

Clerk note:

This document is the original Exhibit A, submitted 8/14/2018. It was replaced by Substitute Ex A on 8/22/2018.

# Exhibit A:

## Findings of Fact Report

### August 22, 2018

Legislative amendments to the Comprehensive Plan goals, policies and map must be found to be consistent with the goals and policies of the Comprehensive Plan, Metro's Urban Growth Management Functional Plan, the Statewide Planning Goals, and any relevant area plans adopted by City Council. (33.835.040 and 33.810.050)

Text amendments to the zoning code must be found to be consistent with the Comprehensive Plan, Urban Growth Management Functional Plan, and the Statewide Planning Goals. In addition, the amendments must be consistent with the intent or purpose statement for the base zone, overlay zone, and plan district where the amendment is proposed, and any plan associated with the regulations. (33.835.040)

Legislative zoning map amendments must be found to comply with the Comprehensive Plan Map with a zone change to a corresponding zone of the Comprehensive Plan Map. The change also must demonstrate that there are adequate public services capable of supporting the uses allowed by the zone. In addition, the school district(s) within which the sites are located must have adequate enrollment capacity to accommodate any projected increase in student population over the number that would result from development in the existing zone. This criterion applies only to sites that are within the David Douglas School District, which has an adopted school facility plan that has been acknowledged by the City of Portland. (33.855.050)

1. **Finding:** The City Council has identified and addressed all relevant and applicable goals and policies in this document.
2. **Finding:** The City Council has considered the public testimony on this matter and has weighed all applicable goals and policies and on balance has found the need to adopt the MDP amendments.

## Part I. Statewide Planning Goals

State planning statutes require cities to adopt and amend comprehensive plans and land use regulations in compliance with the Statewide Planning Goals.

### **The Statewide Planning Goals that apply to Portland are:**

Goal 1 Citizen Involvement

Goal 2 Land Use Planning

Goal 5 Natural Resources, Scenic and Historic Areas, and Open Spaces

Goal 6 Air, Water and Land Resource Quality

Goal 7 Areas Subject to Natural Hazards

Goal 8 Recreational Needs

Goal 9 Economic Development

Goal 10 Housing

Goal 11 Public Facilities and Services

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- Goal 12 Transportation
- Goal 13 Energy Conservation
- Goal 14 Urbanization
- Goal 15 Willamette River Greenway

There are approximately 560 acres of land both within Portland’s municipal boundaries and beyond the regional urban growth boundary that can be classified as rural land. In 1991, as part of Ordinance 164517, the City Council took an exception to Goal 3 and 4. the agriculture and forestry goals. Because of the acknowledged exception, the following goals do not apply:

- Goal 3 Agricultural Lands
- Goal 4 Forest Lands

Other Statewide Planning Goals apply only within Oregon’s coastal zone. Since Portland is not within Oregon’s coastal zone, the following goals do not apply to this decision:

- Goal 16 Estuarine Resources
- Goal 17 Coastal Shorelands
- Goal 18 Beaches and Dunes
- Goal 19 Ocean Resources

**Goal 1. Citizen Involvement.** To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

3. **Finding:** The Portland community had an opportunity to be involved in development and adoption of the MDP amendments.

**Proposed Draft.** On May 7, 2018, the Proposed Draft of MDP amendments was published in preparation for the Planning and Sustainability Commission (PSC) review and recommendation.

In support of this process, the BPS website had a project page dedicated to this project, a Map App page for submitting testimony, and telephone helpline to learn about the plan effort and numerous ways to comment on the plan.

In addition to the online information, the City sent the required Measure 56 notice to all owners – the park owners as well as owners of individual manufactured dwellings in the MDPs. The City sent a legislative notice to interested parties. Also, the City sent a separate notice to the occupants (renters and owners) of all dwellings in the MDPs. BPS sent a notice to a list of individuals and organizations, including neighborhood associations, business associations, and other affected jurisdictions, that have requested notice of proposed land use changes. Also, BPS staff canvassed 37 MDPs to speak directly with MDP residents to inform them about the proposal.

Seventy-four people submitted testimony through the Map App platform and another 17 people submitted written testimony. Eighty-four people called the help line seeking more information about the proposal.

The PSC held a public hearing on June 12, 2018. The hearing was held in the evening at the Portland Community College Southeast Campus to make the meeting accessible to MDP residents. Forty-two people testified at the hearing.

On July 10, 2018, the PSC discussed and amended the proposal and voted to recommend the changes to City Council.

**Recommended Draft.** On August 8, 2018, a legislative notice of the City Council Hearing was sent to interested parties and anyone who testified to the PSC on the proposed draft. On August 13, 2018.

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the Recommended Draft of Manufactured Dwelling Parks project was published to present the PSC recommendations to City Council. City Council held a public hearing on August 22, 2018, to receive testimony on the Recommended Draft. The City Council adopted the recommendations and took final action on August 22, 2018.

As noted below in these findings, the MDP amendments are consistent with the goals and policies of Chapter 2 (Community Involvement) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. The events and outreach strategies summarized here demonstrate consistency with the requirements of Statewide Planning Goal 1.

**Goal 2. Land Use Planning.** To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

4. **Finding:** Goal 2, as it applies to the MDP amendments, requires the City to follow its established procedures for legislative amendments to the Comprehensive Plan policies, the Comprehensive Plan map, the Zoning Code, and the Zoning Map. The amendments support this goal because, as demonstrated by these findings, the MDP amendments were developed consistent with the Statewide Planning Goals, the Metro Urban Growth Management Functional Plan, and 2035 Comprehensive Plan, as detailed in this ordinance.
5. **Finding:** MDPs provide nearly 3,000 units of lower-cost market-rate housing, with an ownership element for many, for residents that are more vulnerable, have lower incomes, have lower education attainment, and tend to be people of color than Portland as a whole (*Recommended Draft*, Section 1). These amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can lead to park owners and home owners to reinvest and improve living conditions in these parks.
6. **Finding:** The PSC received testimony from Michelle Moulton regarding different regulatory approaches from other communities – Boulder, CO, Albuquerque, NM, and Tumwater, WA. Boulder and Albuquerque have established base zones similar to these MDP amendments. The Tumwater, WA overlay zone approach was considered but not pursued because the discretionary review of an economic impact study does not work as well as because the City’s hearings officer is not prepared to make a decision on economic feasibility. This overlay zone alternative also would not resolve the nonconforming situations.
7. **Finding:** Other government agencies received notice from the 35-day DLCD notice and the City’s legislative notice. The City did not receive any requests from other government agencies to modify the MDP amendments.

**Goal 5. Open Space, Scenic and Historic Areas, and Natural Resources.** To protect natural resources and conserve scenic and historic areas and open spaces.

8. **Finding:**

**Scenic Resources.** The MDPs affected by the map changes do not involve designated scenic resources.

**Historic Resources.** The MDPs affected by the map changes do not involve designated historic resources.

**Natural Resources.** As documented in the August 13, 2018 BPS memo, five of the MDPs include designated Goal 5 resources that are protected by the conservation (c) and/or preservation (p) environmental overlay zones.

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ID No.	MDP Name	Site Address
1	Hayden Island Mobile Home Community	1503 N Hayden Island Dr
15	Meadowcrest Farm Mobile Estates	3930 SE 162nd Ave
16	Meadowland Mobile Home Park	16000 SE Powell Blvd
17	Parkway Estates	15768 SE Powell Blvd
33	Johnson Creek Trailer Park	8205 SE 82nd Ave

No changes to the environmental overlay zones are proposed as part of this project. However, as documented in the August 13, 2018 BPS memo, there is one MDP (#1 – Hayden Island Mobile Home Community) that has high and medium ranked natural resources that are not protected by an environmental overlay zone. The City has initiated a separate legislative process to update the environmental overlay zones based on the adopted NRI. Changing the underlying base zone designation with these amendments will not impact the remapping process.

**Open Spaces.** None of the existing MDPs affected by the map changes involve designated open spaces (OS map designations).

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 7 (Environment and Watershed Health) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 5.

**Goal 6. Air, Water, and Land Resource Quality.** To maintain and improve the quality of the air, water and land resources of the state.

9. **Finding:** Goal 6 requires the maintenance and improvement of the quality of air, water, and land resources. The State has not yet adopted specific requirements for complying with Statewide Planning Goal 6. The City is in compliance with environmental standards and statutes, including the federal Clean Water Act and Clean Air Act. Existing City regulations including Title 10 (Erosion Control) and the Stormwater Management Manual will remain in effect and are applicable to future development. As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 7 (Environment and Watershed Health) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 6.

**Goal 7, Areas Subject to Natural Disasters and Hazards.** To protect people and property from natural hazards.

10. **Finding:** The State has not yet adopted specific requirements for complying with Statewide Planning Goal 7. The Buildable Land Inventory (BLI), which was adopted (Ordinance 187831) and acknowledged by LCDC on April 25, 2017, included a development constraint analysis that identified parts of Portland that are subject to natural hazards. As documented in the August 13, 2018 BPS memo, parts of five (5) MDPs are located in the 100-year floodplain.

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ID No.	MDP Name	Site Address
1	Hayden Island Mobile Home Community	1503 N Hayden Island Dr
22	Aspen Meadows	13400 SE Holgate Blvd
30	89 <sup>th</sup> Avenue Estates	7916 SE 89th Ave
31	Flavel RV Park	8410 SE Flavel St
33	Johnson Creek Trailer Park	88205 SE 82nd Ave

As documented in the August 13, 2018 BPS memo, parts of seven (7) MDPs have high or very high landslide susceptibility areas. Most of the floodplain and landslide susceptibility areas are also protected by environmental overlay zones, which limit development in the areas.

ID No.	MDP Name	Site Address
1	Hayden Island Mobile Home Community	1503 N Hayden Island Dr
8	Sumner Estates	5200 NE 92nd Ave
15	Meadowcrest Farm Mobile Estates	3930 SE 162nd Ave
16	Meadowland Mobile Home Park	16000 SE Powell Blvd
17	Parkway Estates	15768 SE Powell Blvd
22	Aspen Meadows	13400 SE Holgate Blvd
25	Strawberry Acres	5200 SE 132nd Ave

The MDP amendments are consistent with this goal because City programs that are deemed in compliance with Metro Title 3 requirements for flood management, and erosion and sediment control (i.e., City Title 10 Erosion Control, and the balanced cut and fill requirements of City Title 24), as well as the environmental overlay zones are unchanged by these amendments and will ensure any new development will be done in a way to protect people and property from hazards. In addition, the expanded territory for density transfers will enable park owners to transfer any unused density to other multi-dwelling zoned sites that are out of the floodplain.

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 7 (Environment and Watershed Health) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 7.

**Goal 8. Recreational Needs.** To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

**11. Finding:** Goal 8 focuses on the provision of destination resorts. However, it does impose a general obligation on the City to plan for meeting its residents’ recreational needs: “(1) in coordination with private enterprise; (2) in appropriate proportions; and (3) in such quantity, quality and locations as is consistent with the availability of the resources to meet such requirements.”

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Goal 8 provides that “Recreation Needs -- refers to existing and future demand by citizens and visitors for recreations areas, facilities and opportunities.” Goal 8 also provides that “Recreation Areas, Facilities and Opportunities -- provide for human development and enrichment, and include but are not limited to: open space and scenic landscapes; recreational lands; history, archaeology and natural science resources; scenic roads and travelers; sports and cultural events; camping, picnicking and recreational lodging; tourist facilities and accommodations; trails; waterway use facilities; hunting; angling; winter sports; mineral resources; active and passive games and activities.”

The City of Portland has robust and diverse system of parks, recreation areas and open spaces. The City’s Parks 2020 Vision documents the City’s long-term plan to provide a wide variety of high quality park and recreation services and opportunities for all residents. The Parks 2020 Vision identifies a goal that 100% of Portlanders are within ½ mile of a Park or Natural Area. The charts below identify progress made since 2006. As of 2016, 81% of households are within ½ mile of a park or natural area, whereas 38 MDPs (68 percent) meet this standard. Certain areas of Portland such as East and Central NE continue to lag behind other parts of the city, which is where many of the MDPs are located. However, these areas continue to be focus for new parks investment.

The MDP map amendments do not affect any land designated as open space. In addition, State and City codes require MDPs to have a common outdoor area of 2,500 square feet in area or 100 square feet per unit, whichever is greater, which can supplement the recreational needs of MDP residents.

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 8 (Public Facilities and Services) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 8.

#### **Goal 9. Economic Development.** To provide adequate opportunities throughout the state for a variety of economic activities vital to health, welfare, and prosperity of Oregon’s citizens.

- 12. Finding:** Goal 9 requires cities to consider economic activities vital to the health, welfare, and prosperity of Oregon's citizens. Comprehensive plans for urban areas are required to include, among other things: an analysis of economic patterns, potentialities, strengths, and deficiencies; policies concerning economic development; and land use maps that provide for at least an adequate supply of sites for a variety of industrial and commercial uses.

The *2035 Comprehensive Plan* demonstrates compliance with Goal 9. Land needs for a variety of industrial and commercial uses are identified in the *Economic Opportunities Analysis* (EOA), which was adopted (Ordinance 187831) and acknowledged by LCDC on April 25, 2017.

The City’s acknowledged EOA analyzed and demonstrated adequate growth capacity for a diverse range of employment uses, which are organized into different geographies that represent a distinct mix of business sectors and building types. In each of the geographies, the City analyzed the future employment growth and the developable land supply to accommodate that growth. MDPs are located in the Harbor and Airport Districts, Dispersed Employment, and Neighborhood Commercial geographies.

As described in Section III: Comprehensive Plan Map Amendments of the Recommended Draft Report (August 13, 2018), the proposed changes to the RMP designation will have a minimal impact on the City’s employment capacity. There are three (3) MDPs located in the Harbor and Airport

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geography that currently have a Mixed Employment comprehensive plan map designation and account for approximately 5 acres of employment land capacity in the Harbor and Airport Districts geography. The MDP amendments will change these sites to multi-dwelling residential use and they will no longer be part of the employment land supply. The EOA identified a 54-acre surplus of development capacity in the Harbor & Airport Districts, which will be reduced to a 49-acre surplus with these changes. There is one MDP located in the Dispersed Industrial geography that currently has a Mixed Employment comprehensive plan map designation and accounts for 0.7 acres of employment land capacity. The Dispersed Industrial geography, which will be reduced to a 15-acre surplus with these changes.

There are four (4) MDPs that currently have a Mixed Use and Commercial comprehensive plan designation and account for 7 acres of employment land capacity in the Neighborhood Commercial geography. The proposed changes to the RMP designation will have a minimal impact on the employment capacity in the Neighborhood Commercial geography, which has 799 acres of surplus capacity.

One (1) MDP (Fox Run Mobile Home Community) has a Mixed Employment comprehensive plan designation in the Prime Industrial Area and accounts for 13.5 acres of employment land capacity in the Harbor and Airport Districts geography. The EOA identified a 25-acre shortfall in the adjacent Harbor Access Land geography and uses the surplus in the Harbor and Airport Districts geography to accommodate that industrial land demand. This shift means the surplus in the Harbor and Airports District is effectively 24 acres or about 2% of the industrial land needs. A further reduction of 13.5 acres to redesignate Fox Run would be reduce the surplus to 11 acres, about 1% of the industrial land needs. The MDP amendments do not include this park because of the tight land supply and the location in the Prime Industrial Area.

Even though the MDP amendments reduce the employment land supply, the affected EOA employment geography maintains sufficient employment capacity to accommodate the forecasted employment growth in compliance with Statewide Planning Goal 9.

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 6 (Economic Development) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 8.

#### **Goal 10. Housing.** To provide for the housing needs of citizens of the state.

**13. Finding:** Goal 10 specifies that each city must plan for and accommodate needed housing types, including manufactured housing. It requires each city to inventory its buildable residential lands, forecast future needs, and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.

Goal 10 and its implementing administrative rules contain the following specific requirements:

1. Identify future housing needs by amount, type, tenure and affordability;
2. Maintain a residential Buildable Lands Inventory (BLI) with sufficient land to meet identified needs;
3. Adopt land use maps, public facility plans and policies to accommodate needed housing (housing capacity, as well as type, tenure and affordability);
4. Meet minimum density and housing mix requirements (including the Metropolitan Housing Rule);
5. Adopt clear and objective standards for needed housing.

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Mobile home and manufactured dwelling parks are needed housing. Section 5c, Chapter 52, Oregon Laws 2016, identifies, “The need for sites to accommodate manufactured dwellings, as defined in ORS 446.003, due to the conversion of manufactured dwelling parks or mobile home parks in the region to other uses,” while ORS 197.303 (1) (c) defines needed housing to include, “Mobile home or manufactured dwelling parks as provided in ORS 197.475 to 197.490.”

Furthermore, in ORS 197.475 the Legislative Assembly declared that “It is the policy of this state to provide for mobile home or manufactured dwelling parks within all urban growth boundaries to allow persons and families a choice of residential settings.” The MDP amendments will resolve nonconforming situations, increase maximum densities, and expand density transfer provisions to support the continued operation of MDPs in Portland. The increased maximum density standard will allow for 2,200 more spaces in MDPs than is allowed under the current zoning for the MDPs.

The adopted *2035 Comprehensive Plan* conducted city-wide analysis to demonstrate compliance with Goal 10. The City's Housing Needs Analysis, which was adopted (Ordinance 185657) and acknowledged by LCDC on June 11, 2014, consists of five distinct reports that analyzed the state of housing supply, housing affordability issues and the City's ability to meet projected housing demand. The City's Housing Needs Analysis was adopted as part of the *2035 Comprehensive Plan*. The Buildable Land Inventory (BLI), which was adopted (Ordinance 187831) and acknowledged by LCDC on April 25, 2017, identified the supply of land available to provide this needed housing.

The findings below address Goal 10 requirements that amendments to the *Zoning Map* and zoning code demonstrate that the City continues to accommodate 20-years of forecast growth and provide the opportunity for a variety of housing types and tenures, with a variety of affordability levels.

The City's adopted BLI estimates Portland has the capacity for 201,000 additional housing units, more than the estimated need to accommodate the City's forecasted future growth of 123,000 units.

As described in Section III: Comprehensive Plan Map Amendments of the Recommended Draft Report (August 13, 2018), the proposed changes to the RMP designation will have a minimal impact on the City's residential capacity. The City's adopted 2016 Buildable Land Inventory (BLI) identified 14 MDPs as underutilized with future redevelopment capacity (see Appendix A. MDP Inventory). For eight (8) MDPs, the recommended changes will increase the maximum density allowed, thereby increasing the development capacity on these sites. The other six (6) MDPs have mixed-use commercial or R1 zoning and account for 349 units of future development capacity. However, the impact on the City's overall residential development capacity is negligible because the 2016 BLI identified 201,000 units of future development capacity. The reduction from these amendments would only amount to a 0.2% reduction development capacity.

The Metropolitan Housing Rule (OAR 660-007-0035) states that cities “*must provide for an overall density of ten or more dwelling units per net buildable acre*”. The maximum density of 1 space per 1,500 square feet of site area is the equivalent of 29 units per acre, well above the ten units per acre requirement. The minimum density of 1 space per 1,875 square feet of site area is the equivalent of 23 units per acre.

ORS 197.307(4) requires that jurisdictions “may apply only clear and objective standards, conditions and procedures regulating the development of needed housing on buildable lands” ...and these provisions... “may not have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay.” The MDP amendments provide clear and objective

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standards for MDPs. Also, the amendments include an exemption from discretionary design review for MDPs, which will apply to three (3) MDPs (#41-43) that currently have the design overlay zone.

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 5 (Housing) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 10.

**Goal 11. Public Facilities and Services.** To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

**14. Finding:** Statewide Planning Goal 11, Public Facilities, requires cities to adopt and update public facilities plans. Public facilities plans ensure that urban development is guided and supported by types and levels of water, sewer and transportation facilities appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement.

The adopted 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDRC on April 25, 2017. The CSP includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects, consistent with the requirements of Statewide Planning Goal 11.

In addition, the service limitations identified in the CSP have been incorporated into the adopted BLI development constraint analysis that identified parts of Portland that lack needed urban infrastructure. The BLI constraint analysis is the basis of a geographic evaluation of the MDPs to ensure that public facilities are planned to support any potential development that could result from these amendments (see Recommended Draft Report, Appendix A. MDP Inventory).

While the MDPs are existing development, the recommended changes increase the maximum density standard, which could result in expanding or reconfiguring MDPs that increase the number of spaces. The maximum density of 1 space per 1,500 square feet of site area will increase the density over current zoning at 52 MDPs. The total increase in maximum density is about 2,200 units in those MDPs (see Recommended Draft Report, Appendix A. MDP Inventory).

#### Sanitary Sewer

Both Portland's combined sewer system and its sanitary sewer system have hydraulic and condition deficiencies that impact the ability of these systems to serve existing properties at designated service levels. These deficiencies can result in higher risks for sewer backups, surcharging, and/or overflows. The greatest concentration of deficiencies are in the older central neighborhoods and in the southwest (Fanno and Burlingame basins), parts of Portland that do not have MDPs. No MDPs are in areas that lack sanitary sewer service.

#### Stormwater

Stormwater is conveyed through the combined sewer system, pipes, ditches, or drainageways to streams and rivers. In some cases, stormwater is managed in detention facilities, other vegetated facilities, or allowed to infiltrate in natural areas. Safe conveyance of stormwater is an issue in some areas, particularly in the hilly areas of west Portland and some parts of outer southeast which lack comprehensive conveyance systems and where infiltration is limited by geology or high groundwater. Since 1999, the Stormwater Management Manual (SWMM) has provided policy and design requirements for stormwater management throughout the City of Portland. The

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requirements apply to all development, redevelopment, and improvement projects within the City of Portland on private and public property and in the public right-of-way. In some cases, solutions may not be technically or financially feasible. Flooding continues to be an issue, particularly in the Johnson Creek area.

Four (4) MDPs are in areas that have identified stormwater constraints. These sites may not be suitable for infiltration, based on depth to seasonal high groundwater, soil infiltration capability, or do not have access to a stormwater pipe or culvert, combined sewer pipe, stream or drainageway.

### Water

Water demand forecasts developed by the Water Bureau anticipate that while per capita water demands will continue to decline somewhat over time, the overall demands on the Portland water system will increase due to population growth. The Portland Water Bureau has not experienced any major supply deficiencies in the last 10 years.

Three (3) MDPs are located adjacent to streets that lack water service or are served only by a 2-inch main, which may be insufficient to provide adequate flow. Any new development may be required to upgrade service mains. None of the MDPs are located in areas with substandard fire flow.

Transportation facilities are addressed under Statewide Planning Goal 12, below.

The constraints on public facilities are not insurmountable, but mean development could face increased cost of to provide the constrained infrastructure.

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 8 (Public Facilities and Services) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 11.

**Goal 12. Transportation.** To provide and encourage a safe, convenient and economic transportation system.

**15. Finding:** OAR 660-012-0060 (1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

- (a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);
- (b) Change standards implementing a functional classification system; or
- (c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.
  - (A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

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- (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or
- (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

The adopted 2035 Comprehensive Plan includes the Transportation Systems Plan (TSP), which was adopted in three phases (Ordinance 187832, 188177, and 188957). Phase 1 and 2 was submitted as part Task Four of Periodic Review; and both were approved by LCDR Order 18 – WKTSK – 001897 on August 8, 2018, but are not yet acknowledged. Phase 3 of the Transportation System Plan was adopted as a post-acknowledgement plan amendment by Ordinance No. 188957, became effective on June 23, 2018. The TSP includes a congestion performance analysis of the 2035 Comprehensive Plan Map.

The MDP amendments increase the maximum density at 52 MDPs, which is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning. The transportation impact of the MDP amendments were evaluated by the Portland Bureau of Transportation (PBOT) (see PBOT memo, dated August 8, 2018). The analysis is a high growth/high impact scenario that assumes all MDPs will utilize 40 percent of the increased density on-site and that growth is added to the population control total, rather than a redistribution of the 2035 growth forecast.

The MDP amendments do not change the functional classification of an existing or planned transportation facility or change the standards implementing a functional classification system. Therefore, the amendments do not have a significant effect under (a) or (b).

With regard to (c), the PBOT analysis found that the MDP will add little traffic on to the roadways on the ODOT/PBOT list of “hot spots” transportation facilities identified in City’s 2035 Comprehensive Plan process. The MDPs are existing development that are served by the existing transportation system consistent with the functional classification of an existing or planned transportation facility. Therefore, the amendments do not have a significant effect under (A).

No roadways on the concern list will change their congestion status from un-congested to congested by link V/C ratio analysis. Therefore, the amendments do not have a significant effect under (B).

The MDP amendments may add traffic on two critical locations that do not meet the TSP performance standards:

1. NE Killingsworth, between 72<sup>nd</sup> and 92<sup>nd</sup> Avenues
2. SE Powell Blvd, between 122<sup>nd</sup> and 162<sup>nd</sup> Avenues

The scale of the added traffic is projected to be 10-15 added automobile trips during the 2035 PM peak hour period, which is a 0.5%-1.2% increase in traffic volumes. These added trips could degrade the performance of these facilities. However, there are mitigating factors that should reduce the impact of these changes:

1. This is a high-level analysis of a high growth scenario that does not factor in redistribution of growth nor does it reassign traffic that might be diverted to other less congested streets. These refinements to the analysis could result in lower added traffic to these segments;
2. The nine (9) MDPs (#2-10) in the NE Killingsworth segment area all have convenient access to transit, including two parks that are in light rail transit station areas.

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3. Twenty-four (24) of the 31 MDPs (#12-29, 44-56) in the SE Powell Blvd corridor (Division to Foster, I-205 to 162<sup>nd</sup>) have convenient access to transit.
4. PBOT is undertaking the Columbia Blvd Access Project can identify improvements to mitigate the impacts on the NE Killingsworth segment.
5. These locations have previously been identified in the TSP as locations that may fail to meet mobility standards in 2035. The adopted TSP includes the Projected ODOT “Hot Spots” Refinement Plan project (TSP Chapter 6, page 282). Major refinement plans are necessary when a transportation need exists, but the mode, function, and general location of a transportation improvement have not been determined, and a range of actions must be considered before identifying a specific project or projects. This refinement plan is still pending, therefore, mitigating the increased traffic from the MDP amendments can be incorporated into that planning process.
6. The adopted TSP Project List identifies several improvement projects on near the impacted facilities that could incorporate future measures to mitigate these significant effects.

**Portland TSP projects on top congested MDP impacted streets**

	Project Number	Lead Agency	Est. Time Frame	Est Cost	Description
<b>SE Powell Blvd., EB/WB, between 122<sup>nd</sup> and 162<sup>nd</sup></b>					
Outer Powell Blvd Corridor Improvements, Phase 2	80015	PBOT/ODOT	Years 1-10	\$24,000,000	Widen street to three lanes
Outer Powell Blvd Corridor Improvements, Phase 2	80032	PBOT/ODOT	Years 11-20	\$67,000,000	Widen street to three lanes
Powell-Division Safety and Access to Transit	80037	TRIMET	Years 1-10	\$2,800,000	Construct improvements
East Portland Access to Employment	80035	PBOT	Years 1-10	\$5,870,000	Build sidewalks
SE 148 <sup>th</sup> Pedestrian Improvements	80005	PBOT	Years 1-10	\$2,000,000	Build sidewalks
<b>NE Killingsworth St. EB, between 72<sup>nd</sup> and 92<sup>nd</sup></b>					
82 <sup>nd</sup> Ave Corridor Improvements	40013.0	PBOT	Years 1-10	\$5,000,000	Design and implement
Columbia Blvd Freight Improvements	40102.0	PBOT/PORT	N/A	\$14,859,000	Construct street and intersection modifications
Columbia Blvd ITS	30008.0	PBOT	Years 1-10	\$390,000	Communication infra.

Given these factors, the impacts should be able to be mitigated with future measures identified in later TSP projects.

As noted below in the findings for the 2035 Comprehensive Plan, the MDP amendments are consistent with the goals and policies of Chapter 9 (Transportation) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, MDP amendments are consistent with the requirements of Statewide Planning Goal 12.

**Goal 13. Energy Conservation. To conserve energy.**

16. **Finding:** The State has not adopted specific rules for complying with Statewide Planning Goal 13. Goal 13 generally requires that land use plans contribute to energy conservation.

The MDP amendments do not adopt or amend a local energy policy or implementing provisions.

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However, the MDP amendments generally support this goal by resolving non-conforming use situations for 27 MDPs, which can reduce a barrier to re-investment in the parks and dwellings; and increasing the maximum allowed density for 51 MDPs. Providing long-term stability for the MDPs can support improvements and upgrades, including weatherization and energy conservation measures.

**Goal 14. Urbanization.** To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

17. **Finding:** Metro exercises Goal 14 obligations on behalf of Portland and other cities within the metropolitan region. Metro has adopted an Urban Growth Management Functional Plan and compliance with this plan by constituent cities assures compliance with Goal 14, which is discussed in Part II of this document and those findings are incorporated by reference.

As discussed above under Goal 9 and 10, the impact of the MDP amendments to Portland’s development capacity are minimal and the City will continue to be able to accommodate its forecasted growth.

**Goal 15. Willamette River Greenway.** To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

18. **Finding:** Goal 15 is not applicable to the MDP amendments because none of the MDPs are located along the Willamette River.

## Part II. Metro Urban Growth Management Functional Plan

Under ORS 268.380 and its Charter, Metro has the authority to adopt regional plans and require city and county comprehensive plans to comply with regional plan. Metro adopted its Urban Growth Management Functional Plan under this authority.

In its June 2011 update to its 2010 compliance report Metro found, “The City of Portland is in compliance with all Urban Growth Management Functional Plan requirements in effect on December 15, 2010, except for Title 13, Nature in Neighborhoods. On January 16, 2013 the City received a letter from Metro stated that Portland had achieved compliance with Title 13.

**Title 1. Housing Capacity.** The Regional Framework Plan calls for a compact urban form and a “fair-share” approach to meeting regional housing needs. It is the purpose of Title 1 to accomplish these policies by requiring each city and county to maintain or increase its housing capacity, especially in centers, corridors, main streets, and station communities, except as provided in section 3.07.120.

19. **Finding:** This element of the regional plan limits down-zoning in 2040 places – specifically Regional Centers, Town Centers, Corridors, Station Communities, and Main Streets. For purposes of this title, Metro measures “minimum zoned capacity.” The title is clear that individual parcels may be down-zoned, provided the impact on the citywide minimum zoned capacity is negligible.

As shown in the Recommended Draft Report, Appendix A. MDP Inventory, the MDP amendments increase in the minimum zoned capacity on 33 MDPs located in 2040 places, which increases the minimum zoned capacity by about 1,100 units. Three (3) MDPs in 2040 places currently have mixed-use commercial zoning with no minimum density standard but will be subject to minimum density standards as a result of the MDP amendments. The MDP amendments reduce the minimum density at five (5) MDPs in 2040 places due to a change from CM2 or R1 zoning. The total

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impact will reduce minimum density capacity by 48 units, which is negligible compared to the 1,100 unit increase citywide. Therefore, the MDP amendments comply with Title 1.

**MDPs in 2040 Places with potential reduction in minimum zoned capacity**

Site	Name	Metro 2040	Current Zoning	Current Minimum Density	MDP Minimum Density	Net Change
9	Parkrose Mobile City	Station Community	CE	N/A	85	85
10	Heidi's Mobile Home Park	Main Street	CE	N/A	28	28
38	Central Park Mobile Homes	Main Street	CM2 R2	59	48	-11
39	Cherry Grove	Station Community	CM1	N/A	10	10
41	Stark Firs Mobile Home Park	Station Community	R1	44	34	-10
43	Value Trailer Court	Corridor	R1	29	22	-7
48	TO-NIS-GAH Mobile Home Park	Main Street	R1	68	53	-15
49	Nine Oaks Estates	Main Street	R1,R2	39	34	-5

**Title 2. Regional Parking Policy.** (repealed in 1997)

**Title 3. Water Quality and Flood Management.** To protect the beneficial water uses and functions and values of resources within the Water Quality and Flood Management Areas by limiting or mitigating the impact on these areas from development activities and protecting life and property from dangers associated with flooding.

