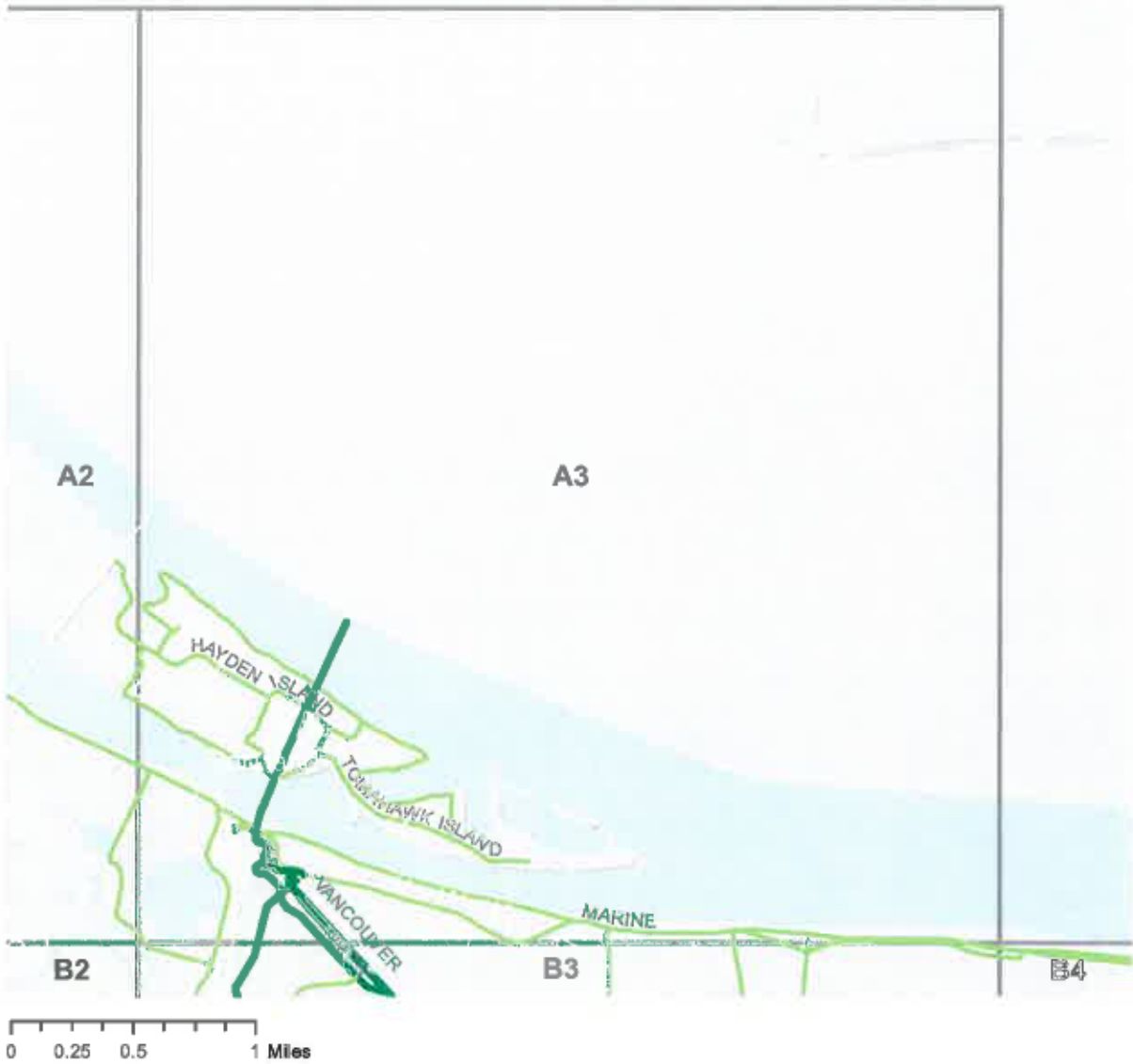
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## Commentary

### Map A3

The bicycle classifications shown for Hayden Island were developed as part of the Hayden Island Plan, adopted in 2009. Before adoption, a City Council amendment removed the City Bikeway classification from the pathway around Hayden Bay in the northeast area Hayden Island, in response to community testimony. A Planning and Sustainability Commission amendment has now restored that City Bikeway classification in this Recommend Draft TSP.

# PSC Recommended Amendment



## Bicycle Classification

-  Major City Bikeway
-  City Bikeway
-  Local Service Bikeway



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

AUDITOR 10/12/16 AM 10:22

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.

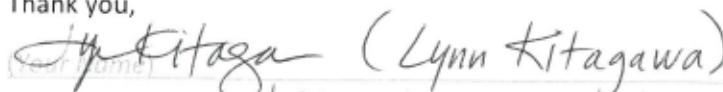
I am requesting that the City Council change the designation of all properties in the business district of Multnomah Village that are covered by the current D overlay to CM1. The new CM1 designation is a better fit for the historic Village because it will limit building heights in this area to 35 feet,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

  
(Your Name) Lynn Kitagawa (Lynn Kitagawa)  
(Your Address) 3550 SW Nevada Ct Portland OR 97219

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)

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

AUDITOR 10/12/16 PM 2:32

**Subject, Portland City Council agenda item #1152: Testimony on minimum parking requirement implementation and zoning submitted in writing, October 12, 2016**

Comprehensive Plan policies 33.266.119 allows for little to no parking for new residential and mixed use developments within 1500 feet from a transit station and within 500 feet of a transit street with 20-minute peak hour service. If those policies hold up and if the city can not require rental leases to mandate that tenants can not have cars unless they park them on-site; then the same high number - 1500 feet - needs to apply as the close in distance in which tenants of the new developments would not be allowed to park their cars on the streets. This would be a mandated binding agreement when signing a lease. The purpose here is to discourage tenants with cars from locating in new residential and mixed use developments when off-street parking is not included. If developers feel this binding agreement would forbid tenants from parking their cars on the streets within 1500 feet of where they live will make it difficult to rent the units, then maybe they will provide adequate parking. **It must be the responsibility of the developer and building owners to make sure the tenants of new residential developments do not continually park their cars on single family home neighboring streets.**

At 51st and Sandy Boulevard, a developer with the reputation of a villain that demolishes neighborhood character wants to build an 89 residential unit, six story mixed use apartment building with only 19 parking places. He says the amount of parking meets all city codes. The immediate area already has a tight supply of on-street parking. Per the city's own studies, 72% of the households in these types of buildings have one or more cars. Therefore, **this new development is likely to add another 45 parked cars to close in neighboring residential streets.** With Sandy being a high volume transit street, the likelihood is many of the tenants that have cars will use transit to commute on week days. **That means many of these 45 cars will be stored long term in front of other people's homes,** and taking up parking for guests and parking that is currently utilized by people that are customers or employed at some of the many small businesses on Sandy. This proposed development clearly demonstrates a higher parking minimum is needed.

Given a reality check for properties on corridors and at the fringes of centers that are located within 1500 feet of adjacent single family home zoned neighborhoods, **parking minimums need to be required and increased** for both multi-unit residential buildings and residential units in mixed use development. **"Adequate" parking to circumvent the negative impacts of long term car storage on residential streets from these new developments needs to be defined and mandated as three parking spaces for every four residential units.** Moreover, the three to four standard needs to apply for any property that has four or more residential units as opposed to starting with a 30 unit minimum. A one to one standard needs to be in place for three units or less. As an example of how destructive the negative impacts of not requiring adequate parking can be on single family home neighborhoods, just listen to the feedback from the single family homeowners about the chaos that is taking place in the lower Southeast Division Street area.

Motorists are the primary financial stakeholders for all Transportation System Plan projects. Even with over 800 million dollars in Portland's 20-year TSP targeted for bicycle infrastructure, bicyclists are basically freeloaders. Transit fares cover only 25% of the operating costs. Public Transit is taxpayer subsidized at over 60 cents per passenger mile, many times more than subsidizing driving. Moreover, there are some dirty little secrets that are less than transparent. **Transit on average uses more energy per passenger mile as measured in BTUs and creates more emissions per passenger mile as measured in Co2 than driving an average modern car. One two-axle bus does as much damage to the streets and roads as 1200 cars.**

Some people have testified that making on-street parking a commodity would force developers to add more off-street parking. This concept is merely diversionary ploy to eliminate parking minimums altogether. It comes from an anti-car point of view. To be fair and just, curb space as a commodity must be regulated in the same manner as when a landlord sets a price for renting for an apartment or commercial floor space. The equivalent price must apply for all potential tenants renters regardless of ethnicity. Therefore, if a fee is charged for curb space thereby making on-street parking a commodity, the charge would be discriminatory unless alternative mode users also pay the equivalent price when the curb space commodity is being utilized for bike lanes, other bicycle infrastructure and/or transit stops. Furthermore, unlike bicyclists and transit riders, motorists already pay for streets and roads in addition to subsidizing alternative mode infrastructure with gas taxes and other related motor vehicle fees. Unless a tax or fee is also implemented on bicycles and/or bicycling and transit riders to pay for the infrastructure they utilize, charging motorists an additional fee for parking on a streets they already pay for is nothing less than triple dipping. The only exception to a paying for curb space as a commodity are homeowners who also must maintain the public sidewalks that have an easement on the property they already pay property taxes on. It would again be dipping more that once and discriminatory if homeowners are not grandfathered in and therefore must pay to park in front of their own homes.

All said it is unconscionable for the car haters to continue to support constructing these multi-unit residential and mixed use structures without adequate parking as a means to discourage car ownership and therefore reduce infrastructure funding. If the revolting car hater mindset is supported and allowed to continue, not only will it show city support for hate in general, but the reality is that new developments that lack off-street parking and create negative impacts in single family home neighborhoods will force the people who can afford to do so to flee the city and move to the suburbs or North of the Columbia River. These people and families who move out will drive more often and farther distances, but also have a better quality of life without having cars from new developments that don't have adequate parking continually lining the streets and parked in front of their homes. Portland will become more of a low income and poverty enclave in need of higher taxes to pay for subsidies. The costs of living and housing will be even less affordable for the middle class who stay. So what then? Build a wall around Portland to keep cars out and taxpayers in?

Respectively submitted,

Terry Parker  
Northeast Portland

**From:** [jessica richman](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [planning@northwestdistrictassociation.org](#); [Karen Karlsson \(Karen@klk-consulting.com\)](#); [Michaelson Rick](#); [Skryha Vicki](#); [Johnson JoZell](#); [Wood, Sandra](#); [Engstrom, Eric](#); [Buono Shannon](#)  
**Subject:** Comprehensive Plan Implementation: Technical correction on FAR transfers into historic/conservation districts  
**Date:** Wednesday, October 12, 2016 4:14:23 PM

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Dear Mayor Hales and City Commissioners,

There is a small technical glitch in the Recommended Draft of the Early Implementation Package Zoning Code Amendment.

33.130.205.C.5 adds new language that prohibits the transfer of density into historic and conservation districts.

This language should also be added to the other base zone chapters where transfers of density are allowed. Specifically, it should be added to 33.120.205.E.4.b, 33.120.205.E.5, 33.140.205.C, and 33.140.205.D.

I support these amendments. As a Portland City Planner for nearly 30 years—now retired—I helped to write the regulations for transfers from Historic Landmarks. At the time, we simply did not think density or other development rights would be transferred into historic districts. It was an oversight, and I have regretted it ever since! Several neighborhood associations and several individuals (including myself) requested this change, and it has been in the RICAP database for quite a few years.

I have no doubt that staff and the Planning Commission intended to apply the limitation in 33.130 to all of the base zones, and that it was simply a technical error that they were not included.

Sincerely,

Jessica Richman

1911 NW Hoyt St.

Portland, OR 97209



**From:** [Rex Burkholder](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Re: Comprehensive Plan Implementation: Eliminate Minimum Parking Requirements in Mixed Use Zones  
**Date:** Wednesday, October 12, 2016 3:55:00 PM

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Dear Commissioners,

I am writing to urge you to uphold City and regional livability aspirations and NOT impose minimum parking requirements in Mixed Use Zones.

The vitality of our urban neighborhoods depends on balancing people and transportation. Automobiles are the most expensive, most land hungry and least pleasant of all transportation options in urban areas. We already provide overly plentiful amount of valuable and scarce urban land to accommodate automobiles--requiring more car storage in areas where we want to encourage housing, commercial activity and social interaction is counterproductive and unnecessary.

Thank you for your attention.

Rex Burkholder

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Rex Burkholder

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**Vote Yes on Measure 99: [Outdoor School for All](#)**



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October 12, 2016

VIA EMAIL ([cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov))  
AND HAND DELIVERY

City Council  
City of Portland  
1221 SW 4th Avenue, Room 130  
Portland, OR 97204

**Re: Lewis & Clark College/Public Trail Through Lewis & Clark Campus**

Dear Mayor Hales and Commissioners:

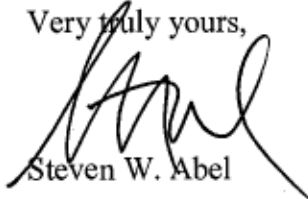
This office represents Lewis & Clark College. The recommended zoning map (August 23, 2016) contains a significant mapping change that requires reconsideration. The draft map proposes a public trail through the Lewis & Clark campus for the law school and the undergraduate campus.

Attached to this letter is a map showing the proposed path of the trail through the middle of both the law school campus and the undergraduate campus. As you know Lewis & Clark College is a private educational institution and is 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 private property. However, because of security issues at the College, 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 be able to exclude those who the college believes constitutes a threat to the college community or its property. With a public trail, the College fears the inability to provide a secure campus. This is a significant issue for Lewis & Clark and all the City's colleges as evidenced by recent events on college campuses, including those in Oregon.

City Council  
October 12, 2016  
Page 2

The College requests that you delete the public trail segment through its campus and reroute it around its campus so that it does not pose a security risk..

