

Exhibit A:

Revised Findings of Fact Report

February 12, 2021

This continuation of the EOAH project amends the Comprehensive Plan Map and Zoning Map in two locations. Legislative amendments to the Comprehensive Plan goals, policies, map and the zoning code text must be found to be consistent with 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). In addition, zoning code text 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)

These requirements must be read in the context of a Comprehensive Plan requirement that amendments to its elements, supporting documents, and implementation tools comply with the plan itself. "Comply" means that the 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 as a whole than the existing language or designation. (Policy 1.10)

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:** As discussed in more detail below, the City Council has considered the public testimony on this matter and has considered all applicable goals and policies and has found the Expanding Opportunities for Affordable Housing Package B Comprehensive Plan Map and Zoning Map amendments (EOAHB amendments) are consistent and comply with the goals and policies of the Comprehensive Plan, Metro Urban Growth Management Functional Plan, Statewide Planning Goals and other relevant city plans.

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
- 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 service 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:** Portland adopted a Community Involvement Program on June 15, 2016. The Community Involvement Program serves as a framework to carry out policies from Chapter 2 — Community Involvement, of the 2035 Comprehensive Plan, and applies to legislative land use and transportation projects initiated by the City. Among the commitments that the City is asked to make in the Comprehensive Plan are the following:
 - To provide a wide range of opportunities for involvement in planning and investment decisions.
 - To achieve greater equity in land use actions through setting priorities and making decisions with meaningful involvement of under-served and under-represented communities.
 - To meaningfully involve, in decision making, those who potentially will be adversely affected by the results of those decisions.
 - To provide this meaningful involvement throughout the phases of planning and investment projects - issue identification and project design through implementation, monitoring, evaluation

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and enforcement.

- To provide well-designed, relevant, responsive and culturally-responsive public involvement.
- To build community capacity for meaningful participation and leadership in planning and investment decisions.

A Community Involvement Committee was appointed in June 2018 to oversee implementation of the program. Council finds that community members were afforded opportunities to be involved in all phases of the planning process. Detailed findings outlining those opportunities are found in response to Comprehensive Plan Chapter 2 goals and policies.

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 EOAHB 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 EOAHB is a continuation of the previous Expanding Opportunities for Affordable Housing (EOAH) project that was adopted by City Council in June of 2020. In the ordinance that adopted that project, Council directed staff to conduct a follow up study on five additional sites as candidates for Comprehensive Map and Zoning Map amendments. The amendments comply with this goal because, as demonstrated by these findings, the amendments were developed consistent with the Statewide Planning Goals, the Metro Urban Growth Management Functional Plan, 2035 Comprehensive Plan and Portland Zoning Code, as detailed in this ordinance.

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 EOAHB amendments.

The City Council's decision is based on the findings in this document and the findings are based on the evidence presented to the Planning and Sustainability Commission and City Council during the first phase of the EOAH. Since this project is a continuation of an already adopted project, the full record for the first phase of the EOAH are adopted by reference. The evidence incorporated in the record provides the adequate factual basis for this decision. The following link to the City's Efiles electronic archives [<https://efiles.portlandoregon.gov/Record/13592934/>] provides access to the legislative record for the first phase of the EOAH. This link was available to the public and City Council during the public hearing process for this second phase of the EOAH. The Council legislative record specifically incorporates all materials linked in the Efiles archives and on the project website which is located on the BPS website under Projects, Expanding Opportunities for Affordable Housing, and listed in the index on the project website..

Several specific facts were particularly relevant:

- The EOAHB Staff report;
- The testimony given to Council;
- Information about the presence of public facilities (water, sewer, stormwater, streets) in the vicinity of the five EOAHB change/comprehensive plan map change sites.

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

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5. **Finding:** Goal 5 addresses open spaces, scenic resources, historic resources, and natural resources.

Open Spaces. None of the map changes or code changes involve designated open spaces (OS map designations).