**20. Finding:** Title 3 calls for the protection of the beneficial uses and functional values of resources within Metro-defined Water Quality and Flood Management Areas by limiting or mitigating the impact of development in these areas. Title 3 establishes performance standards for 1) flood management; 2) erosion and sediment control; and 3) water quality. The City has adopted overlay zones and land use regulations, including Title 10 Erosion Control and the balanced cut-and-fill standards in Title 24 Building Regulations, that, in the June 2011 update to its 2010 compliance report, Metro found sufficient to comply with Title 3. This ordinance does not change any of these overlays or regulations.

As documented in the August 13, 2018 BPS memo, there are five (5) MDPs located in the 100-year floodplain. The City's adopted overlay zones, plan districts and land use regulations that are designed to mitigate the impact of development in these areas are unchanged and will continue apply to these five (5) MDPs.

**Title 4. Industrial and Other Employment Areas.** The Regional Framework Plan calls for a strong regional economy. To improve the economy, Title 4 seeks to provide and protect a supply of sites for employment by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs), Industrial and Employment Areas. Title 4 also seeks to provide the benefits of "clustering" to those industries that operate more productively and efficiently in proximity to one

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another than in dispersed locations. Title 4 further seeks to protect the capacity and efficiency of the region’s transportation system for the movement of goods and services and to encourage the location of other types of employment in Centers, Corridors, Main Streets and Station Communities. The Metro Council will evaluate the effectiveness of Title 4 in achieving these purposes as part of its periodic analysis of the capacity of the urban growth boundary.

**21. Finding:** The purpose of Title 4 is to maintain a regional supply of existing industrial and employment land by limiting competing uses for this land. Metro has not adopted a Statewide Planning Goal 9 economic opportunities analysis for the region, so Title 4 is not based on an assessment of the land needed for various employment types, nor do the Title 4 maps necessarily depict lands most suitable to accommodate future job growth. Rather, Title 4 seeks to protect the manufacturing, warehousing, and distribution of goods within three types of mapped areas by limiting competing uses. These three areas are Regionally Significant Industrial Areas (RSIAs), Industrial Areas, and Employment Areas.

As shown in the Recommended Draft Report, Appendix A. MDP Inventory, four (4) MDPs are in Metro designated Employment Areas. Under 3.07.450, a city may amend its comprehensive plan or zoning regulations to change its designation of land on the Metro Title 4 Employment and Industrial Areas Map. The MDP amendments comply with these requirements because the four MDPs are adjacent to other land designated as Employment land, not Industrial or Regionally Significant Industrial. The sites are currently developed as MDPs and do not have direct access to Main Roadway Routes and Roadway Connectors, as shown on the Regional Freight Network Map in the RTP. The four MDPs have a gross site area of 7.3 acres, significantly less than the 40 acres allowed by Metro. Finally, Metro also allows for map changes for sites historically (prior to 2004) occupied by uses not allowed by Title 4. All four MDPs were established prior to 1954.

**MDPs in Metro Title 4 Employment Areas**

Site	Name	Year Built	Existing Spaces	Site Area
5	Glenwood Trailer Park	1942	77	3.40 acres
6	Fir Grove RV Park	1941	62	2.00 acres
7	El Rancho Mobile Park	1949	27	1.20 acres
33	Johnson Creek Trailer Park	1953	23	0.70 acres

**Title 5. Neighboring Cities (repealed 1997)**

**Title 6. Centers, Corridors, Station Communities and Main Streets.** The Regional Framework Plan identifies Centers, Corridors, Main Streets and Station Communities throughout the region and recognizes them as the principal centers of urban life in the region. Title 6 calls for actions and investments by cities and counties, complemented by regional investments, to enhance this role. A regional investment is an investment in a new high-capacity transit line or designated a regional investment in a grant or funding program administered by Metro or subject to Metro’s approval.

**22. Finding:** Title 6 establishes eligibility criteria for certain regional investments, and the use of more flexible trip generation assumptions when evaluating transportation impacts. Title 6 also contains aspirational activity level targets for different Metro 2040 place types. This title is incentive-based, so these findings simply serve to document intent. There are no specific mandatory compliance standards in Title 6 that apply to this ordinance.

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There are 38 MDPs in Metro 2040 places (see the Recommended Draft Report, Appendix A. MDP Inventory). The MDP amendments help to achieve Metro 2040 Growth Concept by increase in the minimum zoned capacity on 33 MDPs, which increases the minimum zoned capacity by about 1,100 units, in Title 6 areas across Portland. The minimum density increases can contribute towards achieving the activity level targets in 2040 places. The 38 MDPs also will continue to contribute to a mix of needed housings types to be vibrant and successful Centers, Corridors, Station Communities and Main Streets as called for in 3.07.640.C.

**Title 7. Housing Choice.** The Regional Framework Plan calls for establishment of voluntary affordable housing production goals to be adopted by local governments and assistance from local governments on reports on progress towards increasing the supply of affordable housing. It is the intent of Title 7 to implement these policies of the Regional Framework Plan.

**23. Finding:** Title 7 addresses housing choice. Metro adopted voluntary affordable housing goals for each city and county in the region for the years 2001 to 2006, but never updated them. Title 7 does not apply. Nevertheless, the recently adopted *2035 Comprehensive Plan* adopts city-wide affordable housing production goals that greatly exceed those adopted by the outdated Title 7 (Ordinance 178832). The MDP amendments supports the production and preservation of affordable housing by creating an affordable housing bonus for MDPs that reserve at least 50 percent of the spaces in the park are affordable at 60 percent area median income.

**Title 8. Compliance Procedures.** Title 8 addresses compliance procedures. This Title requires the City to notify Metro of pending land use decisions by providing Metro a copy of the 35-day notice required by the DLCD for proposed completion of a periodic review task. This notice was provided to Metro. Title 8 also requires the City to provide findings of compliance with the *Urban Growth Management Functional Plan*. The findings in this ordinance were also provided to Metro. All applicable requirements of Title 8 have been met.

**Title 9. Performance Measures.** (repealed in 2010)

**Title 10. Functional Plan Definitions.** Title 10 contains definitions. When 2035 Comprehensive Plan uses a term found in Title 10 either the term has the same meaning found in Title 10, or the difference is explained.

**24. Finding:** The MDP amendments do not change any definitions in the 2035 Comprehensive Plan. All applicable requirements of Title 10 requirements have been met.

**Title 11. Planning for New Urban Areas.** (not directly applicable)

**Title 12. Protection of Residential Neighborhoods.** Existing neighborhoods are essential to the success of the 2040 Growth Concept. The intent of Title 12 of the Urban Growth Management Functional Plan is to protect the region's residential neighborhoods. The purpose of Title 12 is to help implement the policy of the Regional Framework Plan to protect existing residential neighborhoods from air and water pollution, noise, and crime and to provide adequate levels of public services.

**25. Finding:** Title 12 addresses protection of residential neighborhoods. This title largely restricts Metro's authority to plan and regulate density in single-family neighborhoods. The 2035 Comprehensive Plan does not employ any of the optional provisions of Title 12. The MDP amendments do not employ any of the optional provisions of Title 12. Therefore, this title does not apply to this ordinance.

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**Title 13. Nature in Neighborhoods.** The purposes of this program are to (1) conserve, protect, and restore a continuous ecologically viable streamside corridor system, from the streams' headwaters to their confluence with other streams and rivers, and with their floodplains in a manner that is integrated with upland wildlife habitat and with the surrounding urban landscape; and (2) to control and prevent water pollution for the protection of the public health and safety, and to maintain and improve water quality throughout the region.

**26. Finding:** Title 13 is expressly intended to provide a minimum baseline level of protection for identified Habitat Conservation Areas. Local jurisdictions may achieve substantial compliance with Title 13 using regulatory and/or non-regulatory tools. The City of Portland implements Title 13 through its adopted Natural Resources Inventory and subsequent protection measures through the environmental overlay zones, which Metro has found to be in substantial compliance with Title 13.

Five (5) MDPs include designated Goal 5 resources that are protected by the conservation (c) and/or preservation (p) environmental overlay zones.

No changes to the environmental overlay zones are proposed as part of this project. Therefore, MDP amendments are consistent with the requirements of Title 13.

**Title 14. Urban Growth Management Plan.** Title 14 addresses the regional urban growth boundary. Since this ordinance does not require, nor initiate, a boundary change, Title 14 does not apply.

### **Summary, Urban Growth Management Functional Plan Findings**

**27. Finding:** The Metro Title 10 definition of comply or compliance means "substantial" rather than absolute compliance. "Substantial compliance" means city comprehensive plans and implementing ordinances, on the whole, conforms with the purposes of the performance standards in the functional plan and any failure to meet individual performance standard requirements is technical or minor in nature.

For the facts and reasons stated above this ordinance substantially complies with all Urban Growth Management Functional Plan requirements applicable to the MDP amendments.

## Part III. Portland's Comprehensive Plan

Portland's 2035 Comprehensive Plan was adopted as part Task Four of Periodic Review. Task Four was adopted by Ordinance No. 187832 on June 15, 2016. The 2035 Comprehensive Plan was amended as part Task Five of Periodic Review, which was adopted by Ordinance No. 188177 on December 21, 2016. Both ordinances were made effective on May 24, 2018 by Ordinance No. 188695, and both Tasks Four and Five were approved by LCDC Order 18 – WKTSK – 001897 on August 8, 2018.

**28. Finding:** The City Council has identified the following guiding principles, goals and policies to be applicable to the MDP amendments.

### **Guiding Principles**

The 2035 Comprehensive Plan adopted five "guiding principles" in addition to the goals and policies typically included in a comprehensive plan. These principles were adopted to reinforce that implementation of the plan needs to be balanced, integrated and multi-disciplinary, and the influence of each principle helps to shape the overall all policy framework of the plan. The MDP amendments furthers these guiding principles as described below.

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**Economic Prosperity.** Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

**29. Finding:** This guiding principle is to support a robust and resilient regional economy, thriving local businesses and growth in living-wage jobs and household prosperity. The City's acknowledged EOA analyzed and demonstrated adequate growth capacity for a diverse range of employment uses for several different geographies and analyzing growth capacity at each one. The relevant geographies for MDPs are Harbor and Airport, Dispersed Employment, and Neighborhood Commercial districts. Each of these employment geographies represent a different mix of industrial and employment sectors, building types, and densities.

The EOA identified a 54-acre surplus of development capacity in the Harbor & Airport Districts and a 16-acre surplus capacity in the Dispersed Employment geography. There are four MDPs that currently have a Mixed Employment designation in these two employment geographies. The proposed changes to the RMP designation will have a minimal impact on the employment capacity. The total reduction in employment capacity would be 6 acres; 5 acres in the Harbor and Airport Districts geography and 1 acre in the Dispersed Industrial geography. With these map changes, there is still sufficient employment capacity to accommodate these changes and maintain adequate development capacity to accommodate expected employment growth in the industrial employment geographies.

There are four MDPs that currently have a Mixed Use and Commercial designation. The proposed changes to the RMP designation will have a minimal impact on the employment capacity in the Neighborhood Commercial geography, which has 799 acres of surplus capacity. The total reduction in employment capacity on these four sites would be 6.7 acres.

As discussed in the findings for Statewide Planning Goal 9 and the 2035 Comprehensive Plan goals and policies of Chapter 6 (Economic Development), which are incorporated by reference, even though the MDP amendments reduce the employment land supply, the affected EOA employment geography maintain sufficient employment capacity to accommodate the forecasted employment growth in compliance with Statewide Planning Goal 9. In addition, as discussed in the findings for Statewide Planning Goal 10 and the 2035 Comprehensive Plan goals and policies of Chapter 5 (Housing), the MDP amendments will support the provision of low-cost market rate housing that is a component of household prosperity. Therefore, on balance, the MDP amendments will further the economic prosperity guiding principle.

**Human Health.** Avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives.

**30. Finding:** The MDP amendments further the following objectives which are intended to avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy active lives.

**Increase access to complete neighborhoods.** As described in the 2035 Comprehensive Plan (page I-15), complete neighborhoods are places where people have safe and convenient access to the goods and services needed in daily life. The conveniences of a complete neighborhood make it easier for residents to have active lifestyles and integrate exercise into their daily lives. Thirty-one (31) MDPs are located in areas that are considered to be complete neighborhoods. Providing stability and allowing for increased development will help provide and expand affordable housing opportunities in these locations.

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**Strengthen consideration of environmental justice.** The 2035 Comprehensive Plan describes environmental justice as “the equitable treatment and meaningful involvement of all people in public decision making as it applies to who benefits and who bears the cost of development and growth.” Fifty (50) MDPs are located in vulnerable neighborhoods (Census tracts with higher than average shares of people that are vulnerable to economic displacement: renters, communities of color, adults without a four-year college degree and renters). Fifty-five (55) MDPs are located in areas with higher shares of communities of color. As part of the public review of the proposed MDP amendments the City sent notice to both the owners and occupants; a City helpline with translation services responded eighty-four people to seeking more information about the proposal; and City staff canvassed 37 MDPs to speak directly with MDP residents to inform them about the proposal. The PSC hearing was held in the evening at the Portland Community College Southeast Campus to make the meeting accessible to MDP residents in East Portland.

**Environmental Health.** Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland’s air, water and land.

**31. Finding:** Only five MDPs include designated Goal 5 resources, which are protected by environmental overlay zones (see BPS memo, August 13, 2018). No changes to the environmental overlay zones are proposed as part of this project, therefore the natural resource values and functions will be sustained.

Twelve (12) MDPs are located within ¼-mile of an urban habitat corridor and 26 MDPs are located along City Greenways (see Recommended Draft Report, Appendix A. MDP Inventory). MDPs are required to have a 10-foot perimeter landscape areas that can provide for natural features (at least to the L1 landscaping standard) that can enhance the urban habitat. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity for tree planting and landscaping that can help improve urban habitat and environmental health as part of the development review process.

**Equity.** Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and under-represented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland’s history.

**32. Finding:** This guiding principle provides a framework to ensure Portlanders more equitably share in the benefits and burdens of growth and development. The purpose of the MDP amendments is to provide greater stability for MDPs. Greater stability for parks can help maintain access to lower-cost market-rate housing, especially for historically inequitably burdened communities of color, underserved and under-represented communities, and other vulnerable populations.

The adoption process for the MDP amendments included outreach activities (notices, helpline, canvassing, and meeting locations) to engage under-served and under-represented populations in decision-making process. As noted in the findings for Statewide Planning Goal 1 (Citizen Involvement) and Chapter 2 (Community Involvement) of the 2035 Comprehensive Plan, the findings in response to those goals and policies are incorporated by reference, the MDP amendments are consistent with the principle to create a robust and more inclusive community involvement process.

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Manufactured housing plays a small — but important — role in the affordable housing market. It is often the housing of last resort for households that are struggling to cope with rising housing costs. At the same time, it can be the first choice of housing for low-income households, especially families. The MDP amendments are designed to limit the displacement of residents by providing greater stability for MDPs by resolving nonconforming situations, increasing maximum densities, and expanding density transfer provisions. The increased maximum density standard will allow for 2,200 more spaces in MDPs than is allowed under the current zoning for the MDPs. The increased density can result in added spaces on-site or be transferred to another multi-dwelling site, both of which can generate added revenue that will support the continued operation of the parks. With this stability, park owners and dwelling owners can make investments to repair, improve and upgrade their living conditions with a greater sense of stability from their zoning situation.

MDP amendments strive to create regulations that acknowledge that one size does not fit all by creating development standards to address the unique nature of MDPs in terms of density, access, setbacks and landscaping requirements.

**Resilience.** Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and build environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts.

**33. Finding:** The 2035 Comprehensive Plan describes resilience as “reducing the vulnerability of our neighborhoods, businesses, and built and natural infrastructure to withstand challenges – environmental, economic and social – that may result from major hazardous events.” The MDP amendments are intended to provide greater economic and social stability, especially in terms of supporting lower-cost market-rate housing for the residents of the MDPs. In terms on natural hazards, only 12 MDPs are located in areas of higher-risk of natural hazards (see BPS memo, August 13, 2018). Parts of five MDPs are located in the 100-year floodplain and parts of seven MDPs are located in high or very high landslide susceptibility areas. Most of the floodplain and landslide susceptibility areas are protected by environmental overlay zones and the provisions of 33.631 (Sites in Flood Hazard Areas), which will limit development in these areas and reduce the risk. The City programs for flood management, and erosion and sediment control (Title 10 Erosion Control and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments.

## Chapter 1: The Plan

**Goal 1.A: Multiple goals.** Portland’s Comprehensive Plan provides a framework to guide land use, development, and public facility investments. It is based on a set of Guiding Principles that call for integrated approaches, actions, and outcomes that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient.

**Goal 1.B: Regional partnership.** Portland’s Comprehensive Plan acknowledges Portland’s role within the region, and it is coordinated with the policies of governmental partners.

**Goal 1.C: A well-functioning plan.** Portland’s Comprehensive Plan is effective, its elements are aligned, and it is updated periodically to be current and to address mandates, community needs, and identified problems.

**Goal 1.D: Implementation tools.** Portland’s Comprehensive Plan is executed through a variety of implementation tools, both regulatory and non-regulatory. Implementation tools comply with the Comprehensive Plan and are carried out in a coordinated and efficient manner. They protect the

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public's current and future interests and balance the need for providing certainty for future development with the need for flexibility and the opportunity to promote innovation.

**Goal 1.E: Administration.** Portland's Comprehensive Plan is administered efficiently and effectively and in ways that forward the intent of the Plan. It is administered in accordance with regional plans and state and federal law.

**34. Finding:** The MDP amendments are an amendment to the 2035 Comprehensive Plan. MDP amendments include Comprehensive Plan policy amendments (new land use designation), Comprehensive Plan Map amendments, Zoning Code amendments, and Zoning Map amendments. As noted above, MDP amendments are consistent with the guiding principles of the 2035 Comprehensive Plan.

The findings in this exhibit demonstrate how the MDP amendments are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and the Statewide Planning Goals. Metro, TriMet, and other state agencies received notice of the proposed MDP amendments from the 35-day DLCD notice and the City's legislative notice. The City did not receive any requests from other government agencies to modify the MDP amendments.

### The Comprehensive Plan

**Policy 1.1. Comprehensive Plan elements.** Maintain a Comprehensive Plan that includes these elements:

- **Vision and Guiding Principles.** The Vision is a statement of where the City aspires to be in 2035. The Guiding Principles call for decisions that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient.
- **Goals and policies.** The goals and policies of the Comprehensive Plan, including the Urban Design Framework, provide the long-range planning direction for the development and redevelopment of the city.
- **Comprehensive Plan Map.** The Comprehensive Plan Map is the official long-range planning guide for spatially defining the desired land uses and development in Portland. The Comprehensive Plan Map is a series of maps, which together show the boundaries of municipal incorporation, the Urban Service Boundary, land use designations, and the recognized boundaries of the Central City, Gateway regional center, town centers, and neighborhood centers.
- **List of Significant Projects.** The List of Significant Projects identifies the public facility projects needed to serve designated land uses through 2035, including expected new housing and jobs. It is based on the framework provided by a supporting Public Facilities Plan (PFP). The Citywide Systems Plan (CSP) is the City's public facilities plan. The Transportation System Plan (TSP) includes the transportation-related list of significant projects. The list element of the TSP is also an element of the Comprehensive Plan.
- **Transportation policies, street classifications, and street plans.** The policies, street classifications, and street plan maps contained in the Transportation System Plan (TSP) are an element of the Comprehensive Plan. Other parts of the TSP function as a supporting document, as described in Policy 1.2.

**35. Finding:** The MDP amendments maintain the Comprehensive Plan while simultaneously addressing emerging issues and including policy amendments to add a new land use designation (MDP) and

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corresponding amendments to the Comprehensive Plan Map as well as amendments to the Zoning Code and Zoning Map that are consistent with the Comprehensive Plan Map.

### Supporting Documents

**Policy 1.2. Comprehensive Plan supporting documents.** Maintain and periodically update the following Comprehensive Plan supporting documents.

1. **Inventories and analyses.** The following inventories and analyses are supporting documents to the Comprehensive Plan:
  - Economic Opportunities Analysis (EOA)
  - Buildable Lands Inventory (BLI)
  - Natural Resource Inventory (NRI)
  - Housing Needs Analysis (HNA)

36. **Finding:** The MDP amendments were developed consistent with the supporting documents of the adopted 2035 Comprehensive Plan. As demonstrated in the findings for Statewide Planning Goals 5, 9, and 10, the MDP amendments do not significantly impact the employment and housing development capacity and only five MDPs have significant natural resources that remain protected by environmental overlay zones, which are unchanged by the MDP amendments.

2. **Public Facilities Plan.** The Public Facilities Plan (PFP) is a coordinated plan for the provision of urban public facilities and services within Portland’s Urban Services Boundary. The Citywide Systems Plan (CSP) is the City’s public facilities plan.

37. **Finding:** As demonstrated in the findings for Statewide Planning Goal 11, the MDP amendments do not significantly impact the provision of public services to these sites and are consistent with the adopted Citywide Systems Plan (CSP). The CSP, which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017, includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects, consistent with the requirements of Statewide Planning Goal 11.

In addition, the service limitations identified in the CSP have been incorporated into the adopted BLI development constraint analysis that identified parts of Portland that lack needed urban infrastructure. The BLI constraint analysis is the basis of a geographic evaluation of the MDPs to ensure that public facilities are planned to support any potential development that could result from these amendments (see Recommended Draft Report, Appendix A. MDP Inventory). The constraints on public facilities are not insurmountable, but mean development could face increased cost of to provide the constrained infrastructure.

As noted below in the findings for goals and policies of Chapter 8 (Public Facilities and Services), which are incorporated by reference, the MDP amendments are consistent with the CSP.

3. **Transportation System Plan (TSP).** The TSP is the detailed long-range plan to guide transportation system functions and investments. The TSP ensures that new development and allowed land uses are consistent with the identified function and capacity of, and adopted performance measures for, affected transportation facilities. The TSP includes a financial plan to identify revenue sources for planned transportation facilities included on the List of Significant Projects. The TSP is the transportation element of the Public Facilities Plan. Certain components of the TSP are elements of the Comprehensive Plan. *See Policy 1.1.*

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**38. Finding:** As demonstrated in the findings for Statewide Planning Goal 12 (Transportation) and the goals and policies of Chapter 9 (Transportation), the MDP amendments do not significantly impact key facilities on the surrounding transportation system. The transportation impact of the MDP amendments were evaluated by the Portland Bureau of Transportation (PBOT) (see PBOT memo, dated August 8, 2018). The analysis found that the MDP amendments will add little traffic on to the roadways on the ODOT/PBOT list of “Hot Spot” transportation facilities identified in City’s 2035 Comprehensive Plan process. The MDP amendments may add traffic on two critical locations that currently do not meet the TSP performance standards:

- NE Killingsworth, between 72nd and 92nd Avenues
- SE Powell Blvd, between 122nd and 162nd Avenues

The scale of the added traffic is relatively small, but these added trips could degrade the performance of these facilities. However, there are mitigating factors that should reduce the impact of these changes, including a refinement plan identified in the TSP (TSP Chapter 6, page 282) to address locations that may fail to meet mobility standards in 2035. This refinement plan is still pending, therefore, mitigating the increased traffic from the MDP amendments can be incorporated into that planning process.

**4. School Facility Plans.** School facility plans that were developed in consultation with the City, adopted by school districts serving the City, and that meet the requirements of ORS 195 are considered supporting documents to the Comprehensive Plan.

**39. Finding:** Twenty-four MDPs are located in the David Douglas School District, the only school district in Portland with an adopted school facility plan. The MDP amendments create 600 units in additional development capacity over current zoning. The 2035 Comprehensive Plan BLI estimated 33,000 units of development capacity in the David Douglas School District. The MDP amendments represent a marginal 2 percent increase potential development capacity. The David Douglas School District has indicated that it can accommodate these changes into their future forecasting for their facility plan.

## Implementation tools

**Policy 1.3. Implementation tools subject to the Comprehensive Plan.** Maintain Comprehensive Plan implementation tools that are derived from, and comply with, the Comprehensive Plan.

*Implementation tools include those identified in policies 1.4 through 1.9.*

**Policy 1.4. Zoning Code.** Maintain a Zoning Code that establishes the regulations that apply to various zones, districts, uses, and development types.

**Policy 1.5 Zoning Map.** Maintain a Zoning Map that identifies the boundaries of various zones, districts, and other special features.

**40. Finding:** The MDP amendments include Zoning Code and Map amendments intended to implement the policy framework of the *2035 Comprehensive Plan*. The Zoning Code amendments include the creation of a new base zone with use allowances and development standards to address Comprehensive Plan policy 5.37 (Mobile Home Parks).

## Administration

**Policy 1.10. Compliance with the Comprehensive Plan.** Ensure that amendments to the Comprehensive Plan’s elements, supporting documents, and implementation tools comply with the Comprehensive Plan. “Comply” means that amendments must be evaluated against the Comprehensive Plan’s applicable goals and policies and on balance be equally or more supportive of the Comprehensive Plan than the existing language or designation.

**1.10.a** Legislative amendments to the Comprehensive Plan’s elements and implementation tools must also comply with the Guiding Principles.

**1.10.b** Legislative amendments to the Comprehensive Plan’s elements should be based on the factual basis established in the supporting documents as updated and amended over time.

**1.10.c** Amendments to the Zoning Map are in compliance with the Comprehensive Plan if they are consistent with the Comprehensive Plan Map.

**41. Finding:** These findings identify how the MDP amendments comply with the *2035 Comprehensive Plan*. That is, the amendments are equally or more supportive of the *2035 Comprehensive Plan’s* Guiding Principles, goals, policies, and maps, as detailed throughout this set of findings. Further, all Zoning Map amendments in the MDP amendments reflect amendments to the *2035 Comprehensive Plan Map* and are therefore consistent with the that map.

**Policy 1.11. Consistency with Metro Urban Growth Management Functional Plan and Urban Growth Boundary.** Ensure that the Comprehensive Plan remains consistent with the Metro Urban Growth Management Functional Plan and supports a tight urban growth boundary for the Portland metropolitan area.

**Policy 1.12. Consistency with Statewide Planning Goals.** Ensure that the Comprehensive Plan, supporting documents, and implementation tools remain consistent with the Oregon Statewide Planning Goals.

**42. Finding:** As noted earlier in these findings, the MDP amendments are consistent with and designed to further the applicable elements of the Metro Urban Growth Management Functional Plan and Statewide Planning Goals, consistent with the directives of policies 1.11 and 1.12.

**Policy 1.13. Consistency with state and federal regulations.** Ensure that the Comprehensive Plan remains consistent with all applicable state and federal regulations, and that implementation measures for the Comprehensive Plan are well coordinated with other City activities that respond to state and federal regulations.

**43. Finding:** The MDP amendments were developed to be consistent with applicable state and federal regulations. The RMP zone is consistent with the Oregon Manufactured Dwelling and Park Specialty Code.

**Policy 1.14. Public facility adequacy.** Consider impacts on the existing and future availability and capacity of urban public facilities and services when amending Comprehensive Plan elements and implementation tools. Urban public facilities and services include those provided by the City, neighboring jurisdictions, and partners within Portland’s urban services boundaries, as established by Policies 8.2 and 8.6.

**44. Finding:** As demonstrated in the findings for Statewide Planning Goal 11 and Chapter 8 (Public Facilities and Services) of the *2035 Comprehensive Plan*, the MDP amendments do not significantly impact the provision of public services to these sites.

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**Policy 1.15. Intergovernmental coordination.** Strive to administer the Comprehensive Plan elements and implementation tools in a manner that supports the efforts and fiscal health of the City, county and regional governments, and partner agencies such as school districts and transit agencies.

45. **Finding:** As demonstrated in the findings for Statewide Planning Goal 2, the City filed the required 35-day notice with Oregon Department of Land Conservation and Development to notify other government agencies of the proposed MDP amendments. In addition, the City sent a separate legislative notice to Multnomah County, adjacent cities, Metro and TriMet. The City also coordinated with the David Douglas School District to consider how these amendments may address school enrollment. There were no other government agencies that raised issues or concerns with the MDP amendments.

**Policy 1.16. Planning and Sustainability Commission review.** Ensure the Planning and Sustainability Commission (PSC) reviews and makes recommendations to the City Council on all proposed legislative amendments to Comprehensive Plan elements, supporting documents, and implementation tools. The PSC advises City Council on the City's long-range goals, policies, and programs for land use, planning, and sustainability. The membership and powers and duties of the PSC are described in the Zoning Code.

46. **Finding:** On April 24, 2018, the PSC was given a briefing on the Proposed Draft of MDP amendments. The PSC held a public hearing on June 12, 2018. At the hearing, testimony was received on the Proposed Draft. On July 10, 2018, the PSC considered amendments and voted on the final Recommended Draft to be forwarded to City Council.

**Policy 1.17. Community Involvement Committee.** Establish a Community Involvement Committee to oversee the Community Involvement Program as recognized by Oregon Statewide Planning Goal 1 – Community Involvement and policies 2.15-2.18 of this Comprehensive Plan.

47. **Finding:** The Citizen Involvement Committee had not been created as an official advisory committee at the time that this project was initiated.

**Policy 1.19. Area-specific plans.** Use area-specific plans to provide additional detail or refinements applicable at a smaller geographic scale, such as for centers and corridors, within the policy framework provided by the overall Comprehensive Plan.

**1.19.a** Area-specific plans that are adopted after May 24, 2018, should clearly identify which components amend Comprehensive Plan elements, supporting documents, or implementation tools. Such amendments should be appropriate to the scope of the Comprehensive Plan; be intended to guide land use decisions; and provide geographically-specific detail. Such amendments could include policies specific to the plan area, land use designation changes, zoning map changes, zoning code changes, and public facility projects necessary to serve designated land uses.

**1.19.b** Area-specific plan components intended as context, general guidance, or directives for future community-driven efforts should not amend the Comprehensive Plan elements or implementation tools but be adopted by resolution as intent. These components include vision statements, historical context, existing conditions, action plans, design preferences, and other background information.

**1.19.c** Community, area, neighborhood, and other area-specific plans that were adopted by ordinance prior to January 1, 2018 are still in effect. However, the elements of this Comprehensive

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Plan supersede any goals or policies of a community, area, or neighborhood plan that are inconsistent with this Plan.

48. **Finding:** Findings for policies in area-specific plans that address manufactured dwelling parks are found in Part IV.

## Chapter 2: Community Involvement

**Goal 2.A: Community involvement as a partnership.** The City of Portland works together as a genuine partner with all Portland communities and interests. The City promotes, builds, and maintains relationships, and communicates with individuals, communities, neighborhoods, businesses, organizations, institutions, and other governments to ensure meaningful community involvement in planning and investment decisions.

**Goal 2.B: Social justice and equity.** The City of Portland seeks social justice by expanding choice and opportunity for all community members, recognizing a special responsibility to identify and engage, as genuine partners, under-served and under-represented communities in planning, investment, implementation, and enforcement processes, particularly those with potential to be adversely affected by the results of decisions. The City actively works to improve its planning and investment-related decisions to achieve equitable distribution of burdens and benefits and address past injustices.

**Goal 2.C: Value community wisdom and participation.** Portland values and encourages community and civic participation. The City seeks and considers community wisdom and diverse cultural perspectives, and integrates them with technical analysis, to strengthen land use decisions.

**Goal 2.D: Transparency and accountability.** City planning and investment decision-making processes are clear, open, and documented. Through these processes a diverse range of community interests are heard and balanced. The City makes it clear to the community who is responsible for making decisions and how community input is considered. Accountability includes monitoring and reporting outcomes.