Very truly yours,

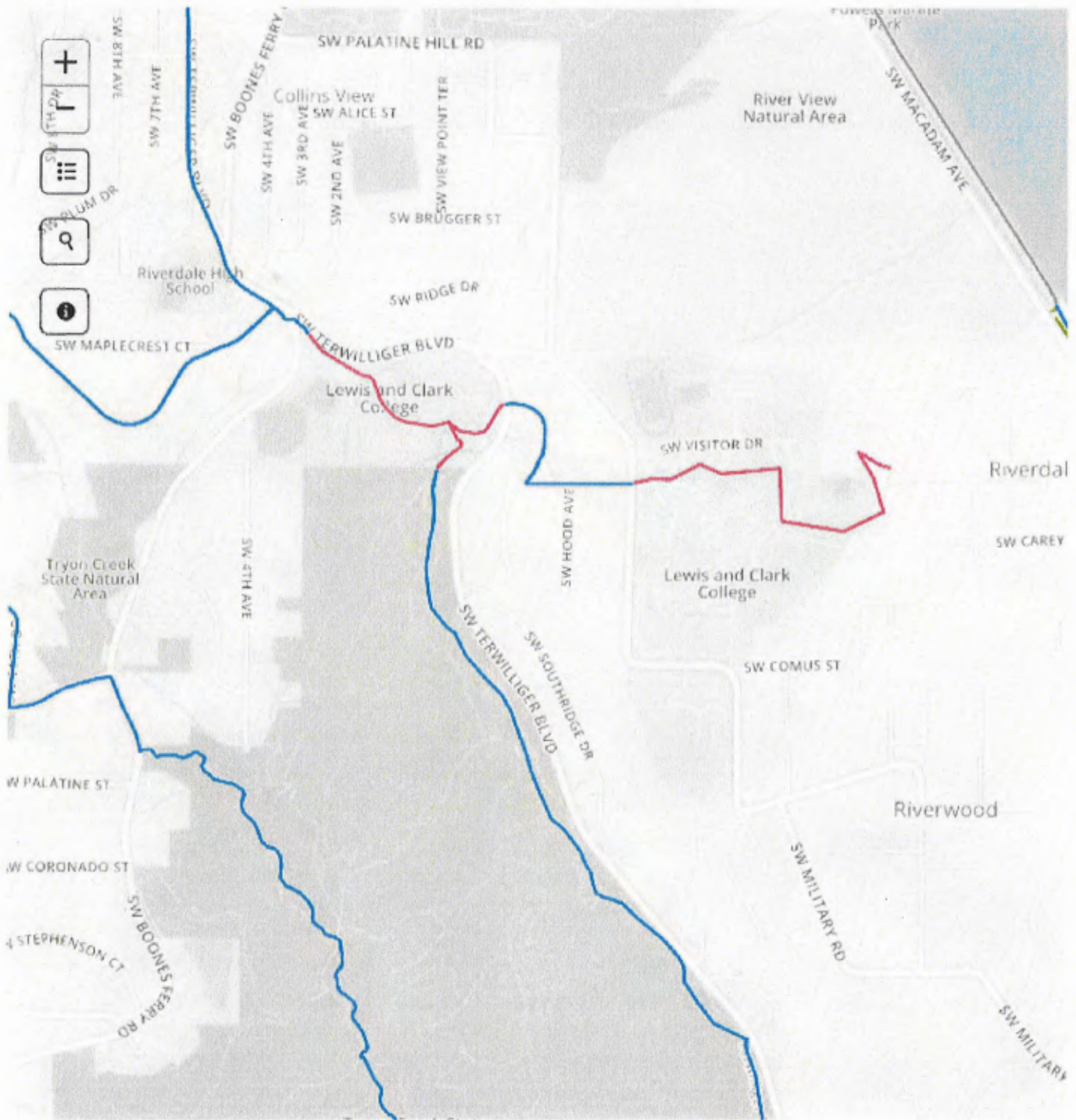


Steven W. Abel

SWA:pjn

Enclosure

cc: David Ellis, V.P. and General Counsel, Lewis & Clark College (*via email*)  
Tera Pierce, Office of Mayor Hales (*via hand delivery*)  
Sonia Schmanski, Office of Commissioner Fish (*via hand delivery*)  
Brendan Finn, Office of Commissioner Saltzman (*via hand delivery*)  
Katie Shriver, Office of Commissioner Novick (*via hand delivery*)  
Claire Adamsick, Office of Commissioner Fritz (*via hand delivery*)  
John Cole (*via email* [John.Cole@portlandoregon.gov](mailto:John.Cole@portlandoregon.gov))



## Zoning: Thoughtful Advancement and Safeguard of Portland Neighborhoods

To the Mayor and Portland City Commissioners,

I write to you not only as a current homeowner and resident of the Richmond neighborhood, but as someone who was born and raised in the same area of Southeast Portland. I am the fourth generation of my family to live in Southeast – my great grandparents raised my grandmother about 12 blocks from where I live today, and both my mother and father were raised in inner Southeast Portland. Three out of my four grandparents were raised in this city – it's a place I am connected to and cherish. I tell you this not because my history in this city should carry more weight than others, I say it because I believe it lends credibility to my understanding of the history and culture of the neighborhood and how that contributes the greatness of this city.

Unfortunately, I am unable to give public testimony in person due to open sessions on this topic being available during daytime business hours only.

A neighbor informed me a couple weeks ago that he received notice from the city regarding proposed zoning changes to his property that sits on west side of Southeast Cesar Chavez Boulevard at Harrison Street. As I read the information provided to my neighbor via mail, I was shocked to see Cesar Chavez Boulevard between Hawthorne and Division is set to be re-zoned from R5 to R1. I began researching and learned about all the proposed zoning changes, and discovered that it included our property to be changed from R5 to R1. I was astonished at what I was learning, especially since we received one piece of mail regarding the change and there was no mention of the overall changes to our neighborhood, and to all of Portland.

The proposed zoning changes from Hawthorne Boulevard to Division Street, specifically from approximately 37<sup>th</sup> Avenue to 41<sup>st</sup> Avenue, are some of the most significant and drastic changes from single family dwellings to medium density multi-dwelling residential (R1) that I discovered. This change, along with all of the proposed zoning changes from Hawthorne south to Market Street and Division north to Sherman Street, encompasses significant and substantial portions of a piece of the Richmond neighborhood.

The longstanding homes, the people, and neighborhood-feel are at the heart of what I believe made and continues to make Portland, Portland. Neighborhoods like Richmond are the essence of community within this city and they represent all of the reasons Portland has always been such a desired place to live. They are why parents choose to raise their children in the neighborhood and why generations of families continue to be rooted here. ***The minute we decide to significantly transform the character of a neighborhood, we risk losing the heart and soul of what made it so great - so Portland.*** When transformation like this happens we all too often find ourselves looking at a place we no longer recognize while starving for a culture and community that once was.

Our city is rooted in its neighborhoods and the foundation they provide. Drastically reducing single family homes in neighborhoods like Richmond in exchange for four story, 45 to 63 units per acre (per R1 definition) seems counter to design and livability of the neighborhood. These large buildings will tower over residential homes and will have alternative repercussions such as loss of sunlight to those homes living around them.

Change is inevitable for our city and even though some of us may resist it, we have to embrace it. Forward progress can come with thoughtful and careful planning centered around the neighborhoods, communities, people and culture that helped it to grow to become what it is today. None of us can deny that higher density buildings and places for commerce and business need to be integrated throughout the city. I have no education in planning; however, zoning conversions such as mixed commercial/residential (CM) two story buildings on busier streets in the middle of a neighborhood might help with a transition while keeping the spirit of the neighborhood.

Although people like my wife and I might benefit financially from being able to sell our home to investors who might develop it into medium density housing, I ask that you **consider the bigger impact on large scale zoning changes within neighborhoods in our city**. We would love to stay in this neighborhood that we have so much history and investment in; we have family nearby and my wife's family owns and operates a small business out of Southeast Portland.

In recent Portland history we have seen some cases where good intentions with development have hurt those with longstanding connections to our city's neighborhoods and culture. One example can be seen in inner North/Northeast Portland where longstanding neighborhoods, families and culture were greatly affected by well-intentioned, but drastic development. I work in these neighborhoods and have seen and heard from current and past residents about the change and its impact. Most will agree that we are now looking for ways to reincorporate those pushed aside in the transformation of their neighborhoods. **Well thought out plans that look beyond the immediate quick fix and money making opportunities will help the city thrive for generations and must come through the incorporation of thoughtful design that incorporates the existing neighborhoods, culture and people.**

**I honestly do not believe that most people in these neighborhoods know that these changes are being proposed.** I'd ask that you seek answers to questions about how many people have been notified about the major changes to their neighborhoods, and to what extent. Are properties not proposed for zoning changes being notified? Have the neighborhoods and people been given ample time and information to learn, discuss and qualify all of these enormous changes? I give credit to those who have produced the information online. It is easy to understand and is done well. I just question whether most neighbors know to even look for this information in the first place.

**My wife and I respectfully request that more planning, public education and outreach, public input, and community collaboration be brought forth in this process.** We urge the council to remember the communities and the citizens who make up this city when making large scale zoning changes to our residential neighborhoods.

Sincerely,

Ryan and Krystal Foote

*From the City of Portland website:*

*The Mixed Commercial/Residential (CM) zone promotes development that combines commercial and housing uses on a single site. This zone allows increased development on busier streets without fostering a strip commercial appearance. This development type will support transit use, provide a buffer between busy streets and residential neighborhoods, and provide new housing opportunities in the City. The emphasis of the nonresidential uses is primarily on locally oriented retail, service, and office uses. Other uses are allowed to provide a variety of uses that may locate in existing buildings. Development is intended to consist primarily of businesses on the ground floor with housing on upper stories. Development is intended to be pedestrian-oriented with buildings close to and oriented to the sidewalk, especially at corners.*

*The R1 zone is a medium density multi-dwelling zone. It allows approximately 43 units per acre. Density may be as high as 65 units per acre if amenity bonus provisions are used. Allowed housing is characterized by one to four story buildings and a higher percentage of building coverage than in the R2 zone. The major type of new housing development will be multi-dwelling structures (condominiums and apartments), duplexes, townhouses, and rowhouses. Generally, R1 zoning will be applied near Neighborhood Collector and District Collector streets, and local streets adjacent to commercial areas and transit streets.*



Oct. 12, 2016 <Sent this date via e-mails noted below>

City of Portland  
Attn: City Council - [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov).  
1221 SW 4th Ave, Room 130  
Portland, OR 97204

CC: BPS Director, Susan Anderson ([Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov))  
PBOT Director, Leah Treat ([Leah.Treat@portlandoregon.gov](mailto:Leah.Treat@portlandoregon.gov))  
BPS Long Range, Joe Zehnder ([Joe.Zehnder@portlandoregon.gov](mailto:Joe.Zehnder@portlandoregon.gov))  
BPS District Liaison, Nan Stark ([nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov))  
PBOT Planner, Zef Waggoner ([Zef.Wagner@portlandoregon.gov](mailto:Zef.Wagner@portlandoregon.gov))  
CNN Exec. Dir., Alison Stoll ([alisons@cnncoalition.org](mailto:alisons@cnncoalition.org))

Subject: Comprehensive Plan Implementation -RCPNA Zone Change & Title 33 Recommendations

Honorable Mayor Charlie Hales and City Commissioners:

Thank you for the opportunity to address the Zoning Map and Title 33 amendments in this proposal. We oppose the BPS proposed zone change for the 60<sup>th</sup> Ave. Station Area for which we have grave concerns. We have worked closely with you, Mayor Hales, and BPS staff in redesigning the pattern of comprehensive plan map for the 60<sup>th</sup> Ave. Station Area. We greatly appreciate your support in our efforts to make this happen. But, we oppose the proposed rezoning of this area to this Comprehensive Plan density at this time due to critical safety concerns.

On July 5, 2016, the RCPNA Board voted unanimously on the following recommendation:

- 1. The Postponement of the rezoning of the 60th Ave. Sta. Area to Comprehensive Plan Density based on the lack of pedestrian/handicap accessibility along NE 60<sup>th</sup> from NE Halsey St to the 60<sup>th</sup> Ave. Max Station/I-84. The current lack of bicycle and pedestrian accessibility along this street constitutes a serious safety hazard. If the area is rezoned to higher density at this time it will only compound this hazardous situation creating a patchwork of improvements as 60<sup>th</sup> Ave. properties increase their density. As in 2011, the RCPNA still supports retaining a Design Overlay for the 60<sup>th</sup> Ave. Station Area. This decision is supported by the following additional information:**

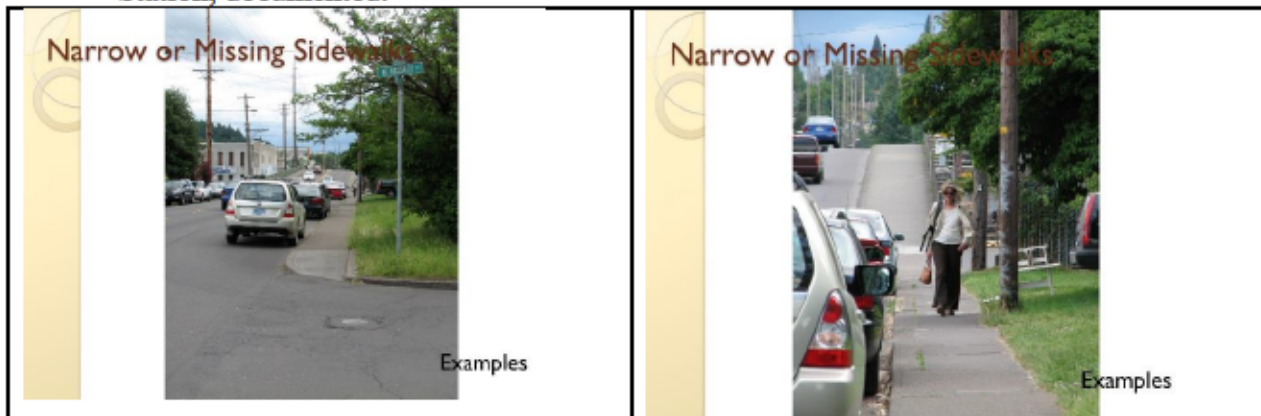
A. In 2011 the Planning and Sustainability Commission agreed with RCPNA not to rezone this area due to the fact that the current sidewalks along 60<sup>th</sup> Ave. in this area are substandard, where majority are 2' wide. Access to the Station Area for many residents, including handicapped, from Halsey St. means walking on the street and in the travel lanes of this 2-lane road. To date nothing has changed. Those 2011 PSC minutes cite, "The statement from the PSC is to approve the commercial rezoning with the Design Overlay Zone. Retain the residential zoning as is with the higher density Comprehensive Plan Map. Add the Design Overlay Zone to the current residential zoning". Further, the minutes state in the formation of the motion the following" *Commissioner Shapiro* moved to accept the proposal with the addition of addressing concerns about safety especially in the Commission's letter to Council. *Commissioner Houck* seconded". See <http://efiles.portlandoregon.gov/Record/4255184> and attached Exhibit A – May 24, 2011 PSC Minutes for more details.

Over ten residents from the neighborhood including two RCPNA representative testified against the increase in residential density at that 2011 hearing. Photographs presented showed the fact that the current sidewalks along 60<sup>th</sup> Ave. in this area are substandard, where the majority are 2' wide. Access to the Station Area for many pedestrians, including handicapped, coming from Halsey St. are forced to travel in the vehicular travel lanes of this 2-lane road. As of this date no improvements have been made to these sidewalks has occurred since this 2011 decision.

Nothing has changed.

B. PBOT's Zef Wangoner has been working with RCPNA on the Growing Transit Communities Improvements project to help address some of this area's transportation deficits. He has communicated that PBOT is applying for transportation funds for the sidewalk widening for this section of 60<sup>th</sup> Ave. It is estimated that if the funding were received through this grant the improvements will be installed by 2020. After these sidewalks are improved to ADA standards then the RCPNA requests the 60<sup>th</sup> Ave. Station Area rezoning be reconsidered as a Zoning Map Amendment.

C. Existing Conditions on NE 60<sup>th</sup> Ave. between NE Halsey St. and 60<sup>th</sup> Ave. Max Light Rail Station, documented.





### Narrow or Missing Sidewalks



Examples

### Relatively High Speeds



60<sup>th</sup> Looking South

2. **“Mixed Use Commercial Zones shall require off street parking at the rate of 3 parking stalls for every 4 dwelling units”** amending the PSC recommended language as follows:

Note: New language is ***bold, italics, and underlined***.

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#### **“33.266.110 Minimum Required Parking Spaces**

**A. Purpose.** The purpose of required parking spaces is to provide enough on-site parking to accommodate the majority of traffic generated by the range of uses which might locate at the site over time. Sites that are located in close proximity to transit, have good street connectivity, and good pedestrian facilities may need little or no off-street parking. Multi-dwelling development that includes a large number of units may require some parking to support existing and future uses in the area and serve residents and guests, especially those with disabilities.

Parking requirements should be balanced with an active pedestrian network to minimize pedestrian, bicycle and vehicle conflicts as much as possible. Transit supportive plazas and bicycle parking may be substituted for some required parking on a site to encourage transit use and bicycling by employees and visitors to the site. The required parking numbers correspond to broad use categories, not specific uses, in response to this long term emphasis. Provision of carpool parking, and locating it close to the building entrance, will encourage carpool use.

#### **B. Minimum number of required parking spaces required *for Mixed Use Commercial zone.***

***1. All Mixed Use Commercial Zone residential units shall require off-street parking at the rate of 3 parking stalls for every 4 dwelling units. This requirement supersedes all other parking regulations.***

#### ***BC. Minimum number of required parking spaces required.***

1. Minimum for sites located close to transit. For sites located 1500 feet or less from a transit station, or 500 feet or less than from a transit street with 20-minute peak hour service the following minimum parking requirements apply. The Bureau of Transportation will publish a map annually, adopted through Administrative Rule, showing sites that meet these service thresholds. For sites not shown on the map, the applicant may provide current information demonstrating that the site meets the service thresholds:

a. Household Living uses. The minimum number of required parking spaces for sites with Household Living uses is:

(1) Where there are up to 30 dwelling units on the site, no parking is required;

(2) Where there are 31 to 40 dwelling units on the site, the minimum number of required parking spaces is 0.20 spaces per dwelling unit;

(3) Where there are 41 to 50 dwelling units on the site, the minimum number of required parking spaces is 0.25 spaces per dwelling unit; and

- (4) Where there are 51 or more dwelling units on the site, the minimum number of required parking spaces is 0.33 spaces per dwelling unit.
- b. All other uses. No parking is required for all other uses.
2. Minimum for sites located far from transit. For sites located more than 1500 feet from a transit station, or more than 500 feet from a transit street with 20-minute peak hour service the minimum number of parking spaces required is stated in Table 266-1.”