Scenic Resources. The City has designated scenic resources in an adopted inventory and protects them through an overlay zone (Chapter 33.480) which address landscaping, setbacks, screening, building facades and tree removal. The EOAHB amendments do not change this program. None of the five EOAHB zoning map/comprehensive plan map sites are in the scenic overlay. Therefore, the EOAH package is consistent with the scenic elements of Goal 5.

Historic Resources. Historic resources are located throughout the City. Council is not amending historic resource protections (Chapter 33.445). One of the zoning map/comprehensive plan map change sites is within the Elliot Historic Conservation District and has an existing non-contributing building on it. A second site includes a contributing resource in the Mississippi Conservation District. Any proposed alteration to historic resources will require conformance with existing historic resource protection measures including historic resource review, demolition delay or review, or design standards as applicable. Therefore, the EOAHB package is consistent with the historic elements of Goal 5. More specific findings related to the city's historic resource inventory are found in response to Comprehensive Plan Policies 4.46 through 4.58.

Natural Resources. Existing natural resource protections are not amended with the EOAH package (Chapters 33.430 and 33.465). None of the EOABH zoning map/comprehensive plan map changes include changes to sites with identified significant natural resources protected through the environmental overlay zone. Therefore, the EOAHB package is consistent with the natural resource elements of Goal 5.

Generally. As noted below in the findings for the 2035 Comprehensive Plan, the EOAHB map amendments are consistent with the goals and policies of Chapter 4 (Design and Development, including Historic and Cultural Resources) and 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, EOAHB map 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.

6. **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 EOAHB 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, the 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.

7. **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

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acknowledged by LCDC on April 25, 2017, included a development constraint analysis that identified parts of Portland that are subject to natural hazards. The City of Portland used several sources of information in its Comprehensive Plan to identify potential hazards:

- Special flood hazard area (Land area covered by the floodwaters of the base flood, as shown on the Federal Emergency Management Agency (FEMA) maps in effect on November 26, 2010);
- Floodway (The active flowing channel during a flood, as designated on the flood maps adopted under authority of Title 24 of the Portland City Code);
- 1996 Flood Inundation area (A record peak flow in February of 1996 caused the Willamette River and its major tributaries to flood. This map was created to delineate the inundated areas near the mainstem and major tributaries of the Willamette River);
- Potential Rapidly Moving Landslide Hazard Zones (as shown in the DOGAMI IMS-22 publication); and
- Deep landslide—High Susceptibility or Landslide Deposit or Scarp as shown in the DOGAMI IMS-57 publication.

Of the two sites where a zoning/comprehensive plan map change is recommended, neither falls within any of the hazard categories above. The EOAHB code changes will not expose people to additional hazard because the EOAH amendments do not include amendments to any programs or regulations that implement floodplain or landslide hazard policies. Floodplain and landslide hazard regulations would continue to apply to any development facilitated by the EOAH amendments.

As noted below in the findings for the 2035 Comprehensive Plan, the EOAHB 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, these amendments continue to protect people and property from natural hazards, 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.

8. **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."

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, and the EOAHB amendments to not change this program. The EOAHB map amendments do not affect

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any land designated as open space. More detailed findings are found in response to Comprehensive Plan Chapter 8 policies – in particular – 8.93 through 8.103, and are incorporated by reference.

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.

9. **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. The EOAHB does not reduce the supply of employment land because none of the EOAHB zoning or comprehensive plan map changes impact any existing employment land. The St Phillip the Deacon zoning map change is from a residential to a commercial/mixed use zone, which provides a small increase to the amount of land available for neighborhood-serving business.

Detailed findings on this topic are found in response to Comprehensive Plan Chapter 6 policies and are incorporated by reference.