**Goal 2.E: Meaningful participation.** Community members have meaningful opportunities to participate in and influence all stages of planning and decision making. Public processes engage the full diversity of affected community members, including under-served and under-represented individuals and communities. The City will seek and facilitate the involvement of those potentially affected by planning and decision making.

**Goal 2.F: Accessible and effective participation.** City planning and investment decision-making processes are designed to be culturally accessible and effective. The City draws from acknowledged best practices and uses a wide variety of tools, including those developed and recommended by under-served and under-represented communities, to promote inclusive, collaborative, culturally-specific, and robust community involvement.

**Goal 2.G: Strong civic infrastructure.** Civic institutions, organizations, and processes encourage active and meaningful community involvement and strengthen the capacity of individuals and communities to participate in planning processes and civic life.

49. **Finding:** The public engagement process provided opportunities for all interested parties to comment on and influence the recommended draft and the final decision before City Council.

In conjunction with publishing the Proposed Draft, the legally required Measure 56 notices were sent to all MDP owners, which included the property owners as well as residents of record who own their own manufactured dwellings and rent spaces. In addition, per Zoning Code 33.855.040, a postcard was sent to all occupants of the MDPs to ensure that renters were aware of the proposal.

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To support these notices, the BPS website had a project page with the available documents; a Map App page with a testimony function; BPS staff created a dedicated help phone line; BPS staff canvassed door-to-door in 37 of the parks prior to the PSC hearing to provide additional opportunities to learn about the Proposed Draft and offer numerous ways to comment.

The public was provided opportunities to express concerns and suggest amendments in front of both the PSC and City Council.

## Partners in decision making

**Policy 2.1. Partnerships and coordination.** Maintain partnerships and coordinate land use engagement with:

**2.1.a** Individual community members.

**2.1.b** Communities of color, low-income populations, Limited English Proficient (LEP) communities, Native American communities, and other under-served and under-represented communities.

**2.1.c** District coalitions, neighborhood associations, and business district associations as local experts and communication channels for place-based projects.

**2.1.d** Businesses, unions, employees, and related organizations that reflect Portland's diversity as the center of regional economic and cultural activity.

**2.1.e** Community-based, faith-based, artistic and cultural, and interest-based non-profits, organizations, and groups.

**2.1.f** Institutions, governments, and Sovereign tribes.

**Policy 2.2. Broaden partnerships.** Work with district coalitions, neighborhood associations, and business district associations to increase participation and to help them reflect the diversity of the people and institutions they serve. Facilitate greater communication and collaboration among district coalitions, neighborhood associations, business district associations, culturally-specific organizations, and community-based organizations.

**50. Finding:** During the review of the MDP amendments, BPS staff attended community meetings to inform people of the proposed amendments. All meetings and events were open to the public and included opportunities for public comment. These meetings included those held with neighborhood associations, the East Portland Action Plan Housing subcommittee, and other City advisory groups (PHAC) not directly involved in the decision-making process.

## Environmental justice

**Policy 2.3. Extend benefits.** Ensure plans and investments promote environmental justice by extending the community benefits associated with environmental assets, land use, and public investments to communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision. Maximize economic, cultural, political, and environmental benefits through ongoing partnerships.

**Policy 2.4. Eliminate burdens.** Ensure plans and investments eliminate associated disproportionate burdens (e.g. adverse environmental, economic, or community impacts) for communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision.

**2.4.a,** Minimize or mitigate disproportionate burdens in cases where they cannot be eliminated.

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#### **2.4.b, Use plans and investments to address disproportionate burdens of previous decisions.**

**51. Finding:** MDPs provide lower-cost market-rate rental housing. The MDP amendments will resolve nonconforming situations, increase maximum densities, expand density transfer provisions and allow RV parks to support the continued operation of MDPs in Portland. Greater stability for these parks can help maintain access to relatively affordable housing, especially for historically inequitably burdened communities of color, underserved and under-represented communities, and other vulnerable populations. As described in the Recommended Draft Report, manufactured dwelling households tend to have more low-income, cost-burdened households than the city as a whole. Manufactured dwelling households have a greater share of households that do not make a self-sufficient income than the city as a whole. Manufactured dwelling residents have a greater share of communities of color and adults without a 4-year college degree.

BPS used a vulnerability analysis to identify neighborhoods (Census tracts) with higher than average shares of people that are vulnerable to economic displacement: renters, communities of color, adults without a four-year college degree and renters. An analysis of the location of MDPs in relation to higher levels of vulnerability show that 50 out of 56 MDPs are located in vulnerable neighborhoods.

### **Community assessment**

**Policy 2.8. Channels of communication.** Maintain channels of communication among City Council, the Planning and Sustainability Commission (PSC), project advisory committees, City staff, and community members.

**52. Finding:** In support of MDP amendments, the project team conducted briefings with the PSC, the Portland Housing Advisory Commission (PHAC), neighborhood associations, and community groups consistent with Policy 2.8.

**Policy 2.9. Community analysis.** Collect and evaluate data, including community-validated population data and information, to understand the needs, priorities, and trends and historical context affecting different communities in Portland.

**Policy 2.10. Community participation in data collection.** Provide meaningful opportunities for individuals and communities to be involved in inventories, mapping, data analysis, and the development of alternatives.

**53. Finding:** The inventory of all MDPs in Portland in support of MDP amendments relied on different sources, including State and County records, field verification and community input. This inventory was available as a support document to the Proposed Draft (Appendix A) and integrated into a Map App that allowed individuals to focus on issues related to a specific park.

### **Transparency and accountability**

**Policy 2.12. Roles and responsibilities.** Establish clear roles, rights, and responsibilities for participants and decision makers in planning and investment processes. Address roles of City bureaus, elected officials, and participants, including community and neighborhood leadership, business, organizations, and individuals.

**Policy 2.13. Project scope.** Establish clear expectations about land use project sponsorship, purpose, design, and how decision makers will use the process results.

**Policy 2.14. Community influence.** At each stage of the process, identify which elements of a planning and investment process can be influenced or changed through community involvement. Clarify the

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extent to which those elements can be influenced or changed.

**Policy 2.15. Documentation and feedback.** Provide clear documentation for the rationale supporting decisions in planning and investment processes. Communicate to participants about the issues raised in the community involvement process, how public input affected outcomes, and the rationale used to make decisions.

**54. Finding:** As described in the findings for Statewide Planning Goal 1 (Citizen Involvement), the legislative process was clearly outlined in notices, documents and on the project website as to how to testify to influence the Proposed Draft at the PSC, which amended the proposal. Then the Recommended Draft was published with the opportunity to testify to the City Council for the August 22, 2018 public hearing.

Throughout this process, BPS staff contacted, met with, and coordinated with stakeholders to inform them how to engage in the decision-making process, how the process was structured, and additional opportunities to participate when such opportunities existed.

### Process design and evaluation

**Policy 2.24. Representation.** Facilitate participation of a cross-section of the full diversity of affected Portlanders during planning and investment processes. This diversity includes individuals, stakeholders, and communities represented by race, color, national origin, English proficiency, gender, age, disability, religion, sexual orientation, gender identity, and source of income.

**Policy 2.25. Early involvement.** Improve opportunities for interested and affected community members to participate early in planning and investment processes, including identifying and prioritizing issues, needs, and opportunities; participating in process design; and recommending and prioritizing projects and/or other types of implementation.

**55. Finding:** The community involvement program conducted in support of MDP amendments engaged the owners and residents of the MDPs. Accommodations were made available for people with disabilities and those that were non-English speaking stakeholders to participate in events and access materials. Also, BPS staff met with interested parties.

**Policy 2.26. Verifying data.** Use data, including community-validated population data, to guide planning and investment processes and priority setting and to shape community involvement and decision-making efforts.

**Policy 2.27. Demographics.** Identify the demographics of potentially affected communities when initiating a planning or investment project.

**Policy 2.28. Historical understanding.** To better understand concerns and conditions when initiating a project, research the history, culture, past plans, and other needs of the affected community, particularly under-represented and under-served groups, and persons with limited English proficiency (LEP). Review preliminary findings with members of the community who have institutional and historical knowledge.

**56. Finding:** The BPS used a vulnerability analysis to identify neighborhoods (Census tracts) with higher than average shares of people that are vulnerable to economic displacement: renters, communities of color, adults without a four-year college degree and renters. An analysis of the location of MDPs in relation to higher levels of vulnerability show that 50 out of 56 MDPs are located in vulnerable neighborhoods.

**Policy 2.29. Project-specific needs.** Customize community involvement processes to meet the needs

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of those potentially affected by the planning or investment project. Use community involvement techniques that fit the scope, character, and potential impact of the planning or investment decision under consideration.

**57. Finding:** The community involvement process was customized to engage the residents of MDPs. In addition to the legally required Measure 56 notices that were sent to all MDP owners, which included the property owners as well as residents of record who own their own manufactured dwellings and rent spaces, a postcard was sent to all occupants of the MDPs to ensure that renters were aware of the proposal.

To support these notices, the BPS website had a project page with the available documents; a Map App page with a testimony function; BPS staff created a dedicated help phone line; BPS staff canvassed door-to-door in 37 of the parks prior to the PSC hearing to provide additional opportunities to learn about the Proposed Draft and offer numerous ways to comment.

**Policy 2.30. Culturally-appropriate processes.** Consult with communities to design culturally-appropriate processes to meet the needs of those affected by a planning or investment project. Evaluate, use, and document creative and culturally-appropriate methods, tools, technologies, and spaces to inform and engage people from under-served and under-represented groups about planning or investment projects.

**Finding:** BPS consulted with two community organization – Living Cully and the East Portland Action Plan Housing Committee – on how to customize the community involvement process to engage MDP residents. BPS staff canvassed door-to-door in 37 of the parks prior to the PSC hearing to provide additional opportunities to learn about the MDP amendments and offer ways to comment.

**Policy 2.31. Innovative engagement methods.** Develop and document innovative methods, tools, and technologies for community involvement processes for plan and investment projects.

**58. Finding:** The City deployed innovative engagement methods, including a Map App (online interactive web-based map application) page with a testimony function; a dedicated help phone line; and canvassing door-to-door in 37 of the parks prior to the PSC hearing to provide additional opportunities to learn about the MDP amendments and offer numerous ways to comment.

**Policy 2.32. Inclusive participation beyond Portland residents.** Design public processes for planning and investment projects to engage affected and interested people who may not live in Portland such as property owners, employees, employers, and students, among others, as practicable.

**59. Finding:** The MDP amendments impact a relatively small part of Portland. BPS staff engaged the property owners through direct notification, replying to email and phone calls, and meeting with representatives of the Manufactured Housing Communities of Oregon.

**Policy 2.33. Inclusive participation in Central City planning.** Design public processes for the Central City that recognize its unique role as the region's center. Engage a wide range of stakeholders from the Central City and throughout the region including employees, employers, social service providers, students, and visitors, as well as regional tourism, institutional, recreation, transportation, and local/regional government representatives, as appropriate.

**60. Finding:** There are no MDPs in the Central City. This policy does not apply.

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**Policy 2.34. Accessibility.** Ensure that community involvement processes for planning and investment projects are broadly accessible in terms of location, time, and language, and that they support the engagement of individuals with a variety of abilities and limitations on participation.

**Policy 2.35. Participation monitoring.** Evaluate and document participant demographics throughout planning and investment processes to assess whether participation reflects the demographics of affected communities. Adapt involvement practices and activities accordingly to increase effectiveness at reaching targeted audiences.

**Policy 2.36. Adaptability.** Adapt community involvement processes for planning and investment projects as appropriate to flexibly respond to changes in the scope and priority of the issues, needs, and other factors that may affect the process.

**Policy 2.37. Process evaluation.** Evaluate each community involvement process for planning or investment projects from both the City staff and participants' perspectives, and consider feedback and lessons learned to enhance future involvement efforts.

**61. Finding:** The MDP project process was designed to be accessible, especially for individuals with limitations on participation. The BPS staff that conducted the canvassing of 37 MDPs included a Spanish speaker and information translated into Spanish. The PSC public hearing on June 12, 2018 was held in the evening at the Portland Community College Southeast Campus to make the meeting accessible to MDP residents who predominantly live in East Portland. Forty-two (42) people testified at the hearing, including several Spanish speakers that were assisted by a translator. Translation services were provided to audience members to be able to follow the testimony at the PSC hearing and the August 22, 2018 City Council Hearing.

### Information design and development

**Policy 2.38. Accommodation.** Ensure accommodations to let individuals with disabilities participate in administrative, quasi-judicial, and legislative land use decisions, consistent with federal regulations.

**62. Finding:** The PSC public hearing on June 12, 2018 was held in the evening at the Portland Community College Southeast Campus to make the meeting accessible. The City Council hearing on August 22, 2018 was held at City Hall, an accessible location.

**Policy 2.39. Notification.** Notify affected and interested community members and recognized organizations about administrative, quasi-judicial, and legislative land use decisions with enough lead time to enable effective participation. Consider notification to both property owners and renters.

**63. Finding:** For the Proposed Draft and PSC hearing, the City sent the required Measure 56 notice to all owners –the park owners as well as owners of individual manufactured dwellings in the MDPs. The City sent a legislative notice to interested parties, including neighborhood associations, business associations, and other affected jurisdictions, that have requested notice of proposed land use changes. Also, the City sent a separate notice to the occupants (renters and owners) of all dwellings in the MDPs. Subsequently, the City sent a legislative notice to interested parties and people who testified to the PSC to inform them of the opportunity to testify at the August 22, 2018, City Council public hearing.

**Policy 2.40. Tools for effective participation.** Provide clear and easy access to information about administrative, quasi-judicial, and legislative land use decisions in multiple formats and through technological advancements and other ways.

**Policy 2.41. Limited English Proficiency (LEP).** Ensure that limited English proficient (LEP) individuals are provided meaningful access to information about administrative, quasi-judicial, and legislative

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land use decisions, consistent with federal regulations.

**64. Finding:** The MDP project process was designed to be accessible for LEP individuals. The BPS staff that conducted the canvassing of 37 MDPs included a Spanish speaker and information translated into Spanish. The telephone helpline had translation services available.

### Chapter 3: Urban Form

**GOAL 3.A: A city designed for people.** Portland’s built environment is designed to serve the needs and aspirations of all Portlanders, promoting prosperity, health, equity, and resiliency. New development, redevelopment, and public investments reduce disparities and encourage social interaction to create a healthy connected city.

**GOAL 3.B: A climate and hazard resilient urban form.** Portland’s compact urban form, sustainable building development practices, green infrastructure, and active transportation system reduce carbon emissions, reduce natural hazard risks and impacts, and improve resilience to the effects of climate change.

**GOAL 3.C: Focused growth.** Household and employment growth is focused in the Central City and other centers, corridors, and transit station areas, creating compact urban development in areas with a high level of service and amenities, while allowing the relative stability of lower-density single-family residential areas.

**GOAL 3.D: A system of centers and corridors.** Portland’s interconnected system of centers and corridors provides diverse housing options and employment opportunities, robust multimodal transportation connections, access to local services and amenities, and supports low-carbon complete, healthy, and equitable communities.

**GOAL 3.E: Connected public realm and open spaces.** A network of parks, streets, City Greenways, and other public spaces supports community interaction; connects neighborhoods, districts, and destinations; and improves air, water, land quality, and environmental health.

**GOAL 3.F: Employment districts.** Portland supports job growth in a variety of employment districts to maintain a diverse economy.

**GOAL 3.G: Nature in the city.** A system of habitat corridors weaves nature into the city, enhances habitat connectivity, and preserves natural resources and the ecosystem services they provide.

**65. Finding:** The Urban Design chapter of the *2035 Comprehensive Plan* contains goals and policies that view the city as if viewed from above. It considers the natural and urban conditions that shape the city, the unique districts that gives the city a diverse character, and considers the network of corridors that link the city internally and with the region. Viewed from this perspective, the MDP amendments affect only 270 acres scattered over 56 sites – a very small part of Portland.

Thirty-five (35) MDPs are in Portland’s centers and corridors, with 31 of the MDPs are located in areas that are considered to be complete neighborhoods. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas.

## Citywide design and development

**Policy 3.2. Growth and stability.** Direct most growth and change to centers, corridors, and transit station areas, allowing the continuation of the scale and characteristics of Portland’s residential neighborhoods.

66. **Finding:** Thirty-five (35) MDPs are in Portland’s centers and corridors. The MDP amendments will increase the maximum density allowed at 31 of the 35 MDPs with the potential for an additional 1,800 units. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas. These amendments increase in the minimum zoned capacity on these 35 MDPs, which increases the minimum zoned capacity by about 1,500 units, consistent with this policy direction.

**Policy 3.3. Equitable development.** Guide development, growth, and public facility investment to reduce disparities, ensure equitable access to opportunities, and produce positive outcomes for all Portlanders.

**3.3.a.** Anticipate, avoid, reduce, and mitigate negative public facility and development impacts, especially where those impacts inequitably burden communities of color, under-served and under-represented communities, and other vulnerable populations.

**3.3.b.** Make needed investments in areas that are deficient in public facilities to reduce disparities and increase equity. Accompany these investments with proactive measures to avoid displacement and increase affordable housing.

**3.3.c.** Encourage use of community benefit agreements to ensure equitable outcomes from development projects that benefit from public facility investments, increased development allowances, or public financial assistance. Consider community benefit agreements as a tool to mitigate displacement and housing affordability impacts.

**3.3.d.** Consider use of exactions imposed on development and other tools to capture value created by plans and investments, to reduce or mitigate displacement and housing affordability impacts.

**3.3.e.** Coordinate housing, economic development, and public facility plans and investments to create an integrated community development approach to restore communities impacted by past decisions.

**Policy 3.4. All ages and abilities.** Strive for a built environment that provides a safe, healthful, and attractive environment for people of all ages and abilities.

67. **Finding:** The purpose of the MDP amendments is to provide greater stability for MDPs, especially by resolving nonconforming uses, increasing maximum densities, expanding density transfer provisions and allowing RV parks to support the continued operation of MDPs in Portland.. Greater stability for these parks can help maintain access to relatively affordable housing, especially for historically inequitably burdened communities of color, underserved and under-represented communities, and other vulnerable populations.

The BPS used a vulnerability analysis to identify neighborhoods (Census tracts) with higher than average shares of people that are vulnerable to economic displacement: renters, communities of color, adults without a four-year college degree and renters. An analysis of the location of MDPs in relation to higher levels of vulnerability show that 50 out of 56 MDPs are located in vulnerable neighborhoods.

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**Policy 3.5. Energy and resource efficiency.** Support energy-efficient, resource-efficient, and sustainable development and transportation patterns through land use and transportation planning.

68. **Findings:** The MDP amendments will resolve nonconforming situations, increase maximum densities, expand density transfer provisions and allow RV parks to support the continued operation of MDPs in Portland. The increased maximum density standard will allow for 2,200 more spaces in MDPs than is allowed under the current zoning for the MDPs. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity for improvements and upgrades, including weatherization and energy conservation measures.

**Policy 3.6. Land efficiency.** Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land while protecting environmental quality.

69. **Findings:** The MDP amendments result in additional development capacity. The maximum density of 1 space per 1,500 square feet of site area (29 units per acre) is an increase in development capacity that will allow for more spaces than allowed under the current zoning for 52 MDPs. The MDP amendments provide an incentive to increase infill and support the voluntary production and preservation of affordable housing by creating an affordable housing bonus for MDPs that reserve at least 50 percent of the spaces are affordable at 60 percent area median income.

**Policy 3.7. Integrate nature.** Integrate nature and use green infrastructure throughout Portland.

70. **Findings:** Only five of the MDPs include significant natural resources that are protected by environmental overlay zones. No changes to the environmental overlay zones are proposed as part of this project.

**Policy 3.8. Leadership and innovation in design.** Encourage high-performance design and development that demonstrates Portland’s leadership in the design of the built environment, commitment to a more equitable city, and ability to experiment and generate innovative design solutions.

71. **Finding:** “Encourage” is defined in the Comprehensive Plan as “promote or foster using some combination of voluntary approaches, regulations, or incentives.” The MDP amendments are a regulatory approach that increases the maximum density standard, which will allow for more spaces than allowed under the current zoning at 52 MDPs. The additional development capacity can support park owners who want to expand with recent innovations such as park model or stackable units.

**Policy 3.9. Growth and development.** Evaluate the potential impacts of planning and investment decisions, significant new infrastructure, and significant new development on the physical characteristics of neighborhoods and their residents, particularly under-served and under-represented communities, with attention to displacement and affordability impacts. Identify and implement strategies to mitigate the anticipated impacts.

72. **Finding:** The purpose of the MDP amendments is to provide greater stability for MDPs, especially by resolving nonconforming uses. Greater stability for these parks can help maintain access to relatively affordable housing, especially for historically inequitably burdened communities of color, underserved and under-represented communities, and other vulnerable populations.

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The MDP amendments strive to create regulations to address the unique nature of MDPs in terms of density, access, setbacks and landscaping requirements. The 35-foot maximum building height is equivalent to the maximum height in the R3 zone, so the new development will not have an impact on the physical characteristics of the surrounding neighborhoods.

More importantly, manufactured housing plays a small — but important — role in the affordable housing market. It is often the housing of last resort for households that are struggling to cope with rising housing costs. At the same time, it can be the first choice of housing for low-income households, especially families. The MDP amendments are designed to limit the displacement of residents by provide greater stability for MDPs, especially by resolving nonconforming uses, so the park owners and dwelling owners can make investments to repair, improve and upgrade their living conditions with a greater sense of stability from their zoning situation.

**Policy 3.11. Significant places.** Enhance and celebrate significant places throughout Portland with symbolic features or iconic structures that reinforce local identity, histories, and cultures and contribute to way-finding throughout the city. Consider these especially at:

- High-visibility intersections
- Attractions
- Schools, libraries, parks, and other civic places
- Bridges
- Rivers
- Viewpoints and view corridor locations
- Historically or culturally significant places
- Connections to volcanic buttes and other geologic and natural landscape features
- Neighborhood boundaries and transitions

73. **Finding:** MDPs are not symbolic features or iconic structures. This policy does not apply.

## Centers

**Policy 3.12. Role of centers.** Enhance centers as anchors of complete neighborhoods that include concentrations of commercial and public services, housing, employment, gathering places, and green spaces.

**Policy 3.13. Variety of centers.** Plan for a range of centers across the city to enhance local, equitable access to services, and expand housing opportunities.

**Policy 3.14. Housing in centers.** Provide housing capacity for enough population to support a broad range of commercial services, focusing higher-density housing within a half-mile of the center core.

**Policy 3.15. Investments in centers.** Encourage public and private investment in infrastructure, economic development, and community services in centers to ensure that all centers will support the populations they serve.

**Policy 3.16. Government services.** Encourage the placement of services in centers, including schools and colleges, health services, community centers, daycare, parks and plazas, library services, and justice services.

**Policy 3.17. Arts and culture.** Ensure that land use plans and infrastructure investments allow for and

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incorporate arts, culture, and performance arts as central components of centers.

**Policy 3.18. Accessibility.** Design centers to be compact, safe, attractive, and accessible places, where the street environment makes access by transit, walking, biking, and mobility devices such as wheelchairs, safe and attractive for people of all ages and abilities.

**Policy 3.19. Center connections.** Connect centers to each other and to other key local and regional destinations, such as schools, parks, and employment areas, by frequent and convenient transit, bicycle sharing, bicycle routes, pedestrian trails and sidewalks, and electric vehicle charging stations.

**Policy 3.20. Green infrastructure in centers.** Integrate nature and green infrastructure into centers and enhance public views and connections to the surrounding natural features.

**74. Finding:** Sixteen (16) MDPs are in Portland's centers. The MDP amendments will increase the maximum density allowed at 11 of the 16 MDPs. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas.

### Central City

**Policy 3.21. Role of the Central City.** Encourage continued growth and investment in the Central City, and recognize its unique role as the region's premier center for jobs, services, and civic and cultural institutions that support the entire city and region.

**Policy 3.22. Model Urban Center.** Promote the Central City as a living laboratory that demonstrates how the design and function of a dense urban center can concurrently provide equitable benefits to human health, the natural environment, and the local economy.

**Policy 3.23. Central City employment.** Encourage the growth of the Central City's regional share of employment and continue its growth as the region's unique center for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

**Policy 3.24. Central City housing.** Encourage the growth of the Central City as Portland's and the region's largest center with the highest concentrations of housing and with a diversity of housing options and services.

**Policy 3.25. Transportation hub.** Enhance the Central City as the region's multimodal transportation hub and optimize regional access as well as the movement of people and goods among key destinations.

**Policy 3.26. Public places.** Promote public places and the Willamette River waterfront in the Central City as places of business and social activity and gathering for the people of its districts and the broader region.

**75. Finding:** There are no MDPs in the Central City. These policies are not applicable.

### Gateway Regional Center

**Policy 3.27 Role of Gateway.** Encourage growth and investment in Gateway to enhance its role as East Portland's center of employment, commercial, and public services.

**Policy 3.28 Housing.** Encourage housing in Gateway, to create East Portland's largest concentration of high-density housing.

**Policy 3.29 Transportation.** Enhance Gateway's role as a regional high-capacity transit hub that serves as an anchor for East Portland's multimodal transportation system.

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**Policy 3.30 Public places.** Enhance the public realm and public places in Gateway to provide a vibrant and attractive setting for business and social activity that serves East Portland residents and the region.

**76. Finding:** There is one MDP (#41 Stark Firs Mobile Home Park) in the Gateway Regional Center. As noted in the 2035 Comprehensive Plan, housing supply is not the only factor that determines access to housing. The City's adopted BLI estimates Portland has the capacity for 201,000 additional housing units, more than the estimated need to accommodate the City's forecasted future growth of 123,000 units. Therefore, the City also can consider housing choice in terms of different types, tenures and sizes when making land use decisions. The MDP amendments will help provide for the long-term stability of this park, which in turn will provide diverse housing options in Gateway.

### Town Centers

**Policy 3.31 Role of Town Centers.** Enhance Town Centers as successful places that serve the needs of surrounding neighborhoods as well as a wider area, and contain higher concentrations of employment, institutions, commercial and community services, and a wide range of housing options.

**Policy 3.32 Housing.** Provide for a wide range of housing types in Town Centers, which are intended to generally be larger in scale than the surrounding residential areas. There should be sufficient zoning capacity within a half-mile walking distance of a Town Center to accommodate 7,000 households.

**Policy 3.33 Transportation.** Improve Town Centers as multimodal transportation hubs that optimize access from the broad area of the city they serve and are linked to the region's high-capacity transit system.

**Policy 3.34 Public places.** Provide parks or public squares within or near Town Centers to support their roles as places of focused business and social activity.

**77. Finding:** There are three MDPs in the Midway Town Center (SE 122<sup>nd</sup>/Division). The MDP amendments will increase the maximum density allowed at all three MDPs. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in the town center.

### Neighborhood Centers

**Policy 3.35 Role of Neighborhood Centers.** Enhance Neighborhood Centers as successful places that serve the needs of surrounding neighborhoods. In Neighborhood Centers, provide for higher concentrations of development, employment, commercial and community services, and a wider range of housing options than the surrounding neighborhoods.

**Policy 3.36 Housing.** Provide for a wide range of housing types in Neighborhood Centers, which are intended to generally be larger in scale than the surrounding residential areas, but smaller than Town Centers. There should be sufficient zoning capacity within a half-mile walking distance of a Neighborhood Center to accommodate 3,500 households.

**Policy 3.37 Transportation.** Design Neighborhood Centers as multimodal transportation hubs that are served by frequent-service transit and optimize pedestrian and bicycle access from adjacent neighborhoods.

**Policy 3.38 Public places.** Provide small parks or plazas within or near Neighborhood Centers to support their roles as places of local activity and gathering.

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**78. Finding:** There are 12 MDPs in six different Neighborhood Centers. The MDP amendments will increase the maximum density allowed at 10 of the 12 MDPs. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these neighborhood centers.

### Inner Ring Districts

**Policy 3.39 Growth.** Expand the range of housing and employment opportunities in the Inner Ring Districts. Emphasize growth that replaces gaps in the historic urban fabric, such as redevelopment of surface parking lots and 20th century auto-oriented development.

**Policy 3.40 Corridors.** Guide growth in corridors to transition to mid-rise scale close to the Central City, especially along Civic Corridors.

**Policy 3.41 Distinct identities.** Maintain and enhance the distinct identities of the Inner Ring Districts and their corridors. Use and expand existing historic preservation and design review tools to accommodate growth in ways that identify and preserve historic resources and enhance the distinctive characteristics of the Inner Ring Districts, especially in areas experiencing significant development.

**Policy 3.42 Diverse residential areas.** Provide a diversity of housing opportunities in the Inner Ring Districts' residential areas. Encourage approaches that preserve or are compatible with existing historic properties in these areas. Acknowledge that these areas are historic assets and should retain their established characteristics and development patterns, even as Inner Ring centers and corridors grow. Apply base zones in a manner that takes historic character and adopted design guidelines into account.

**Policy 3.43 Active transportation.** Enhance the role of the Inner Ring Districts' extensive transit, bicycle, and pedestrian networks in conjunction with land uses that optimize the ability for more people to utilize this network. Improve the safety of pedestrian and bike connections to the Central City. Strengthen transit connections between the Inner Ring Districts and to the Central City.

**79. Finding:** There are no MDPs in the Inner Ring Districts. The policies are not applicable.

### Corridors

**Policy 3.44. Growth and mobility.** Coordinate transportation and land use strategies along corridors to accommodate growth and mobility needs for people of all ages and abilities.

**Policy 3.45. Connections.** Improve corridors as multimodal connections providing transit, pedestrian, bicycle, and motor vehicle access and that serve the freight needs of centers and neighborhood business districts.

**Policy 3.46. Design.** Encourage street design that balances the important transportation functions of corridors with their roles as the setting for commercial activity and residential living.

**Policy 3.47. Green infrastructure in corridors.** Enhance corridors with distinctive green infrastructure, including landscaped stormwater facilities, extensive tree plantings, and other landscaping that both provide environmental function and contribute to a quality pedestrian environment.

**80. Finding:** Thirty-five (35) MDPs are in Portland's centers and corridors. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that these corridors provide.

## Civic Corridors

**Policy 3.48. Integrated land use and mobility.** Enhance Civic Corridors as distinctive places that are models of ecological urban design, with transit-supportive densities of housing and employment, prominent street trees and other green features, and high-quality transit service and pedestrian and bicycle facilities.

**Policy 3.49. Design great places.** Improve public streets and sidewalks along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe, healthy, and attractive pedestrian environment, and contribute to quality living environments for residents.

**Policy 3.50. Mobility corridors.** Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way or on nearby parallel routes.

**Policy 3.51. Freight.** Maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets.

**81. Finding:** Twenty-one (21) MDPs are located along Civic Corridors. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that these corridors provide.

## Neighborhood Corridors

**Policy 3.52. Neighborhood Corridors.** Enhance Neighborhood Corridors as important places that support vibrant neighborhood business districts with quality multi-family housing, while providing transportation connections that link neighborhoods.

**82. Finding:** Twelve (12) MDPs are located along Neighborhood Corridors. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that these corridors provide.

## Transit Station Areas

**Policy 3.53. Transit-oriented development.** Encourage transit-oriented development and transit-supportive concentrations of housing and jobs, and multimodal connections at and adjacent to high-capacity transit stations.

**Policy 3.54. Community connections.** Integrate transit stations into surrounding communities and enhance pedestrian and bicycle facilities (including bike sharing) to provide safe and accessible connections to key destinations beyond the station area.

**Policy 3.55. Transit station area safety.** Design transit areas to improve pedestrian, bicycle, and personal safety.

**Policy 3.56. Center stations.** Encourage transit stations in centers to provide high density concentrations of housing and commercial uses that maximize the ability of residents to live close to both high-quality transit and commercial services.