Supportive findings as follows:

- 1) The 2012 David Evans and Associates conducted a Parking Study for BPS during their review of apartment parking. In this document, page 14 “Key Take Aways” states that “roughly 72 percent (of apartment residents surveyed) do own or lease at least one car”. Although 67% of apartment residents currently park on the street the residents of the new Mixed Use Commercial will not have this option. The Centers and Corridors Parking Committee, of which RCPNA Chairwoman Tamara DeRidder was a member, concluded that Commercial Uses will not be allowed to park in Residentially zoned areas. Corridors such as NE Sandy Blvd. do not contain the depth of Commercial/Mixed Use Commercial Zone to accommodate much, if any, long term parking. Therefore, adequate off- street parking needs to be required for Mixed Use Commercial that contain dwelling units to accommodate these residents.
- 2) The November 2012 David Evans Parking Study, mentioned above, states that “roughly 72 percent (of apartment residents surveyed) do own or lease at least one car” <Emphasis Added>. If we assume that half of those who own one car also own another then 36% of the total own 2 cars. This will equate roughly to the same number as if 100% residents own 1 car. Requiring 3 vehicle off-street parking spaces for every 4 units serves to restrict the current rate of vehicle ownership in the Mixed Use Commercial Zones thereby encouraging the transition to use of alternative means of transportation.”

Thank you again for opportunity to recommend changes to the Recommended Zoning Map and Parking Requirements for Mixed Use Commercial. Please let me know if you have any questions.

Respectfully,



Tamara DeRidder, AICP  
Chair, RCPNA  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213

Exhibits:

- A. May 24<sup>th</sup>, 2011 City of Portland PSC Minutes on the 60<sup>th</sup> Ave. Station Area Rezone.

## Portland Planning and Sustainability Commission

Exhibit A

Tuesday, May 24,

2011 6-9pm

Meeting Minutes (part)

**Commissioners Present:** Andre' Baugh, Karen Gray, Mike Houck, Gary Oxman, Howard Shapiro, Chris Smith

**Commissioners Absent:** Don Hanson, Lai-Lani Ovalles, Michelle Rudd, Jill Sherman, Irma

Valdez **BPS Staff Present:** Joe Zehnder, Chief Planner; Julie Ocken, PSC Coordinator; Deborah Stein, Supervising Planner; Matt Wickstrom, CPII; Eric Engstrom, Principal Planner

**Other City Staff:** Stuart Gwin, PBOT

*Chair Baugh* called the meeting to order at 6:03pm and provided an overview of the agenda.

### 60<sup>th</sup> Ave Station Area Project

Action: Hearing / Recommendation

Matt Wickstrom and Stuart Gwin presented

Documents Provided:

- o 60<sup>th</sup> Ave Station Area existing and proposed conditions table
- o BPS staff response to PSC questions at 04/12/2011 hearing
- o BPS staff addendum dated 05/20/2011

- o PBOT staff response to RCPNA transportation questions

Matt provided an overview of what has happened since 04/12/11 PSC hearing on this project:

- o BPS staff provided a memo response to the PSC questions from the 04/12/11 meeting

- o RCPNA sent a request for PBOT to review areas of concern; BPS met with PBOT to form a response to RCPNA

- o Written testimony was received — noted in “other testimony” below

- o BPS and PBOT staff met with Vice Chair of North Tabor NA

- o BPS staff sent an updated memo to PSC members on May 20, 2011

- o PBOT responded to RCPNA about their transportation concerns

Stuart commented on transportation in the station area:

- o PBOT and BPS met with the neighborhood associations last week to discuss content of memo PSC received in the briefing packets

- o Changes in zoning would not have significant impact on mobility — zoning proposals will not do harm in terms of transportation in the neighborhood

- o PBOT will continue to work with the neighborhood about operational concerns over the next 6 months to one year

*Commissioner Smith* noted some traffic concerns could be handled soon, and some would require financial capital

- o Stuart: To do significant changes (for example, a “road diet” for Halsey), this may take a while to get there due to limited finances, but we would be glad to lay out a plan with the neighborhoods.

- o Matt: We've contacted TriMet to look at safety issues on platform, TriMet is working on a response.

*Commissioner Smith:* The service station is planning to put in a convenience store — they can do this in current and proposed zoning.

- o Matt: Most changes would be interior ones at the gas station; we would have to see plans to see if other adjustments would be needed.

There have been suggestions made about moving from the current zoning to the comprehensive plan zoning to go through design review. What are the standards?

- o The design overlay zone needs to be applied with current zoning, not just with the comprehensive zone plan

- o R5 zoning has been applied in a few areas outside historic areas. It's not out of the question for a D-overlay with R5 zoning, but it's not very common

*Commissioner Shapiro:* Throughout the process, there have been safety concerns raised. Can you be sure those will be addressed? I'm not comfortable pushing this through without making sure safety issues will be worked on.

o Stuart: We are working on the issues now; we may not have a solution for everything immediately, but we are trying to resolve transportation issues immediately.

*Commissioner Gray:* When we meet with communities and neighborhoods, some people don't always understand the answers from bureaus because they are very technical. What are the top 3 things people have been concerned about in your discussions?

o Matt: Design of infill; transportation and safety; and potential density of infill. People would like the design overlay while maintaining current density.

#### **Testimony**

o Bob Richardson, RCPNA (+ written testimony): a member of the RCPNA land use and transportation committee. As noted, the NA has had ongoing talks with PBOT and BPS. There are significant existing problems, especially that would need to be addressed with increases in density. We have 3 priority areas: 1. safety/access on the station overpass; 2. the NE Hassalo and NE 60<sup>th</sup> intersection and lack of sidewalks eastward; 3. the intersection of NE Halsey and NE 60<sup>th</sup>. Modest signalization changes could make a big improvement for the intersection at Halsey and 60<sup>th</sup>, so please work with PBOT to continue work on safety issues. We need to look at density done right with adequate infrastructure, not just the zoning.

o Allen Brown: a homeowner in the area. Please reject or modify with substantial changes the proposal. RCP has 166 properties that would be affected by the zoning changes; 66% are owner-occupied; this is an "old" residential neighborhood. Adoption of the changes would negatively affect livability and home valuation — with few people, there is less demand and prices go down. He favors the design overlay, which would remedy some of the challenges there have been with previous projects. The comprehensive plan called for Transit Oriented Development in the area, which was

accomplished 10 years ago... but we don't need 2 TODs in the area. High density is not appropriate for the area. I oppose the residential zoning and think the comprehensive plan map designations need to be reviewed.

*Commissioner Smith:* There is RH zoning in the comp plan, and changing zoning now to match the comp plan would accelerate pace of changes, but wouldn't change what is allowed today.

o Allen: There is no room for development in the area aside from 2 vacant lots, but these shouldn't spur further development.

*Commissioner Shapiro:* Is there a way you would suggest we could pass this project on to City Council for support?

o Allen: I am in favor of the design overlay, which we would want over zoning. Safety concerns need to be addressed.

*Commissioner Oxman:* How would design overlay help situation?

o Allen: There were 2 recent RH developments in the area when we moved in. 1 was a 6-plex of condos, all of which sold, but parking is a challenge. The other is the "infamous Willow Place", also of 6 condos. Their front entrances do not face the street. People have no parking, and the building is too big for the lot; only 1 of the 6 units has sold.

o Bob: Guidelines go along with design overlay, including things like doorways facing the street, windows needing to engage with the street.

o Allen: The character of the neighborhood is single family residential. Any infill should work with neighborhood.

o Jacob Wollner, North Tabor NA vice chair. We've had feedback from single family home owners saying infill doesn't relate to the existing home character. We want to see a design overlay that reflects this. More importantly, we want safety for transit connections in and around neighborhood, which have not been prevalent (vs. freeway infrastructure being built). High quality, thoughtful infill and development is needed to address current safety issues. This plan is one piece of this. It's a good plan, a good start, but we need to get other agencies on the table to address safety and transportation issues.

o Terry Parker (+ written testimony), speaking for self as resident of community. The lightrail boardings at 60<sup>th</sup> Ave have been larger than expected since the station's beginning. Plus with the expansion of Providence, there is increased congestion on streets. I oppose the

upzoning prior to review of the area as well as transportation updates needed. I do support design overlay. The PacWest property should be reevaluated as an opportunity site with potential housing on the side of the property facing Normandale Park.

o Robert Hawthorne, on behalf of Andrew Dryden (+ written testimony): Expressed support for project in its entirety. Infill will help bring investment to neighborhood.

o Tamara DeRidder, RCPNA land use and transportation committee. The NA opposes the automatic upzoning to comp plan density without property owner consent. We don't mind upzoning but want to make sure people are on board. We strongly support design review overlay — but medium density vs. high density has been discussed as the proper density for the area. We oppose upzoning until traffic and crosswalk issues have been reviewed. We do support the interim transportation improvements.

*Commissioner Smith:* I'm not sure about owner consent. I should be able to redevelop my property to a higher density if it is allowed. This is more about being informed than consent.

o Tamara: The comp plan does not show up on title reports or bills of sale. It would be a disservice to a property owner for them not to be at least have been talked to about what applies to your property.

o Joe Recker: I reviewed the comp plan before buying my house in the neighborhood about 3.5 years ago, and I see the change as a positive direction. New development contributes positively to the neighborhood. We do need to rebuild some of the local streets that don't currently have complete infrastructure. We already have excellent transit access with excess capacity to accommodate more boardings. Bus lines provide options as well. We are in a good location for the zoning change.

o Lisa Gorlin: There are safety solutions needed in neighborhood, including at the 60th Ave station. Still has lots needed to be done, and a decision should consider long-term solutions like bike boulevard treatments, traffic calming on Glisan for pedestrians or putting in a light at 63rd.

*Chair Baugh closed testimony for this project.*

Matt clarified that the differing Comprehensive Plan Map designations are not recorded in deeds. We've referred to this as "truth in advertising" — you see what you are buying.

*Commissioner Smith:* Why is the PacWest property not shown as opportunity site?

o Matt: It was early on, but we determined the level of investment is beyond what could expect turnover at a reasonable pace. In 2004 they went through Land Use Review and have brought all their operations up to code so they could continue their operations.

There is also the potential that a future property owner would request a more intense zoning through a quasi-judicial process. If that was the case, large scale transportation improvements may be required, unlike the piecemeal improvements that the Zoning Map Amendment process triggers for residential properties.

*Commissioner Smith:* In design review, development has to meet a set of guidelines in code or go in front of design commission at staff level.

o Matt: It's a two track system. One track is to meet the Community Design Standards in the Zoning Code. The other track, if the Community Design Standards cannot be met, is to go through a discretionary Design Review. This review is done at the staff level with appeals going to the Design Commission and is based on the Community Design Standards.

*Commissioner Oxman:* What is the current design review overlay and standards? What if we change this as the community has requested? How would design overlay happen procedurally?

o Matt: The Community Design Standards require a front porch and main entrance facing the street and other aspects that create a friendlier street façade in general. If making additions, neighbors would have to meet community design standards as well. Design review does not regulate density, just aesthetics. This could be applied as part of the current zoning and would be carried over to comp plan zoning.

o Joe: In application, this could affect the developer.

*Commissioner Oxman:* Point 6 on the May 5th memo from BPS staff sites an intensity of 10,000 residents plus workers per half mile radius around the station vs. how much presented in testimony?

o Matt: This is about half of what was presented at the previous hearing.

#### **Other Testimony Received**

- o Ed Gorman, RCPNA land use and transportation committee o
- Michael Roth, Chair, RCPNA
- o David Diggs
- o Rami Abdalwahab
- o Allen Brown
- o Ron Stout
- o Mike, Seven Virtues, North Tabor o
- Tamay Primitivo
- o Bill Lymm
- o Rich Virkelyst

*Chair Baugh* stated the proposal to adopt the 60<sup>th</sup> Ave Community Project to Council including:

- o changing residential zoning from R5 to R1 or RH (except for the two mid-block transitions areas);

- o changing commercial zoning to CS (except for the two gas stations which remain CN2 with a CS Comp Plan Map designation);

- o adding the design overlay zone throughout the station area;
- o refining or elevating priority of transportation improvements.

*Commissioner Smith*: This is emblematic about what we are trying to do around the city; I like TOD but also know there is difference between density done right and density done wrong (e.g. the Pearl vs. 122<sup>nd</sup> Ave). The 60<sup>th</sup> area is somewhere in between. I have a concern about how fast we push density, and we need to push infrastructure with density. We need tools to better match the paces of each. What about funneling SDCs into capital projects to improve livability? Or like the Mayor has proposed, a micro-URA to capture taxes and funnel back into projects? I'm supportive of design overlay, but I'm not sure of zoning change at this point.

*Commissioner Shapiro*: I have the same concerns. Can we pass along a recommendation that basically supports the idea but with safety issues being addressed more immediately? We need to be careful on referring projects to Council about zoning issues.

*Commissioner Houck*: The design review and safety issues need to be strongly addressed in our letter.

*Commissioner Shapiro* moved to accept the proposal with the addition of addressing concerns about safety especially in the Commission's letter to Council. *Commissioner Houck* seconded.

*Chair Baugh*: Transportation improvements are disconnected from zoning. They are long-term and very topical for the neighborhood. We have an opportunity to press this forward to get visibility for transportation concerns of the neighbors and bring them forward to Council. This area could look to a TGM grant as an opportunity for extra funds to look at the safety issues.

TriMet is working on their letter. We can also come back in about 6 months to see how things are progressing. Zoning-wise, commercial zones seem to work; it's the residential that seem to be a question/problem. If we separate them, the design overlay seems to be a winner for all.

When we do the comp plan, we will again address this issue even if we don't address it today.

*Commissioner Smith*: I support the design overlay and only commercial upzoning at this time.

*Commissioner Smith* proposed an amendment to the recommendation by removing upzoning of residential areas and adding a summary of comments about livability and safety aspects in the letter to Council.

The statement from the PSC is to approve the commercial rezoning with the Design Overlay Zone. Retain the residential zoning as is with the higher density Comprehensive Plan Map designation. Add the Design Overlay Zone to the current residential zoning.

*Commissioner Shapiro* seconded and the amended proposal passed unanimously.

(Y5 — Gray, Houck, Oxman, Shapiro, Smith)

- o The goal of the inventory is to identify and manage risks and opportunities; to provide a baseline for regulatory and legislative development; collaborate with local governments, ODOT, TriMet and others; and set the stage for tools being developed

- o The GHG emissions toolkit looks at projects and programs based on climate impacts; it is designed for project or building managers to evaluate options to minimize GHG emissions

o Climate Smart Communities Scenario Planning

o HB 2001 & SB 1059 created the Oregon Sustainable Transportation Initiative o Target rulemaking advisory committee — 20% per capita GHG emission reduction by 2035 from light duty transportation sector

o Currently, 15% of local emissions are from SUVs and light duty trucks

o Transportation strategies include incentives for walking, biking, transit, lowcarbon vehicles, shared options and complete pedestrian/bike networks

o Work is also being done in reviewing technology and fleet mix; pricing options; and percentages of hybrids vs. cars/trucks — and looking at the change from 2005 to 2035, with specific goals for each category

*Commissioner Smith:* Will there be a report that shows the benefits for reducing GHG emissions?

o Mike: Yes, at a state level.