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

10. **Finding:** Goal 10 specifies that each city must plan for and accommodate needed housing types. As used in ORS 197.307 “needed housing” means all housing on land zoned for residential use or mixed residential and commercial use that is determined to meet the need shown for housing within an urban growth boundary at price ranges and rent levels that are affordable to households within the county with a variety of incomes, including but not limited to households with low incomes, very low incomes and extremely low incomes, and includes attached and detached single-family housing and multiple family housing for both owner and renter occupancy.

Goal 10 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.

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

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housing supply, housing affordability issues and the City's ability to meet projected housing demand. 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.

Goal 10 mandates that local jurisdictions ensure adequate capacity, and provides a “floor” for such measure, but does not restrict or prevent jurisdictions from increasing housing capacity above a set “ceiling”. In other words, just because the City has shown that it meets the number of requisite units to accommodate the forecast growth, Goal 10 does not prevent the City from increasing the capacity, and especially so when such increases help improve the housing target performance in other areas of the goal (type, tenure and affordability).

EOAHB project map changes impact the City’s capacity for housing development by rezoning two institutional and residential sites to a higher density.

- The impact of these changes on housing supply are described in findings responding to Policy 5.3 of the Comprehensive Plan.
- The impact of these changes on housing choice are described in findings responding to Comprehensive Plan Policies 5.10, 5.16, 5.19, 5.22, 5.43.
- The impact of these changes on affordability are described in findings responding to Policies 5.25 through 5.30 and 5.36 of the Comprehensive Plan.

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 adopted comprehensive plan provides for 31 units per acre overall¹. The EOAHB amendments do not change minimum density requirements or remove current housing allowances. Therefore, the amendments provide for more than ten housing units per net buildable acre across the city.

As noted below in the findings for the 2035 Comprehensive Plan, the EOAHB map 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, the EOAH 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.

11. 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 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.

Findings addressing water, sanitary sewage disposal, stormwater management, and school district capacity are found in findings in response to Chapter 8 policies. Findings addressing transportation

¹ City of Portland, Ord. 188177, Vol. 1.1.A, page 40

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systems are in response to Chapter 9 policies. Therefore, as described in these findings, EOAHB 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.

- 12. Finding:** This goal requires Portland to adopt a *Transportation System Plan (TSP)* that supports safe, convenient and economical movement of people and goods, and supports a pattern of travel that will avoid air pollution, traffic and livability problems. Parts but not all of the City's *TSP* have to be adopted as part of the *Comprehensive Plan*

All cities are required to provide safe and convenient motor vehicle, pedestrian and bicycle travel on a well-connected network of streets. Larger cities are required to provide for transit service and to promote more efficient performance of existing transportation facilities through transportation system management and demand management measures.

Goal 12 rules require coordination with the state and regional transportation plans (such as the *Oregon Highway Plan* and the *Regional Transportation Plan*), and with other transportation providers. OAR 660-012-0060 states that if an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would have a significant negative impact on an existing or planned transportation facility, then the local government must take mitigating action, or plan for additional facilities to accommodate the expected impact. Generally, a jurisdiction cannot take action that significantly increases traffic on a facility that is failing to meet state, regional, or local mobility standards.

A key objective of Goal 12 (and associated administrative rules) is to reduce reliance on single occupancy automobile use, particularly during the morning and afternoon commutes. To accomplish this, the Goal requires street connectivity and land use patterns, "that make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs."

Staff examined the two EOAHB zone/comprehensive plan map changes relative to traffic modelling completed with the 2035 Comprehensive Plan adoption in 2015/16. Detailed findings describing that analysis are found in response to Comprehensive Plan Chapter 9 policies and are incorporated by reference. Those findings describe why there is not a significant impact on transportation facilities and describe how the proposal helps reduce reliance on single occupancy automobiles, and helps support more walking, bicycling, and use transit. Based on the findings in Chapter 9, the proposal satisfies Goal 12.

Goal 13. Energy Conservation. To conserve energy.