**Policy 3.57. Employment stations.** Encourage concentrations of jobs and employment-focused land uses in and around stations in employment-zoned areas.

**Policy 3.58. Transit neighborhood stations.** Encourage concentrations of mixed-income residential

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development and supportive commercial services close to transit neighborhood stations. Transit neighborhood stations serve mixed-use areas that are not in major centers.

**Policy 3.59. Destination stations.** Enhance connections between major destinations and transit facilities and strengthen the role of these station areas as places of focused activity.

**83. Finding:** Seven (7) MDPs are located in Transit Station Areas. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that these areas provide. The MDP amendments will increase the maximum density on five of the seven parks.

## City Greenways

**Policy 3.60. Connections.** Create a network of distinctive and attractive City Greenways that link centers, parks, schools, rivers, natural areas, and other key community destinations.

**Policy 3.61. Integrated system.** Create an integrated City Greenways system that includes regional trails through natural areas and along Portland's rivers, connected to neighborhood greenways, and heritage parkways.

**Policy 3.62. Multiple benefits.** Design City Greenways that provide multiple benefits that contribute to Portland's pedestrian, bicycle, green infrastructure, and parks and open space systems.

**Policy 3.63. Design.** Use design options such as distinctive street design, motor vehicle diversion, landscaping, tree plantings, scenic views, and other appropriate design options, to create City Greenways that extend the experience of open spaces and nature into neighborhoods, while improving stormwater management and calming traffic.

**84. Finding:** Twenty-six (26) MDPs are located within ¼-mile of a City Greenway. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide residents with the opportunity to benefit from the transportation and health benefits from the enhanced connections.

## Urban habitat corridors

**Policy 3.64. Urban habitat corridors.** Establish a system of connected, well-functioning, and diverse habitat corridors that link habitats in Portland and the region, facilitate safe fish and wildlife access and movement through and between habitat areas, enhance the quality and connectivity of existing habitat corridors, and establish new habitat corridors in developed areas.

**Policy 3.65. Habitat connection tools.** Improve habitat corridors using a mix of tools including natural resource protection, property acquisition, natural resource restoration, tree planting and landscaping with native plants, and ecological design integrated with new development.

**Policy 3.66. Connect habitat corridors.** Ensure that planned connections between habitat corridors, greenways, and trails are located and designed to support the functions of each element, and create positive interrelationships between the elements, while also protecting habitat functions, fish, and wildlife.

**85. Finding:** Twelve (12) MDPs are located within ¼-mile of an urban habitat corridor. MDPs are required to have a 10-foot perimeter landscape areas that can provide for natural features (at least to the L1 landscaping standard) that can enhance the urban habitat. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and

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reinvestment, which can provide an opportunity for tree planting and landscaping that can help implement the habitat corridor.

### Employment areas

**Policy 3.67. Employment area geographies.** Consider the land development and transportation needs of Portland’s employment geographies when creating and amending land use plans and making infrastructure investments.

**Policy 3.68. Regional Truck Corridors.** Enhance designated streets to accommodate forecast freight growth and support intensified industrial use in nearby freight districts. *See Figure 3-7 — Employment Areas.* Designated regional truckways and priority truck streets (Transportation System Plan classifications are shown to illustrate this network).

**86. Finding:** Five (5) MDPs are located along NE Killingsworth Street, a priority truck street. The transportation impact analysis demonstrates that the additional development capacity allowed through the MDP amendments will not have a significant adverse impact on this segment of NE Killingsworth Street.

### Rivers Pattern Area

**Policy 3.69. Historic and multi-cultural significance.** Recognize, restore, and protect the historic and multi-cultural significance of the Willamette and Columbia Rivers, including current activities such as subsistence fishing of legally-permitted fish species.

**Policy 3.70. River transportation.** Recognize and enhance the roles of the Willamette and Columbia rivers as part of Portland’s historic, current, and future transportation infrastructure, including for freight, commerce, commuting, and other public and private transportation functions.

**Policy 3.71. Recreation.** Improve conditions along and within the Willamette and Columbia rivers to accommodate a diverse mix of recreational users and activities. Designate and invest in strategically-located sites along the length of Portland’s riverfronts for passive or active recreation activities that are compatible with nearby land uses, historically and culturally important sites, significant habitat areas, restoration sites, and native fish and wildlife usage.

**Policy 3.72 Industry and port facilities.** Enhance the regionally significant economic infrastructure that includes Oregon’s largest seaport and largest airport, unique multimodal freight, rail, and harbor access; the region’s critical energy hub; and proximity to anchor manufacturing and distribution facilities.

**Policy 3.73. Habitat.** Enhance the roles of the Willamette and Columbia rivers and their confluence as an ecological hub that provides locally and regionally significant habitat for fish and wildlife and habitat restoration opportunities.

**Policy 3.74. Commercial activities.** Enhance the roles of the Willamette and Columbia rivers in supporting local and regional business and commerce, including commercial fishing, tourism, recreation, and leisure.

**Policy 3.75. River neighborhoods.** Enhance the strong river orientation of residential areas that are located along the Willamette and Columbia Rivers.

**Policy 3.76. River access.** Enhance and complete Portland’s system of river access points and riverside trails, including the Willamette Greenway Trail, and strengthen active transportation connections between neighborhoods and the rivers.

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**Policy 3.77. River management and coordination.** Coordinate with federal, state, regional, special districts, and other agencies to address issues of mutual interest and concern, including economic development, recreation, water transportation, flood and floodplain management and protection, regulatory compliance, permitting, emergency management, endangered species recovery, climate change preparation, Portland Harbor Superfund, brownfield cleanup, and habitat restoration.

**Policy 3.78 Columbia River.** Enhance the role of the Columbia River for river dependent industry, fish and wildlife habitat, subsistence and commercial fisheries, floating- and land-based neighborhoods, recreational uses, and water transportation.

**Policy 3.79 Willamette River North Reach.** Enhance the role of the Willamette River North Reach for river dependent industry, fish and wildlife habitat, and as an amenity for riverfront neighborhoods and recreational users.

**Policy 3.80. Willamette River Central Reach.** Enhance the role of the Willamette River Central Reach as the Central City and region's primary riverfront destination for recreation, history and culture, emergency response, water transportation, and as habitat for fish and wildlife.

**Policy 3.81 Willamette River South Reach.** Enhance the role of the Willamette River South Reach as fish and wildlife habitat, a place to recreate, and as an amenity for riverfront neighborhoods and others.

**Policy 3.82. Willamette River Greenway.** Maintain multi-objective plans and regulations to guide development, infrastructure investments, and natural resource protection and enhancement within and along the Willamette Greenway.

87. **Finding:** One MDP (Hayden Island Mobile Home Community) is located in the Rivers pattern area. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide the opportunity to enhance the orientation to the Columbia River.

### Central City Pattern Area

**Policy 3.83. Central City districts.** Enhance the distinct identities of the Central City's districts.

**Policy 3.84. Central City river orientation.** Enhance and strengthen access and orientation to the Willamette River in the Central City and increase river-focused activities.

**Policy 3.85. Central City pedestrian system.** Maintain and expand the Central City's highly interconnected pedestrian system.

**Policy 3.86. Central City bicycle system.** Expand and improve the Central City's bicycle system.

88. **Finding:** There are no MDPs in the Central City. These policies are not applicable.

### Inner Neighborhoods Pattern Area

**Policy 3.87 Inner Neighborhoods main streets.** Maintain and enhance the Streetcar Era pattern of street-oriented buildings along Civic and Neighborhood corridors.

**Policy 3.88 Inner Neighborhoods street patterns.** Preserve the area's urban fabric of compact blocks and its highly interconnected grid of streets.

**Policy 3.89 Inner Neighborhoods infill.** Fill gaps in the urban fabric through infill development on vacant and underutilized sites and in the reuse of historic buildings on adopted inventories.

**Policy 3.90 Inner Neighborhoods active transportation.** Use the extensive street, sidewalk, and

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bikeway system and multiple connections to the Central City as a key part of Portland's active transportation system

**Policy 3.91 Inner Neighborhoods residential areas.** Continue the patterns of small, connected blocks, regular lot patterns, and streets lined by planting strips and street trees in Inner Neighborhood residential areas.

89. **Finding:** There are two MDPs in the Inner Neighborhoods pattern area. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these neighborhoods.

### Eastern Neighborhoods Pattern Area

**Policy 3.92 Eastern Neighborhoods street, block, and lot pattern.** Guide the evolving street and block system in the Eastern Neighborhoods in ways that build on positive aspects of the area's large blocks, such as opportunities to continue mid-block open space patterns and create new connections through blocks that make it easier to access community destinations.

**Policy 3.93 Eastern Neighborhoods site development.** Require that land be aggregated into larger sites before land divisions and other redevelopment occurs. Require site plans which advance design and street connectivity goals.

**Policy 3.94 Eastern Neighborhoods trees and natural features.** Encourage development and right-of-way design that preserves and incorporates Douglas fir trees and groves, and that protects the area's streams, forests, wetlands, steep slopes, and buttes.

**Policy 3.95 Eastern Neighborhoods buttes.** Enhance public views of the area's skyline of buttes and stands of tall Douglas fir trees.

**Policy 3.96 Eastern Neighborhoods corridor landscaping.** Encourage landscaped building setbacks along residential corridors on major streets.

**Policy 3.97 Eastern Neighborhoods active transportation.** Enhance access to centers, employment areas, and other community destinations in Eastern Neighborhoods by ensuring that corridors have safe and accessible pedestrian and bicycle facilities and creating additional secondary connections that provide low-stress pedestrian and bicycle access.

90. **Finding:** Fifty-three (53) MDPs are in the Eastern Neighborhoods pattern area. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these neighborhoods.

### Western Neighborhoods Pattern Area

**Policy 3.98 Western Neighborhoods village character.** Enhance the village character of the Western Neighborhoods' small commercial districts and increase opportunities for more people to live within walking distance of these neighborhood anchors.

**Policy 3.99 Western Neighborhoods active transportation.** Provide safe and accessible pedestrian and bicycle connections, as well as off-street trail connections, to and from residential neighborhoods.

**Policy 3.100 Western Neighborhoods development.** Encourage new development and infrastructure to be designed to minimize impacts on the area's streams, ravines, and forested slopes.

**Policy 3.101 Western Neighborhoods habitat corridors.** Preserve, enhance, and connect the area's network of habitat areas and corridors, streams, parks, and

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tree canopy.

**Policy 3.102 Western Neighborhoods trails.** Develop pedestrian-oriented connections and enhance the Western Neighborhoods’ distinctive system of trails to increase safety, expand mobility, access to nature, and active living opportunities in the area.

**91. Finding:** There are no MDPs in the Western Neighborhoods pattern area. These policies are not applicable.

## Chapter 4: Design and Development

**Goal 4.A: Context-sensitive design and development.** New development is designed to respond to and enhance the distinctive physical, historic, and cultural qualities of its location, while accommodating growth and change.

**Goal 4.B: Historic and cultural resources.** Historic and cultural resources are integral parts of an urban environment that continue to evolve and are preserved.

**Goal 4.C: Human and environmental health.** Neighborhoods and development are efficiently designed and built to enhance human and environmental health: they protect safety and livability; support local access to healthy food; limit negative impacts on water, hydrology, and air quality; reduce carbon emissions; encourage active and sustainable design; protect wildlife; address urban heat islands; and integrate nature and the built environment.

**Goal 4.D: Urban resilience.** Buildings, streets, and open spaces are designed to ensure long-term resilience and to adjust to changing demographics, climate, and economy, and withstand and recover from natural disasters.

**92. Finding:** The Design and Development chapter focuses on the specifics of the built environment. The MDP amendments include development standards for perimeter setbacks, landscaping, common outdoor areas, vehicle and pedestrian circulation and parking that will promote context-sensitive design. Most of the MDPs were built before these standards were adopted and are not developed to these current standards. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which in turn will require MDPs to comply with these design development standards that will enhance the built and natural environment.

## Context

**Policy 4.1. Pattern areas.** Encourage building and site designs that respect the unique built, natural, historic, and cultural characteristics of Portland’s five pattern areas described in Chapter 3: Urban Form.

**Policy 4.2. Community identity.** Encourage the development of character-giving design features that are responsive to place and the cultures of communities.

**Policy 4.3. Site and context.** Encourage development that responds to and enhances the positive qualities of site and context — the neighborhood, the block, the public realm, and natural features.

**Policy 4.4. Natural features and green infrastructure.** Integrate natural and green infrastructure such as trees, green spaces, ecoroofs, gardens, green walls, and vegetated stormwater management systems, into the urban environment. Encourage stormwater facilities that are designed to be a functional and attractive element of public spaces, especially in centers and corridors.

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**Policy 4.5. Pedestrian-oriented design.** Enhance the pedestrian experience throughout Portland through public and private development that creates accessible, safe, and attractive places for all those who walk and/or use wheelchairs or other mobility devices.

**Policy 4.6. Street orientation.** Promote building and site designs that enhance the pedestrian experience with windows, entrances, pathways, and other features that provide connections to the street environment.

**Policy 4.7. Development and public spaces.** Guide development to help create high-quality public places and street environments while considering the role of adjacent development in framing, shaping, and activating the public space of streets and urban parks.

**Policy 4.9. Transitional urbanism.** Encourage temporary activities and structures in places that are transitioning to urban areas to promote job creation, entrepreneurship, active streets, and human interaction.

**93. Finding:** MDPs are required by the standards in Title 33 and the Oregon Manufactured Dwelling and Park Specialty Code to have an internal pedestrian circulation system and street frontage improvements that will enhance the pedestrian experience. MDPs are also required to have a 10-foot perimeter landscape areas that can help respond to the public realm by providing a landscaped buffer and providing for natural features (at least to the L1 landscaping standard). The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide the opportunity to enhance the design and natural features of these parks.

### Health and safety

**Policy 4.10. Design for active living.** Encourage development and building and site design that promotes a healthy level of physical activity in daily life.

**Policy 4.11. Access to light and air.** Provide for public access to light and air by managing and shaping the height and mass of buildings while accommodating urban-scale development.

**Policy 4.12. Privacy and solar access.** Encourage building and site designs that consider privacy and solar access for residents and neighbors while accommodating urban-scale development.

**Policy 4.13. Crime-preventive design.** Encourage building, site, and public infrastructure design approaches that help prevent crime.

**Policy 4.14. Fire prevention and safety.** Encourage building and site design that improves fire prevention, safety, and reduces seismic risks.

**94. Finding:** The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide the opportunity to enhance the health and safety of these parks through compliance with current development standards.

### Residential areas

**Policy 4.15. Residential area continuity and adaptability.** Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages, and the changing needs of households over time. Allow adaptive reuse of existing buildings, the creation of accessory dwelling units, and other arrangements that bring housing diversity that is compatible with the general scale and patterns of residential areas.

**Policy 4.16. Scale and patterns.** Encourage design and development that complements the general

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scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow for a range of architectural styles and expression.

**Policy 4.19. Resource efficient and healthy residential design and development.** Support resource efficient and healthy residential design and development.

**95. Finding:** Twelve (12) MDPs are located in residential neighborhoods. Manufactured dwellings encourage more affordable housing choices to a wider range of households that tend to be lower income, less educated (no four-year degree), and high concentrations of communities of color than typical Portland households. The MDP amendments allow for higher densities in these neighborhoods, while maintaining a residential scale of mostly one-story units that compliments the general scale of the surrounding neighborhood. The MDP amendments help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide the opportunity to enhance the health and resource efficiency of these parks.

### Design and development of centers and corridors

**Policy 4.20. Walkable scale.** Focus services and higher-density housing in the core of centers to support a critical mass of demand for commercial services and more walkable access for customers.

**Policy 4.21. Street environment.** Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.

**Policy 4.22. Relationship between building height and street size.** Encourage development in centers and corridors that is responsive to street space width, thus allowing taller buildings on wider streets.

**Policy 4.23. Design for pedestrian and bicycle access.** Provide accessible sidewalks, high-quality bicycle access, and frequent street connections and crossings in centers and corridors.

**Policy 4.24. Drive-through facilities.** Prohibit drive through facilities in the Central City, and limit new development of new ones in the Inner Ring Districts and centers to support a pedestrian-oriented environment.

**Policy 4.25. Residential uses on busy streets.** Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic.

**Policy 4.26. Active gathering places.** Locate public squares, plazas, and other gathering places in centers and corridors to provide places for community activity and social connections. Encourage location of businesses, services, and arts adjacent to these spaces that relate to and promote the use of the space.

**Policy 4.27. Protect defining features.** Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources.

**Policy 4.28. Historic buildings in centers and corridors.** Protect and encourage the restoration and improvement of historic resources in centers and corridors.

**Policy 4.29. Public art.** Encourage new development and public places to include design elements and public art that contribute to the distinct identities of centers and corridors, and that highlight the history and diverse cultures of neighborhoods.

**96. Finding:** Thirty-five (35) MDPs are in Portland's centers and corridors. The MDP amendments will

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help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can lead to improvements to perimeter sidewalks and interior pedestrian connections. MDPs are required to have 10-foot perimeter landscape areas (at least to the L1 landscaping standard) to buffer residents from street traffic and enhance the pedestrian experience.

### Transitions

**Policy 4.30. Scale transitions.** Create transitions in building scale in locations where higher-density and higher-intensity development is adjacent to smaller-scale single-dwelling zoning. Ensure that new high-density and large-scale infill development adjacent to single dwelling zones incorporates design elements that soften transitions in scale and limit light and privacy impacts on adjacent residents.

**Policy 4.31. Land use transitions.** Improve the interface between non-residential uses and residential uses in areas where commercial or employment uses are adjacent to residentially-zoned land.

**Policy 4.32. Industrial edge.** Protect non-industrially zoned parcels from the adverse impacts of facilities and uses on industrially zoned parcels using a variety of tools, including but not limited to vegetation, physical separation, land acquisition, and insulation to establish buffers between industrial sanctuaries and adjacent residential or mixed-use areas to protect both the viability of long-term industrial operations and the livability of adjacent areas.

**97. Finding:** Fifteen (15) MDPs are located on edge sites that are adjacent to industrial or employment zones. MDPs are required to have 10-foot perimeter landscape areas (at least to the L1 landscaping standard) to buffer residents from adjacent non-residential uses. The MDP amendments provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can lead to improvements to perimeter landscaping that can better mitigate the adverse impacts of these edge sites.

### Off-site impacts

**Policy 4.33. Off-site impacts.** Limit and mitigate public health impacts, such as odor, noise, glare, light pollution, air pollutants, and vibration that public facilities, land uses, or development may have on adjacent residential or institutional uses, and on significant fish and wildlife habitat areas. Pay attention to limiting and mitigating impacts to under-served and under-represented communities.

**Policy 4.34. Auto-oriented facilities, uses, and exterior displays.** Minimize the adverse impacts of highways, auto-oriented uses, vehicle areas, drive-through areas, signage, and exterior display and storage areas on adjacent residential uses.

**Policy 4.35. Noise impacts.** Encourage building and landscape design and land use patterns that limit and/or mitigate negative noise impacts to building users and residents, particularly in areas near freeways, regional truckways, major city traffic streets, and other sources of noise.

**Policy 4.36. Air quality impacts.** Encourage building and landscape design and land use patterns that limit and/or mitigate negative air quality impacts to building users and residents, particularly in areas near freeways, regional truckways, high traffic streets, and other sources of air pollution.

**Policy 4.37. Diesel emissions.** Encourage best practices to reduce diesel emissions and related impacts when considering land use and public facilities that will increase truck or train traffic.

**Policy 4.38. Light pollution.** Encourage lighting design and practices that reduce the negative impacts of light pollution, including sky glow, glare, energy waste, impacts to public health and safety, disruption of ecosystems, and hazards to wildlife.

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**98. Finding:** The MDP development standards address potential impacts associated with noise, air quality and pollution, and light and glare on residents through a 10-foot perimeter landscape area (at least to the L1 landscaping standard). This landscape buffer is larger than the 5-foot minimum setback required by the State of Oregon's MDP Specialty Code. The MDP amendments provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can lead to improvements to perimeter landscaping that can better mitigate the adverse impacts to park residents.

### Scenic resources

**Policy 4.41. Scenic resources.** Enhance and celebrate Portland's scenic resources to reinforce local identity, histories, and cultures and contribute toward way-finding throughout the city. Consider views of mountains, hills, buttes, rivers, streams, wetlands, parks, bridges, the Central City skyline, buildings, roads, art, landmarks, or other elements valued for their aesthetic appearance or symbolism.

**Policy 4.42. Scenic resource protection.** Protect and manage designated significant scenic resources by maintaining scenic resource inventories, protection plans, regulations, and other tools.

**Policy 4.43. Vegetation management.** Maintain regulations and other tools for managing vegetation in a manner that preserves or enhances designated significant scenic resources.

**Policy 4.44. Building placement, height, and massing.** Maintain regulations and other tools related to building placement, height, and massing to preserve designated significant scenic resources.

**Policy 4.45. Future development.** Encourage new public and private development to create new public viewpoints providing views of Portland's rivers, bridges, surrounding mountains, hills and buttes, the Central City skyline, and other landmark features.

**99. Finding:** MDP amendments include a maximum building height of 35-feet, which lowers the maximum height at 42 of the 56 MDPs, which will lessen the impact new development would have on nearby scenic resources.

### Historic and cultural resources

**Policy 4.46. Historic and cultural resource protection.** Protect and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

**Policy 4.47. State and federal historic resource support.** Advocate for state and federal policies, programs, and legislation that would enable stronger historic resource designations, protections, and rehabilitation programs.

**Policy 4.48. Continuity with established patterns.** Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources.

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

**Policy 4.50. Demolition.** Protect historic resources from demolition. Provide opportunities for public comment, and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

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**Policy 4.51. City-owned historic resources.** Maintain City-owned historic resources with necessary upkeep and repair.

**Policy 4.52. Historic Resources Inventory.** Maintain and periodically update Portland's Historic Resources Inventory to inform historic and cultural resource preservation strategies.

**Policy 4.53. Preservation equity.** Expand historic preservation inventories, regulations, and programs to encourage historic preservation in areas and in communities that have not benefited from past historic preservation efforts, especially in areas with high concentrations of under-served and/or under-represented people.

**Policy 4.54. Cultural diversity.** Work with Portland's diverse communities to identify and preserve places of historic and cultural significance.

**Policy 4.55. Cultural and social significance.** Encourage awareness and appreciation of cultural diversity and the social significance of historic places and their roles in enhancing community identity and sense of place.

**Policy 4.56. Community structures.** Encourage the adaptive reuse of historic community structures, such as former schools, meeting halls, and places of worship, for arts, cultural, and community uses that continue their role as anchors for community and culture.

**Policy 4.57. Economic viability.** Provide options for financial and regulatory incentives to allow for the productive, reasonable, and adaptive reuse of historic resources.

**Policy 4.58. Archaeological resources.** Protect and preserve archaeological resources, especially those sites and objects associated with Native American cultures. Work in partnership with Sovereign tribes, Native American communities, and the state to protect against disturbance to Native American archaeological resources.

**100.Finding:** None of the MDPs are designated as historic or cultural resources. These policies do not apply.

### Public art

**Policy 4.59. Public art and development.** Create incentives for public art as part of public and private development projects.

**101.Finding:** Not applicable. No changes or incentives are proposed.

### Resource-efficient design and development

**Policy 4.60. Rehabilitation and adaptive reuse.** Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.

**102.Finding:** The MDP amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can lead to park owners and home owners to reinvest and rehabilitate the parks and the individual dwelling units.

**Policy 4.61. Compact housing.** Promote the development of compact, space- and energy-efficient housing types that minimize use of resources such as smaller detached homes or accessory dwellings and attached homes.

**103.Finding:** MDP amendments increase the maximum density at 51 MDPs, which could allow those MDPs to add spaces that could accommodate smaller park model units or stacked units.

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**Policy 4.62. Seismic and energy retrofits.** Promote seismic and energy-efficiency retrofits of historic buildings and other existing structures to reduce carbon emissions, save money, and improve public safety.

**Policy 4.63. Life cycle efficiency.** Encourage use of technologies, techniques, and materials in building design, construction, and removal that result in the least environmental impact over the life cycle of the structure.

**Policy 4.64. Deconstruction.** Encourage salvage and reuse of building elements when demolition is necessary or appropriate.

**Policy 4.65. Materials and practices.** Encourage use of natural, resource-efficient, recycled, recycled content, and non-toxic building materials and energy-efficient building practices.

**Policy 4.66. Water use efficiency.** Encourage site and building designs that use water efficiently and manage stormwater as a resource.

**Policy 4.67. Optimizing benefits.** Provide mechanisms to evaluate and optimize the range of benefits from solar and renewable resources, tree canopy, ecoroofs, and building design.

**Policy 4.68. Energy efficiency.** Encourage and promote energy efficiency significantly beyond the Statewide Building Code and the use of solar and other renewable resources in individual buildings and at a district scale.

**Policy 4.69. Reduce carbon emissions.** Encourage a development pattern that minimizes carbon emissions from building and transportation energy use.

**Policy 4.70. District energy systems.** Encourage and remove barriers to the development and expansion of low-carbon heating and cooling systems that serve multiple buildings or a broader district.

**Policy 4.71. Ecodistricts.** Encourage ecodistricts, where multiple partners work together to achieve sustainability and resource efficiency goals at a district scale.

**Policy 4.72. Energy-producing development.** Encourage and promote development that uses renewable resources, such as solar, wind, and water to generate power on-site and to contribute to the energy grid.

**104.Finding:** The MDP amendments provide for the long-term stability of these parks, which can enable park and unit owners to invest in rehabilitation and energy-efficiency improvements. The MDP amendments include a new provision to facilitate the transfer of unused density from MDPs to any other multi-dwelling zoned property outside of the Central City, which the transfer proceeds could be used to support rehabilitation of the parks and individual units.

### Designing with nature

**Policy 4.73. Design with nature.** Encourage design and site development practices that enhance, and avoid the degradation of, watershed health and ecosystem services and that incorporate trees and vegetation.

**Policy 4.74. Flexible development options.** Encouraging flexibility in the division of land, the siting and design of buildings, and other improvements to reduce the impact of development on environmentally-sensitive areas and to retain healthy native and beneficial vegetation and trees.

**Policy 4.75. Low-impact development and best practices.** Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure.

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**Policy 4.76. Impervious surfaces.** Limit use of and strive to reduce impervious surfaces and associated impacts on hydrologic function, air and water quality, habitat connectivity, tree canopy, and urban heat island effects.

**Policy 4.77. Hazards to wildlife.** Encourage building, lighting, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.

**Policy 4.78. Access to nature.** Promote equitable, safe, and well-designed physical and visual access to nature for all Portlanders, while also maintaining the functions and values of significant natural resources, fish, and wildlife. Provide access to major natural features, including:

- Water bodies such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.
- Major topographic features such as the West Hills, Mt. Tabor, and the East Buttes.
- Natural areas such as Forest Park and Oaks Bottom.

**105.Finding:** MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped that can provide for natural features (at least to the L1 landscaping standard) that can enhance the urban habitat. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity for tree planting and landscaping that can help enhance access to nature.

## Hazard-resilient design

**Policy 4.79. Natural hazards and climate change risks and impacts.** Limit development in or near areas prone to natural hazards, using the most current hazard and climate change-related information and maps.

**Policy 4.80. Geological hazards.** Evaluate slope and soil characteristics, including liquefaction potential, landslide hazards, and other geologic hazards.

**Policy 4.81. Disaster-resilient development.** Encourage development and site-management approaches that reduce the risks and impacts of natural disasters or other major disturbances and that improve the ability of people, wildlife, natural systems, and property to withstand and recover from such events.

**Policy 4.83. Urban heat islands.** Encourage development, building, landscaping, and infrastructure design that reduce urban heat island effects.

**Policy 4.84. Planning and disaster recovery.** Facilitate effective disaster recovery by providing recommended updates to land use designations and development codes, in preparation for natural disasters.

**106.Finding:** Parts of five of the MDPs are located in the 100-year floodplain. Parts of seven of the MDPs are located in high or very high landslide susceptibility areas. Most of the landslide susceptibility areas are also protected by environmental overlay zones. The MDP amendments reduce the risk from these hazards because City programs for flood management, and erosion and sediment control (Title 10 Erosion Control and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments. MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped that can provide for natural features (at least to the L1 landscaping standard) that can reduce urban heat island effects.

## Healthy food

**Policy 4.85. Grocery stores and markets in centers.** Facilitate the retention and development of grocery stores, neighborhood-based markets, and farmer’s markets offering fresh produce in centers.

**Policy 4.86. Neighborhood food access.** Encourage small, neighborhood-based retail food opportunities, such as corner markets, food co-ops, food buying clubs, and community-supported agriculture pickup/drop-off sites, to fill in service gaps in food access across the city.

**Policy 4.87. Growing food.** Increase opportunities to grow food for personal consumption, donation, sales, and educational purposes.

**Policy 4.88. Access to community gardens.** Ensure that community gardens are allowed in areas close to or accessible via transit to people living in areas zoned for mixed-use or multi-dwelling development, where residents have few opportunities to grow food in yards.

107. **Finding:** Thirty-three (33) MDPs have convenient access to grocery stores. MDPs are required to have individual outdoor areas, common outdoor areas and a minimum of 30 percent of the site area is required to be landscaped, which provide opportunities for growing food.

## Chapter 5: Housing

**Goal 5.A: Housing diversity.** Portlanders have access to high-quality affordable housing that accommodates their needs, preferences, and financial capabilities in terms of different types, tenures, density, sizes, costs, and locations.

108. **Finding:** MDPs offer a unique housing opportunity that can be an affordable homeownership opportunity or a lower-cost market-rate housing option for larger sized units. The purpose of the MDP amendments are to preserve and enhance this housing diversity. There are approximately 3,000 housing units in MDPs in Portland. The MDP amendments increase the maximum density standard that will allow for 2,200 more spaces in MDPs than is allowed under the current zoning.

**Goal 5.B: Equitable access to housing.** Portland ensures equitable access to housing, making a special effort to remove disparities in housing access for people with disabilities, people of color, low-income households, diverse household types, and older adults.

109. **Finding:** Greater stability for these parks can help maintain access to relatively affordable housing, especially for historically inequitably burdened, underserved and under-represented communities, and other vulnerable populations. Manufactured dwelling households tend to have more low-income, cost-burdened households than the city as a whole. Manufactured dwelling households have a greater share of households that do not make a self-sufficient income than the city as a whole. Manufactured dwelling residents have a greater share of communities of color and adults without a 4-year college degree.

**Goal 5.C: Healthy connected city.** Portlanders live in safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe, convenient, and affordable multimodal transportation.

110. **Finding:** Thirty-one (31) MDPs are located in areas that are considered to be complete neighborhoods. Forty-eight (48) MDPs are located with convenient access to transit. Twenty-seven (27) MDPs have convenient access to bikeways. The MDP amendments are intended to

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provide stability and allow for increased development that will help provide and expand lower-cost market-rate housing opportunities in these locations.

**Goal 5.D: Affordable housing.** Portland has an adequate supply of affordable housing units to meet the needs of residents vulnerable to increasing housing costs.

**111. Finding:** The MDP amendments supports the voluntary production and preservation of affordable housing by creating an affordable housing bonus for MDPs that reserve at least 50 percent of the spaces in the park are affordable at 60 percent area median income.

**Goal 5.E: High-performance housing.** Portland residents have access to resource-efficient and high-performance housing for people of all abilities and income levels.

**112. Finding:** The MDP amendments provide for the long-term stability of these parks, which can enable park and unit owners to invest in rehabilitation and energy-efficiency improvements. The MDP amendments include a new provision to facilitate the transfer of unused density from MDPs to any other multi-dwelling zoned property outside of the Central City, which the transfer proceeds could be used to support rehabilitation of the parks and individual units.