Research has shown that the top GHG reduction strategies are those that expand low GHG options and that reduce the amount people drive. For Metro's work, the state will give us the technology and fuels assumptions for us to include in our scenarios, leaving us to focus on the land use and transportation strategies highlighted in blue for our scenarios.

Early analysis by the state shows that 100 mpg economy is required to get within the 60-70% reduction range.

Metro will evaluate the alternative scenarios to see how they perform relative to the GHG targets and the other outcomes we are trying to achieve. The recently adopted RTP, Community Investment Strategy and the Regional Indicators project will provide direction on the measures we should use for this evaluation. These are the same types of evaluation measures being used in the State GHG analysis.

Scenarios timeline

o 2011 — phase 1 — understand choices; January 2012 report to state legislature

o 2012 — phase 2 — shaping the direction; November 2012 to confirm preferred scenario elements

o 2013-14 — phase 3 — building the strategy; June 2014 to adopt preferred strategy and begin implementation

*Commissioner Houck:* My adaptation question was referred to but it's not in the materials. The CAP includes lots of discussion about adaptation, but seems like Metro's documents have no mention of climate adaptation, although Mr. Hogle did in his remarks. But, Mr. Hogle's remarks seem to indicate that Metro's view is adaptation work is met purely through their acquisition of natural areas. Urban/rural reserves and regional biodiversity are in Metro's purview. Where is adaptation piece in the scenario planning work?

o Rex: We are wrapping up 2 year effort, and the last component is an inventory/gap analysis about adaptation and preparation to respond to the Lower Willamette Report and other programs in the community. Also things such as proposing budget amendments to continue this work that is not covered in Scenario Planning is on the table.

o Mike: From the Scenario Planning perspective, natural areas are a base level. We're also thinking about adaptation of the built environment and are still looking at tradeoffs between adaptation and mitigation efforts. It is more expensive to adapt the built environment instead of looking at mitigation for long-term.

*Commissioner Houck:* In terms of adaptation, we expect more storm events in winter, expanded flood plains... so how do we build resiliency into natural systems. It's more about not putting homes where they shouldn't be. I want to be clear regarding what I am referring to vis a vis climate adaptation. I am not referring to the structural changes Mr. Hogle described with regard to elevating bridges, buildings and other physical structures. I am referring to the

natural landscapes such as floodplains, steep slopes, fire hazard areas. Those are issues that Metro does have control over the extent that land use planning can impact where housing, commercial and industrial development are allowed—or not allowed. Acquisition and bringing natural areas into public ownership is one important strategy, but land use and regional growth management are also critical functions that Metro has and should use in the arena of climate adaptation strategies.

o Rex: Some things we don't control; there are huge impacts if we don't do mitigation, but this is global issue too.

*Commissioner Shapiro:* Air doesn't know boundaries, so Metro is a good place for this work. In terms of The Intertwine, I see this as an opportunity for ways to get around the region other than in cars. I encourage branding concept of The Intertwine.

o Mike: The Intertwine is a joint effort. Alliance's efforts include a regional conservation strategy that includes a chapter on climate change and ideas that could be implemented at the regional scale.

*Commissioner Smith:* I support The Intertwine. I also encourage Metro to be a sponsor of Sunday Parkways to promote these areas such as the Springwater Corridor. Tying back to the 60<sup>th</sup> Ave project, how do you make the "medicine go down with some sugar" on how we execute and communicate to a community about a strategy?

o Rex: We are talking about creating "high amenity communities". Most areas want more amenities, choices and options — which relate back to density since business and services need people. How do we help local communities redesign TSPs to get what they are missing.

*Commissioner Houck:* DOI will get additional funds to address climate change, biodiversity, green infrastructure. I also want to reiterate we are already doing lots of things to address mitigation and adaptation (for example the Healthy Connected Neighborhood strategy). The recent acquisition of 146 acres using stormwater fees is another example.

In Scenario Building, Metro is using Envision as well as Metropolitan's GreenStep... next spring. Draft preferred strategy by end of 2012 to transition into Phase 3.

o Joe: This timing is a little ahead of scenario planning for the Comprehensive Plan, but we want to synch it up to provide input into this thinking.

o Kim: There is a big impact on the RTP. We're already helping to mitigate climate change, but a hope is that we will reexamine investment priorities. We know there are lots of needs for all modes of travel, but are goal is to achieve all 6 outcomes while reducing GHG emissions.

*Commissioner Gray:* You noted equity is important. How do I see this in what you're doing?

o Mike: It is an emerging important piece to what we're doing. Our Indicators project with the City of Portland has an equity panel, which was developed through community leaders. We are analyzing race/ethnicity/other social economic factors, aligning services with low-income or other households of need. Will apply to this effort as investments impact. Social services, shopping at the local level also to be included.

o Rex: We are changing what we measure. In the RTP we measure costs of housing plus transportation. We are looking at what our investments affect in terms of locations where people live. Also we have started the OptIn panel to understand people's concerns, furthering our outreach to people.

*Chair Baugh:* In terms of the 122<sup>nd</sup> Ave community, we know the school district doesn't want any more density; transit doesn't work well there; the area is lacking sidewalks; jobs are not plentiful in the area, so people need to drive more. As we look at transit, this could cause gentrification and/or displace people. The conflict is if new TSP will address improved transit instead of basic needs.

o Rex: The climate action work will not address this, but regional planning efforts can. The 2040 goal is that everyone is prosperous. We have attempted at a regional level and failed on affordable housing strategy. In the current system, people who lack financial stability get priced out of areas. This remains one of the biggest tasks we have to work on in trying to make all neighborhoods great places to live.

## **Portland Plan – Buildable Lands Inventory**

Action: Briefing

Eric Engstrom



PowerPoint: <http://www.portlandonline.com/bps/index.cfm?c=41664&a=350556>

Documents Provided:

o BLI documents: [www.pdxplan.com/bli](http://www.pdxplan.com/bli)

o Update maps: [www.pdxplan.com/atlas](http://www.pdxplan.com/atlas)

This presentation is a preview of what the PSC will consider at the June 28 meeting, when we will finalize consideration of residential BLI, with a recommendation to City Council to adopt and deliver the BLI to the State as part of Periodic Review.

Analysis here is based on the cCurrent Comprehensive Plan.

A Constraint identifies physical, regulatory and/or market factors that limit future housing and jobs.

Vacant or Underutilized Land describes what is capacity for growth and where growth may occur. Report w/map-like drawing includes the GIS methodology behind mapping.

A reminder is that forecasts are not targets — they are descriptions of what we think may happen, but we are not saying we prefer it. Using Metro 2009 forecasts, will be updating at Metro updates UGB decision.

BLI is part of the analysis and includes zoning and constraints assumptions. The steps are looking at:

1. Where is it possible for future development to occur?
2. looking at a default scenario — where we think growth will happen without changes
3. Adopting a preferred scenario — where we want growth to happen

Since December we have added an air quality and an earthquake hazard map; we have completed a Technical Methodology Report; and have added a “tipping point” for constraint model — that is, some sites have overlays of constraints, making them really difficult to consider. The threshold of 4+ constraints reduces capacity of these sites.

We do have sufficient capacity to meet Metro forecasts. But only about 16% is single-dwelling whereas the trend is more for multi-family units. We could have a potential shortfall in some housing types for some neighborhoods.

Next steps:

o Recalibrate maps with Metro allocation

o Update Employment Opportunities Analysis Report. This will come to the PSC in Fall 2011

o Evaluate default scenario

o Create a scenarios Report that describes some of the trade-offs

Scenarios Report — what is the Default Scenario?

o In some areas, you can't just look at past trends. This model fills an area then reallocates to other areas that still have capacity

o Many would land in Central City; Mt Tabor to Powell Butte; north Portland o

Single-family building would be more at the periphery

*Commissioner Smith:* My concern is that the left half (west side) has infrastructure to handle an increase, but the east side doesn't yet.

o Eric: This is one of the things we need to look at.

*Chair Baugh:* The I-205 area has capacity ability, but what about air quality there along the highway?

o Eric: A map we added is the air quality risk factor map (p. 51) where you can see the DEQ modeling to see if people are in a risk area. This is the current map, not the 2035 map. Online we have a 2017 map, which actually shows many risk factors declining. We can look at how many people these scenarios are put in areas with poor air quality.

*Chair Baugh:* In the upcoming scenario with jobs, is there an assumption about jobs and income levels? How close will people be to their jobs? Looking at east county today, what are the job classifications and where are people traveling to? How do we get people close to their jobs with appropriate housing types and minimize transportation?

o Eric: On the jobs side, there are about 12 employment geographies throughout the city, representing different types of jobs. There is a map of employment opportunity areas showing this. On the residential side, we have housing units and feasible type mix

based on zoning. Ignoring job type, there are many more jobs on west side than on the east side.

*Commissioner Gray:* I'm hoping it wouldn't be all one kind of housing and one kind of jobs.

Hope we also talk about “mixed use jobs”. We don’t want people to be stuck in low-income jobs just based on where they live.

o Joe: When we look at scenarios, it brings up these types of questions. How do we use the growth coming to Portland to shape the neighborhoods in ways we desire? What about the ability to provide the services you desire to reshape different areas? New development can help shape development of hubs.

*Commissioner Smith:* This suggests beefing up Gateway as an employment hub for the city to give access to the workforce in east Portland. What is the framework for evaluating these choices?

o Joe: Gateway is zoned to be this employment hub, so we wouldn’t have to change the zoning. But we may have artificially inflated land values by prematurely zoning this way.

*Commissioner Smith:* What about engagement with neighborhoods about this work?

o Eric: We sent communications and have proactively tried to engage NAs and District Coalitions; we’ve outlined the schedule; the citywide landuse group is engaged.

*Chair Baugh:* Regarding neighborhood engagement, we want to make sure we engage them in a way that says changes are coming, and there will be pressure on their systems. Again the discussion is not about density, but how do we do it right.

o Eric: The message is not that we need to upzone or increase density. The investment strategy is the main next step — looking at how we better get amenities in place in specific areas.

*Commissioner Gray:* The Gateway Education Center plan is to build good jobs, education that matches population living there so they can live, work, play where they are.

No further comments or questions were offered.

*Chair Baugh* adjourned the meeting at 8:53pm.

**From:** [Donald Hanna Jr](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Stockton, Marty](#)  
**Subject:** RE: Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 2:56:56 PM

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Dear City Council,

I'm writing to request early implementation of the zoning changes that were approved in June.

My family has owned property on Woodstock Blvd since the 1970's. Properties were purchased with the hopes of commercial development someday. The properties were zoned commercial back then and then sometime later became zoned medium and high density residential. Now the comprehensive plan makes them zoned mixed use commercial. This is the best of both worlds for us and the City. It will allow us commercial and residential use. We would very much like to get started right away with a mixed use development in fact we have preliminary sketches drawn. The city desperately needs more housing and we are prepared to move forward if we can get this zoning now. Here are the addresses for the properties that my family owns. Thank you for your consideration.

5112 SE Woodstock  
6014 SE 51st Ave  
6028 SE 51st Ave  
5119 SE Martins  
5105 SE Woodstock

**Donald Hanna, Jr.**

President

**HANNA REALTY, INC**

10001 SE Sunnyside Rd, Suite 200

Clackamas, OR 97015

503-774-8893

503-774-8889 (fax)

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

**From:** [Sarah Sloane](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [sloane](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 2:33:00 PM

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**From:**

Sarah Sloane-Barton  
1535 SE Clatsop  
Portland, OR 97202

In regards to:

Rezoning on SE 13th St in Sellwood

Comments;

I am writing in strong opposition to the rezoning of the southern part of SE 13th Ave (around Clatsop and Sherrott). Like many of my neighbors, I bought a house in this specific neighborhood because it is an escape from the city with easy access to amenities. Walking south on 13th from Tacoma towards and beyond Clatsop is like no other part of SE 13th Ave. It is leafy and quiet and has many lovely historic homes with beautiful gardens. It is a pleasure to leave the business of 13th and to arrive home into this quiet neighborhood. To rezone that area so that developers can come in and destroy the homes that are there, creating apartment buildings up to 4 stories, is a travesty.

There are other ways to increase density in the neighborhood without allowing large builds. These alternatives add affordable homes, but leave the character and its historic homes as they are.

1. Encourage the building of ADUs for rentals or even as condos on lots that are big enough
2. Encourage adding onto existing houses and then dividing into condos or multi-family dwellings.
3. Discourage tear-downs and the building of large single-family houses where single-family houses already exist (this does not add density -- it only produces a house out of character and financially out of range)
4. Limit multifamily dwellings to existing structures with modification

These practices increase density but also retain the unique character of the existing neighborhood. Those of us who have bought houses here and live here should have the greater say in what happens to our neighborhood than developers or city officials who undoubtedly live elsewhere and don't understand the tremendous importance of place.

Portland, ME, although smaller than Portland, OR has taken the historic preservation

route (established 1990). In spite of some restrictions (no tear-downs with a few exceptions) it has nonetheless been able to maintain neighborhood character while increasing available housing. Many large homes are now condos. And, if the lot size permits, houses have been expanded to divide into condos or rentals. Lots are generally small and can't accommodate ADUs (unlike Portland, OR) but where they can, that has also been a solution. What Portland hasn't done is permit tear-downs. The result is a lovely city with original structures and increased density. I own a house on a street that is entirely multifamily dwellings now. Many of these were originally single family (including my own house built in 1899 which is rental and income property). None of the neighboring houses is under 100 years old and they look fantastic. Yes, the street is probably more "city" feeling and less "residential" than it was 100 years ago. But its architecture and feel is intact. It still feels like the old city and is a pleasure to walk around. Each house is unique and there is pride in heritage. Many of the houses have plaques with dates on them. It's a big tourist draw, BTW.

Please don't turn Sellwood into a part of the city that has no soul. You will do that if you continue to allow tear-downs. And the southern part of 13th will never be the same with new large builds. As it is now, it is a treasure. Once something is destroyed, it is gone forever.

**DONALD P. ROACH**  
ATTORNEY AT LAW  
3700 Barbur Bldg.  
3718 SW Condor, Suite 110  
Portland OR 97239

TELEPHONE: (503) 228-7306

FAX: (503) 228-8676

October 12, 2016

CPUtestimony@portlandoregon.gov

RE: Property located at 1012 NW 21<sup>st</sup> Ave., Portland, Oregon  
Currently Zoned CS; Proposed Zoned CM2; Overlay at M  
regarding NW Comprehensive Plan

Dear Sir/Madam:

I represent the owners of the above referenced property on NW 21<sup>st</sup> Ave., Virginia Corey and Bernita Johnston.

My clients received a copy of a notice of proposed zoning map and code changes.


I note that it appears that the CM2 zone will allow limited commercial parking. The CS zone provides for approved parking.

This property is currently leased to Starbucks for a coffee shop with a parking lot for customers.

Finally, restricting parking for its current use as a Starbucks would be a serious hardship for the tenants and for the owners for future use of this property.

I would appreciate it if you would provide this information to me at your earliest convenience.

Very truly yours,

  
Donald P. Roach

DPR/dsh  
c: Virginia Corey

**From:** [Jim Edelson](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** "Comprehensive Plan Implementation"  
**Date:** Wednesday, October 12, 2016 2:04:37 PM

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Dear Sirs

I am a board member of the Laurelhurst NA who serves on the Good Neighbor Agreement Advisory Committee with Providence Medical Center, and have attended many of the development meetings for the components of the IZP.

Our neighborhood impacts from the Medical Center frequently concern traffic. We have worked with PPMC by forming a Transportation Working Group and hope to assist them in further developing their TDM program

But it has become evident to me that an equally large concern to our neighborhood must be assuring that the City prioritizes those TSP projects that not only address infrastructure needs in general, but also address specific items that create "bottlenecks" to achieve TDM objectives. In our particular neighborhood, the failure of adequate traffic capacity is compounded by the abrupt termination of bicycle lanes at NE 47th and Glisan, just short of the the Medical Center - thereby creating hazardous obstacles to choosing the bicycle commute option. This is one among several projects, at multiple institutions that if funded could get "two birds with one stone" in achieving transportation solutions in Portland.