### Diverse and expanding housing supply

**Policy 5.1. Housing supply.** Maintain sufficient residential development capacity to accommodate Portland's projected share of regional household growth.

**113. Finding:** The maximum density of 1 space per 1,500 square feet of site area (29 units per acre) is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning for 52 MDPs.

**Policy 5.2. Housing growth.** Strive to capture at least 25 percent of the seven-county region's residential growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania counties).

**Policy 5.3. Housing potential.** Evaluate plans and investments for their impact on housing capacity, particularly the impact on the supply of housing units that can serve low- and moderate-income households, and identify opportunities to meet future demand.

**114. Finding:** MDPs are a small but important part of Portland's housing stock, especially for housing low-income households, who occupy manufactured dwellings at a higher rate than Portlanders as a whole. The purpose of the MDP amendments are to preserve housing diversity and equitable access to housing. There are nearly 3,000 housing units in MDPs in Portland. The MDP amendments support the development of an additional 5,000 units over the current number of units in MDPs, which can help diversify the housing types and tenures that are available in Portland. The maximum density of 1 space per 1,500 square feet of site area (29 units per acre) is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning for 52 MDPs.

**Policy 5.4. Housing types.** Encourage new and innovative housing types that meet the evolving needs of Portland households, and expand housing choices in all neighborhoods. These housing types include but are not limited to single-dwelling units; multi-dwelling units; accessory dwelling units; small units; pre-fabricated homes such as manufactured, modular, and mobile homes; co-housing; and clustered housing/clustered services.

**115. Finding:** "Encourage" is defined in the Comprehensive Plan as "promote or foster using some

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combination of voluntary approaches, regulations, or incentives.” The MDP amendments promote or the evolving needs of Portland households by preserving a small but important part of the affordable housing inventory. The MDP amendments include both regulatory and incentive-based approaches to encourage the housing type. The MDPs amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can lead to park owners and home owners to reinvest and improve living conditions in these parks, which will support the continuing availability of manufactured and mobile homes as a lower-cost market-rate housing choice throughout Portland. Furthermore, the Comprehensive Plan includes a definition of “expand.” “Expand” means to “make something that already exists more extensive.” The MDP amendments “expand” MDPs by creating a new zone that applies to existing parks and allowing for more density—and ultimately the expansion of this housing type. Council interprets “expand housing choices in all neighborhoods” to mean increase housing choices throughout the City as a whole. Council does not interpret this to mean that every single zone must allow for all housing types but rather Council interprets this policy to ensure that the city-wide there is a variety of housing types and within neighborhoods. “Neighborhoods” are defined to include broad areas of the city that typically include residential, commercial, and mixed-use areas. Neighborhood is not limited to the specific MDP but rather the MDP exists as a part of the larger area. Within the neighborhood MDPs serve to promote one housing type and ensure that within the neighborhood as a whole there are housing choices.

**Policy 5.5. Housing in centers.** Apply zoning in and around centers that allows for and supports a diversity of housing that can accommodate a broad range of households, including multi-dwelling and family-friendly housing options.

**116. Finding:** Sixteen (16) MDPs are in Portland’s centers. The MDP amendments will increase the maximum density allowed at 11 of the 16 MDPs. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas.

**Policy 5.6. Middle housing.** Enable and encourage development of middle housing. This includes multi-unit or clustered residential buildings that provide relatively smaller, less expensive units; more units; and a scale transition between the core of the mixed use center and surrounding single family areas. Where appropriate, apply zoning that would allow this within a quarter mile of designated centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.

**117. Finding:** MDPs enable and encourage, as those terms are defined in the Comprehensive Plan, middle housing. Council interprets “middle housing” to mean housing that is compatible in scale with single-family homes but meets the needs of an urban environment with moderate density. Manufactured dwellings are one form of middle housing because they relatively smaller in size, less expensive and are clustered into MDPs. Thirty-five (35) MDPs are in Portland’s centers and corridors. The MDPs amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can lead to park owners and home owners to reinvest and improve living conditions in these parks, which will support the continuing availability of manufactured and mobile homes as a lower-cost market-rate housing choice throughout Portland.

**Policy 5.7. Adaptable housing.** Encourage adaption of existing housing and the development of new housing that can be adapted in the future to accommodate the changing variety of household types.

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**118. Finding:** The MDP amendments foster and promote the modification and reinvestment of MDPs by resolving nonconforming situations, increasing density, and expanding the ability to transfer unused density in ways that can support the continued operations of these parks. The new density allowances can lead to park owners and home owners to reinvest and improve conditions in these parks and to individual units that can adapt to changing households.

**Policy 5.8. Physically-accessible housing.** Allow and support a robust and diverse supply of affordable, accessible housing to meet the needs of older adults and people with disabilities, especially in centers, station areas, and other places that are proximate to services and transit.

**Policy 5.9. Accessible design for all.** Encourage new construction and retrofitting to create physically-accessible housing, extending from the individual unit to the community, using Universal Design Principles.

**119. Finding:** Eleven (11) MDPs, with over 700 units, are exclusively for older adults (55+). The MDP amendments increase in development capacity at these MDPs by more than 600 more spaces than allowed under the current zoning. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options for older adults.

**Policy 5.10. Coordinate with fair housing programs.** Foster inclusive communities, overcome disparities in access to community assets, and enhance housing choice for people in protected classes throughout the city by coordinating plans and investments to affirmatively further fair housing.

**120. Finding:** The Comprehensive Plan defines “foster” to mean “encourage or guide the incremental development of something over a long period of time.” The MDP amendments encourage and enhance housing choice by preserving MDPs. MDPs provide lower-cost market-rate rental housing. As described in the Recommended Draft Report, manufactured dwelling households tend to have more households of color, low-income, cost-burdened households than the city as a whole. The MDP amendments will resolve nonconforming situations, increase maximum densities, and expand density transfer provisions in ways that can support the continued operation of MDPs in Portland. Greater stability for these parks can help maintain access to relatively affordable housing, especially for historically inequitably burdened communities of color, underserved and under-represented communities, and other vulnerable populations.

### Housing access

**Policy 5.11. Remove barriers.** Remove potential regulatory barriers to housing choice for people in protected classes to ensure freedom of choice in housing type, tenure, and location.

**121. Finding:** The City Council interprets the intent of this policy is to ensure housing choices for residents in all neighborhoods, not the development options on a single parcel. Seventeen (17) MDPs, with over 750 units, are non-conforming uses. The City’s regulatory intent (33.258) is not to force all noncomplying situations to be immediately brought into conformance, but eventually, bring them into conformance. Expansion of nonconforming uses require a nonconforming situation review, which adds additional costs that can discourage improvements and expansions of existing parks. The MDP amendments will remove barriers by making these parks a conforming use, which provides for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options. Three (3) MDPs have non-conforming densities that will be resolved with additional density that creates the opportunity to expand these parks.

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**Policy 5.12. Impact analysis.** Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts.

**Policy 5.13. Housing stability.** Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.

**Policy 5.14. Preserve communities.** Encourage plans and investments to protect and/or restore the socioeconomic diversity and cultural stability of established communities.

**Policy 5.15. Gentrification/displacement risk.** Evaluate plans and investments, significant new infrastructure, and significant new development for the potential to increase housing costs for, or cause displacement of communities of color, low- and moderate-income households, and renters. Identify and implement strategies to mitigate the anticipated impacts.

**Policy 5.16. Involuntary displacement.** When plans and investments are expected to create neighborhood change, limit the involuntary displacement of those who are under-served and under-represented. Use public investments and programs, and coordinate with nonprofit housing organizations (such as land trusts and housing providers) to create permanently-affordable housing and to mitigate the impacts of market pressures that cause involuntary displacement.

**122. Finding:** The City Council interprets Policies 5.12 to 5.16 as requiring evaluation and analysis as to who will benefit and who will be burdened by a planning decision, including amendments to the Comprehensive Plan, the Comprehensive Plan Map, the Zoning Code, and the Zoning Map. The Council interprets “involuntary displacement” to occur when a resident is forced to relocate due to factors that are beyond the residents control including but not limited to increased rents. MDPs are a small but important part of Portland’s housing stock, especially for housing for people of color and low-income households, who occupy manufactured dwellings at a higher rate than Portlanders as a whole. The MDP amendments provide incentives to mitigate market pressures in a way that will support the long-term operations of MDPs, which in turn will help preserve housing diversity and equitable access to housing. The MDP amendments provide greater stability for MDPs, especially by resolving nonconforming situations and providing an opportunity for expansion. In addition, the amendments create an affordable housing density bonus to incentivize the permanently-affordable housing. Greater stability for these parks can help maintain access to lower-cost market-rate housing, especially for historically inequitably burdened communities of color, underserved and under-represented communities, and other vulnerable populations.

The BPS used a vulnerability analysis to identify neighborhoods (Census tracts) with higher than average shares of people that are vulnerable to economic displacement: renters, communities of color, adults without a four-year college degree and renters. An analysis of the location of MDPs in relation to higher levels of vulnerability show that 50 out of 56 MDPs are located in vulnerable neighborhoods.

**Policy 5.17. Land banking.** Support and coordinate with community organizations to hold land in reserve for affordable housing, as an anti-displacement tool, and for other community development purposes.

**Policy 5.18. Rebuild communities.** Coordinate plans and investments with programs that enable communities impacted by involuntary displacement to maintain social and cultural connections, and

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re-establish a stable presence and participation in the impacted neighborhoods.

**123. Finding:** The MDP amendments resolve nonconforming situations, increase maximum densities, expand density transfer provisions to support the long-term stability of MDPs. The MDP amendments create the opportunity for community organizations to acquire MDPs and hold these sites as affordable housing.

**Policy 5.19. Aging in place.** Encourage a range of housing options and supportive environments to enable older adults to remain in their communities as their needs change.

**124. Finding:** Eleven (11) MDPs, with over 700 units, are exclusively for older adults (55+). The MDP amendments increase in development capacity at these MDPs by more than 600 more spaces than allowed under the current zoning. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options for older adults.

### Housing location

**Policy 5.20. Coordinate housing needs in high-poverty areas.** Meet the housing needs of under-served and under-represented populations living in high-poverty areas by coordinating plans and investments with housing programs.

**125. Finding:** Greater stability for these parks can help maintain access to relatively affordable housing, especially for historically inequitably burdened, underserved and under-represented communities, and other vulnerable populations. Manufactured dwelling households tend to have more low-income, cost-burdened households than the city as a whole. Manufactured dwelling households have a greater share of households that do not make a self-sufficient income than the city as a whole. Manufactured dwelling residents have a greater share of communities of color and adults without a 4-year college degree.

**Policy 5.21. Access to opportunities.** Improve equitable access to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities in areas with high concentrations of under-served and under-represented populations and an existing supply of affordable housing.

**126. Finding:** The City Council interprets this policy to provide guidance to public investment decisions to improve access to opportunity. This policy does not apply to the MDP amendments because they address housing supply.

**Policy 5.22. New development in opportunity areas.** Locate new affordable housing in areas that have high/medium levels of opportunity in terms of access to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities.

**127. Finding:** The City Council interprets the policy to equate the term opportunity area to the concept of complete neighborhoods in the Portland Plan's Healthy Connect City strategy. Thirty-one (31) MDPs are located in areas that are considered to be complete neighborhoods. Providing stability and allowing for increased development will help provide and expand housing opportunities in these locations.

**Policy 5.23. Higher-density housing.** Locate higher-density housing, including units that are affordable and accessible, in and around centers to take advantage of the access to active transportation, jobs, open spaces, schools, and various services and amenities.

**128. Finding:** Thirty-five (35) MDPs are in Portland's centers and corridors. The MDP amendments will increase the maximum density at 31 of the 35 MDPs, which will help provide for the long-term

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stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that these centers and corridors provide.

**Policy 5.24. Impact of housing on schools.** Evaluate plans and investments for the effect of housing development on school enrollment, financial stability, and student mobility. Coordinate with school districts to ensure plans are aligned with school facility plans.

**129. Finding:** The David Douglas School District in East Portland is the only school district in Portland with an adopted school facility plan. Twenty-four (24) MDPs are located in the David Douglas School District. The MDP amendments create the potential for 600 units in additional development capacity over current zoning. The 2035 Comprehensive Plan BLI estimated 33,000 units of development capacity in the David Douglas School District, which means these amendments represent a marginal 2 percent increase potential development capacity. The development capacity increase is spread over six different elementary schools and in 2017-18 elementary school enrollment declined by 3.8% in the school district. The David Douglas School District has indicated that it can accommodate any future increase in student enrollment that can be expected from these amendments.

The MDP amendments will provide for the long-term stability of these parks by resolving nonconforming situations, providing an opportunity for expansion, and providing for a wider range of density transfers. The enhanced stability should address student mobility, especially for lower income households in these parks.

### Housing affordability

**Policy 5.25. Housing preservation.** Preserve and produce affordable housing to meet needs that are not met by the private market by coordinating plans and investments with housing providers and organizations.

**Policy 5.26. Regulated affordable housing target.** Strive to produce at least 10,000 new regulated affordable housing units citywide by 2035 that will be affordable to households in the 0-80 percent MFI bracket.

**Policy 5.27. Funding plan.** Encourage development or financial or regulatory mechanisms to achieve the regulated affordable housing target set forth for 2035.

**Policy 5.28. Inventory of regulated affordable housing.** Coordinate periodic inventories of the supply of regulated affordable housing in the four-county (Clackamas, Clark, Multnomah and Washington) region with Metro.

**Policy 5.29. Permanently-affordable housing.** Increase the supply of permanently-affordable housing, including both rental and homeownership opportunities.

**130. Finding:** The 2035 Comprehensive Plan defines permanently-affordable housing as units that will remain affordable to a low-income household, such as housing that is owned and maintained by a public agency or a nonprofit organization. Only one MDP (#3 Oak Leaf Mobile Homes) is owned by a non-profit organization that can maintain permanent affordability. The MDP amendments provide incentives, including an affordable housing density bonus, to support the continued operation of MDPs as lower-cost market-rate rental housing.

**Policy 5.30. Housing cost burden.** Evaluate plans and investments for their impact on household cost, and consider ways to reduce the combined cost of housing, utilities, and/or transportation. Encourage

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energy-efficiency investments to reduce overall housing costs.

**131. Finding:** Forty-two (42%) percent of households in MDPs are cost-burdened, which is higher than the citywide rate of 37 percent. Forty-eight (48) MDPs are located with convenient access to transit and twenty-seven (27) MDPs have convenient access to bikeways, which can help reduce transportation costs. The MDP amendments will provide for the long-term stability of these parks that can enable park and unit owners to invest in rehabilitation and energy-efficiency improvements that can reduce energy costs.

**Policy 5.31. Household prosperity.** Facilitate expanding the variety of types and sizes of affordable housing units, and do so in locations that provide low-income households with greater access to convenient transit and transportation, education and training opportunities, the Central City, industrial districts, and other employment areas.

**132. Finding:** Eleven (11) MDPs are located near the Columbia Corridor employment area. Ten of the 11 MDPs have convenient access to transit. The MDP amendments will increase the maximum density at these 11 MDPs, which will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas.

**Policy 5.33. Central City affordable housing.** Encourage the preservation and production of affordable housing in the Central City to take advantage of the area's unique concentration of active transportation access, jobs, open spaces, and supportive services and amenities.

**133. Finding:** There are no MDPs in the Central City. This policy does not apply.

**Policy 5.34. Affordable housing resources.** Pursue a variety of funding sources and mechanisms including new financial and regulatory tools to preserve and develop housing units and various assistance programs for households whose needs are not met by the private market.

**134. Finding:** This policy does not apply.

**Policy 5.35. Inclusionary housing.** Use inclusionary zoning and other regulatory tools to effectively link the production of affordable housing to the production of market-rate housing.

**135. Finding:** Inclusionary housing does not apply to MDPs because the requirement only applies to buildings with more than 20 dwelling units. The MDP amendments include an affordable housing bonus that provides for a 50 percent increase in density when at least 50 percent of the units are affordable to households earning no more than 60 percent of the area median income.

**Policy 5.36. Impact of regulations on affordability.** Evaluate how existing and new regulations affect private development of affordable housing, and minimize negative impacts where possible. Avoid regulations that facilitate economically-exclusive neighborhoods.

**136. Finding:** The MDP amendments facilitate the development of affordable housing with an increase the maximum density at 52 MDPs, which is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning. The MDP amendments also include an affordable housing bonus that provides for a 50 percent increase in density when at least 50 percent of the units are affordable to households earning no more than 60 percent of the area median income.

**Policy 5.37. Mobile home parks.** 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

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mobile home park.

**137. Finding:** The 2035 Comprehensive Plan defines “encourage” as promoting or fostering using some combination of voluntary approaches, regulations or incentives. The MDP amendments are a combination of regulatory changes and incentives that include density increases, expand density transfer provisions, and create an affordable housing density bonus to support the continued operation of MDPs as lower-cost market-rate housing. The RMP base zone creates consistent land use regulations for MDPs, especially in terms of resolving nonconforming uses, that will facilitate the repair and replacement of manufactured homes within parks.

**Policy 5.38. Workforce housing.** Encourage private development of a robust supply of housing that is affordable to moderate-income households located near convenient multimodal transportation that provides access to education and training opportunities, the Central City, industrial districts, and other employment areas.

**138. Finding:** Eleven (11) MDPs are located near the Columbia Corridor employment area. Ten of the 11 MDPs have convenient access to transit. The MDP amendments will increase the maximum density at these 11 MDPs, which will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options near this employment area.

**Policy 5.39. Compact single-family options.** Encourage development and preservation of small resource-efficient and affordable single-family homes in all areas of the city.

**139. Finding:** Manufactured dwellings are compact detached dwellings that have similar characteristic to single-family dwellings. The MDPs amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can lead to park owners and home owners to reinvest and improve living conditions in these parks.

**Policy 5.40 Employer-assisted housing.** Encourage employer-assisted affordable housing in conjunction with major employment development.

**140. Finding:** The MDP amendments increase density and create an affordable housing density bonus that could be utilized by a major employer to provide employer-assisted affordable housing.

**Policy 5.41 Affordable homeownership.** Align plans and investments to support improving homeownership rates and locational choice for people of color and other groups who have been historically under-served and under-represented.

**Policy 5.42 Homeownership retention.** Support opportunities for homeownership retention for people of color and other groups who have been historically under-served and under-represented.

**Policy 5.43 Variety in homeownership opportunities.** Encourage a variety of ownership opportunities and choices by allowing and supporting including but not limited to condominiums, cooperatives, mutual housing associations, limited equity cooperatives, land trusts, and sweat equity.

**141. Finding:** Council finds that Policies 5.41 through 5.43 all aim to support opportunities for homeownership for all Portlanders, including historically under-served and under-represented Portlanders. MDPs offer a lower-cost ownership opportunity where the resident can own their unit, but rent the land space in the park. MDPs can be operated as a condominium, cooperative,

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mutual housing association, limited equity cooperative, land trusts and nonprofit park ownership models. The MDPs amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can provide greater stability to park owners and homeowners to reinvest and improve living conditions in these parks. MDP amendments promote the affordable housing type that has the potential to offer a path towards home ownership.

**Policy 5.44 Regional cooperation.** Facilitate opportunities for greater regional cooperation in addressing housing needs in the Portland metropolitan area, especially for the homeless, low- and moderate-income households, and historically under-served and under-represented communities.

**Policy 5.45 Regional balance.** Encourage development of a “regional balance” strategy to secure greater regional participation to address the housing needs of homeless people and communities of color, low- and moderate-income households, and historically under-served and under-represented communities throughout the region.

**142. Finding:** Council finds that Policies 5.44 through 5.45 address how the City engages with Metro and other jurisdictions in the Portland region on housing issues. The MDP amendments are one strategy to maintain lower-cost market-rate housing in Portland that will help Portland meet its housing needs and serve as an example for other jurisdictions in the region.

### Homelessness

**Policy 5.46. Housing continuum.** Prevent homelessness and reduce the time spent being homeless by ensuring that a continuum of safe and affordable housing opportunities and related supportive services are allowed, including but not limited to Permanent Supportive Housing, transitional housing, self-built micro housing communities, emergency shelters, temporary shelters such as warming centers, and transitional campgrounds.

**143. Finding:** Manufactured housing plays an important role in the affordable housing market. Fifty-eight (58%) percent of households in MDPs have incomes below a self-sufficiency standard. Manufactured dwellings are often housing of last resort for households that are struggling to cope with rising housing costs. At the same time, it can be the first choice of housing for low-income households, especially families. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which can provide long-term housing for lower income households.

### Health, safety, and well-being

**Policy 5.47 Healthy housing.** Encourage development and maintenance of all housing, especially multi-dwelling housing, that protects the health and safety of residents and encourages healthy lifestyles and active living.

**144. Finding:** Council has received testimony that MDPs promote and foster strong communities, which contributes to the health and safety of residents and their quality of life. Thirty-three (33) MDPs have convenient access to grocery stores. MDPs are required to have individual outdoor areas, common outdoor areas and a minimum of 30 percent of the site area is required to be landscaped, which provide opportunities for healthy lifestyles and active living.

**Policy 5.48 Housing safety.** Require safe and healthy housing free of hazardous materials such as lead, asbestos, and radon.

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**145. Finding:** The MDPs amendments resolve nonconforming situations, increase density, and expand the ability to transfer unused density in ways that can support the continued operations of these parks, which can lead to park owners and home owners to reinvest and improve living conditions in these parks.

**Policy 5.49. Housing quality.** Encourage housing that provides high indoor air quality, access to sunlight and outdoor spaces, and is protected from excessive noise, pests, and hazardous environmental conditions.

**Policy 5.50. High-performance housing.** Encourage energy efficiency, green building practices, materials, and design to produce healthy, efficient, durable, and adaptable homes that are affordable or reasonably priced.

**146. Finding:** The MDP amendments will provide for the long-term stability of these parks that can enable park and unit owners to invest in rehabilitation and energy-efficiency improvements that can reduce energy costs and improve health outcomes for lower-cost market-rate housing.

**Policy 5.51. Healthy and active living.** Encourage housing that provides features supportive of healthy eating and active living such as useable open areas, recreation areas, community gardens, crime-preventive design, and community kitchens in multifamily housing.

**147. Finding:** MDPs are required to have individual outdoor areas, common outdoor areas and a minimum of 30 percent of the site area is required to be landscaped, which can be supportive of healthy active living.

**Policy 5.52. Walkable surroundings.** Encourage active transportation in residential areas through the development of pathways, sidewalks, and high-quality onsite amenities such as secure bicycle parking.

**148. Finding:** MDPs are required to have internal pathways to provide safe pedestrian access through the MDP.

**Policy 5.53. Responding to social isolation.** Encourage site designs and relationship to adjacent developments that reduce social isolation for groups that often experience it, such as older adults, people with disabilities, communities of color, and immigrant communities.

**149. Finding:** The public testimony in support of the MDP amendments makes it clear that MDPs provide a sense of community for park residents that helps reduce social isolation, especially for older adults, people with disabilities, communities of color and immigrant communities.

**Policy 5.54 Renter protections.** Enhance renter health, safety, and stability through education, expansion of enhanced inspections, and support of regulations and incentives that protect tenants and prevent involuntary displacement.

**150. Finding:** MDPs include a landlord-tenant relationship that involves either renting the space or renting the unit and the space in an MDP. MDP tenants are entitled to the same renter protections as tenants in other housing types.

## Chapter 6: Economic Development

**Goal 6.A: Prosperity.** Portland has vigorous economic growth and a healthy, diverse economy that supports prosperity and equitable access to employment opportunities for an increasingly diverse population. A strong economy that is keeping up with population growth and attracting resources and talent can:

- Create opportunity for people to achieve their full potential.

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- Improve public health.
- Support a healthy environment.
- Support the fiscal well-being of the city.

**Goal 6.B: Development.** Portland supports an attractive environment for industrial, commercial, and institutional job growth and development by: 1) maintaining an adequate land supply; 2) a local development review system that is nimble, predictable, and fair; and 3) high-quality public facilities and services.

**Goal 6.C: Business district vitality.** Portland implements land use policy and investments to:

- Ensure that commercial, institutional, and industrial districts support business retention and expansion.
- Encourage the growth of districts that support productive and creative synergies among local businesses.
- Provide convenient access to goods, services, and markets.
- Take advantage of our location and quality of life advantages as a gateway to world-class natural landscapes in Northwest Oregon, Southwest Washington, and the Columbia River Basin, and a robust interconnected system of natural landscapes within the region's Urban Growth Boundary.

**151. Finding:** There are four (4) MDPs that currently have a Mixed Employment designation. The proposed changes to the RMP designation will have a minimal impact on the employment capacity. The total reduction in employment capacity would be 6 acres; 5 acres in the Harbor and Airport Districts geography and 1 acre in the Dispersed Industrial geography. The EOA identified a 54-acre surplus of development capacity in the Harbor & Airport Districts and a 16-acre surplus capacity in the Dispersed Employment geography. With these map changes, there is still sufficient employment capacity to accommodate expected employment growth in the industrial employment geographies.

There are four MDPs that currently have a Mixed Use and Commercial designation. The proposed changes to the RMP designation will have a minimal impact on the employment capacity in the Neighborhood Commercial geography, which has 799 acres of surplus capacity. The total reduction in employment capacity on these four sites would be 6.7 acres.

Given the relatively small amount of employment land affected by the MDP amendments, the impact of these changes on the City's economic opportunities is minimal.

### **Diverse, expanding city economy**

**Policy 6.1. Diverse and growing community.** Expand economic opportunity and improve economic equity for Portland's diverse, growing population through sustained business growth.

**Policy 6.2. Diverse and expanding economy.** Align plans and investments to maintain the diversity of Portland's economy and status as Oregon's largest job center with growth across all sectors (commercial, industrial, creative, and institutional) and across all parts of the city.

**Policy 6.3. Employment growth.** Strive to capture at least 25 percent of the seven-county region's employment growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania counties).

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**Policy 6.4. Fiscally-stable city.** Promote a high citywide jobs-to-households ratio that supports tax revenue growth at pace with residential demand for municipal services.

**Policy 6.5. Economic resilience.** Improve Portland's economic resilience to impacts from climate change and natural disasters through a strong local economy and equitable opportunities for prosperity.

**Policy 6.6. Low-carbon and renewable energy economy.** Align plans and investments with efforts to improve energy efficiency and reduce lifecycle carbon emissions from business operations. Promote employment opportunities associated with energy efficiency projects, waste reduction, production of more durable goods, and recycling.

**Policy 6.7. Competitive advantages.** Maintain and strengthen the city's comparative economic advantages including access to a high-quality workforce, business diversity, competitive business climate, and multimodal transportation infrastructure.

**Policy 6.8. Business environment.** Use plans and investments to help create a positive business environment in the city and provide strategic assistance to retain, expand, and attract businesses.

**Policy 6.9. Small business development.** Facilitate the success and growth of small businesses and coordinate plans and investments with programs that provide technical and financial assistance to promote sustainable operating practices.

**Policy 6.10. Business innovation.** Encourage innovation, research, development, and commercialization of new technologies, products, and services through responsive regulations and public sector approaches.

**Policy 6.12. Economic role of livability and ecosystem services.** Conserve and enhance Portland's cultural, historic, recreational, educational, food-related, and ecosystem assets and services for their contribution to the local economy and their importance for retention and attraction of skilled workers and businesses.

152. **Finding:** Given the relatively small amount of employment land affected by the MDP amendments, the impact of these changes on the City's economic opportunities is minimal.

### Land development

**Policy 6.13. Land supply.** Provide supplies of employment land that are sufficient to meet the long-term and short-term employment growth forecasts, adequate in terms of amounts and types of sites, available and practical for development and intended uses. Types of sites are distinguished primarily by employment geographies identified in the Economic Opportunities Analysis, although capacity needs for building types with similar site characteristics can be met in other employment geographies.

153. **Finding:** There are eight (8) MDPs, with a total employment land capacity of 12.7 acres, that currently have an employment designation. Given the relatively small amount of employment land affected by the MDP amendments, the impact of these changes on the City's economic opportunities is minimal.

**Policy 6.15. Regionally-competitive development sites.** Improve the competitiveness of vacant and underutilized sites located in Portland's employment areas using incentives, and regional and state assistance for needed infrastructure and site readiness improvements.

**Policy 6.16. Regulatory climate.** Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:

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**6.16.a.** Assess and understand cumulative regulatory costs to promote Portland’s financial competitiveness with other comparable cities.

**6.16.b.** Promote certainty for new development through appropriate allowed uses and “clear and objective” standards to permit typical development types without a discretionary review.

**6.16.c.** Allow discretionary-review to facilitate flexible and innovative approaches to meet requirements.

**6.16.d.** Design and monitor development review processes to avoid unnecessary delays.

**6.16.e.** Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and efficient, well-coordinated development review and permitting procedures.

**Policy 6.17. Short-term land supply.** Provide for a competitive supply of development-ready sites with different site sizes and types, to meet five-year demand for employment growth in the Central City, industrial areas, campus institutions, and neighborhood business districts.

**Policy 6.19. Corporate headquarters.** Provide land opportunities for development of corporate headquarters campuses in locations with suitable transportation facilities.

154. **Finding:** These policies do not apply because the MDP amendments address a particular housing type and do not create new regulatory requirements on employment land.

### Traded sector competitiveness

**Policy 6.20. Traded sector competitiveness.** Align plans and investments with efforts to improve the city and regional business environment for traded sector and export growth. Participate in regional and statewide initiatives.

**Policy 6.21. Traded sector diversity.** Encourage partnerships to foster the growth, small business vitality, and diversity of traded sectors.

**Policy 6.22. Clusters.** Align plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters.

**Policy 6.23. Trade and freight hub.** Encourage investment in transportation systems and services that will retain and expand Portland’s competitive position as a West Coast trade gateway and freight distribution hub.

**Policy 6.24. Traded sector land supply.** Foster traded sector retention, growth, and competitive advantages in industrial districts and the Central City. Recognize the concentration of traded-sector businesses in these districts.

**Policy 6.26. Business opportunities in urban innovation.** Strive to have Portland’s built environment, businesses, and infrastructure systems showcase examples of best practices of innovation and sustainability.

155. **Finding:** The MDP amendments address housing and do not adversely impact the city and regional business climate. These policies do not apply.

### Equitable household prosperity

**Policy 6.27. Income self-sufficiency.** Expand access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities to support and expand opportunities in Portland for middle- and high-wage jobs that do not

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require a 4-year college degree.

**6.27.a.** Support the role of industrial districts as a leading source of middle-wage jobs that do not require a 4-year college degree and as a major source of wage-disparity reduction for under-served and under-represented communities.

**6.27.b.** Evaluate and limit negative impacts of plans and investments on middle and high wage job creation and retention.

**Policy 6.29. Poverty reduction.** Encourage investment in, and alignment of, poverty-reduction efforts that address economic development, land use, transportation, housing, social services, public health, community development, and workforce development.

**156. Finding:** Eleven (11) MDPs are located near the Columbia Corridor employment area. Ten of the 11 MDPs have convenient access to transit. The MDP amendments will increase the maximum density at these 11 MDPs, which will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options near this employment area with middle-wage jobs.

### Central City

**Policy 6.33. Central City.** Improve the Central City's regional share of employment and continue its growth as the unique center of both the city and the region for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

**Policy 6.34. Central City industrial districts.** Protect and facilitate the long-term success of Central City industrial districts, while supporting their evolution into places with a broad mix of businesses with high employment densities.

**Policy 6.35. Innovation districts.** Provide for expanding campus institutions in the Central City and Marquam Hill, and encourage business development that builds on their research and development strengths.

**157. Finding:** There are no MDPs in the Central City. These policies do not apply.

### Industrial and employment districts

**Policy 6.36. Industrial land.** Provide industrial land that encourages industrial business retention, growth, and traded sector competitiveness as a West Coast trade and freight hub, a regional center of diverse manufacturing, and a widely-accessible base of family-wage jobs, particularly for under-served and under-represented people.

**Policy 6.37. Industrial sanctuaries.** Protect industrial land as industrial sanctuaries identified on the Comprehensive Plan Map primarily for manufacturing and distribution uses and to encourage the growth of industrial activities in the city.

**Policy 6.38. Prime industrial land retention.** Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land that is prioritized for long-term retention.

**6.38.a.** Protect prime industrial lands from quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land to non-industrial uses, and consider the potential for other map amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.

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**6.38.b.** Limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

**6.38.c.** Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area while ensuring environmental resources are also protected.

**6.38.d.** Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics. Offsets may include but are not limited to additional brownfield remediation, industrial use intensification, strategic investments, and other innovative tools and partnerships that increase industrial utilization of industrial land.

**6.38.e.** Protect prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.

**6.38.f.** Promote efficient use of freight hub infrastructure and prime industrial land by limiting non-industrial uses that do not need to be in the prime industrial area.

**Policy 6.41. Multimodal freight corridors.** Encourage freight-oriented industrial development to locate where it can maximize the use of and support reinvestment in multimodal freight corridors.

**Policy 6.43. Dispersed employment areas.** Provide small, dispersed employment areas for a flexible and affordable mix of office, creative services, small-scale manufacturing, traded sector and distribution, and other small-format light industrial and commercial uses with access to nearby freeways or truck streets.

**Policy 6.44. Industrial land use intensification.** Encourage reinvestment in, and intensification of, industrial land use, as measured by output and throughput per acre.

**Policy 6.46. Impact analysis.** Evaluate and monitor the impacts on industrial land capacity that may result from land use plans, regulations, public land acquisition, public facility development, and other public actions to protect and preserve existing industrial lands.

**Policy 6.47. Clean, safe, and green.** Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitating adoption of market feasible new technology and design.

**Policy 6.52. Residential and commercial reuse.** Facilitate compatible industrial or employment redevelopment on residential or commercial sites that become available for reuse if the site is in or near prime industrial areas, and near a freeway or on a freight street.

**Policy 6.55. Neighborhood park use.** Allow neighborhood park development within industrial zones where needed to provide adequate park service within one-half mile of every resident.

**158. Finding:** There are four (4) MDPs that currently have a Mixed Employment designation. The proposed changes to the RMP designation will have a minimal impact on the employment capacity. The total reduction in employment capacity would be 6 acres; 5 acres in the Harbor and Airport Districts geography and 1 acre in the Dispersed Industrial geography. The EOA identified a 54-acre surplus of development capacity in the Harbor & Airport Districts and a 16-acre surplus capacity in the Dispersed Employment geography. With these map changes, there is still sufficient employment capacity to accommodate expected employment growth in the industrial

## Campus institutions

**Policy 6.56. Campus institutions.** Provide for the stability and growth of Portland’s major campus institutions as essential service providers, centers of innovation, workforce development resources, and major employers.

**Policy 6.57. Campus land use.** Provide for major campus institutions as a type of employment land, allowing uses typically associated with health care and higher education institutions. Coordinate with institutions in changing campus zoning to provide land supply that is practical for development and intended uses.

**Policy 6.61. Satellite facilities.** Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality.

159. There are no MDPs with a campus institution land use designation. These policies do not apply.

## Neighborhood business districts

**Policy 6.62. Neighborhood business districts.** Provide for the growth, economic equity, and vitality of neighborhood business districts.

**Policy 6.63. District function.** Enhance the function of neighborhood business districts as a foundation of neighborhood livability.

**Policy 6.64. Small, independent businesses.** Facilitate the retention and growth of small and locally-owned businesses.

**Policy 6.67. Retail development.** Provide for a competitive supply of retail sites that support the wide range of consumer needs for convenience, affordability, accessibility, and diversity of goods and services, especially in under-served areas of Portland.

**Policy 6.70. Involuntary commercial displacement.** Evaluate plans and investments for their impact on existing businesses.

**6.70.a.** Limit involuntary commercial displacement in areas at risk of gentrification, and incorporate tools to reduce the cost burden of rapid neighborhood change on small business owners vulnerable to displacement.

**6.70.b.** Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.

**Policy 6.71. Temporary and informal markets and structures.** Acknowledge and support the role that temporary markets (farmer’s markets, craft markets, flea markets, etc.) and other temporary or mobile-vending structures play in enabling startup business activity. Also, acknowledge that temporary uses may ultimately be replaced by more permanent development and uses.

**Policy 6.73. Centers.** Encourage concentrations of commercial services and employment opportunities in centers.

**6.73.a.** Encourage a broad range of neighborhood commercial services in centers to help residents and others in the area meet daily needs and/or serve as neighborhood gathering places.

**6.73.b.** Encourage the retention and further development of grocery stores and local markets as essential elements of centers.

**6.73.c.** Enhance opportunities for services and activities in centers that are responsive to the needs of the populations and cultural groups of the surrounding area.

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**6.73.d.** Require ground-level building spaces in core areas of centers accommodate commercial or other street-activating uses and services.

**6.73.e.** Encourage employment opportunities as a key function of centers, including connections between centers, institutions, and other major employers to reinforce their roles as vibrant centers of activity.

**160. Finding:** There are four MDPs that currently have a Mixed Use and Commercial designation. The proposed changes to the RMP designation will have a minimal impact on the employment capacity in the Neighborhood Commercial geography, which has 799 acres of surplus capacity. The total reduction in employment capacity on these four sites would be 6.7 acres.

Thirty-five (35) MDPs are located in Portland's centers and corridors. The MDP amendments will increase the maximum density allowed at 31 of the 35 MDPs, with the potential for an additional 1,800 units, which will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn can provide additional customers to support neighborhood businesses.

## Chapter 7: Environmental and Watershed Health

**Goal 7.A: Climate.** Carbon emissions are reduced to 50 percent below 1990 levels by 2035.

**161. Finding:** One of the key strategies to reduce carbon emissions is to reduce emissions related to transportation by reducing reliance on the automobile by encouraging housing in close proximity to multi-modal transportation alternatives, such as transit service and bikeways. Thirty-five (35) MDPs are in Portland's centers and corridors. Forty-eight (48) MDPs are located with convenient access to transit and twenty-seven (27) MDPs have convenient access to bikeways. The MDP amendments will increase the maximum density at 31 of the 35 MDPs in centers and corridors, which will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that can support a low carbon lifestyle.

**Goal 7.B: Healthy watersheds and environment.** Ecosystem services and ecosystem functions are maintained and watershed conditions have improved over time, supporting public health and safety, environmental quality, fish and wildlife, cultural values, economic prosperity, and the intrinsic value of nature.

**162. Finding:** Environmental zones protect resources and functional values that have been identified by the City as providing benefits to the public. Parts of five (5) MDPs are located in the 100-year floodplain. The MDP amendments are consistent with this goal because City programs for flood management, and erosion and sediment control (i.e., City Title 10 Erosion Control, and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments.

**Goal 7.C: Resilience.** Portland's built and natural environments function in complementary ways and are resilient in the face of climate change and natural hazards.

**163. Finding:** Most of the MDPs are located in lower-risk areas. Only parts of five MDPs are located in the 100-year floodplain. Parts of seven (7) MDPs are located in high or very high landslide susceptibility areas. Most of the floodplain and landslide susceptibility areas are also protected by environmental overlay zones. The MDP amendments reduce the risk from these hazards because

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City programs for flood management, and erosion and sediment control (Title 10 Erosion Control and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments.

**Goal 7.D: Environmental equity.** All Portlanders have access to clean air and water, can experience nature in their daily lives, and benefit from development designed to lessen the impacts of natural hazards and environmental contamination.

**164. Finding:** MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped, which can provide for natural features (at least to the L1 landscaping standard) that can enhance the urban habitat. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity for tree planting and landscaping that can help enhance access to nature.

**Goal 7.E: Community stewardship.** Portlanders actively participate in efforts to maintain and improve the environment, including watershed health.

**165. Finding:** This goal is focused on community involvement in improving the environment and does not apply.

### Improving environmental quality and resilience

**Policy 7.1. Environmental quality.** Protect or support efforts to protect air, water, and soil quality, and associated benefits to public and ecological health and safety, through plans and investments.

**Policy 7.2. Environmental equity.** Prevent or reduce adverse environment-related disparities affecting under-served and under-represented communities through plans and investments. This includes addressing disparities relating to air and water quality, natural hazards, contamination, climate change, and access to nature.

**Policy 7.3. Ecosystem services.** Consider the benefits provided by healthy ecosystems that contribute to the livability and economic health of the city.

**166. Finding:** Five (5) MDPs have parts of their site covered by an environmental overlay zone, which is unchanged by these amendments. MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped that can provide for natural features (at least to the L1 landscaping standard) that can enhance the urban habitat. Most of the MDPs were built before these development standards were adopted and are not developed to these current standards. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which in turn will require MDPs to comply with these design development standards that will enhance the natural environment through the opportunity for tree planting and landscaping that can help enhance environmental quality.

**Policy 7.4. Climate change.** Update and implement strategies to reduce carbon emissions and impacts, and increase resilience through plans and investments and public education.

**7.4.a. Carbon sequestration.** Enhance the capacity of Portland's urban forest, soils, wetlands, and other water bodies to serve as carbon reserves.

**7.4.b. Climate adaptation and resilience.** Enhance the ability of rivers, streams, wetlands, floodplains, urban forest, habitats, and wildlife to limit and adapt to climate-exacerbated flooding, landslides, wildfire, and urban heat island effects.

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**167. Finding:** Parts of five (5) MDPs are located in the 100-year floodplain. Parts of seven (7) MDPs are located in high or very high landslide susceptibility areas. Most of the floodplain and landslide susceptibility areas are also protected by environmental overlay zones. The MDP amendments reduce the risk from these hazards because City programs for flood management, and erosion and sediment control (Title 10 Erosion Control and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments. MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped, which can provide areas for trees that can enhance the urban forest and mitigate urban heat island effects.

**Policy 7.5. Air quality.** Improve, or support efforts to improve, air quality through plans and investments, including reducing exposure to air toxics, criteria pollutants, and urban heat island effects. Consider the impacts of air quality on the health of all Portlanders.

**168. Finding:** MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped, which can provide areas for trees that can enhance air quality and mitigate urban heat island effects.

**Policy 7.6. Hydrology.** Through plans and investments, improve or support efforts to improve watershed hydrology to achieve more natural flow and enhance conveyance and storage capacity in rivers, streams, floodplains, wetlands, and aquifers. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly-infiltrating soils and limited public stormwater discharge points, and encourage restoration of degraded hydrologic functions.

**Policy 7.7. Water quality.** Improve, or support efforts to improve, water quality in rivers, streams, floodplains, groundwater, and wetlands through land use plans and investments, to address water quality issues including toxics, bacteria, temperature, metals, and sediment pollution. Consider the impacts of water quality on the health of all Portlanders.

**Policy 7.8. Biodiversity.** Strive to achieve and maintain self-sustaining populations of native species, including native plants, native resident and migratory fish and wildlife species, at-risk species, and beneficial insects (such as pollinators) through plans and investments.

**Policy 7.9. Habitat and biological communities.** Ensure that plans and investments are consistent with and advance efforts to improve, or support efforts to improve fish and wildlife habitat and biological communities. Use plans and investments to enhance the diversity, quantity, and quality of habitats habitat corridors, and especially habitats that:

- Are rare or declining.
- Support at-risk plant and animal species and communities.
- Support recovery of species under the Endangered Species Act, and prevent new listings.
- Provide culturally important food sources, including those associated with Native American fishing rights.

**Policy 7.10. Habitat connectivity.** Improve or support efforts to improve terrestrial and aquatic habitat connectivity for fish and wildlife by using plans and investments, to:

- Prevent and repair habitat fragmentation.
- Improve habitat quality.
- Weave habitat into sites as new development occurs.
- Enhance or create habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas.

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- Promote restoration and protection of floodplains.

169. **Finding:** Five (5) MDPs have parts of their site covered by an environmental overlay zone, which is unchanged by these amendments. MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped that can provide for natural features (at least to the L1 landscaping standard) that can enhance the habitat. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity for tree planting and landscaping that can help enhance the habitat.

**Policy 7.11. Urban forest.** Improve, or support efforts to improve the quantity, quality, and equitable distribution of Portland’s urban forest through plans and investments.

**7.11.a. Tree preservation.** Require or encourage preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas.

**7.11.b. Urban forest diversity.** Coordinate plans and investments with efforts to improve tree species diversity and age diversity.

**7.11.c. Tree canopy.** Support progress toward meeting City tree canopy targets.

**7.11.d. Tree planting.** Invest in tree planting and maintenance, especially in low-canopy areas, neighborhoods with under-served or under-represented communities, and within and near urban habitat corridors.

**7.11.e. Vegetation in natural resource areas.** Require native trees and vegetation in significant natural resource areas.

**7.11.f. Resilient urban forest.** Encourage planting of Pacific Northwest hardy and climate change resilient native trees and vegetation generally, and especially in urban habitat corridors.

**7.11.g. Trees in land use planning.** Identify priority areas for tree preservation and planting in land use plans.

**7.11.h. Managing wildfire risk.** Address wildfire hazard risks and management priorities through plans and investments.

170. **Finding:** MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped (at least to the L1 landscaping standard) that can provide areas for additional tree planting. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity for tree planting as part of the development review process.

**Policy 7.12. Invasive species.** Prevent the spread of invasive plants, and support efforts to reduce the impacts of invasive plants, animals, and insects, through plans, investments, and education.

**Policy 7.13. Soils.** Coordinate plans and investments with programs that address human-induced soil loss, erosion, contamination, or other impairments to soil quality and function.

**Policy 7.14. Natural hazards.** Prevent development-related degradation of natural systems and associated increases in landslide, wildfire, flooding, and earthquake risks.

171. **Finding:** Parts of five (5) MDPs are located in the 100-year floodplain. Parts of seven (7) MDPs are located in high or very high landslide susceptibility areas. Most of the floodplain and landslide susceptibility areas are also protected by environmental overlay zones. The MDP amendments

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reduce the risk from these hazards because City programs for flood management, and erosion and sediment control (Title 10 Erosion Control and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments.

**Policy 7.15. Brownfield remediation.** Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.

**Policy 7.16. Adaptive management.** Evaluate trends in watershed and environmental health using current monitoring data and information to guide and support improvements in the effectiveness of City plans and investments.

**Policy 7.17. Restoration partnerships.** Coordinate plans and investments with other jurisdictions, air and water quality regulators, watershed councils, soil and water conservation districts, Sovereign nations, and community organizations and groups including under-served and under-represented communities, to optimize the benefits, distribution, and cost-effectiveness of watershed restoration and enhancement efforts.

**Policy 7.18. Community stewardship.** Encourage voluntary cooperation between property owners, community organizations, and public agencies to restore or re-create habitat on their property, including removing invasive plants and planting native species.

172. **Finding:** These policies do not apply.

### Planning for natural resource protection

**Policy 7.19. Natural resource protection.** Protect the quantity, quality, and function of significant natural resources identified in the City's natural resource inventory, including:

- Rivers, streams, sloughs, and drainageways.
- Floodplains.
- Riparian corridors.
- Wetlands.
- Groundwater.
- Native and other beneficial vegetation species and communities.
- Aquatic and terrestrial habitats, including special habitats or habitats of concern, large anchor habitats, habitat complexes and corridors, rare and declining habitats such as wetlands, native oak, bottomland hardwood forest, grassland habitat, shallow water habitat, and habitats that support special-status or at-risk plant and wildlife species.
- Other resources identified in natural resource inventories.

**Policy 7.20. Natural resource inventory.** Maintain an up-to-date inventory by identifying the location and evaluating the relative quantity and quality of natural resources.

**Policy 7.21. Environmental plans and regulations.** Maintain up-to-date environmental protection plans and regulations that specify the significant natural resources to be protected and the types of protections to be applied, based on the best data and science available and on an evaluation of cumulative environmental, social, and economic impacts and tradeoffs. *See Figure 7-2 — Adopted Environmental Plans.*

- 7.21.a. Improve the effectiveness of environmental protection plans and regulations to protect and encourage enhancement of ecological functions and ecosystem services.

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**Policy 7.22. Land acquisition priorities and coordination.** Maintain a land acquisition program as a tool to protect and support natural resources and their functions. Coordinate land acquisition with the programs of City bureaus and other agencies and organizations.

173. **Finding:** The *2035 Comprehensive Plan* background documents included an updated Natural Resources Inventory (NRI), which was adopted (Ordinance 185657) and acknowledged by LCDC on June 13, 2014. The NRI identified the location, quantity, and quality of all significant natural resources as required by the inventory provisions of Statewide Planning Goal 5. From the set of all significant resources, high and medium quality resources, ranked primarily from riparian corridor and wildlife habitat considerations, were identified to comply with the inventory requirements of Title 13 of Metro’s Urban Growth Management Functional Plan.

Environmental zones protect resources and functional values that have been identified by the City as providing benefits to the public.

Five (5) MDPs have parts of their site covered by an environmental overlay zone, which is unchanged by these amendments. There is one MDP (#1 – Hayden Island Mobile Home Community) that has high and medium ranked natural resources that are not protected by an environmental overlay zone. The City has initiated a separate legislative process to update the environmental overlay zones based on the adopted NRI. Changing the underlying base zone designation will not impact the remapping process.

### Protecting natural resources in development situations

**Policy 7.23. Impact evaluation.** Evaluate the potential adverse impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide to inform and guide development design and mitigation consistent with policies 7.24-7.26. and other relevant Comprehensive Plan policies.

**Policy 7.24. Regulatory hierarchy: avoid, minimize, mitigate.** Maintain regulations requiring that the potential adverse impacts of new development on significant natural resources and their functions first be avoided where practicable, then minimized, then lastly, mitigated.

**Policy 7.25. Mitigation effectiveness.** Require that mitigation approaches compensate fully for adverse impacts on locally and regionally significant natural resources and functions. Require mitigation to be located as close to the impact as possible. Mitigation must also take place within the same watershed or portion of the watershed that is within the Portland Urban Services Boundary, unless mitigating outside of these areas will provide a greater local ecological benefit. Mitigation will be subject to the following preference hierarchy:

- On the site of the resource subject to impact with the same kind of resource; if that is not possible, then
- Off-site with the same kind of resource; if that is not possible, then
- On-site with a different kind of resource; if that is not possible, then
- Off-site with a different kind of resource.

**Policy 7.26. Improving environmental conditions through development.** Encourage ecological site design, site enhancement, or other tools to improve ecological functions and ecosystem services in conjunction with new development and alterations to existing development.

174. The City’s environmental overlay zones (33.430) are the regulations that control development in order to protect the resources and functional values while allowing environmentally sensitive urban development. Five (5) MDPs have parts of their site covered by an environmental overlay

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zone, which is unchanged by these amendments. The development standards and review process encourages ecological site design and requires mitigation to improve the resource functions as part of a development review process to alter or expand an MDP.

### Willamette River Watershed

**Policy 7.33. Fish habitat.** Provide adequate intervals of ecologically-functional shallow-water habitat for native fish along the entire length of the Willamette River within the city, and at the confluences of its tributaries.

**Policy 7.34. Stream connectivity.** Improve stream connectivity between the Willamette River and its tributaries.

**Policy 7.35. River bank conditions.** Preserve existing river bank habitat and encourage the rehabilitation of river bank sections that have been significantly altered due to development with more fish and wildlife friendly riverbank conditions.

**Policy 7.37. Contaminated sites.** Promote and support programs that facilitate the cleanup, reuse, and restoration of the Portland Harbor Superfund site and other contaminated upland sites.

**Policy 7.38. Sensitive habitats.** Protect and enhance grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific Flyway and the Willamette River corridor.

**Policy 7.39. Riparian corridors.** Increase the width and quality of vegetated riparian buffers along the Willamette River.

**Policy 7.40. Connected upland and river habitats.** Enhance habitat quality and connectivity between the Willamette riverfront, the Willamette's floodplain, and upland natural resource areas.

**Policy 7.41. River-dependent and river-related uses.** Develop and maintain plans and regulations that recognize the needs of river-dependent and river-related uses, while also supporting ecologically-sensitive site design and practices.

175. **Finding:** There are no MDPs along the Willamette River. These policies do not apply.

## Chapter 8: Public Facilities and Services

**Goal 8.A: Quality public facilities and services.** High-quality public facilities and services provide Portlanders with optimal levels of service throughout the city, based on system needs and community goals, and in compliance with regulatory mandates.

**Goal 8.B: Multiple benefits.** Public facility and service investments improve equitable service provision, support economic prosperity, and enhance human and environmental health.

**Goal 8.C: Reliability and resiliency.** Public facilities and services are reliable, able to withstand or recover from catastrophic natural and manmade events, and are adaptable and resilient in the face of long-term changes in the climate, economy, and technology.

**Goal 8.D: Public rights-of-way.** Public rights-of-way enhance the public realm and provide a multi-purpose, connected, safe, and healthy physical space for movement and travel, public and private utilities, and other appropriate public functions and uses.

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**Goal 8.E: Sanitary and stormwater systems.** Wastewater and stormwater are managed, conveyed, and/or treated to protect public health, safety, and the environment, and to meet the needs of the community on an equitable, efficient, and sustainable basis.

**Goal 8.F: Flood management.** Flood management systems and facilities support watershed health and manage flooding to reduce adverse impacts on Portlanders' health, safety, and property.

**Goal 8.G: Water.** Reliable and adequate water supply and delivery systems provide sufficient quantities of high-quality water at adequate pressures to meet the needs of the community on an equitable, efficient, and sustainable basis.

**Goal 8.H: Parks, natural areas, and recreation.** All Portlanders have safe, convenient, and equitable access to high-quality parks, natural areas, trails, and recreational opportunities in their daily lives, which contribute to their health and well-being. The City manages its natural areas and urban forest to protect unique urban habitats and offer Portlanders an opportunity to connect with nature.

**Goal 8.I: Public safety and emergency response.** Portland is a safe, resilient, and peaceful community where public safety, emergency response, and emergency management facilities and services are coordinated and able to effectively and efficiently meet community needs.

**Goal 8.J: Solid waste management.** Residents and businesses have access to waste management services and are encouraged to be thoughtful consumers to minimize upstream impacts and avoid generating waste destined for the landfill. Solid waste — including food, yard debris, recyclables, electronics, and construction and demolition debris — is managed, recycled, and composted to ensure the highest and best use of materials.

**Goal 8.K: School facilities.** Public schools are honored places of learning as well as multifunctional neighborhood anchors serving Portlanders of all ages, abilities, and cultures.

**Goal 8.L: Technology and communications.** All Portland residences, businesses, and institutions have access to universal, affordable, and reliable state-of-the-art communication and technology services.

**Goal 8.M: Energy infrastructure and services.** Residents, businesses, and institutions are served by reliable energy infrastructure that provides efficient, low-carbon, affordable energy through decision-making based on integrated resource planning.

**176. Finding:** The adopted 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017. The CSP includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects.

In addition, the service limitations identified in the CSP have been incorporated into the adopted BLI development constraint analysis that identified parts of Portland that lack needed urban infrastructure. The BLI constraint analysis is the basis of a geographic evaluation of the MDPs to ensure that public facilities are planned to support any potential development that could result from these amendments (see Recommended Draft Report, Appendix A. MDP Inventory).

While the MDPs are existing development, the recommended changes increase the maximum density standard, which could result in expanding or reconfiguring MDPs that increase the number of spaces. The proposed maximum density of 1 space per 1,500 square feet of site area is an increase that will allow for more spaces than allowed under the current zoning for 48 MDPs. The total increase in maximum density is about 2,200 units (see Recommended Draft Report, Appendix A. MDP Inventory).

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#### Sanitary Sewer

Both Portland's combined sewer system and its sanitary sewer system have hydraulic and condition deficiencies that impact the ability of these systems to serve existing properties at designated service levels. These deficiencies can result in higher risks for sewer backups, surcharging, and/or overflows. The greatest concentration of deficiencies are in the older central neighborhoods and in the southwest (Fanno and Burlingame basins), parts of Portland that do not have MDPs. No MDPs are in areas that lack sanitary sewer service.

#### Stormwater

Stormwater is conveyed through the combined sewer system, pipes, ditches, or drainageways to streams and rivers. In some cases, stormwater is managed in detention facilities, other vegetated facilities, or allowed to infiltrate in natural areas. Safe conveyance of stormwater is an issue in some areas, particularly in the hilly areas of west Portland and some parts of outer southeast which lack comprehensive conveyance systems and where infiltration is limited by geology or high groundwater. Since 1999, the Stormwater Management Manual (SWMM) has provided policy and design requirements for stormwater management throughout the City of Portland. The requirements apply to all development, redevelopment, and improvement projects within the City of Portland on private and public property and in the public right-of-way. In some cases, solutions may not be technically or financially feasible. Flooding continues to be an issue, particularly in the Johnson Creek area.

Four (4) MDPs are in areas that have identified stormwater constraints. These sites may not be suitable for infiltration, based on depth to seasonal high groundwater, soil infiltration capability, or do not have access to a stormwater pipe or culvert, combined sewer pipe, stream or drainageway.

#### Water

Water demand forecasts developed by the Water Bureau anticipate that while per capita water demands will continue to decline somewhat over time, the overall demands on the Portland water system will increase due to population growth. The Portland Water Bureau has not experienced any major supply deficiencies in the last 10 years.

Three (3) MDPs are located adjacent to streets that lack water service or are served only by a 2-inch main, which may be insufficient to provide adequate flow. Any new development may be required to upgrade service mains. None of the MDPs are located in areas with substandard fire flow.

Transportation facilities are addressed under Chapter 9 (Transportation), below.

The constraints on public facilities are not insurmountable, but mean development could face increased cost of to provide the constrained infrastructure.

The findings for Statewide Planning Goal 11 also address public facilities and are incorporated by reference.

## Public benefits

**Policy 8.31. Application of Guiding Principles.** Plan and invest in public facilities in ways that promote and balance the Guiding Principles established in The Vision and Guiding Principles of this Comprehensive Plan.

**Policy 8.32. Community benefit agreements.** Encourage the use of negotiated community benefit agreements for large public facility projects as appropriate to address environmental justice policies in

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Chapter 2: Community Involvement.

**Policy 8.33. Community knowledge and experience.** Encourage public engagement processes and strategies for larger public facility projects to include community members in identifying potential impacts, mitigation measures and community benefits.

**Policy 8.34. Resource efficiency.** Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses to meet adopted City goals and targets.

**Policy 8.35. Natural systems.** Protect, enhance, and restore natural systems and features for their infrastructure service and other values.

**Policy 8.36. Context-sensitive infrastructure.** Design, improve, and maintain public rights-of-way and facilities in ways that are compatible with, and that minimize negative impacts on, their physical, environmental, and community context.

**Policy 8.38. Age-friendly public facilities.** Promote public facility designs that make Portland more age-friendly.

177. **Finding:** The MDP amendments do not include new public facility or infrastructure projects. These policies do not apply.

## Public rights-of-way

**Policy 8.39. Interconnected network.** Establish a safe and connected rights-of-way system that equitably provides infrastructure services throughout the city.

**Policy 8.40. Transportation function.** Improve and maintain the right-of-way to support multimodal transportation mobility and access to goods and services as is consistent with the designated street classification.

**Policy 8.42. Stormwater management function.** Improve rights-of-way to integrate green infrastructure and other stormwater management facilities to meet desired levels-of-service and economic, social, and environmental objectives.

**Policy 8.43. Trees in rights-of-way.** Integrate trees into public rights-of-way to support City canopy goals, transportation functions, and economic, social, and environmental objectives.

**Policy 8.44. Community uses.** Allow community use of rights-of-way for purposes such as public gathering space, events, or temporary festivals, if the community uses are integrated in ways that balance and minimize conflict with the designated through movement and access roles of rights-of-ways.

**Policy 8.45. Pedestrian amenities.** Encourage facilities that enhance pedestrian enjoyment, such as transit shelters, garbage containers, benches, etc. in the right-of-way.

**Policy 8.46. Commercial uses.** Accommodate allowable commercial uses of the rights-of-way for enhancing commercial vitality, if the commercial uses can be integrated in ways that balance and minimize conflict with the other functions of the right-of-way.

**Policy 8.47. Flexible design.** Allow flexibility in right-of-way design and development standards to appropriately reflect the pattern area and other relevant physical, community, and environmental contexts and local needs.

**8.47.a.** Use a variety of transportation resources in developing and designing projects for all City streets, such as the City of Portland's Pedestrian Design Guide, Bicycle Master Plan- Appendix A, NACTO Urban Bikeway Design Guide, NACTO Urban Street Design Guide, Portland

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Parks and Recreation Trail Design Guidelines, Designing for Truck Movements and Other Large Vehicles, and City of Portland Green Street Policy, Stormwater Management Manual, Design Guide for Public Street Improvements, and Neighborhood Greenways. (TSP objective 8.1.e.).

**Policy 8.48. Corridors and City Greenways.** Ensure public facilities located along Civic Corridors, Neighborhood Corridors, and City Greenways support the multiple objectives established for these corridors.

178. **Finding:** The City Council interprets these policies apply to new public facilities or infrastructure projects in the right-of-way. The MDP amendments do not include new public facility or infrastructure projects in the right-of-way. These policies do not apply.

### Trails

**Policy 8.53. Public trails.** Establish, improve, and maintain a citywide system of public trails that provide transportation and/or recreation options and are a component of larger network of facilities for bicyclists, pedestrians, and recreational users.

**Policy 8.54. Trail system connectivity.** Plan, improve, and maintain the citywide trail system so that it connects and improves access to Portland’s neighborhoods, commercial areas, employment centers, schools, parks, natural areas, recreational facilities, regional destinations, the regional trail system, and other key places that Portlanders access in their daily lives.

**Policy 8.55. Trail coordination.** Coordinate planning, design, improvement, and maintenance of the trail system among City agencies, other public agencies, non-governmental partners, and adjacent landowners.

**Policy 8.56. Trail diversity.** Allow a variety of trail types to reflect a trail’s transportation and recreation roles, requirements, and physical context.

**Policy 8.57. Public access requirements.** Require public access and improvement of public trails along the future public trail alignments shown in Figure 8-2 — Future Public Trail Alignments.

**Policy 8.58. Trail and City Greenway coordination.** Coordinate the planning and improvement of trails as part of the City Greenways system.

**Policy 8.59. Trail and Habitat Corridor coordination.** Coordinate the planning and improvement of trails with the establishment, enhancement, preservation, and access to habitat corridors.

**Policy 8.60. Intertwine coordination.** Coordinate with the Intertwine Alliance and its partners, including local and regional parks providers, to integrate Portland’s trail and active transportation network with the bi-state regional trail system.

179. **Finding:** The City Council interprets these policies to apply to designated trails. The MDP amendments do not include any sites with designated trails. These policies do not apply.

### Stormwater Systems

**Policy 8.68. Stormwater facilities.** Provide adequate stormwater facilities for conveyance, flow control, and pollution reduction.

**Policy 8.69. Stormwater as a resource.** Manage stormwater as a resource for watershed health and public use in ways that protect and restore the natural hydrology, water quality, and habitat of Portland’s watersheds.

**Policy 8.71. Green infrastructure.** Promote the use of green infrastructure, such as natural areas, the urban forest, and landscaped stormwater facilities, to manage stormwater.

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**180. Finding:** Stormwater is conveyed through the combined sewer system, pipes, ditches, or drainageways to streams and rivers. In some cases, stormwater is managed in detention facilities, other vegetated facilities, or allowed to infiltrate in natural areas. Safe conveyance of stormwater is an issue in some areas, particularly in the hilly areas of west Portland and some parts of outer southeast which lack comprehensive conveyance systems and where infiltration is limited by geology or high groundwater. Since 1999, the Stormwater Management Manual (SWMM) has provided policy and design requirements for stormwater management throughout the City of Portland. The requirements apply to all development, redevelopment, and improvement projects within the City of Portland on private and public property and in the public right-of-way. In some cases, solutions may not be technically or financially feasible. Flooding continues to be an issue, particularly in the Johnson Creek area.