That is why I am encouraged that while page 24 of CIZ - Recommended Draft explicitly shows that there are \$700 million dollars of projects within 1/2 mile of campuses, many of these should be prioritized **WHEN THEY ALSO IDENTIFY IMPROVEMENTS THAT WILL INCREASE PARTICIPATION IN CAMPUS TDM PROGRAMS.**

Thank you for your attention,

jim edelson  
[edelson8@gmail.com](mailto:edelson8@gmail.com)  
503.231.4665

**From:** [orliving@gmail.com](mailto:orliving@gmail.com) on behalf of [orliving](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Proposed zone changes affecting Lair Hill (Historic District)  
**Date:** Wednesday, October 12, 2016 2:03:05 PM

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Hi,

I'm a joint property owner in Lair Hill and just got wind of this latest zone change proposal. Knocked me off my feet. Please consider the following comments in making any final decision on this matter:

1) Don't change the FAR from 3 to 2.5.

Reducing density footprint? Why? The character of the historic housing in this small neighborhood is all about large footprint on small lots. Why reduce density in this way when we're so close to city center and the historical neighborhood always supported increased footprint on small lots.

2) Don't allow quick vehicle servicing

This is a small mostly residential neighborhood close to downtown Portland. Why would you propose to allow quick vehicle servicing in this lovely neighborhood? This doesn't help the neighborhood or the people living there. It increases traffic flow. We don't need a vehicle to live here, but those that have them, can get their vehicles serviced in commercial areas along arterial streets...not here.

3) Don't allow commercial parking

Whose idea was this? Is someone playing politics here? This small neighborhood has no need for a park and ride. It needs housing and services to residents of the neighborhood, not a bunch of commercial parking lots.

4) Don't change the height limit to 55 feet

It's proposed to make the footprint smaller and then say build it high and put everybody around you in the shade. What? This will change the character of this historical neighborhood. Structures will be towering over the small historical houses beside them. This is progress?

Thank you for considering my comments. Hopefully, they are read, and acted upon.

Sincerely,

Lee Klingler  
58570 Nehalem Hwy S  
Vernonia, OR 97064



**From:** [Geoff April](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 2:01:03 PM

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City of Portland,

As a Resident and Lover of Portland, I want to voice concern over the constant and increased use of Trucks on the St. Johns Bridge.

My Fiance and I travel this bridge every day, and are always nervous when crossing it. The reason for nerves are the narrow lanes, with Trucks, Cars, and Bikes all jockeying for space. The lanes are so narrow, I have seen countless trucks clip mirrors when passing, even slowly, on the bridge. When Two trucks are headed in the same direction, there is no ability for a biker to safely ride across the bridge. The worst, though, is being sandwiched between a Truck moving South, and having a Truck come toward you traveling north, with no center divide. It is threading a needle, with no escape route if any driver veers off course for a split second. Lastly, it stands to reason that by eliminating the stresses and loads on the bridge from the heavy and moving trucks, the upkeep and repair cost to this iconic bridge will be reduced, allowing us all to enjoy it for a long future to come.

Eliminating Trucks from the St Johns bridge, though, is not the only reason to consider a new bridge connecting the 30 to Rivergate. All trucks that traverse the bridge must crawl their way through our lovely community. The Apartments on N. Ivanhoe, for instance, are constantly spewed with exhaust gases and particulates, especially the second story apartments, which are in direct alignment with the exhaust stacks of trucks. Trucks on these local streets pose a danger to children walking to school, families walking to town, and cause increased wear on our local streets. They further cause increased congestion, and with hundreds of new apartments going up in St Johns and Cathedral Park, the traffic problem is only going to get worse. We are dramatically under served for river crossings. For the entire North Peninsula, the only two river crossing that we have closely at our disposal at the St. Johns Bridge and the Fremont (405) bridge.

Please consider the public safety, including air quality, street crossing, and vehicular safety, when considering the creation of a new bridge. Keeping icons like the St Johns Bridge safe and functional for the increasingly popular community, and keeping our downtown Truck Free should be a high priority for the City of Portland.

--  
Geoffrey April  
Project Manger

DAN WEBER ARCHITECTURE  
235 E. Canon Perdido St.  
Santa Barbara, CA 93101  
[201-803-3026](tel:201-803-3026)

**From:** [Gerik Kransky](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 1:53:48 PM

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Dear Portland City Council,

My name is Gerik Kransky, Advocacy Director with the Bicycle Transportation Alliance. Our mission is to create healthy, sustainable communities by making bicycling safe, convenient and accessible. We envision a community where everyone from all racial backgrounds has access to safe, healthy, and affordable transportation options in the neighborhoods where they live, work, learn, pray, and play. We want all residents to equally share in the prosperity created by investments in active transportation regardless of race, income, and socio-economic status.

I'm writing today in support of new multi-modal access language regarding the drive through facilities in the City of Portland.

- 33.224.070 Multi-Modal Access - When a drive-through facility is open and other pedestrian-oriented customer entrances to the business are unavailable or locked, the drive-through facility must serve customers using modes other than a vehicle such as pedestrians and bicyclists.

Allowing people to utilize drive through services whether or not they own a car is a common sense solution that will provide equal access to business establishment for people walking and biking. Please preserve this new policy in our upcoming Early Implementation Package.

Additionally, we ask that you please trade minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones. It makes perfect sense to allow developers to focus their resources on increasing housing supply without requiring them to increase housing costs by building costly private auto-parking structures. We are in a housing crisis and eliminating minimum parking requirements will help reduce the cost of new housing. Please consider this simple change that could create a large impact.

Thank you for considering our input on this issue.

Regards,  
Gerik

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Gerik Kransky | Advocacy Director  
tel: 503-226-0676 x11 | cell: 503-523-9651  
follow me on [twitter.com/gerikkransky](https://twitter.com/gerikkransky)

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Bicycle Transportation Alliance | [btaoregon.org](http://btaoregon.org)  
618 NW Glisan Street, Suite 401  
Portland, OR 97209



**From:** [Madeline Kovacs](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** P4E Testimony on Downzoning Proposed for NW Portland  
**Date:** Wednesday, October 12, 2016 1:53:23 PM  
**Attachments:** [NW Downzone P4E Testimony.pdf](#)

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Hello,

Please find the attached letter of testimony from the Portland for Everyone coalition urging the Portland City Council to reconsider and refine “Miscellaneous Zoning Amendment package item 3, as amended by the Zoning Code Chapter 120 Map Series: 4:1 FAR memo dated August 17, 2016” (part of Exhibit N).

Portland will remain a national leader on smart growth, climate change, and affordability for its residents only if it expands capacity for housing in its best-connected neighborhoods. We can accomplish both expanded housing capacity and historic preservation at the same time, but reducing allowed FAR across a large, high-opportunity area is a blunt tool, where more nuanced solutions are required.

Sincerely,

Madeline Kovacs

--

Madeline Jane Kovacs  
(preferred pronouns: she/her/hers)  
Program Coordinator | Portland for Everyone  
1000 Friends of Oregon | [portlandforeveryone.org](http://portlandforeveryone.org)  
+1 510.410.4176 | skype: madeline.kovacs

"The world needs beauty as well as bread..." - John Muir



October 11, 2016

Dear Mr. Mayor and Portland City Commissioners,

The Portland for Everyone Coalition urges the Portland City Council to reconsider and refine "Miscellaneous Zoning Amendment package item 3, as amended by the Zoning Code Chapter 120 Map Series: 4:1 FAR memo dated August 17, 2016" (part of Exhibit N).

The amendment as proposed would reduce allowed density from the currently allowed 4:1 FAR to 2:1 in an area covering about 17 blocks of Northwest Portland. This down-zoning as defined would likely undermine a 161-unit senior housing project currently in pre-development, adding much-needed housing for our seniors in a vibrant neighborhood connected to transit and services. This action is also therefore contrary to the City's intent to increase the availability of affordable housing, and to provide equitable access to housing for people with low and moderate incomes in high-opportunity areas.

To reduce total available housing capacity in this high-opportunity area (again, talking about number of homes) will, de facto, focus development pressure on other areas. This is an important point for those who are concerned with protecting Portland's most vulnerable residents from further displacement. As the White House recently stated in its Housing Development Toolkit, "When new housing development is limited region-wide, and particularly precluded in neighborhoods with political capital to implement even stricter local barriers, the new housing that does get built tends to disproportionately concentrate in low-income communities of color, causing displacement and concerns of gentrification."

Commissioners should ask why requests like this don't seem to come before them from low-income communities, and what the effect might be of where we choose to focus our new development in the years to come. We need proposals that could ADD 1,500 or more units of zoned capacity to high opportunity areas, and include projects that will house seniors affordably in well-connected areas, not proposals that may increase displacement pressures elsewhere.

We also need to remember that zoned capacity through a comprehensive planning process gives us the total hopeful amount of units that MAY be built, not what WILL be built and made available to Portlanders looking for a home. As Dan Bertolet recently pointed out in an article published on Sightline, "Delaying upzones has the paradoxical effect of reducing future zoned capacity. Every building erected to four stories rather than eight, because zoning is too restrictive, represents four floors of potential homes denied to the city for as much as a century."

The goals of historic preservation and providing adequate housing for all are not mutually exclusive. But using a blunt tool like a broad reduction of FAR to restrict new housing, instead of a nuanced one like form-based code or hybrid of the two, kills the potential for new homes that don't threaten crucial historic characteristics. The City should be thoughtful about how it weighs these two important goals, and we believe that BOTH can successfully be achieved on a neighborhood-wide basis. Arbitrarily restricting buildable capacity (the proposal under consideration will cut the NW Alphabet Historic District in half) does not allow the City to employ a strategy that will grow supply adequately while being appropriately contextual in its approach. Rather than relying only on FAR allowances, we should build more units on sites that make sense, and engage in preservation on others.

For these reasons and more, we strongly encourage the Portland City Council to reject any down-zoning amendments, and instead look for more culturally sensitive ways to advance the city's admirable goal of historic preservation. The Portland for Everyone coalition will continue to encourage Portland City Council to make inclusive and equitable policy and funding decisions to:

- Provide abundant, affordable and diverse housing types in all Portland neighborhoods
- Prioritize housing for historically and currently under-served populations
- Prioritize housing for humans over housing for cars
- Allow more people to live in areas with good access to transportation, parks, and services
- Create and maintain economically diverse neighborhoods

Portland will remain a national leader on smart growth, climate change, and affordability for its residents only if it expands capacity for housing in its best-connected neighborhoods.

Sincerely,



Madeline Kovacs  
Program Coordinator  
Portland for Everyone  
133 SW 2<sup>nd</sup> Ave. # 201  
Portland OR 97204

Portland for Everyone is a project of 1000 Friends of Oregon  
[www.portlandforeveryone.org](http://www.portlandforeveryone.org)

ROSE Community Development  
City Repair Project  
Cully Association of Neighbors  
EnvironsPDX  
Green Hammer  
Guerilla Development Co.  
King Neighborhood Association  
Oregon Opportunity Network  
Orange Splot, LLC  
Bike Walk Vote  
Housing Land Advocates  
Oregon Walks

Brink Communications  
Communitecture  
Portland Housing Center  
Sunnyside Neighborhood Association  
Board  
Portlanders for Parking Reform  
Bike Loud!  
Safe Routes to School NW Partnership  
Turtle Island Development LLC  
Urban Greenspaces Institute  
Urban Development Partners  
Bicycle Transportation Alliance  
Proud Ground  
Woodlawn Neighborhood Association

**From:** [Beth Kerschen](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 1:50:51 PM

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To Whom it May Concern,

I am writing about the City Hall meetings that are going on in regards to the new zoning code being decided on. I would like to be there in person, but I am an artist for a living and I work 7 days a week, at least 12 hours a day and I am barely make a living here in Portland. Many of my colleagues have moved away because they can't afford to live here anymore.

First of all, I guess I am glad I couldn't come to the hearings because online I am seeing reports of really bad organization in terms of the agenda and the meeting on the whole and reports of violence where people testifying are being pushed and pepper sprayed. All handled very badly. You should know this is a very heated topic, the City Council hasn't listened to the people of Portland already and people are desperately trying to be heard. You should have been prepared to handle it better. I hope you all see these heated meetings as the concern people have and what huge impact your decisions have on the people of Portland - the current people that live here.

The artwork I do is city based landscapes and most of my Portland has been depicting Portland because I love it so much. I know the city's every corner, I have photographed it all. So, I can say that the landscape is changing in an inorganic pace and the livability and pricing is changing with it.

This is a report ([http://www.nahbclassic.org/directory\\_details.aspx?sectionID=0&directoryID=3576&directoryRecordID=706941&search=pageNumber%3D1%26directoryID%3D3576%26version%3D1%26keyword%3D2015%26activeFlag%3D1%26proximityLimit%3D0%2661090%3D17751&\\_ga=1.71670293.749387521.1471261481](http://www.nahbclassic.org/directory_details.aspx?sectionID=0&directoryID=3576&directoryRecordID=706941&search=pageNumber%3D1%26directoryID%3D3576%26version%3D1%26keyword%3D2015%26activeFlag%3D1%26proximityLimit%3D0%2661090%3D17751&_ga=1.71670293.749387521.1471261481)) from the National Association of Home Builder's report stating how liberal, rich, and closed of the People of Portland are. That we are a bunch of rich NIMBY's, but all they really want to do is build affordable housing and house the poor people. These are the arguments we hear by developers all the time - they want to get rid of old homes to make new, more affordable housing. Well, I keep reading in the papers over and over how so many of these new developments are not providing the same number of affordable housing units that they promise and what is regulation. Who is checking up on them and keeping them accountable? And I constantly see these types of houses popping up (but usually taller): [http://www.zillow.com/homedetails/4511-NE-25th-Ave-Portland-OR-97211/2097546184\\_zpid/](http://www.zillow.com/homedetails/4511-NE-25th-Ave-Portland-OR-97211/2097546184_zpid/) There is a three story house built right next to me that was on sale for \$760,000. Developers bailing out on their promises to make affordable units and then these very expensive homes are being built instead of keeping more affordable Portland bungalows (which is ruining the character of the city.)

Well, I am certainly not a rich NIMBY and I get that there is a market for these very expensive homes. I get money talks. Let's be real...this is really what all this about, developers want to make money. All this talk about affordable housing and having less parking spaces in new multi-family homes to keep prices low is all a facade. The new homes are not affordable for any existing residents, and rents for the new apartments are through the roof expensive. All I am asking right now is some balance....when you make some decisions, please think of some

balance. Think of the existing people here already living in Portland who want to stay and afford to do so. The change in buildings, landscape, pricing and traffic is growing at an inorganic rate. Demolishing old homes to build 2-4 new ones in the same spot is not providing affordable housing for everyone. Everything the developers argue is just spin to allow more building. There are a ton of empty lots in town...yes build on those. There are a ton of parking structures that could be made into a new complex, with parking. You can allow people to add ADU units to their property. Provide incentives for people to refurbish homes instead of destroying old, historical ones. Don't allow the developers and the money to completely take over.

People are moving here in droves for a reason...they love the character and culture of Portland. The Creative Class of people are a part of why people are moving here (consciously or not) and we don't qualify for this very limited Affordable Housing and we can live with this new expensive housing. As a creative, I know my days are numbered living in this city, but I write to beg you to consider options that try to preserve the culture and character of the city and these new zoning laws are not taking that into consideration.

Thank you,  
Beth Kerschen

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beth kerschen | [www.bethkerschen.com](http://www.bethkerschen.com) | [www.urbanretrospectives.com](http://www.urbanretrospectives.com)

**From:** [Wilbur Widicus](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 1:33:40 PM

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October 12, 2016

Mayor Hales and Portland City Council Members  
1221 SW 4th Ave.  
Portland, OR 97204

Dear Mayor Hales and City Council Members

Subject: Portland's Comprehensive Plan and Transportation System Plan

My wife and I and our daughter's family own property and live at 11175 NW Saltzman Road. This is a dead end road which terminates at the edge of our property.

When we bought the property about two and a half years ago we received a letter from METRO asking us to provide an easement across our property for the proposed West Side Trail. We discussed the desirability of providing this easement, and for several reasons decided to not provide it.

Our reasoning was that the trail would come so close to our house and barns that our security would be severely compromised. Another determining factor was Saltzman Road. The section of Saltzman which leads to our house is paved, but is not of a standard width. For most of its length there is no parking space. Our belief is that the proposed trail would create a trail head, and that people, perhaps many people, would park wherever they could. Also, our property has a network of horse trails. Keeping hikers using the proposed Westside Trail off our trails, we assume, would be impossible.

For these reasons we decided to not provide an easement over our property. We can't imagine that our decision will change so long as we own the property, which is expected to be for many years.

It is of great concern to us that we continue to see West Side Trail maps which show a trail through our property. Sometime the trail is designated as "proposed" or "conceptual" but to many hikers this simply means that the trail exists but isn't quite completed. Anyway, people read these maps, and they show up on our property. We have posted many signs stating that this is private property, but this doesn't seem to deter the avid hikers.

We respectfully ask that Westside Trail maps be updated so that they do not show a route through our property. We understand that there are several other routes which can be used to complete the trail connection to Forest Park. These routes may not be as desirable as one through our backyard, but they can be used to make the connection to Forest Park. As it now stands, we will never provide an easement through our property and the proposed West Side Trail will never be completed as it is proposed in the Metro planning documents.

Sincerely,



Wilbur and Isabel Widicus

October 13, 2016

**To: Portland City Council**

**Re: Testimony: Comprehensive Plan Amendments to align zoning with historic districts**

My name is Peggy Moretti and I'm the Executive Director of Restore Oregon, a non-profit that works statewide to preserve and pass forward the historic places that make our communities livable and sustainable.

I am here today to enthusiastically endorse the proposed amendments to lower the FAR and height limits in northwest for the Alphet Historic District, and in northeast for the Irvington Historic District. This is highly important if we want to fulfill the Comp Plan's policy objective of preserving historic buildings and the character of our historic districts. Inherent in that is the need to ensure the compatibility of new construction.

I would further point out that this adjustment does NOT conflict with the City's other worthy goals of density and affordability:

- The Alphet District is already one of the densest districts in the state.
- With proposed transfer bonuses, the FAR for new development can still reach 5:1.
- The current zoning will undoubtedly generate development proposals that will be rejected by the Landmarks Commission, thus setting up case after acrimonious case brought to City Council to resolve.
- Taken all together, Portland's historic districts represent less than 2% of the City's total land area. But they contain the majority of our historic resources. Giving them a little protection will not stymie our quest for affordable housing.
- Furthermore, it makes no sense that advocates are picking the most expensive land to build affordable housing on. Why is the Central City, which is already dense, bearing the bulk of the burden of adding more density when further outlying neighborhoods are crying out for new and better development? We should be focusing on making Portland's outer neighborhoods as lovely, livable, and dense as the Central City.

Please approve the proposed Comp Plan Amendments.

Sincerely,



Peggy Moretti, Executive Director

**From:** [Alan Love](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 1:20:05 PM

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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. Portland is growing up as a city, and part of that maturity involves trading the convenience of single-occupancy vehicle use for housing that can be afforded by the average citizen.

Thanks,  
Alan Love

**From:** [Daniel Ribeiro](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 12:57:43 PM

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I would like to voice my support for the building of a new bridge connecting the terminals in North Portland directly with HWY 30. The current flow of traffic through St. Johns not only impedes traffic significantly, but it adds a sizable risk of traffic accidents between local traffic, pedestrians, cyclists, and the commercial vehicles which have to contend with the tight spaces they must drive through. A bridge further west of St. Johns Bridge would be a welcome addition that would be more suitable to the industries in North Portland as well as mitigating the growing traffic woes across St. Johns Bridge, Ivanhoe and Lombard streets.

Thank you,

Daniel Ribeiro

**From:** [Rob Mumford](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 12:55:55 PM

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Dear Council,

I'm asking you to consider trading minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones.

I believe in a city for people, not cars. I'm for affordable housing, not minimum parking requirements.

I own a car and drive it, but parking is not a problem for me. It's seeing people being priced out of neighborhoods that is a problem. People not being able to afford of roof over their heads is a problem.

Thank you for your time.

Rob Mumford  
SE Division and Chavez

**From:** [jené despain](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 12:21:33 PM

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Testimony for the TSP Stage 2:

To Whom It May Concern,

As a resident of Portland's Cathedral Park neighborhood, I am writing to express my support for the conduction of a traffic study on the need for a new bridge from US Highway 30 to Rivergate.

The bridge traffic has begun to dramatically impact the traffic flow within Cathedral Park and St. John's streets. This shift not only impacts the time schedules of our residents, but our health, our environment, our homes, our safety, and a number of other aspects of our residential lives.

A new bridge would be a wonderful step towards creating new infrastructure that addresses the level of growth occurring in our city.

Thank you,  
Jené DeSpain  
7034 N John Avenue  
Portland, OR. 97203

**From:** [Gerald Fittipaldi](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 12:19:13 PM

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Hi,

I'm writing regarding parking minimums. I would like Portland to get rid of parking minimums. By requiring a certain amount of parking we are encouraging people to drive and indirectly discouraging them from biking or taking public transportation.

Thank you for your time.

Gerald Fittipaldi  
[fit884@gmail.com](mailto:fit884@gmail.com)  
mobile: 732-322-4769

October 12, 2016

Portland City Council  
1221 SW 4<sup>th</sup> Avenue  
Room 130  
Portland, OR 97204

RE: Comprehensive Plan Implementation  
4100-4120 NE Fremont Street and 3422 NE 41<sup>st</sup>  
Avenue.

MESSAGE:

Enclosed please find my two-page letter regarding the  
above zoning of the given real estate properties.

FROM:



E. John Rumpakis, property owner  
2006 NE Multnomah  
Portland, OR 97232  
TEL: 503-281-8141

Enclosure: 2



To: Portland City Council  
From: E. John Rumpakis, 2006 NE Multnomah Street, Portland, OR 97232  
Date: October 12, 2016  
Re: Written Testimony Regarding Notice of Proposed Changes

Portland City Council:

I received two separate letters dated September 6, 2016, from the City of Portland, Oregon, Bureau of Planning and Sustainability titled "Notice of Proposed Zoning Map and Code Changes that May Affect the Permissible Uses of Your Property and Other Properties". They state that the properties affected are 4100-4120 NE Fremont Street, State ID # 1N1E25AA 100 and 3422 NE 41<sup>st</sup> Avenue, State ID # 1N1E25AA 200.

Each notice states that the Planning and Sustainability Commission has recommended a new Zoning Map designation for my properties. The current base zones are stated as CS, and the proposed based zones are stated as CM1.

I am providing this as written testimony regarding the above mentioned "Notice of Proposed Zoning Map and Code Changes". For the record, I wish to state that I object to the new proposed based zone of CM1, as it amounts to a downsizing of the current zoning of my properties, which in turn, will negatively impact the future valuation of my properties.

Enclosed with the two Notices I received was a letter titled "Mixed Use Zoning at a Glance". Within this letter is a summary table which states that the current CS zoning designation is considered a "medium-scale zone" within the City's current zoning laws. However, the proposed new base zone of CM1 is listed as a "small-scale zone" on the table. This change in zoning will result in very substantial reductions to the height, FAR, and permissible uses available to my properties. Accordingly, I believe that the appropriate new zoning for my properties should be CM3. Based upon further communications and clarifications from the City, CM2 could be a possibility as well. These designations (CM3 and CM2) much more closely resemble the current CS zoning. It is a matter of fairness and equity.

Additionally, I would like to note for the record that the "Mixed Use Zoning at a Glance" letter actually states in its opening paragraph that "in most cases, the zone proposed for this property was selected because it is the closest to the existing zone". Unfortunately, even under the City's own characterization of what constitutes "medium-scale" zoning, and what constitutes new zoning considered to be closest to the existing CS zoning, I have not received, at a minimum, a proposed new zoning of CM2. In other words, while the City itself considers CS and CM2 to be "medium-scale" zoning, my properties are receiving a new base zone designation of CM1, which the City itself classifies as a "small-scale" zoning. I believe that a very reasonable case can additionally be made, on the basis of FAR alone, that a designation of CM3 as a replacement for CS, is the most equitable replacement, as CM3 maintains the maximum base FAR of 3:1 that is available

for properties currently zoned CS, whereas CM2 actually decreases it to 2.5:1. Additionally, it appears that under CS, residential area is not regulated by FAR (see "Mixed Use Zoning at a Glance").

Furthermore, upon review of the 2035 Comprehensive Plan Map App made available by the Bureau of Planning and Sustainability via the internet, I believe that I am not receiving similar treatment to many other properties located on NE Fremont Street that are also undergoing changes to their zoning. I sampled some of the proposed zoning changes for properties situated along NE Fremont Street that are in between NE 7<sup>th</sup> Avenue and NE 72<sup>nd</sup> Avenue, and in many cases property owners that were receiving a new designation of CM1 were actually being "upgraded" from arguably less preferential zones such as Residential 2,000 (R2), Neighborhood Commercial 1 (CN1), or Neighborhood Commercial 2 (CN2). With respect to the latter two (CN1 and CN2), their maximum base FAR is actually being doubled from .75:1 to 1.5:1, as opposed to the decrease in FAR across my properties from 3:1 under CS to 1.5:1 under CM1.

Additionally, many of the properties that currently share the same CS zoning as my properties are maintaining, at a minimum, a "medium-scale" new proposed zoning designation (the properties located just to the north and east of mine along NE Fremont in between NE 42<sup>nd</sup> Avenue and NE 46<sup>th</sup> Avenue have an existing base zone of CS, and yet are receiving a proposed base zone of CM2, not CM1). It seems logical that at a minimum, this new proposed designation of CM2 should be extended further west to include all of my properties located near the intersection of NE Fremont Street and NE 41<sup>st</sup> Avenue that are subject to the Notification letters dated September 6, 2016 from the City of Portland. There is no significant distinction between my properties and the properties located just across the street to the north, situated at the intersection of NE Fremont Street and NE 42<sup>nd</sup> Avenue, which are also currently zoned CS, but are receiving a proposed base zone change of CM2. In fact, market forces to this point have resulted in more dense development on my properties than those directly across the street that are receiving a proposed base zone of CM2. Not only that, but, very importantly, it appears to me that my existing building located at 4100 to 4120 NE Fremont Street may not be able to be built on this site under the proposed base zone of CM1, given the lower maximum base FAR of 1.5:1.

In conclusion, I object to the proposed base zone of CM1 for my properties, and believe that the proposed base zones should instead be CM3 (with the possibility of CM2 as noted above), as it is the only replacement proposed zoning that preserves the maximum base FAR of 3:1 that currently exists on my properties, and that does not negatively impact their value.

Sincerely,



E. John Rumpakis  
2006 NE Multnomah Street  
Portland, OR 97232

**From:** [Stephenson, Garrett H.](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Cole, John](#); ["Martha Cox"](#); [Flanagan, Brien J.](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 11:49:11 AM  
**Attachments:** [Columbia Steel Trail Testimony 10.12.16.pdf](#)

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To whom it may concern:

This office represents Columbia Steel Casting Co., Inc. Please find the attached letter and four exhibits in testimony regarding Portland's Comprehensive Plan Implementation, and specifically the Public Recreational Trail maps proposed as part of the City's "Miscellaneous Zoning Amendment" package. Please place this before the City Council for their October 13, 2016 hearing on the Miscellaneous Zoning Amendments and include it in the official record of those proceedings.

Please also respond to this email to confirm that you have received this testimony.

Thank you.

Garrett Stephenson

**Schwabe Williamson & Wyatt**

**Garrett H. Stephenson**

Of Counsel

Direct: 503-796-2893

[gstephenson@schwabe.com](mailto:gstephenson@schwabe.com)

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**COLUMBIA STEEL CASTING CO., INC.**

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service@columbiasteel.com  
www.columbiasteel.com

October 12, 2016

Portland City Council  
1221 SW 4th Ave, Room 130  
Portland, OR 97204  
Attn: Comprehensive Plan Implementation

Re: Portland Comprehensive Plan and Zoning Code Revisions  
Requested Revision to Proposed Public Recreation Trails

Dear Mayor Hales and City Commissioners,

My name is Martha Cox and I am the Chief Executive Officer of Columbia Steel Casting Co., Inc ("Columbia Steel"). As part of the Miscellaneous Zoning Amendments before you, the City proposes refined Public Recreation Trail alignments, one of which crosses our facility. This letter is respectfully submitted to request a revision in the proposed alignment of the trail so that it will not impact our operations if and when it is constructed. We have worked with Bureau of Planning and Sustainability (BPS) staff to establish a compromise alignment that would satisfy both our needs and the City's objectives, which is discussed in detail below.

**Introduction.**

Since 1901, Columbia Steel has been an important feature of Portland's economic landscape. Columbia Steel is one of the few remaining U.S. wear parts producers to maintain a vertically integrated manufacturing operation at one location, 10425 N. Bloss Ave. Our site is shown in the aerial photograph attached to this letter. **Exhibit 1.** For more than 20 years, Portland zoning maps have shown a public trail as generally located within the Columbia Slough. **Exhibit 2.** The City now proposes a new refined alignment located south of the Slough and across the operational areas of our site. **Exhibit 3.**

**Request.**

Our plant includes a substantial amount of large, complex, and expensive equipment. We rely on internal circulation roadways to move large cast steel parts and other materials around our facility. We maintain large outdoor storage areas and have our own electrical substation. The proposed trail alignment (**Exhibit 3**) runs across many of these areas and directly through our substation. Construction of the trail in this alignment would substantially undermine our business operations and circulation throughout our site. Moreover, we are concerned that routing the trail across our operational areas would present an unacceptable risk of theft and potential danger to trespassers. I raised these concerns before the Planning and Sustainability Commission on July 26, 2016 and before Metro in 2005 and 2010.

For these reasons, we request that the Council decline to adopt the portion of the Public Recreation Trail that crosses our active industrial facility and instead adopt the attached revised alignment, shown in yellow (the line currently proposed in the amendment package is shown in red). **Exhibit 4**. This will ensure a greater separation between our operations and the trail, minimizing the opportunities for theft and trespass as well as increasing safety for trail users. This proposed alignment was developed in consultation with BPS staff who, in fact, suggested it, and support our request.

**Conclusion.**

Columbia Steel is dedicated to providing family wage jobs to Portland residents and looks forward to the next 100 years. That said, competition in this industry is intense and the alignment proposed by the City will only make it more difficult for Columbia Steel to maintain its operations. Our site is zoned General Industrial (IG2) and proposed to be included within a new Prime Industrial Overlay Zone. To the extent that the City wishes to maintain the viability of its industrial land supply, we feel that it is essential that the City carefully scrutinize proposals that would actually make it harder to conduct industrial activities in Portland, such as the proposed public recreation trail at issue here. For this reason and those discussed above, we sincerely hope the Council will grant our request to revise the proposed Public Recreational Trail alignment consistent with the compromise we have developed with BPS staff.