Four (4) MDPs are in areas that have identified stormwater constraints. These sites may not be suitable for infiltration, based on depth to seasonal high groundwater, soil infiltration capability, or do not have access to a stormwater pipe or culvert, combined sewer pipe, stream or drainageway.

MDPs are required to have 10-foot perimeter landscape areas and 30 percent of the site area is required to be landscaped, which can provide for trees and natural features (at least to the L1 landscaping standard) that can manage stormwater on the site.

Fifty-three (53) MDPs were built before the City adopted the original Stormwater Management Manual (SWMM) in 1999. Twenty (20) MDPs have nonconforming situations. The MDP amendments will resolve these nonconforming situations and increase the maximum allowed density on 52 parks, which will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which in turn will require these MDPs to comply with the SWMM that will provide an opportunity to improve the stormwater facilities on these sites.

### Flood management

**Policy 8.76. Flood management.** Improve and maintain the functions of natural and managed drainageways, wetlands, and floodplains to protect health, safety, and property, provide water conveyance and storage, improve water quality, and maintain and enhance fish and wildlife habitat.

**Policy 8.77. Floodplain management.** Manage floodplains to protect and restore associated natural resources and functions and to minimize the risks to life and property from flooding.

**Policy 8.78. Flood management facilities.** Establish, improve, and maintain flood management facilities to serve designated land uses through planning, investment and regulatory requirements.

**181.** Five (5) MDPs are located in the floodplain and two (2) MDPs have associated natural resources that are protected by environmental overlay zones. The MDP amendments do not amend the environmental overlay maps, nor do they change City programs that regulate development in the floodplain (i.e., Title 33.631 Sites in Flood Hazard Areas; Title 10 Erosion Control, and the balanced cut and fill requirements of Title 24). The MDP amendments will resolve nonconforming situations and increase the maximum allowed density, which will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which in turn will require these MDPs to comply with the City's flood management regulations.

### Parks and recreation

**Policy 8.92. Acquisition, development, and maintenance.** Provide and maintain an adequate supply

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and variety of parkland and recreational facilities to serve the city's current and future population based on identified level-of-service standards and community needs.

**Policy 8.93. Service equity.** Invest in acquisition and development of parks and recreation facilities in areas where service-level deficiencies exist.

**Policy 8.95. Park planning.** Improve parks, recreational facilities, natural areas, and the urban forest in accordance with current master plans, management plans, or adopted strategies that reflect user group needs, development priorities, development and maintenance costs, program opportunities, financing strategies, and community input.

**Policy 8.96. Recreational trails.** Establish, improve, and maintain a complete and connected system of public recreational trails, consistent with Portland Parks & Recreation's trail strategy.

**Policy 8.97. Natural resources.** Preserve, enhance, and manage City-owned natural areas and resources to protect and improve their ecological health, in accordance with both the natural area acquisition and restoration strategies, and to provide compatible public access.

**Policy 8.98. Urban forest management.** Manage urban trees as green infrastructure with associated ecological, community, and economic functions, through planning, planting, and maintenance activities, education, and regulation.

**Policy 8.99. Recreational facilities.** Provide a variety of recreational facilities and services that contribute to the health and well-being of Portlanders of all ages and abilities.

**182. Finding:** The City Council interprets these policies to address City-owned parks and natural areas and not development on private land. These policies do not apply.

### School facilities

**Policy 8.113. School district capacity.** Consider the overall enrollment capacity of a school district – as defined in an adopted school facility plan that meets the requirements of Oregon Revised Statute 195 – as a factor in land use decisions that increase capacity for residential development.

**Policy 8.114. Facilities Planning.** Facilitate coordinated planning among school districts and City bureaus, including Portland Parks and Recreation, to accommodate school site/facility needs in response to most up-to-date growth forecasts.

**183.** The David Douglas School District in East Portland is the only school district in Portland with an adopted school facility plan. Twenty-four (24) MDPs are located in the David Douglas School District. The MDP amendments create the potential for 600 units in additional development capacity over current zoning. The 2035 Comprehensive Plan BLI estimated 33,000 units of development capacity in the David Douglas School District, which means these amendments represent a marginal 2 percent increase potential development capacity.

The development capacity increase is spread over six different elementary schools and in 2017-18 elementary school enrollment declined by 3.8% in the school district. The David Douglas School District has indicated that it can accommodate any future increase in student enrollment that can be expected from these amendments.

**Policy 8.115. Co-location.** Encourage public school districts, Multnomah County, the City of Portland, and other providers to co-locate facilities and programs in ways that optimize service provision and intergenerational and intercultural use.

**Policy 8.116. Community use.** Encourage public use of public school grounds for community purposes

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while meeting educational and student safety needs and balancing impacts on surrounding neighborhoods.

**Policy 8.117. Recreational use.** Encourage publicly-available recreational amenities (e.g. athletic fields, green spaces, community gardens, and playgrounds) on public school grounds for public recreational use, particularly in neighborhoods with limited access to parks.

**Policy 8.118. Schools as emergency aid centers.** Encourage the use of seismically-safe school facilities as gathering and aid-distribution locations during natural disasters and other emergencies.

**Policy 8.119. Facility adaptability.** Ensure that public schools may be upgraded to flexibly accommodate multiple community-serving uses and adapt to changes in educational approaches, technology, and student needs over time.

**Policy 8.120. Leverage public investment.** Encourage City public facility investments that complement and leverage local public school districts' major capital investments.

**Policy 8.122. Private institutions.** Encourage collaboration with private schools and educational institutions to support community and recreational use of their facilities.

184. **Finding:** The City Council interprets these policies to address school facilities and not development on private land. These policies do not apply.

### Energy infrastructure

**Policy 8.125. Energy efficiency.** Promote efficient and sustainable production and use of energy resources by residents and businesses, including low-carbon renewable energy sources, district energy systems, and distributed generation, through land use plans, zoning, and other legislative land use decisions.

185. **Finding:** The MDP amendments will resolve nonconforming situations on 20 MDPs and increase the maximum allowed density on 52 parks, which will help provide for the long-term stability of these parks, with an opportunity for expansion and reinvestment, which can provide an opportunity to improve energy efficiency and renewable energy sources on these sites.

## Chapter 9 Transportation

**GOAL 9.A: Safety.** Transportation safety impacts the livability of a city and the comfort and security of those using City streets. Comprehensive efforts to improve transportation safety through engineering, education, enforcement and evaluation will be used to eliminate traffic-related fatalities and serious injuries from Portland's transportation system.

**Goal 9.B: Multiple goals.** Portland's transportation system is funded and maintained to achieve multiple goals and measurable outcomes for people and the environment. The transportation system is safe, complete, interconnected, multimodal, and fulfills daily needs for people and businesses.

**GOAL 9.C: Great places.** Portland's transportation system enhances quality of life for all Portlanders, reinforces existing neighborhoods and great places, and helps make new great places in town centers, neighborhood centers and corridors, and civic corridors.

**GOAL 9.D: Environmentally sustainable.** The transportation system increasingly uses active transportation, renewable energy, or electricity from renewable sources, achieves adopted carbon reduction targets, and reduces air pollution, water pollution, noise, and Portlanders' reliance on private vehicles.

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**GOAL 9.E: Equitable transportation.** The transportation system provides all Portlanders options to move about the city and meet their daily needs by using a variety of safe, efficient, convenient, and affordable modes of transportation. Transportation investments are responsive to the distinct needs of each community.

**GOAL 9.F: Positive health outcomes.** The transportation system promotes positive health outcomes and minimizes negative impacts for all Portlanders by supporting active transportation, physical activity, and community and individual health.

**GOAL 9.G: Opportunities for prosperity.** The transportation system supports a strong and diverse economy, enhances the competitiveness of the city and region, and maintains Portland’s role as a West Coast trade gateway and freight hub by providing efficient and reliable goods movement, multimodal access to employment areas and educational institutions, as well as enhanced freight access to industrial areas and intermodal freight facilities. The transportation system helps people and businesses reduce spending and keep money in the local economy by providing affordable alternatives to driving.

**186. Finding:** As demonstrated in the findings for Statewide Planning Goal 12 (Transportation) and the policies of Chapter 8 (Transportation), the MDP amendments do not significantly impact key facilities on the surrounding transportation system. The transportation impact of the MDP amendments were evaluated by the Portland Bureau of Transportation (PBOT) (see PBOT memo, dated August 8, 2018). The analysis found that the MDP amendments will add little traffic on to the roadways on the ODOT/PBOT list of “Hot Spot” transportation facilities identified in City’s 2035 Comprehensive Plan process. The MDP amendments may add traffic on two critical locations that do not meet the TSP performance standards:

- NE Killingsworth, between 72nd and 92nd Avenues
- SE Powell Blvd, between 122nd and 162nd Avenues

The scale of the added traffic is relatively small, but these added trips could degrade the performance of these facilities. However, there are mitigating factors that should reduce the impact of these changes, including a refinement plan identified in the TSP (TSP Chapter 6, page 282) to address locations that may fail to meet mobility standards in 2035. This refinement plan is still pending, therefore, mitigating the increased traffic from the MDP amendments can be incorporated into that planning process.

### Designing and planning

**Policy 9.1. Street design classifications.** Maintain and implement street design classifications consistent with land use plans, environmental context, urban design pattern areas, and the Neighborhood Corridor and Civic Corridor Urban Design Framework designations.

**Policy 9.2. Street policy classifications.** Maintain and implement street policy classifications for pedestrian, bicycle, transit, freight, emergency vehicle, and automotive movement, while considering access for all modes, connectivity, adjacent planned land uses, and state and regional requirements.

**9.2.a.** Designate district classifications that emphasize freight mobility and access in industrial and employment areas serving high levels of truck traffic and to accommodate the needs of intermodal freight movement.

**9.2.b.** Designate district classifications that give priority to pedestrian access in areas where high

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levels of pedestrian activity exist or are planned, including the Central City, Gateway regional center, town centers, neighborhood centers, and transit station areas.

**9.2.c.** Designate district classifications that give priority to bicycle access and mobility in areas where high levels of bicycle activity exist or are planned, including Downtown, the River District, Lloyd District, Gateway Regional Center, town centers, neighborhood centers, and transit station areas.

**Policy 9.3. Transportation System Plan.** Maintain and implement the Transportation System Plan (TSP) as the decision-making tool for transportation-related projects, policies, programs, and street design.

**Policy 9.4. Use of classifications.** Plan, develop, implement, and manage the transportation system in accordance with street design and policy classifications outlined in the Transportation System Plan.

**9.4.a.** Classification descriptions are used to describe how streets should function for each mode of travel, not necessarily how they are functioning at present.

**Policy 9.5. Mode share goals and Vehicle Miles Travelled (VMT) reduction.** Increase the share of trips made using active and low-carbon transportation modes. Reduce VMT to achieve targets set in the most current Climate Action Plan and Transportation System Plan, and meet or exceed Metro's mode share and VMT targets.

**Policy 9.6. Transportation strategy for people movement.** Design the system to accommodate the most vulnerable users, including those that need special accommodation under the Americans with Disabilities Act (ADA). Implement a prioritization of modes for people movement by making transportation system decisions per the following ordered list:

1. Walking
2. Bicycling
3. Transit
4. Fleets of electric, fully automated, multiple passenger vehicles
5. Other shared vehicles
6. Low or no occupancy vehicles, fossil-fueled non-transit vehicles

When implementing this prioritization ensure that:

- The needs and safety of each group of users are considered, and changes do not make existing conditions worse for the most vulnerable users.
- All users' needs are balanced with the intent of optimizing the right of way for multiple modes on the same street.
- When necessary to ensure safety, accommodate some users on parallel streets as part of multi-street corridors.
- Land use and system plans, network functionality for all modes, other street functions, and complete street policies, are maintained.
- Policy-based rationale is provided if modes lower in the ordered list are prioritized.

**Policy 9.7. Moving goods and delivering services.** In tandem with people movement, maintain efficient and reliable movement of goods and services as a critical transportation system function. Prioritize freight system reliability improvements over single-occupancy vehicle mobility where there are solutions that distinctly address those different needs.

**Policy 9.8. Affordability.** Improve and maintain the transportation system to increase access to convenient and affordable transportation options for all Portlanders, especially those who have

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traditionally been under-served or under-represented or have historically borne unequal burdens.

**Policy 9.9. Accessible and age-friendly transportation system.** Ensure that transportation facilities are accessible to people of all ages and abilities, and that all improvements to the transportation system (traffic, transit, bicycle, and pedestrian) in the public right-of-way comply with the Americans with Disabilities Act of 1990. Improve and adapt the transportation system to better meet the needs of the most vulnerable users, including the young, older adults, and people with different abilities.

**Policy 9.10. Geographic policies.** Adopt geographically-specific policies in the Transportation System Plan to ensure that transportation infrastructure reflects the unique topography, historic character, natural features, system gaps, economic needs, demographics, and land uses of each area. Use the Pattern Areas identified in Chapter 3: Urban Form as the basis for area policies.

**9.10.a.** Refer to adopted area plans for additional applicable geographic objectives related to transportation. Land use, development, and placemaking

187. **Finding:** These policies address the design and planning of transportation facilities and not development on private land. These policies do not apply.

### Land use, development, and placemaking

**Policy 9.11. Land use and transportation coordination.** Implement the Comprehensive Plan Map and the Urban Design Framework through coordinated long-range transportation and land use planning. Ensure that street policy and design classifications and land uses complement one another.

188. **Finding:** The MDP amendments increase the maximum density at 52 MDPs, which is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning. The transportation impact of the MDP amendments were evaluated by the Portland Bureau of Transportation (PBOT) (see PBOT memo, dated August 8, 2018). The scale of the added traffic is relatively small, but these added trips could degrade the performance of these facilities. However, there are mitigating factors that should reduce the impact of these changes, including a refinement plan identified in the TSP (TSP Chapter 6, page 282) to address locations that may fail to meet mobility standards in 2035. This refinement plan is still pending, therefore, mitigating the increased traffic from the MDP amendments can be incorporated into that planning process.

**Policy 9.12. Growth strategy.** Use street design and policy classifications to support Goals 3A-3G in Chapter 3: Urban Form. Consider the different design contexts and transportation functions in Town Centers, Neighborhood Centers, Neighborhood Corridors, Employment Areas, Freight Corridors, Civic Corridors, Transit Station Areas, and Greenways.

**Policy 9.13. Development and street design.** Evaluate adjacent land uses to help inform street classifications in framing, shaping, and activating the public space of streets. Guide development and land use to create the kinds of places and street environments intended for different types of streets.

189. **Finding:** Thirty-five (35) MDPs are in Portland's centers and corridors. The MDP amendments will help provide for the long-term stability of these parks, with an opportunity for expansion, which in turn will provide diverse housing options in these areas, in proximity to the transit and multimodal connections that these corridors provide. Given the relatively small overall increase in density and the distributed pattern of MDPs, the MDP amendments are expected to have a minimal impact on transportation facilities.

### Streets as public spaces

**Policy 9.14. Streets for transportation and public spaces.** Integrate both placemaking and

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transportation functions when designing and managing streets by encouraging design, development, and operation of streets to enhance opportunities for them to serve as places for community interaction, environmental function, open space, tree canopy, recreation, and other community purposes.

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

**Policy 9.16. Design with nature.** Promote street alignments and designs that respond to topography and natural features, when feasible, and protect streams, wildlife habitat, and native trees.

190. **Finding:** These policies address the design and use of public streets and not development on private land. These policies do not apply.

### Modal policies

**Policy 9.17. Pedestrian transportation.** Encourage walking as the most attractive mode of transportation for most short trips, within and to centers, corridors, and major destinations, and as a means for accessing transit.

**Policy 9.18. Pedestrian networks.** Create more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment.

**Policy 9.19. Pedestrian safety and accessibility.** Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities.

**Policy 9.20. Bicycle transportation.** Create conditions that make bicycling more attractive than driving for most trips of approximately three miles or less.

**Policy 9.21. Accessible bicycle system.** Create a bicycle transportation system that is safe, comfortable, and accessible to people of all ages and abilities.

**Policy 9.22. Public transportation.** Coordinate with public transit agencies to create conditions that make transit the preferred mode of travel for trips that are not made by walking or bicycling.

**Policy 9.23. Transportation to job centers.** Promote and enhance transit to be more convenient and economical than the automobile for people travelling more than three miles to and from the Central City and Gateway. Enhance regional access to the Central City and access from Portland to other regional job centers.

**Policy 9.24. Transit service.** In partnership with TriMet, develop a public transportation system that conveniently, safely, comfortably, and equitably serves residents and workers 24 hours a day, 7 days a week.

**Policy 9.25. Transit equity.** In partnership with TriMet, maintain and expand high-quality frequent transit service to all Town Centers, Civic Corridors, Neighborhood Centers, Neighborhood Corridors, and other major concentrations of employment, and improve service to areas with high concentrations of poverty and historically under-served and under-represented communities.

**9.25.a.** Support a public transit system and regional transportation that address the transportation needs of historically marginalized communities and provide increased mobility options and access.

**Policy 9.26. Transit funding.** Consider funding strategies and partnership opportunities that improve access to and equity in transit service, such as raising metro-wide funding to improve service and decrease user fees/fares.

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**Policy 9.27. Transit service to centers and corridors.** Use transit investments to shape the city's growth and increase transit use. In partnership with TriMet and Metro, maintain, expand, and enhance Portland Streetcar, frequent service bus, and high-capacity transit, to better serve centers and corridors with the highest intensity of potential employment and household growth.

**9.27.a.** Locate major park-and-ride lots only where transit ridership is increased significantly, vehicle miles traveled are reduced, transit-supportive development is not hampered, bus service is not available or is inadequate, and the surrounding area is not negatively impacted.

**Policy 9.28. Intercity passenger service.** Coordinate planning and project development to expand intercity passenger transportation services in the Willamette Valley, and from Portland to Seattle and Vancouver, BC.

**Policy 9.29. Regional trafficways and transitways.** Maintain capacity of regional transitways and existing regional trafficways to accommodate through-traffic.

**Policy 9.30. Multimodal goods movement.** Develop, maintain, and enhance a multimodal freight transportation system for the safe, reliable, sustainable, and efficient movement of goods within and through the city.

**Policy 9.31. Economic development and industrial lands.** Ensure that the transportation system supports traded sector economic development plans and full utilization of prime industrial land, including brownfield redevelopment.

**Policy 9.32. Multimodal system and hub.** Maintain Portland's role as a multimodal hub for global and regional movement of goods. Enhance Portland's network of multimodal freight corridors.

**Policy 9.33. Freight network.** Develop, manage, and maintain a safe, efficient, and reliable freight street network to provide freight access to and from intermodal freight facilities, industrial and commercial districts, and the regional transportation system. Invest to accommodate forecasted growth of interregional freight volumes and provide access to truck, marine, rail, and air transportation systems. Ensure designated routes and facilities are adequate for over-dimensional trucks and emergency equipment.

**Policy 9.34. Sustainable freight system.** Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on- and off-street loading spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

**Policy 9.35. Freight rail network.** Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network.

**Policy 9.37. Portland Heliport.** Maintain Portland's Heliport functionality in the Central City.

**Policy 9.38. Automobile transportation.** Maintain acceptable levels of mobility and access for private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

**Policy 9.39. Automobile efficiency.** Coordinate land use and transportation plans and programs with other public and private stakeholders to encourage vehicle technology innovation, shifts toward electric and other cleaner, more energy-efficient vehicles and fuels, integration of smart vehicle technology with intelligent transportation systems, and greater use of options such as car-share, carpool, and taxi.

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**Policy 9.40. Emergency response.** Maintain a network of accessible emergency response streets to facilitate safe and expedient emergency response and evacuation. Ensure that police, fire, ambulance, and other emergency providers can reach their destinations in a timely fashion, without negatively impacting traffic calming and other measures intended to reduce crashes and improve safety.

191. **Finding:** These policies address the design and use of public transportation infrastructure and not development on private land. These policies do not apply.

## System management

**Policy 9.45. System management.** Give preference to transportation improvements that use existing roadway capacity efficiently and that improve the safety of the system for all users.

**9.45.a.** Support regional equity measures for transportation system evaluation.

**Policy 9.46. Traffic management.** Evaluate and encourage traffic speed and volume to be consistent with street classifications and desired land uses to improve safety, preserve and enhance neighborhood livability, and meet system goals of calming vehicle traffic through a combination of enforcement, engineering, and education efforts.

**9.46.a.** Use traffic calming tools, traffic diversion and other available tools and methods to create and maintain sufficiently low automotive volumes and speeds on neighborhood greenways to ensure comfortable cycling environment on the street.

**Policy 9.47. Connectivity.** Establish an interconnected, multimodal transportation system to serve centers and other significant locations. Promote a logical, direct, and connected street system through street spacing guidelines and district-specific street plans found in the Transportation System Plan, and prioritize access to specific places by certain modes in accordance with policies 9.6 and 9.7.

**9.47.a.** Develop conceptual master street plans for areas of the City that have significant amounts of vacant or underdeveloped land and where the street network does not meet City and Metro connectivity guidelines.

**9.47.b.** As areas with adopted Street Plans develop, provide connectivity for all modes by developing the streets and accessways as shown on the Master Street Plan Maps in the Comp Plan.

**9.47.c.** Continue to provide connectivity in areas with adopted Street Plans for all modes of travel by developing public and private streets as shown on the Master Street Plan Maps in the Comp Plan.

**9.47.d.** Provide street connections with spacing of no more than 530 feet between connections except where prevented by barriers such as topography, railroads, freeways, or environmental constraints. Where streets must cross over protected water features, provide crossings at an average spacing of 800 to 1000 feet, unless exceptional habitat quality of length of crossing prevents a full street connection.

**9.47.e** Provide bike and pedestrian connections at approximately 330 feet intervals on public easements or rights-of-way when full street connections are not possible, except where prevented by barriers such as topography, railroads, freeways, or environmental constraints. Bike and pedestrian connections that cross protected water features should have an average spacing of no more than 530 feet, unless exceptional habitat quality or length of connection prevents a connection.

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**Policy 9.48 Technology.** Encourage the use of emerging vehicle and parking technology to improve real-time management of the transportation network and to manage and allocate parking supply and demand.

**Policy 9.49 Performance measures.** Establish multimodal performance measures and measures of system completeness to evaluate and monitor the adequacy of transportation services based on performance measures in goals 9.A. through 9.I. Use these measures to evaluate overall system performance, inform corridor and area-specific plans and investments, identify project and program needs, evaluate and prioritize investments, and regulate development, institutional campus growth, zone changes, Comprehensive Plan Map amendments, and conditional uses.

- 9.49.a.** Eliminate deaths and serious injuries for all who share Portland streets by 2025.
- 9.49.b.** Maintain or decrease the number of peak period non-freight motor vehicle trips, system-wide and within each mobility corridor to reduce or manage congestion.
- 9.49.c.** By 2035, reduce the number of miles Portlanders travel by car to 11 miles per day or less, on average.
- 9.49.d.** Establish mode split targets in 2040 Growth Concept areas within the City, consistent with Metro’s targets for these areas.
- 9.49.e.** By 2035, increase the mode share of daily non-drive alone trips to 70 percent citywide, and to the following in the five pattern areas:

Pattern Area	2035 daily target mode share
Central City	85%
Inner Neighborhoods	70%
Western Neighborhoods	65%
Eastern Neighborhoods	65%
Industrial and River	55%

**9.49.f.** By 2035, 70 percent of commuters walk, bike, take transit, carpool, or work from home at approximately the following rates:

Mode	Mode Share
Walk	7.5%
Bicycle	25%
Transit	25%
Carpool	10%

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Single Occupant Vehicle (SOV)	30% or less
Work at home	10% below the line (calculated outside of the modal targets above)

**9.49.g.** By 2035, reduce Portland’s transportation-related carbon emissions to 50% below 1990 levels, at approximately 934,000 metric tons.

**9.49.h.** By 2025, increase the percentage of new mixed use zone building households not owning an automobile from approximately 13% (2014) to 25%, and reduce the percentage of households owning two automobiles from approximately 24% to 10%.

**9.49.i.** Develop and use alternatives to the level-of-service measure to improve safety, encourage multimodal transportation, and to evaluate and mitigate maintenance and new trip impacts from new development.

**9.49.j.** Use level-of-service, consistent with Table 9.1\*, as one measure to evaluate the adequacy of transportation facilities in the vicinity of sites subject to land use review.

**9.49.k.** Maintain acceptable levels of performance on state facilities and the regional arterial and throughway network, consistent with the interim standard in Table 9.2\*, in the development and adoption of, and amendments to, the Transportation System Plan and in legislative amendments to the Comprehensive Plan Map.

**9.49.l.** In areas identified by Metro that exceed the level-of-service in Table 9.2\* and are planned to, but do not currently meet the alternative performance criteria, establish an action plan that does the following:

- Anticipates growth and future impacts of motor vehicle traffic on multimodal travel in the area
- Establishes strategies for mitigating the future impacts of motor vehicles
- Establishes performance standards for monitoring and implementing the action plan.

\*Note: Referenced Tables 9.1 and 9.2 are contained within the Transportation System Plan and should not be confused with tables or figures within the 2035 Comprehensive Plan.

**9.49.m.** Develop performance measures to track progress in creating and maintaining the transportation system.

**Policy 9.50 Regional congestion management.** Coordinate with Metro to establish new regional multimodal mobility standards that prioritize transit, freight, and system completeness.

**9.50.a.** Create a regional congestion management approach, including a market-based system, to price or charge for auto trips and parking, better account for the cost of auto trips, and to more efficiently manage the regional system.

**Policy 9.51. Multimodal Mixed-Use Area.** Manage Central City Plan amendments in accordance with the designated Central City Multimodal Mixed-Use Area (MMA) in the geography indicated in Figure 9-2. The MMA renders congestion / mobility standards inapplicable to any proposed plan amendments under OAR 660-0012-0060(10).

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192. **Finding:** These policies address the management of the City's transportation system and not development on private land. These policies do not apply.

### Transportation Demand Management

**Policy 9.52. Outreach.** Create and maintain TDM outreach programs that work with Transportation Management Associations (TMA), residents, employers, and employees that increase the modal share of walking, bicycling, and shared vehicle trips while reducing private vehicle ownership, parking demand, and drive-alone trips, especially during peak periods.

**Policy 9.53. New development.** Create and maintain TDM regulations and services that prevent and reduce traffic and parking impacts from new development and redevelopment. Encourage coordinated area-wide delivery of TDM programs. Monitor and improve the performance of private-sector TDM programs.

**Policy 9.54. Projects and programs.** Integrate TDM information into transportation project and program development and implementation to increase use of new multimodal transportation projects and services.

193. The City has created TDM outreach programs but has elected to only require participation in those programs for larger developments.

### Parking management

**Policy 9.55. Parking management.** Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district vitality, vehicle miles traveled (VMT) reduction, and air quality. Implement strategies that reduce demand for new parking and private vehicle ownership, and that help maintain optimal parking occupancy and availability.

**Policy 9.56. Curb Zone.** Recognize that the Curb Zone is a public space, a physical and spatial asset that has value and cost. Evaluate whether, when, and where parking is the highest and best use of this public space in support of broad City policy goals and local land use context. Establish thresholds to utilize parking management and pricing tools in areas with high parking demand to ensure adequate on-street parking supply during peak periods.

**Policy 9.57. On-street parking.** Manage parking and loading demand, supply, and operations in the public right of way to achieve mode share objectives, and to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand.

**Policy 9.58. Off-street parking.** Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.

**Policy 9.59. Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space.

**Policy 9.60. Cost and price.** Recognize the high public and private cost of parking by encouraging prices that reflect the cost of providing parking and balance demand and supply. Discourage employee and resident parking subsidies.

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**Policy 9.61. Bicycle parking.** Promote the development of new bicycle parking facilities including dedicated bike parking in the public right-of-way. Provide sufficient bicycle parking at high-capacity transit stations to enhance bicycle connection opportunities. Require provision of adequate off-street bicycle parking for new development and redevelopment. Encourage the provision of parking for different types of bicycles. In establishing the standards for long-term bicycle parking, consider the needs of persons with different levels of ability.

194. The MDP amendments set the parking standards as the same as the other multi-dwelling zones. In addition, the State of Oregon’s MDP Specialty Code establishes parking standards for manufactured dwelling parks.

### Finance, programs, and coordination

**Policy 9.62. Coordination.** Coordinate with state and federal agencies, local and regional governments, special districts, other City bureaus, and providers of transportation services when planning for, developing, and funding transportation facilities and services.

**Policy 9.63. New development impacts.** Prevent, reduce, and mitigate the impacts of new development and redevelopment on the transportation system. Utilize strategies including transportation and parking demand management, transportation system analysis, and system and local impact mitigation improvements and fees.

**Policy 9.64. Education and encouragement.** Create, maintain, and coordinate educational and encouragement programs that support multimodal transportation and that emphasize safety for all modes of transportation. Ensure that these programs are accessible to historically under-served and under-represented populations.

**Policy 9.65. Telecommuting.** Promote telecommuting and the use of communications technology to reduce travel demand.

**Policy 9.66. Project and program selection criteria.** Establish transportation project and program selection criteria consistent with goals 9A through 9I, to cost-effectively achieve access, placemaking, sustainability, equity, health, prosperity, and safety goals.

**Policy 9.67. Funding.** Encourage the development of a range of stable transportation funding sources that provide adequate resources to build and maintain an equitable and sustainable transportation system.

195. **Finding:** These policies address the funding and management of the City’s transportation system and not development on private land. The MDP amendments do not change the system development charges for new housing units. These policies do not apply.

### Connected and Automated Vehicles

**Policy 9.68 Connected and Automated Vehicles Priorities and Outcomes.** Prioritize connected and automated vehicles that are fleet/shared ownership, fully automated, electric and, for passenger vehicles, shared by multiple passengers (known by the acronym FAVES). Develop and implement strategies for each following topic.

**9.68.a.** Ensure that all levels of automated vehicles advance Vision Zero by operating safely for all users, especially for vulnerable road users. Require adequate insurance coverage for operators, customers, and the public-at-large by providers of commercial connected and autonomous vehicle services.

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**9.68.b.** Ensure that connected and automated vehicles improve travel time reliability and system efficiency by:

1. maintaining or reducing the number of vehicle trips during peak congestion periods;
2. reducing low occupancy vehicle trips during peak congestion periods;
3. paying for use of, and impact on, Portland's transportation system including factors such as congestion level, vehicle miles traveled, vehicle occupancy, and vehicle energy efficiency; and
4. supporting and encouraging use of public transportation.

**9.68.c.** Cut vehicle carbon pollution by reducing low occupancy "empty miles" traveled by passenger vehicles with zero or one passengers. Prioritize electric and other zero direct emission vehicles operated by fleets and carrying multiple passengers.

**9.68.d.** Make the benefits of automated mobility available on an equitable basis to all segments of the community while ensuring traditionally disadvantaged communities are not disproportionately hurt by connected and autonomous vehicle use. This includes people with disabilities, as well as communities of color, women, and geographically underserved communities.

**9.68.e** Identify, prevent, and mitigate potential adverse impacts from connected and automated vehicles.

**Policy 9.69 Connected and Automated Vehicles Tools.** Use a full range of tools to ensure that connected and automated vehicles and private data communications devices installed in the City right of way contribute to achieving Comprehensive Plan and Transportation System Plan goals and policies.

**9.69.a.** Maintain City authority to identify and develop appropriate data sharing requirements to inform and support safe, efficient, and effective management of the transportation system. Ensure that when connected and automated vehicles use City rights-of-way or when vehicles connect with smart infrastructure within the City they share information including, but not limited to, vehicle type, occupancy, speed, travel routes, and travel times, with appropriate privacy controls. Ensure that private data communications devices installed in the City right of way are required to share anonymized transportation data.

**9.69.b.** Design and manage the mobility zone, curb zone, and traffic control devices, e.g. to limit speeds to increase safety, to minimize cut-through traffic, evaluate future demand for pick-up and drop-off zones, and to prioritize automated electric vehicles carrying more passengers in congested times and locations;

**9.69.c.** Evaluate the public cost and benefit of investments in wayside communication systems serving connected and automated vehicles. Develop a criteria-driven automated vehicle wayside infrastructure investment plan.

**9.69.d.** Develop sustainable user-pays funding mechanisms to support connected and automated vehicle infrastructure and service investments, transportation system maintenance, and efficient system management.

**9.69.e.** Ensure that automated vehicles and vehicles that connect to smart City infrastructure,

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and private data communications devices installed in the City right of way, help pay for infrastructure and service investments, and support system reliability and efficiency. Develop a tiered pricing structure that reflects vehicle impacts on the transportation system, including factors such as congestion level, vehicle miles traveled, vehicle occupancy, and vehicle energy efficiency.

196. **Finding:** These policies address the management of automated vehicles and not development on private land. These policies do not apply.

## Chapter 10: Land Use Designations and Zoning

**Goal 10.A: Land use designations and zoning.** Effectively and efficiently carry out the goals and policies of the Comprehensive Plan through the land use designations, Zoning Map, and the Zoning Code.

197. The MDP amendments create a new land use designation, development standards, use allowances, and development incentives to support the continued operation of MDPs that is consistent with and furthers the goals and policies of the *2035 Comprehensive Plan*, as detailed by these findings.

### Land use designations

**Policy 10.1. Land use designations.** Apply a land use designation to all land and water within the City's Urban Services Boundary. Apply the designation that best advances the Comprehensive Plan goals and policies. The land use designations are shown on the adopted Land Use Map and on official Zoning Maps.

198. The MDP amendments create a new land use designation – Manufactured Dwelling Park (MDP) – to represent the best designation that furthers the goals and policies of the *2035 Comprehensive Plan*, as detailed by the findings of this ordinance. The MDP amendments include Comprehensive Plan Map and Zoning Map amendments to implement the MDP designation.

### The Zoning Map and the Zoning Code

**Policy 10.2. Relationship of land use designations to base zones.** Apply a base zone to all land and water within the City's urban services boundary. The base zone applied must either be a zone that corresponds to the land use designation or be a zone that does not correspond but is allowed per Figure 10-1 — Corresponding and Less-Intense Zones for Each Plan Map Designation. In some situations, there are long-term or short-term obstacles to achieving the level of development intended by the land use designation (e.g., an infrastructure improvement to serve the higher level of development is planned but not yet funded). In these situations, a less intense zone (listed in Figure 10-1) may be applied. When a land use designation is amended, the zone may also have to be changed to a corresponding zone or a zone that does not correspond but is allowed.

199. The MDP amendments include a change to Figure 10-1 to identify the corresponding zone (RMP) for the MDP map designation. The MDP amendments do not identify non-corresponding zones because the map designations are applied to existing MDPs.

### Policy 10.3. Amending the Zoning Map.

**10.3.a.** Amending a base zone may be done legislatively or quasi-judicially.

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**10.3.b.** When amending a base zone quasi-judicially, the amendment must be to a corresponding zone (*see Figure 10-1 — Corresponding and Allowed Zones for Each Land Use Designation*). When a designation has more than one corresponding zone, the most appropriate zone, based on the purpose of the zone and the zoning and general land uses of surrounding lands, will be applied.

**10.3.c.** When amending a base zone legislatively, the amendment may be to a corresponding zone or to a zone that does not correspond but is allowed (*see Figure 10-1 — Corresponding and Allowed Zones for each Land Use Designation for zones that are allowed*). A legislative Zoning Map amendment may not be to a zone that is not allowed.

**10.3.d.** An amendment to a base zone consistent with the land use designation must be approved when it is found that current public services can support the uses allowed by the zone, or that public services can be made capable by the time the development is complete. The adequacy of services is based on the proposed use and development. If a specific use and development proposal is not submitted, services must be able to support the range of uses and development allowed by the zone. For the purposes of this requirement, services include water supply, sanitary sewage disposal, stormwater management, transportation, school district capacity (where a school facility plan exists), and police and fire protection.

**200. Finding:** As discussed in the findings under Statewide Planning Goal 11 and 12, as well as Comprehensive Plan policies in Chapter 8 and 9, the MDP amendments will result in dispersed and incremental increase in development capacity over current zoning that can be supported by the public services identified in the Citywide Systems Plan.

The David Douglas School District in East Portland is the only school district in Portland with an adopted school facility plan. Twenty-four (24) MDPs are located in the David Douglas School District. The MDP amendments create the potential for 600 units in additional development capacity over current zoning, which represents a marginal 2 percent increase potential development capacity. The development capacity increase is spread over six different elementary schools and in 2017-18 elementary school enrollment declined by 3.8% in the school district. The David Douglas School District has indicated that it can accommodate any future increase in student enrollment that can be expected from these amendments.

**10.3.e.** An amendment to apply or remove an overlay zone or plan district may be done legislatively or quasi-judicially, and must be based on a study or plan document that identifies a specific characteristic, situation, or problem that is not adequately addressed by the base zone or other regulations.

**201. Finding:** The MDP amendments remove the Alternative Design Density (a) Overlay Zone from 39 MPDs. The purpose of the *a* overlay zone, which was initially adopted in 1993, is to allow increased density for development that meets additional design compatibility requirements. The overlay zone provides for a 50 percent increase in density for projects multi-dwelling zones that voluntarily go through a Type III design review process. The MDP amendments change the density bonus from design review to incentivize long-term affordable housing to better meet the policies of the 2035 Comprehensive Plan.

**Policy 10.4. Amending the Zoning Code.** Amendments to the zoning regulations must be done legislatively and should be clear, concise, and applicable to a broad range of development situations faced by a growing city. Amendments should:

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### 10.4.a. Promote good planning:

- Effectively and efficiently implement the Comprehensive Plan.
- Address existing and potential land use problems.
- Balance the benefits of regulations against the costs of implementation and compliance.
- Maintain Portland's competitiveness with other jurisdictions as a location in which to live, invest, and do business.

### 10.4.b. Ensure good administration of land use regulations:

- Keep regulations as simple as possible.
- Use clear and objective standards wherever possible.
- Maintain consistent procedures and limit their number.
- Establish specific approval criteria for land use reviews.
- Establish application requirements that are as reasonable as possible, and ensure they are directly tied to approval criteria.
- Emphasize administrative procedures for land use reviews.
- Avoid overlapping reviews.

### 10.4.c. Strive to improve the code document:

- Use clear language.
- Maintain a clear and logical organization.
- Use a format and layout that enables use of the document by lay people as well as professionals.
- Use tables and drawings to clarify and shorten the document.
- Identify and act on regulatory improvement suggestions.

202. **Finding:** The MDP amendments include legislative amendments to the Zoning Code. The purpose of these amendments is update existing regulations to better support the continued operation of MDPs by increasing density, allowing for expanded transfers of density, and allowing RV Parks to as an allowed use. The MDP amendments use clear and objective development standards with administrative land use review procedures.

## Part IV. Area-specific Plans

As required by 2035 Comprehensive Plan Policy 1.19, the following area-specific plans provide additional policy direction that is relevant within the policy framework provided by the overall Comprehensive Plan.

### **Cully/Parkrose Community Plan (1986)**

#### **Policy 4 Housing Location**

1. Attached residential and multifamily residential zones must meet the following locational requirements:
  1. Have direct access to an arterial or collector street;
  2. Avoid routing of through traffic on local neighborhood streets;
  3. Have public transit available or planned to be available within one-quarter mile of the site; and

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4. Be designed to be compatible with existing residential uses by the use of design features such as buffering, landscaping, screening, and building orientation.

**203. Finding:** Ten (10) MDPs are located in the Cully/Parkrose Community Plan area. All ten parks were developed prior to 1962, well before this policy was adopted. These parks are located along NE Killingsworth Street (District Collector and Regional Trafficway/Major City Traffic Street) or NE Sandy Blvd (Major City Traffic Street). Only one MDP (#8 Sumner Estates) requires more than one block of access routing on local neighborhood streets. All ten MDPs have convenient access to transit. The MDP amendments include requirements for 10-foot perimeter landscape areas and 30 percent of the site area to be landscaped, which can make MDPs compatible with residential uses.

### **Cully Neighborhood Plan (1992)**

#### **Policy 3A. Preserve Housing and Promote New Development**

Preserve, protect and improve existing housing stock while providing opportunities for new housing for people of all ages, family types and income levels.

Objective 2.2. Encourage multifamily development on properly zoned land with access to transit service, within walking distance to commercial, schools and parks.

**204. Finding:** Five (5) MDPs are located in the Cully Neighborhood Plan area. These parks are located along NE Killingsworth Street with convenient access to transit. Four MDPs are within walking distance of Cully Park.

#### **Policy 4C. Redevelopment in the Special Focus Area**

Encourage mixed industrial, commercial and new residential uses within the special focus area while providing a buffer or step-down in use between the heavier industrial uses to the north and the neighborhood to the south.

Objective 1. Redesignate and rezone portions of the special focus area from IG2h to EG2h to promote greater land uses flexibility. Encourage mixed residential, commercial and clean industrial uses. Encourage all new residential uses to be condominium or rowhouses with home ownership throughout the focus area.

Objective 5. Encourage condominium or rowhouse ownership use in Area 4 by rezoning the area from R2 to R2.5 to ensure compatibility with the surrounding neighborhood.

**205. Finding:** The policy direction for the Special Focus Area is conversion of the industrial uses and the MDPs to mixed employment, commercial and residential. The 2035 Comprehensive Plan also emphasizes housing affordability and diversity of housing types. MDPs are a form of affordable home ownership. For the six parks in Cully, the share of residents that own their units ranges from 10-20%, to 35-40%, and up to 80% in The Arbor (#3). Also, testimony from Living Cully, the Cully Neighborhood Association, and Cully residents indicate support for maintaining the MDPs as a long-term housing option in the Cully neighborhood. The MDP amendments include measures, such as density increases and transfers, that can support the long-term stability of the parks, which can support a different model of home ownership. Therefore, in this situation, the City Council finds that on balance, the housing policies of the 2035 Comprehensive Plan should supersede this area plan policy.

## Outer Southeast Community Plan (1996)

**Housing Policy:** Provide a variety of housing choices for outer southeast community residents of all income levels by maintaining the existing sound housing stock and promoting new housing development.

Objective 7c. Preserve existing mobile home parks.

206. **Finding:** Forty-four (44) MDPs are located in the Outer Southeast Community Plan area. The MDP amendments include measures, such as resolving nonconforming situations, density increases and expanded transfers, and additional use allowances, which can support the long-term stability of the parks.

## Part V. Comprehensive Plan and Zoning Code Amendment Criteria

### 33.835.040 Approval Criteria

**A. Amendments to the zoning code.** Text amendments to the zoning code must be found to be consistent with the Comprehensive Plan, Urban Growth Management Functional Plan, and the Statewide Planning Goals. In addition, the amendments must be consistent with the intent or purpose statement for the base zone, overlay zone, plan district, use and development, or land division regulation where the amendment is proposed, and any plan associated with the regulations. The creation of a new plan district is subject to the approval criteria stated in 33.500.050.

207. **Finding:** The findings in this exhibit demonstrate how the MDP amendments are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and the Statewide Planning Goals.
208. **Finding:** The City Council interprets this criterion to require the MDP amendments show consistency on balance. The City Council has applied all applicable policies and the findings in this exhibit demonstrate how the MDP amendments to the zoning code are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and with the Statewide Planning Goals.

### 33.120 Multi-Dwelling Zones

#### 33.120.010 Purpose

The multi-dwelling zones are intended to preserve land for urban housing and to provide opportunities for multi-dwelling housing.

A. Use regulations. The use regulations are intended to create and maintain higher density residential neighborhoods. At the same time, they allow for large scale institutional campuses and other nonresidential uses but not to such an extent as to sacrifice the overall residential neighborhood image and character.

B. Development standards. The six multi-dwelling zones are distinguished primarily by density and development standards. The development standards work together to create desirable residential areas by promoting aesthetically pleasing environments, safety, privacy, energy conservation, and recreational opportunities. The development standards generally assure that new development will be compatible with the City's character. At the same time, the standards

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allow for flexibility for new development. In addition, the regulations provide certainty to property owners, developers, and neighbors about the limits of what is allowed. The development standards are generally written for development on flat, regularly shaped lots. Other situations are addressed through special standards or exceptions.

209. **Finding:** The MDP amendments are consistent with the purpose of the Multi-Dwelling Zones because the RMP zone allows multi-dwelling housing (more than one unit on a lot or parcel) and allows for the same range of institutional uses that are allowed in the other multi-dwelling zones. Like the other multi-dwelling zones, the RMP zone is distinguished primarily by density and development standards that reflect the unique features of MDPs.

**33.251 Manufactured Homes and Manufactured Dwelling Parks**

**33.251.030 Manufactured Dwelling Park Regulations**

**A. Purpose.** Manufactured dwelling parks are allowed in certain high-density residential zones to provide locational opportunities for manufactured dwellings. The manufactured dwelling park requirements provide standards for orderly development, adequate vehicle circulation, parking, pedestrian circulation, open areas, and landscaping.

210. **Finding:** The MDP Amendments are consistent with the purpose of 33.251 development standards because the code changes clarify the development standards specific to MDPs, consistent with the purpose of the RMP base zone.

**Other overlay zone, plan district, use and development, or land division regulations**

211. **Finding:** See Section VIII below for the discussion as to how the MDP Amendments are consistent with the purpose of the other zoning code changes. These other changes add the RMP zone to the list of multi-dwelling zones so that it is clear which development standards apply in the RMP zone.

**B. Amendments to the goals and policies of the Comprehensive Plan.** Text amendments to the goals and policies of the Comprehensive Plan must be found to be consistent with the Comprehensive Plan, the Urban Growth Management Functional Plan, and with the Statewide Planning Goals.

212. **Finding:** The City Council interprets this criterion requires the MDP amendments to show consistency on balance. The City Council has applied all applicable policies and the findings in this exhibit to demonstrate how the MDP amendments to the 2035 Comprehensive Plan are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and the Statewide Planning Goals.

## Part VI. Comprehensive Plan Map Amendment Criteria

### 33.810.050 Approval Criteria

**B. Legislative.** Amendments to the Comprehensive Plan Map which are legislative must be found to be consistent with the goals and policies of the Comprehensive Plan, Metro's Urban Growth Management Functional Plan, the Statewide Planning Goals, and any relevant area plans adopted by the City Council.

213. **Finding:** The City Council interprets this criterion requires the MDP amendments to show consistency on balance. The City Council has applied all applicable policies and the findings in this exhibit demonstrate how the MDP amendments to the 2035 Comprehensive Plan Map are

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consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, the Statewide Planning Goals, and relevant area plans.

## Part VII. Zoning Map Amendments Approval Criteria

### 33.855.050 Approval Criteria for Base Zone Changes

An amendment to the base zone designation on the Official Zoning Maps will be approved (either quasi-judicial or legislative) if the review body finds that the applicant has shown that all of the following approval criteria are met:

**A. Compliance with the Comprehensive Plan Map.** The zone change is to a corresponding zone of the Comprehensive Plan Map. When the Comprehensive Plan Map designation has more than one corresponding zone, it must be shown that the proposed zone is the most appropriate, taking into consideration the purposes or characteristics of each zone and the zoning pattern of surrounding land.

**214. Finding:** The MDP amendments include a comprehensive plan text amendment to establish the RMP zone as the only corresponding zone for the MDP comprehensive plan map designation. All of the zoning map changes are to the RMP zone.

### **B. Adequate public services.**

- A.** Adequacy of services applies only to the specific zone change site.
- B.** Adequacy of services is determined based on performance standards established by the service bureaus. The burden of proof is on the applicant to provide the necessary analysis. Factors to consider include the projected service demands of the site, the ability of the existing and proposed public services to accommodate those demand numbers, and the characteristics of the site and development proposal, if any.
  - a.** Public services for water supply, and capacity, and police and fire protection are capable of supporting the uses allowed by the zone or will be capable by the time development is complete.

**215. Finding:** While the MDPs are existing development, the MDP amendments will increase the maximum density standard, which could result in expanding or reconfiguring MDPs that increase the number of spaces. The MDP amendments increase the maximum density at 52 MDPs, which is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning (see Recommended Draft Report, Appendix A. MDP Inventory). The City's adopted BLI estimates Portland has the capacity for 201,000 additional units. The MDP amendments result in a 1 percent net increase in additional development capacity distributed over 52 sites that will have a minimal impact on public facilities.

The adopted 2035 Comprehensive Plan includes the Citywide Systems Plan (CSP), which was adopted (Ordinance 185657) and acknowledged by LCDC on April 25, 2017. The CSP includes the Public Facilities Plan with information on current and future transportation, water, sanitary sewer, and stormwater infrastructure needs and projects, consistent with the requirements of Statewide Planning Goal 11.

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In addition, the service limitations identified in the CSP have been incorporated into the adopted BLI development constraint analysis that identified parts of Portland that lack needed urban infrastructure. The BLI constraint analysis is the basis of a geographic evaluation of the MDPs to ensure that public facilities are planned to support any potential development that could result from these amendments (see Recommended Draft Report, Appendix A. MDP Inventory).

#### Water

Water demand forecasts developed by the Water Bureau anticipate that while per capita water demands will continue to decline somewhat over time, the overall demands on the Portland water system will increase due to population growth. The Portland Water Bureau has not experienced any major supply deficiencies in the last 10 years.

Three (3) MDPs are located adjacent to streets that lack water service or are served only by a 2-inch main, which may be insufficient to provide adequate flow. Any new development may be required to upgrade service mains. None of the MDPs are in areas with substandard fire flow.

#### Police and Fire Protection

The Police and Fire Bureaus have not established any specific or quantifiable levels of service for new development.

The constraints on public facilities are not insurmountable, but mean development could face increased cost of to provide the constrained infrastructure.

As noted in the findings above, the MDP amendments are consistent with Statewide Planning Goal 11 (Public Facilities and Services) and the applicable 2035 Comprehensive Plan policies in Chapter 8 (Public Facilities and Services) and the findings in response to those goals and policies are incorporated by reference. Therefore, the public services for water supply, and capacity, and police and fire protection are capable of supporting the uses allowed by the RMP zone in the locations of the 56 MDPs that are included in the MDP amendments.

- b. Proposed sanitary waste disposal and stormwater disposal systems are or will be made acceptable to the Bureau of Environmental Services. Performance standards must be applied to the specific site design. Limitations on development level, mitigation measures or discharge restrictions may be necessary in order to assure these services are adequate.

#### Finding: Sanitary Sewer

Both Portland's combined sewer system and its sanitary sewer system have hydraulic and condition deficiencies that impact the ability of these systems to serve existing properties at designated service levels. These deficiencies can result in higher risks for sewer backups, surcharging, and/or overflows. The greatest concentration of deficiencies are in the older central neighborhoods and in the southwest (Fanno and Burlingame basins), parts of Portland that do not have MDPs. No MDPs are in areas that lack sanitary sewer service.

#### Stormwater

Stormwater is conveyed through the combined sewer system, pipes, ditches, or drainageways to streams and rivers. In some cases, stormwater is managed in detention facilities, other vegetated facilities, or allowed to infiltrate in natural areas. Safe conveyance of stormwater is an issue in some areas, particularly in the hilly areas of west Portland and some parts of outer southeast which lack comprehensive conveyance systems and where infiltration is limited by geology or high groundwater. Since 1999, the Stormwater Management Manual (SWMM) has provided policy and design requirements for stormwater management throughout the City of Portland.

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The requirements apply to all development, redevelopment, and improvement projects within the City of Portland on private and public property and in the public right-of-way. In some cases, solutions may not be technically or financially feasible. Flooding continues to be an issue, particularly in the Johnson Creek area.

Four (4) MDPs are in areas that have identified stormwater constraints. These sites may not be suitable for infiltration, based on depth to seasonal high groundwater, soil infiltration capability, or do not have access to a stormwater pipe or culvert, combined sewer pipe, stream or drainageway. These conditions will be mitigated through the application of the SWMM to any new development at these MDPs.

As noted in the findings above, the MDP amendments are consistent with Statewide Planning Goal 11 (Public Facilities and Services) and the applicable 2035 Comprehensive Plan policies in Chapter 8 (Public Facilities and Services) and the findings in response to those goals and policies are incorporated by reference. Therefore, the public services for water supply, and capacity, and police and fire protection are capable of supporting the uses allowed by the RMP zone in the locations of the 56 MDPs that are included in the MDP amendments.

c. Public services for transportation system facilities are capable of supporting the uses allowed by the zone or will be capable by the time development is complete. Transportation capacity must be capable of supporting the uses allowed by the zone by the time development is complete, and in the planning period defined by the Oregon Transportation Rule, which is 20 years from the date the Transportation System Plan was adopted. Limitations on development level or mitigation measures may be necessary in order to assure transportation services are adequate.

**216. Finding:** The adopted 2035 Comprehensive Plan includes the Transportation Systems Plan (TSP), which was adopted in three phases (Ordinance 187832, 188177, and 188957). Phase 1 and 2 was submitted as part Task Four of Periodic Review; and both were approved by LCDC Order 18 – WKTSK – 001897 on August 8, 2018, but are not yet acknowledged. Phase 3 of the Transportation System Plan was adopted as a post-acknowledgement plan amendment by Ordinance No. 188957, became effective on June 23, 2018. The TSP includes a congestion performance analysis of the 2035 Comprehensive Plan Map.

The MDP amendments increase the maximum density at 52 MDPs, which is an increase in development capacity that will allow for 2,200 more spaces than allowed under the current zoning. The transportation impact of the MDP amendments were evaluated by the Portland Bureau of Transportation (PBOT) (see PBOT memo, dated August 8, 2018). The analysis is a high growth/high impact scenario that assumes all MDPs will utilize 40 percent of the increased density on-site and that growth is added to the population control total, rather than a redistribution of the 2035 growth forecast.

The PBOT analysis found that the MDP amendments will add little traffic on to the roadways on the ODOT/PBOT list of “hot spot” transportation facilities identified in City’s 2035 Comprehensive Plan process. No roadways on the concern list will change their congestion status from uncongested to congested by link V/C ratio analysis. The MDP amendments may add traffic on two critical locations that currently do not meet the TSP performance standards:

1. NE Killingsworth, between 72<sup>nd</sup> and 92<sup>nd</sup> Avenues
2. SE Powell Blvd, between 122<sup>nd</sup> and 162<sup>nd</sup> Avenues

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The scale of the added traffic is projected to be 10-15 added automobile trips during the 2035 PM peak hour period, which is a 0.5%-1.2% increase in traffic volumes. These added trips could degrade the performance of these facilities. However, there are mitigating factors that should reduce the impact of these changes:

1. This is a high-level analysis of a high growth scenario that does not factor in redistribution of growth nor does it reassign traffic that might be diverted to other less congested streets. These refinements to the analysis could result in lower added traffic to these segments;
2. The nine (9) MDPs (#2-10) in the NE Killingsworth segment area all have convenient access to transit, including two parks that are in light rail transit station areas.
3. Twenty-four (24) of the 31 MDPs (#12-29, 44-56) in the SE Powell Blvd corridor (Division to Foster, I-205 to 162<sup>nd</sup>) have convenient access to transit.
4. PBOT is undertaking the Columbia Blvd Access Project can identify improvements to mitigate the impacts on the NE Killingsworth segment.
5. These locations have previously been identified in the TSP as locations that may fail to meet mobility standards in 2035. The adopted TSP includes the Projected ODOT “Hot Spots” Refinement Plan project (TSP Chapter 6, page 282). Major refinement plans are necessary when a transportation need exists, but the mode, function, and general location of a transportation improvement have not been determined, and a range of actions must be considered before identifying a specific project or projects. This refinement plan is still pending, therefore, mitigating the increased traffic from the MDP amendments can be incorporated into that planning process.
6. The adopted TSP Project List identifies several improvement projects on near the impacted facilities that could incorporate future measures to mitigate these significant effects.

#### Portland TSP projects on top congested MDP impacted streets

	Project Number	Lead Agency	Est. Time Frame	Est Cost	Description
<b>SE Powell Blvd., EB/WB, between 122<sup>nd</sup> and 162<sup>nd</sup></b>					
Outer Powell Blvd Corridor Improvements, Phase 2	80015	PBOT/ODOT	Years 1-10	\$24,000,000	Widen street to three lanes
Outer Powell Blvd Corridor Improvements, Phase 2	80032	PBOT/ODOT	Years 11-20	\$67,000,000	Widen street to three lanes
Powell-Division Safety and Access to Transit	80037	TRIMET	Years 1-10	\$2,800,000	Construct improvements
East Portland Access to Employment	80035	PBOT	Years 1-10	\$5,870,000	Build sidewalks
SE 148 <sup>th</sup> Pedestrian Improvements	80005	PBOT	Years 1-10	\$2,000,000	Build sidewalks
<b>NE Killingsworth St. EB, between 72<sup>nd</sup> and 92<sup>nd</sup></b>					
82 <sup>nd</sup> Ave Corridor Improvements	40013.0	PBOT	Years 1-10	\$5,000,000	Design and implement
Columbia Blvd Freight Improvements	40102.0	PBOT/PORT	N/A	\$14,859,000	Construct street and intersection modifications
Columbia Blvd ITS	30008.0	PBOT	Years 1-10	\$390,000	Communication infra.

Given these factors, the transportation impacts should be able to be mitigated with future measures identified in later TSP projects.

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As noted in the findings above, the MDP amendments are consistent with Statewide Planning Goal 12 (Transportation) and the applicable 2035 Comprehensive Plan policies in Chapter 9 (Transportation) and the findings in response to those goals and policies are incorporated by reference. Therefore, the public services for transportation are capable of supporting the uses allowed by the RMP zone in the locations of the 56 MDPs that are included in the MDP amendments.

- d. The school district within which the site is located has adequate enrollment capacity to accommodate any projected increase in student population over the number that would result from development in the existing zone. This criterion applies only to sites that are within a school district that has an adopted school facility plan that has been acknowledged by the City of Portland.

**217. Finding:** The David Douglas School District in East Portland is the only school district in Portland with an adopted school facility plan. Twenty-four (24) MDPs are located in the David Douglas School District. The MDP amendments create the potential for 600 units in additional development capacity over current zoning. The 2035 Comprehensive Plan BLI estimated 33,000 units of development capacity in the David Douglas School District, which means these amendments represent a marginal 2 percent increase potential development capacity.

The development capacity increase is spread over six different elementary schools and in 2017-18 elementary school enrollment declined by 3.8% in the school district. The David Douglas School District has indicated that it can accommodate any future increase in student enrollment that can be expected from these amendments.

#### 33.855.060 Approval Criteria for Other Changes

In addition to the base zones and Comprehensive Plan designations, the Zoning Map also shows overlay zones. An amendment will be approved (either quasi-judicial or legislative) if the review body finds that all of the following approval criteria are met:

- A. Where a designation is proposed to be added, the designation must be shown to be needed to address a specific situation. When a designation is proposed to be removed, it must be shown that the reason for applying the designation no longer exists or has been addressed through other means;

**218. Finding:** The MDP amendments remove the Alternative Design Density (a) Overlay Zone from 39 MPDs. The purpose of the a overlay zone, which was initially adopted in 1993, is to allow increased density for development that meets additional design compatibility requirements. The overlay zone provides for a 50 percent increase in density for projects multi-dwelling zones that voluntarily go through a Type III design review process (review by the Design Commission). These provisions have rarely been used, especially by a MDP. The MDP amendments change the density bonus from encouraging projects to go through design review to incentivizing long-term affordable housing to better meet the policies of the 2035 Comprehensive Plan.

- B. The addition or removal is consistent with the purpose and adoption criteria of the regulation and any applicable goals and policies of the Comprehensive Plan and any area plans; and

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219. **Finding:** The purpose of the Alternative Design Density Overlay Zone is to focus development on vacant sites, preserve existing housing and encourage new development that is compatible with and supportive of the positive qualities of residential neighborhoods. The overlay zone allows increased density for development that meets additional design compatibility requirements.

The MDP amendments will resolve nonconforming situations, increase maximum densities, expand density transfer provisions and allow RV parks to support the continued operation of MDPs in Portland. The amendments include development standards for perimeter landscaping that will provide vegetation buffers that can enhance the residential neighborhood surrounding the MDPs. For these amendments, the City Council has weighed providing a density bonus for design compatibility versus providing a density bonus for affordable housing and has decided an affordable housing bonus better meets the goals and policies of the 2035 Comprehensive Plan.

c. In the Marquam Hill plan district, relocation of a scenic viewpoint must be shown to result in a net benefit to the public, taking into consideration such factors as public access, the quality of the view, the breadth of the view, and the public amenities that are or will be available.

220. **Finding:** There are no MDPs in the Marquam Hill Plan District. This criterion does not apply.

## Part VIII. Zoning Code Purpose Statements

The purpose statements for the overlay zones and plan districts with MDP zoning map amendments.

### 33.420 Design Overlay Zone

#### 33.420.010 Purpose

The Design Overlay Zone promotes the conservation, enhancement, and continued vitality of areas of the City with special scenic, architectural, or cultural value. The Design Overlay Zone also promotes quality high-density development adjacent to transit facilities. This is achieved through the creation of design districts and applying the Design Overlay Zone as part of community planning projects, development of design guidelines for each district, and by requiring design review or compliance with the Community Design Standards. In addition, design review or compliance with the Community Design Standards ensures that certain types of infill development will be compatible with the neighborhood and enhance the area.

221. **Finding:** The RMP zone applies to existing development and only three MDPs are located in the Design Overlay Zone. MDPs are required to have a 10-foot perimeter landscape areas that can help respond to the public realm by providing a landscaped buffer. Therefore, as a way to encourage improvements in the parks while keeping the cost of housing in a manufactured dwelling park affordable, the new development in MDPs will be exempt from design review.

### 33.537 Johnson Creek Basin

#### 33.537.010 Purpose

The Johnson Creek Basin plan district provides for the safe, orderly, and efficient development of lands which are subject to a number of physical constraints, including significant natural resources, steep and hazardous slopes, flood plains, wetlands, and the lack of streets, sewers, and water services. At certain locations, the density of development is limited by applying special regulations to new land division proposals. In addition, restrictions are placed on all new land uses and activities to reduce stormwater runoff, provide groundwater recharge, reduce erosion, enhance water quality, and retain and enhance

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native vegetation throughout the plan district. At other locations, development is encouraged and mechanisms are included that provide relief from environmental restrictions. This plan district is intended to be used in conjunction with environmental zoning placed on significant resources and functional values in the Johnson Creek basin, to protect resources and functional values in conformance with Goal 8 of the Comprehensive Plan and Statewide Planning Goal 5.

**222. Finding:** The Johnson Creek Basic plan district allows a transfer of development rights (dwelling units) from single-dwelling zones to other sites in the plan district. The allowance includes a list of sites that are not eligible to receive transferred development rights. The RMP zone has been added to that list because the RMP zone includes an affordable housing density bonus that comes with a requirement that at least 50% of the manufactured dwelling units on the site are permanently affordable. The Johnson Creek Basin plan district transfer will not come with the same affordability requirement. The limitation is also consistent with the density transfer recommendations for the base multi-dwelling zones, which also prioritize increasing density in an MDP through an affordable housing bonus rather than a density transfer from another zone. For these amendments, the City Council has weighed allowing for transfers versus providing a density bonus for affordable housing and has decided an affordable housing bonus better meets the goals and policies of the 2035 Comprehensive Plan.