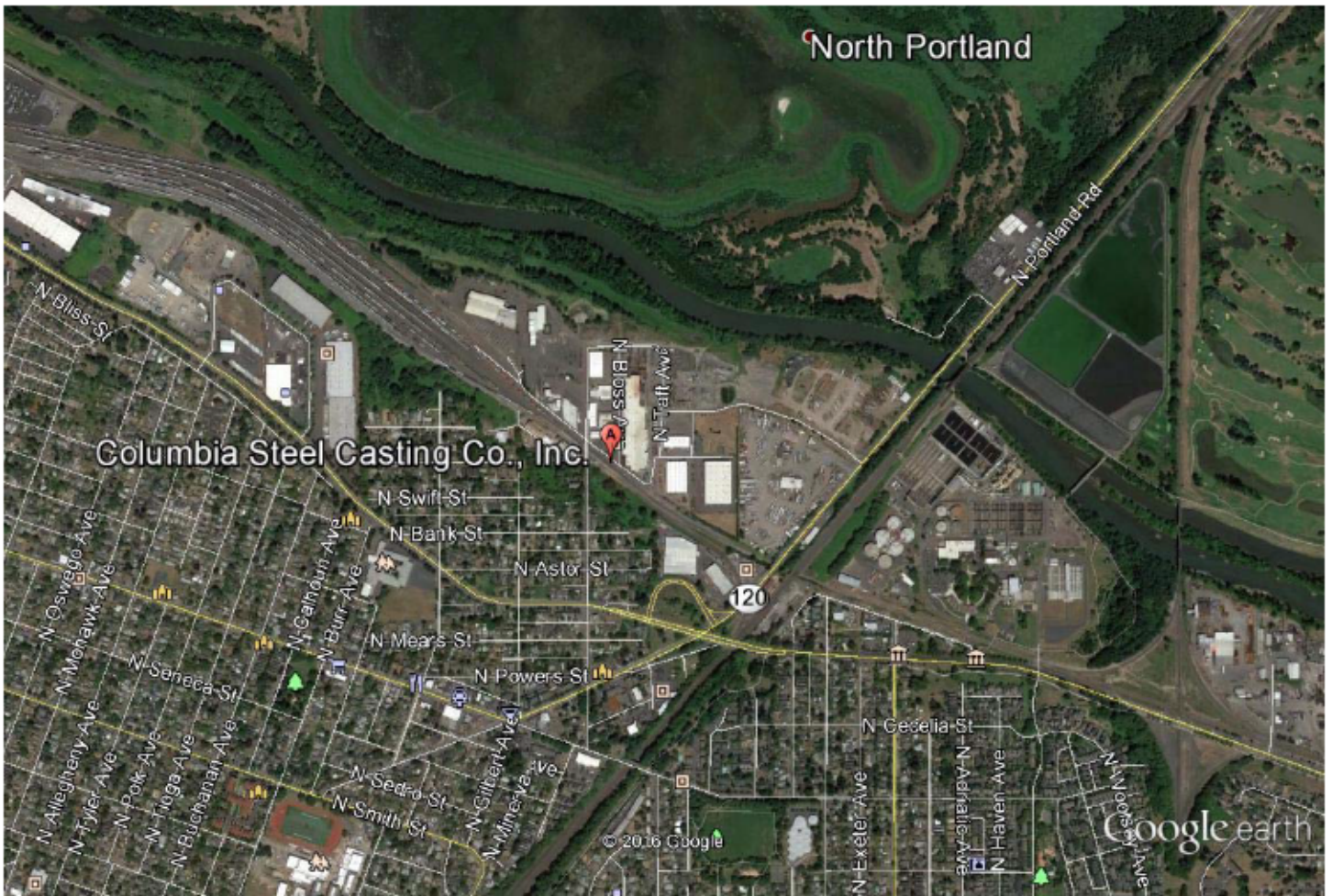
Sincerely,



Martha Cox

CEO, Columbia Steel Casting Co., Inc.

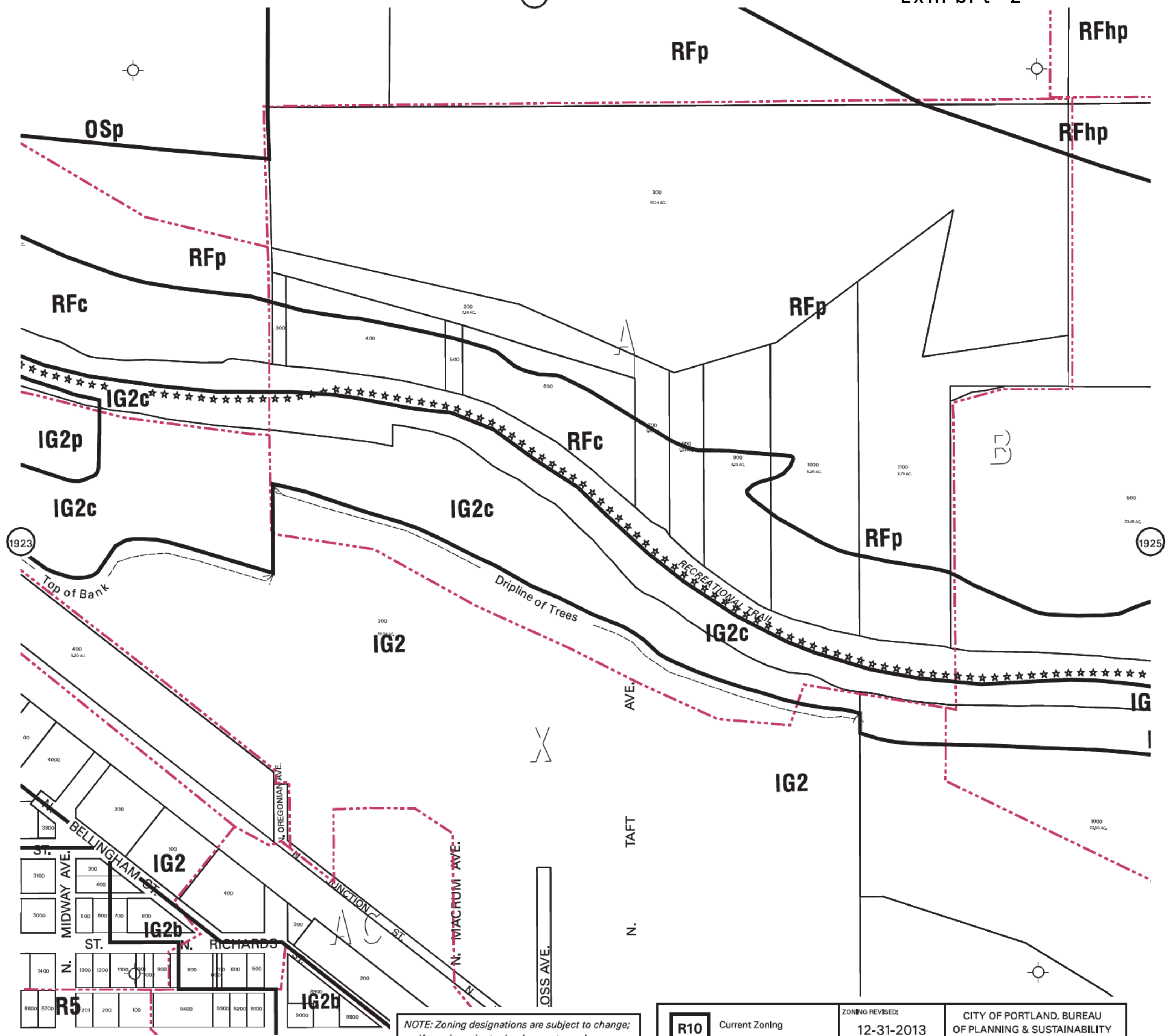
Cc: Mr. John Cole, Bureau of Planning and Sustainability



Google earth



1824






1923

1925

2024

NOTE: Zoning designations are subject to change; verify zoning prior to development or sales.

 Plan District Boundary  
 Historic or Conservation District or N.R.M.P. Boundary  
 Zoning Line


 Current Zoning  Maximum Potential Zoning as per Comprehensive Plan  State ID Map Boundary	ZONING REVISED: 12-31-2013	CITY OF PORTLAND, BUREAU OF PLANNING & SUSTAINABILITY  SCALE IN FEET 
	BASEMAP ACQUIRED: 07 - 2010	
	LEGAL DESCRIPTION: NE 1/4 SEC. 06 - 1N - 1E	<b>1924</b>











 Draft Pub. Rec. Trail

 Requested Revision to Draft Pub. Rec. Trail

**Legend**

-  Conservation Zone (c)
-  Protection Zone (p)
-  Taxlots
-  2' contours



**From:** [Peter Ghosh](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation.  
**Date:** Wednesday, October 12, 2016 11:47:47 AM

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I support Tony in his effort to eliminate minimum parking requirements in Mixed-Use Zones.

<http://pdxshoupistas.com/it-is-time-for-portland-to-eliminate-minimum-parking-requirements/>

**From:** [Pastor Aaron](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 11:44:18 AM

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## Comprehensive Plan Implementation

To whom it may concern:

I am writing to address the proposed Zoning Code changes that would reduce the maximum floor area ratio in properties in the Northwest Neighborhood from the current allowance of 4:1 to 2:1. On behalf of the Church Council of First Immanuel Lutheran Church (1816 NW Irving St.), I want to express our opposition to this change. We believe the proposed changes are a terrible idea.

First Immanuel has been located in the Northwest Neighborhood since 1906. Over the years, the congregation has worked with many partners to serve neighbors in need. We currently host a neighborhood food pantry with LIFT Urban Portland, and host a day shelter for women and children with Rose Haven. We care about those who live with the challenges of poverty and homelessness.

Over the past three years, First Immanuel has begun to explore whether we might be able to develop our property, creating more usable space for non-profit ministry partners, together with space for affordable housing. We have begun conversations with neighbors and neighborhood non-profits about how a development on First Immanuel's property can serve a wide variety of needs, and how it can contribute to improving our neighborhood. If the city adopts the proposed changes to the Zoning Code, it will make it much more difficult, if not impossible, to develop our property in such a way as to include affordable housing.

The City Council has declared a housing emergency. There is no question that the housing emergency is caused by a shortage of available housing units in Portland. It is hard to imagine how the City Council can justify reducing existing development densities in the face of a severe shortage of housing. The proposed Zoning Code changes will only make the housing emergency worse. On behalf of First Immanuel Lutheran Church, I urge the council not to change the Zoning Code. At a minimum, the Council should ensure that any zoning changes do not create barriers to or impose costs on the development of multifamily housing that Portland so desperately needs.

Sincerely,

Pastor Aaron J. Couch

On behalf of First Immanuel Lutheran Church

as directed by the First Immanuel Lutheran Church Council

--

Pastor Aaron Couch First Immanuel Lutheran Church 1816 NW Irving St. Portland, Oregon  
97209 503-226-3659

**From:** [Lucy Wong](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Vision Zero comment  
**Date:** Wednesday, October 12, 2016 11:27:01 AM

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To whom it may concern,

I am writing to comment on the Vision Zero plan. While a step in the right direction, VZ does not go far enough. For instance, there are very few specifics when it comes to action items for the future. The public needs hard numbers in terms of how much pedestrian infrastructure, protected bike lanes, etc will be created. Also, there is very little said about strengthening punishments against people caught driving while on the phone and texting. As a cyclist it often feels as if I am putting my life in my hands every time I commute because of how many distracted drivers I see. We need strict laws or more separate pedestrian and bike lanes to ensure pedestrian safety. There does not seem to be nearly enough enforcement or any data regarding distracted driving. We need that information in order to show how big of a problem this really is.

Please remember that pedestrians are the most vulnerable on the streets, every extra month or year it takes to protect them is another death on our streets.

Thank you,  
Lucy Wong



October 5, 2016

## Oregon Walks: Testimony to City Council Regarding Parking Minimums in Comprehensive Plan Update

PROTECTING YOUR  
RIGHT TO ROAM

Oregon Walks is the state's pedestrian advocacy organization that works to make walking a safe, convenient, and accessible transportation option in every community, for every Oregonian. As explained and popularized by nationally-recognized urban scholar Dr. Donald Shoup in "The High Cost of Free Parking," few urban planning policies have as profound an impact on the viability of building walkable communities than those that regulate automobile parking minimums in urban neighborhoods. The impact of forcing new construction to build abundant parking for automobiles has a significant impact on the supply of housing we can build in walkable neighborhoods, thereby restricting the number of Portlanders who can afford to live somewhere they can walk their children to school.

In 2013, Oregon Walks joined dozens of community advocates and organizations in opposing the minimum parking requirements. Since this vote three years ago, many of the fears expressed by our organization and our peers have been realized: Portland's rents have continued to skyrocket, our streets have become increasingly gridlocked, and many folks are lamenting their limited mobility and opportunity to get around town safely.

Oregon Walks is submitting testimony in advance of the October 6th Council hearing to ask City Council to strongly consider eliminate the minimum parking requirements in the Mixed Use Zones designated as "Centers" and potentially along "Corridors" as high capacity, frequent headway transit is built. In our letter this past July, we advocated for eliminating parking minimums in Northwest Portland; today, we ask Council to continue to assess if they believe the decisions to mandate provisions for automobile parking over affordable housing, healthier communities, and low-carbon communities truly reflect the relative urgency of each issue in our city. We also affirm our support for the letter of intent and the MOU signed between TriMet and the City of Portland to more fully integrate land use and frequent service for fully realizing the 2040 growth concept. We're excited to see continued support for Transportation Demand Management programs, as a way to mitigate against parking concerns, as well as minimizing parking footprints in new developments through mechanized stacked parking.



PROTECTING YOUR  
RIGHT TO ROAM

These seemingly minor policy proposals will have significant ramifications for the number of people who will have an opportunity to afford to live in a walkable neighborhood. By eliminating mandatory provisions of automobile parking in the neighborhoods specifically targeted in the Comprehensive Plan for new growth to address our current housing shortage, we're encouraging Portland's new economic growth to provide a housing stock with demonstratively proven community benefits. By taking a proactive stance to eliminate these parking minimums to encourage other forms of transportation besides single-occupancy vehicle use, City Council can encourage more walking, make current and future investments in public transit more cost-effective, improve local air quality, contribute towards Portland's ambitious carbon reductions goals, provide options for residents stuck in congestion, and increase the number of homes built to address the housing affordability. This is not a radical idea; advocacy for the elimination of parking minimums has now been championed as a necessary piece of urban housing reform by the White House in their recent "Housing Development Toolkit", which stated that minimum parking requirements "have a disproportionate impact on housing for low-income households because these families tend to own fewer vehicles but are nonetheless burdened by the extra cost of parking's inclusion in the development."

Oregon Walks encourages City Council to eliminate the parking minimums in the Mixed Use Zones as part of the Comprehensive Plan. Policy initiatives like this only push us quicker toward our desired outcomes on affordable housing, climate policy, supporting healthy commuting options, and cost-effective use of limited urban space that benefits all Portlanders.

A handwritten signature in black ink, appearing to read "Noel Mickelberry".

Noel Mickelberry  
Executive Director, Oregon Walks

A handwritten signature in black ink, appearing to read "Aaron Brown".

Aaron Brown  
Board President, Oregon Walks

**From:** [Jennifer Vitello](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Doug Larson](#); [Liz Smith](#); [Bruce Franklin](#); [jené despain](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 10:50:28 AM

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Testimony for the TSP Stage 2:

To Whom It May Concern,

The amount of truck traffic that moves through the Cathedral Park Neighborhood, and over the St. Johns Bridge, has become unacceptable. The truck traffic causes a number of significant problems: 1) The diesel smoke from the trucks crossing the St. Johns Bridge leaves a black dusty soot all over the homes in the neighborhood. That most assuredly means that that diesel smoke is in our lungs and those of our elderly and children. It is a substantial health hazard. 2) The truck traffic is causing bottlenecks at the ramps to the St. Johns Bridge. It now takes 20 to 30 minutes to travel from the bottom of the on-ramp to the bridge to the bridge itself. There is ever increasing traffic from both trucks and commuter vehicles attempting to avoid both I-5 and I-205, causing congestion that neither the St. Johns Bridge, nor the Cathedral Park Neighborhood are capable of handling. 3) The noise from the trucks, and particularly the truck breaking (which they aren't supposed to do) overwhelms the Cathedral Park Neighborhood and is incredibly loud, particularly late at night. This noise level is both stressful, and causes significant sleep disturbance for the residents of the Cathedral Park Neighborhood.

Something has got to be done to mitigate the extraordinary harm caused by the heavy truck traffic in the Cathedral Park Neighborhood, the St. Johns Neighborhood and over the St. Johns Bridge. It is time to conduct a study and planning for a truck crossing outside of residential areas, as well as ways to mitigate the bottleneck of traffic trying to get over the St. Johns Bridge. Cars trying to get over the bridge and into Beaverton are now cutting through the local neighborhood streets in order to avoid the lights on Ivanhoe leading to the bridge. This has created a dangerous situation for pedestrians trying to walk to the St. Johns Town Center and decreases the quality of life for everyone.

Please support the analysis and and re-design of the traffic patterns and pedestrian safety issues in the Cathedral Park Neighborhood near the St. Johns Bridge and the building of a new crossing over the Willamette River. The residents of the North Portland neighborhoods have borne the brunt of the city's industrial traffic for too long with no protections in place for their residents.

Very Best Regards,

Jennifer Vitello  
8515 N Willamette Blvd.  
Portland, OR 97203

**From:** [Sharon K White](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** "Comprehensive Plan Implementation"  
**Date:** Wednesday, October 12, 2016 10:44:33 AM

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I am the property owner of 8101-8116 NE Oregon st, 97213. I have owned this property for 25 years, seen many changes in the neighborhood, and in fact welcome change.

The last significant change for my immediate hood is Mile Post 5. Although we are delighted there is a drop in prostitution on the corner of 81st and Oregon, there is a major increase in other issues.

As I was doing yard work on my property yesterday a list of concerns came to mind with the additional zoning changes purposed to the area. I am shocked and disappointed with Mile Post 5. There appears to be a lack of concern from them with regard to the immediate area. My guess is they are "within the law" so I am horrified as to how much worse it can possibly get.

Parking is off the chart.

My triplex has "3 garage spaces" for 3 units. The city no longer requires "off street parking".

Most days my driveway is encroached from both sides, making it extremely difficult to enter or exit, certainly unsafe. If I rent a Uhaul truck, almost impossible. Yes, I can call parking patrol on the violations, however I do not always have the time, and retaliation is always a consideration

Violators blame me for their ticket

Mile Post 5 tenants ram their cars onto the curb (sometimes on the grass) park in my drive, and have removed my "no parking" sign

I can no longer edge my parking strip due to the parking issues

I no longer get my street cleaned due to on street parking. I must clean it myself if I want it done. The city doesn't notify us when the cleaners are coming

The crosswalks are blocked partially on street parking, making it unsafe to even cross the street The list goes on

Increase in trash

My tenants and I pick up trash daily from Mile Post 5 guests and tenants.

Our garbage pick up has been reduced to twice a month. We can fill a can weekly with the trash increase from the wonderful changes in our hood.

I complained to MP5. They have someone picking up outside trash occasionally however, they NEVER cross the street and pick up where their tenants park, and dump, including but not limited to used needles-syringes, and condoms. Tenants even walk up my drive and put in our cans!

Speed on Oregon st

With the increase in cars on 82nd, there has been an increase on Oregon st. The 82nd Oregon st intersection is narrow due to the green spaces on each side (no complaints about GS) however, it doesn't slow vehicles down that turn from 82 or fly down Oregon. With the increase in street parking, visibility is less and it's becoming a nightmare just getting out of my driveway and crossing the street

If more negative changes like this are what property owners can expect I must ask why the city would recommend more? Why would the city want this area to be "higher density" than it already is?

I pay my property taxes, I'm expected to follow the city codes, and be a responsible part of the neighborhood.

Business (like MP5) and I'm certain it will be the same with new business, don't even need to be good neighbors.

Portland has been my home for 65 years. As I said I welcome change, but I'm convinced you allow change without thought to the "little things". You may think my concerns amount to nothing, trash, speeding cars, and neighborhood safety. They are important to me as a property owner, and to my tenants. My neighborhood has never been ghetto, but it's getting closer with the changes the city of Portland has allowed.

I appreciate your time and consideration of my concerns



Sincerely,  
Sharon White

Sent from my iPad



133 SW Second Ave, Suite 201 • Portland, OR 97204 • (503) 497-1000 • fax (503) 223-0073 • [www.friends.org](http://www.friends.org)  
Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389  
Willamette Valley Office • PO Box 51252 • Eugene, OR 97405 • (541) 520-3763 • fax (503) 223-0073  
Central Oregon Office • 115 NW Oregon Ave #21 • Bend, OR 97701 • (541) 719-8221 • fax (866) 394-3089

## Reject down-zoning proposal in NW Portland

Dear Mayor Hales and City Commissioners,

1000 Friends of Oregon has been engaged in affordable housing issues, statewide and in Portland, for decades. Recently in Portland, we have participated in Anti-Displacement PDX, the Residential Infill Project, and inclusionary zoning. These experiences are why we oppose part of the zoning map amendment package coming to you for your consideration in October. We have serious concerns about Exhibit N, Miscellaneous Zoning Amendments, in particular "Miscellaneous Zoning Amendment package item 3, as amended by the Zoning Code Chapter 120 Map Series: 4:1 FAR memo dated August 17, 2016," approved by the Planning & Sustainability Commission on August 23rd.

This amendment as proposed would reduce allowed density in parts of Northwest Portland from 4:1 FAR to 2:1. **We respectfully ask that you vote separately on this amendment, and vote no.**

To say that affordable housing in Portland is scarce would be an understatement. Rents are at an all-time high, and increasing every month. Given the city's unmet need for approximately 25,000 affordable units, we need to utilize many tools to ensure that every member of our community has a home that meets their needs. Encouraging abundant and diverse housing in **all** of our neighborhoods is a critical part of that; down-zoning Northwest Portland - particularly as we up-zone other neighborhoods - at the behest of the Northwest District Association would be a step backward for affordable housing.

This risk is not hypothetical. According to the Portland Tribune,<sup>1</sup> this amendment could interfere with Northwest Housing Alternatives' plan to build 161 units of low-income senior housing on NW Hoyt St, a project sorely needed to meet our city's need for affordable, accessible housing that allows seniors to age in their own communities.

Down-zoning in Northwest would also run afoul of the goals of the Anti-Displacement PDX Coalition, which were woven into Portland's new Comprehensive Plan with the support of Council. The White House recognizes the connection between affordability and zoning, as described in its recently-released Housing Development Toolkit: "Local zoning code changes that allow for the development of higher-density and multifamily housing, especially in transit zones, can help to alleviate some of the pressure of the growing population in many city centers," while helping to prevent and mitigate gentrification and residential displacement by concentrating affordable developments in low-income neighborhoods.<sup>2</sup>

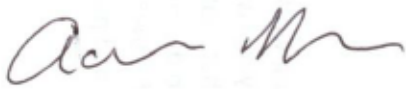
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<sup>1</sup> <http://portlandtribune.com/pt/9-news/325747-205040-housing-growth-not-in-my-backyard>

<sup>2</sup> [https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing\\_Development\\_Toolkit\\_f.2.pdf](https://www.whitehouse.gov/sites/whitehouse.gov/files/images/Housing_Development_Toolkit_f.2.pdf)

We thank you, the Bureau of Planning & Sustainability, and the PSC for your work to develop and implement Portland's new Comprehensive Plan. However, we believe that the amendment at issue would block a needed senior housing project already in pre-development, while reducing or eliminating future opportunities for additional and more-affordable housing in Northwest Portland. Please reject this amendment.

Respectfully,

A handwritten signature in black ink, appearing to read "Andrew Riley". The signature is fluid and cursive, with the first name "Andrew" written in a larger, more prominent script than the last name "Riley".

Andrew Riley  
Community Engagement Coordinator  
1000 Friends of Oregon  
andrew@friends.org  
(503) 497-1000, ext. 129

Alan Kessler  
2725 SE 36th Ave  
Portland, OR 97202  
503 860 1020  
alankessler@gmail.com

October 12, 2016

**RE: Comprehensive Plan Implementation**

Dear Mayor Hales and City Commissioners:

I am a homeowner in and resident of the Richmond Neighborhood, and a member of the Richmond Neighborhood Association's board of directors, though this letter is on my own behalf.

**I support the proposed CM-2 zoning of two groups of lots near SE Hawthorne and Cesar Chavez.** The first group is on SE 38th south of Hawthorne (1524, 1534, 1604 SE 38th), and the second group is on both sides of SE Cesar Chavez south of Hawthorne (1523, 1535, 1605, 1613 Chavez, a multifamily building at 1621-27 Chavez, a house at 3829 SE Market, and a multifamily building at 1600-1604 SE Chavez)

Each of these lots has a Comprehensive Plan designation of Mixed Use-Urban Center. They are immediately south of or across the street from currently CS-zoned parcels on SE Hawthorne and on 38th, or they are on Cesar Chavez (except for the adjacent 3829 Market lot). This is a key location, at the intersection of busy Hawthorne Blvd. and the Frequent #14 bus, and the frequent #75 bus service on Chavez. This is the prime corner for transit service and commercial services in all of Southeast Portland.

Some property owners in the neighborhood have expressed concerns about the zoning of properties to CM-2 when they abut single-dwelling zones. This same abutting situation applies for 30 blocks along the south side of Hawthorne, and for 25 blocks along the north side of Division. All of these adjacent residential parcels are being up-zoned to R-2.5, with a 35' height limit, so the adjacent 45' height limit (55' on a partial, stepped back 5th floor with bonus provisions) of the adjacent CM-2 zone is a small difference. The proposed CM-2 will now be required to step back above the third floor (above 35') at the side or rear, to 25' from any residential lot line. This will minimize impacts to adjacent residential.

Putting this zoning in place now will allow for more housing to be built in this high-opportunity location, near two transit streets, two large grocery stores and innumerable shops, and the increased housing opportunities will allow more residents of all income levels in our neighborhood. Putting the zoning in place now removes the need for costly and time-consuming zone changes, and reduces the chances that lower-density development done in the meantime will delay the opportunity to take full advantage of the MU-UC Comprehensive Plan Designation. Please keep these lots zoned CM-2, to encourage a well-planned neighborhood that serves all residents.

Sincerely Yours,



Alan Kessler

**From:** [adawson@juno.com](mailto:adawson@juno.com)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Wednesday, October 12, 2016 6:55:13 AM

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

We are writing to request that the existing zoning of R2.5 not be changed to R1 on our block or the adjacent block. Our property, 3106 SE 19th Ave, is zoned R2.5. We feel this is the appropriate designation. The proposed zoning identified in the Residential and Open Space Zoning Map is R1.

We 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, we believe that when an area includes a mix of incomes, it can be 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 our property lies. We feel that the R2.5 zone does this better than an R1 zone would.

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

Again, we request that our zoning remain R2.5

Thank you for your consideration of this matter.

Truly,  
Angel Dawson & Louis Hodes

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**JAM**Investments

503-502-9778 jim@opuscreative.com 2337 NW York St. Portland, OR 97210

October 12, 2016

Jim Fletcher  
JAMInvestments  
2337 NW York St.  
Portland, OR 97210

Dear City Council,

We are building owners in the NW industrial area, and part of the "I Overlay" that is being proposed. We are very concerned with not having the option in the future to change the zoning of our building. We would like the opportunity to present our story/arguments to the city council as to why we need options in the future.

Thank you for your time.

  
Jim Fletcher

## OPEN LETTER

Portland, OR  
October 12<sup>th</sup> 2016

Dear City Council Members,

My name is Stefan Andrén, and I am the managing member of 2351 NW York LLC that owns the properties at 2351 NW York St, and 2335 NW 23<sup>rd</sup> Place. I hereby request that I - along with my fellow neighboring property owners - am not included in the newly proposed Prime Industrial ("I") overlay. We request the opportunity to discuss an amendment to the plan.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'SANDRÉN', with a horizontal line drawn through the middle of the letters.

Stefan Andrén





## BRIDGETON NEIGHBORHOOD ASSOCIATION

October 12, 2016

Portland City Council  
1221 S.W. Fourth Avenue  
Portland Oregon 97201

**Bridgeton Neighborhood Association officially requests the City of Portland restore the Intersection Improvements at Marine Drive and Bridgeton Road to the Transportation System Plan.**

These safety improvements are an important part of our Neighborhood Plan and have been adopted in the Bridgeton Transportation Plan.

We realize the improvement may not be as important as other improvements along Marine Drive like a traffic signal at 122nd, nonetheless they are all part of a long term traffic safety improvement formula for Marine Drive.

These improvements were on the list before and even if this is a lower priority, we still want to remain on the list. This intersection improvement has been discussed as a possible community enhancement for other levee work. It would be good to remain on the list for that reason too.

Please restore this intersection improvement at Marine Drive and Bridgeton to the Transportation System Plan as part of the Comprehensive Plan Update.

Respectfully,

Unanimously Approved by the Bridgeton Neighborhood Board on October 12, 2016

Karen Kane. Bridgeton Neighborhood Chair    Leslie Sawyer    Scott Nielsen  
Nancy MacGregor    Bill Coffman    Brian Stipak    Ann Neuenschwander  
Matt Whitney    Kim Swenson    Bridget Bayer    Walter Valenta



October 5, 2016

## Oregon Walks: Testimony to City Council Regarding Parking Minimums in Comprehensive Plan Update

PROTECTING YOUR  
RIGHT TO ROAM

Oregon Walks is the state's pedestrian advocacy organization that works to make walking a safe, convenient, and accessible transportation option in every community, for every Oregonian. As explained and popularized by nationally-recognized urban scholar Dr. Donald Shoup in "The High Cost of Free Parking," few urban planning policies have as profound an impact on the viability of building walkable communities than those that regulate automobile parking minimums in urban neighborhoods. The impact of forcing new construction to build abundant parking for automobiles has a significant impact on the supply of housing we can build in walkable neighborhoods, thereby restricting the number of Portlanders who can afford to live somewhere they can walk their children to school.

In 2013, Oregon Walks joined dozens of community advocates and organizations in opposing the minimum parking requirements. Since this vote three years ago, many of the fears expressed by our organization and our peers have been realized: Portland's rents have continued to skyrocket, our streets have become increasingly gridlocked, and many folks are lamenting their limited mobility and opportunity to get around town safely.

Oregon Walks is submitting testimony in advance of the October 6th Council hearing to ask City Council to strongly consider eliminate the minimum parking requirements in the Mixed Use Zones designated as "Centers" and potentially along "Corridors" as high capacity, frequent headway transit is built. In our letter this past July, we advocated for eliminating parking minimums in Northwest Portland; today, we ask Council to continue to assess if they believe the decisions to mandate provisions for automobile parking over affordable housing, healthier communities, and low-carbon communities truly reflect the relative urgency of each issue in our city. We also affirm our support for the letter of intent and the MOU signed between TriMet and the City of Portland to more fully integrate land use and frequent service for fully realizing the 2040 growth concept. We're excited to see continued support for Transportation Demand Management programs, as a way to mitigate against parking concerns, as well as minimizing parking footprints in new developments through mechanized stacked parking.



PROTECTING YOUR  
RIGHT TO ROAM

These seemingly minor policy proposals will have significant ramifications for the number of people who will have an opportunity to afford to live in a walkable neighborhood. By eliminating mandatory provisions of automobile parking in the neighborhoods specifically targeted in the Comprehensive Plan for new growth to address our current housing shortage, we're encouraging Portland's new economic growth to provide a housing stock with demonstratively proven community benefits. By taking a proactive stance to eliminate these parking minimums to encourage other forms of transportation besides single-occupancy vehicle use, City Council can encourage more walking, make current and future investments in public transit more cost-effective, improve local air quality, contribute towards Portland's ambitious carbon reductions goals, provide options for residents stuck in congestion, and increase the number of homes built to address the housing affordability. This is not a radical idea; advocacy for the elimination of parking minimums has now been championed as a necessary piece of urban housing reform by the White House in their recent "Housing Development Toolkit", which stated that minimum parking requirements "have a disproportionate impact on housing for low-income households because these families tend to own fewer vehicles but are nonetheless burdened by the extra cost of parking's inclusion in the development."

Oregon Walks encourages City Council to eliminate the parking minimums in the Mixed Use Zones as part of the Comprehensive Plan. Policy initiatives like this only push us quicker toward our desired outcomes on affordable housing, climate policy, supporting healthy commuting options, and cost-effective use of limited urban space that benefits all Portlanders.

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Noel Mickelberry  
Executive Director, Oregon Walks

A handwritten signature in black ink, appearing to read "Aaron Brown".

Aaron Brown  
Board President, Oregon Walks