- 13. 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 EOAHB amendments do not adopt or amend a local energy policy or implementing provisions. The two zoning/comprehensive plan map changes encourage energy conservation because they change two residential sites to higher density multi-dwelling and mixed-use zones. This leads to lower energy use because these zones allow attached housing forms, which have a lower ratio of interior volume to exterior wall area.

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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.

14. **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 Goals 9 and 10, the impact of the EOAHB amendments will increase development capacity in areas located inside the urban growth boundary, further enabling the City to accommodate its forecasted growth. The amendments increase the efficient use of land by increasing housing capacity on the sites with map amendments. Therefore, the EOAH amendments are consistent with the requirements of Statewide Land Use Goal 14.

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.

15. **Finding:** Goal 15 requires cities to adopt local greenway plans, along with criteria for new development, new uses, and the increase of uses along the river. The EOAHB amendments are consistent with the requirements of Statewide Land Use Goal 15 because they do not impact any lands within the Willamette River Greenway.

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 the regional plan. Metro adopted its Urban Growth Management Functional Plan under this authority.

In Metro's 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 stating 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.

16. **Finding:** The EOAHB project map changes impact the City's capacity for housing development by rezoning two sites to a higher density. This is summarized in findings responding to policy 10.1. The zoning changes on these sites impacts approximately 35,000 square feet of land. The parcels are being rezoned to a multi-dwelling or mixed-use zone.

Title 2. Regional Parking Policy. (Repealed Ord. 10-1241B, Sec. 6, 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.

17. **Finding:** Title 3 calls for the protection of the beneficial water 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 (33.430, 33.465, 33.537, 33.563, 33.564, 33.631, 33.640) as well as 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.

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 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.

18. **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

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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.

None of the parcels impacted by the EOAHB are in Metro designated Employment Areas. Therefore, the amendments are consistent with the requirements of Metro Title 4.

Title 5. Neighboring Cities (Repealed Ord. 10-1238A, Sec. 4, 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.

19. 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.

Metro has designated the areas that may qualify for these regional incentives, including transit stations, the Central City, Gateway regional center, along with Hollywood, Hillsdale, Raleigh Hills, West Portland, Lents, and St. Johns town centers. The EOAHB amendments help to achieve the Metro 2040 Growth Concept by slightly increasing the zoned capacity near several Metro-designated centers and corridors as described in more detail in response to Comprehensive Plan policies in Chapters 5 and 10.

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.

20. 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. Therefore, Title 7 does not apply. Nevertheless, the recently adopted *2035 Comprehensive Plan* includes city-wide affordable housing production goals that greatly exceed those adopted by the outdated Title 7 (Ordinance 178832). The EOAHB amendments support the production of affordable housing by creating more flexibility to develop affordable housing on these sites.

Title 8. Compliance Procedures. Title 8 addresses compliance procedures and establishes a process for ensuring city or county compliance with requirements of the Urban Growth Management Functional Plan and for evaluating and informing the region about the effectiveness of those requirements. An amendment to a city or county comprehensive plan or land use regulation shall be deemed to comply with the functional plan upon the expiration of the appropriate appeal period specified in ORS 197.830 or 197.650 or, if an appeal is made, upon the final decision on appeal. Once the amendment is deemed to comply, the functional plan requirement shall no longer apply to land use decisions made in conformance with the amendment. A city or county proposing an amendment to a comprehensive plan or land use regulation shall submit the proposed amendment to Metro at least 35 days prior to the first evidentiary hearing on the amendment.

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21. **Finding:** Required notice was provided to Metro. Title 8 also requires the City to provide findings of compliance with the *Urban Growth Management Functional Plan*. These findings meet this requirement. All applicable requirements of Title 8 have been met.

Title 9. Performance Measures. (repealed Ord. 10-1244B, Sec. 8, 2010)

Title 10. Functional Plan Definitions. Title 10 contains definitions.

22. **Finding:** 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. The EOAHB amendments do not change any definitions in the 2035 Comprehensive Plan that are also found in Title 10. All applicable requirements of Title 10 requirements have been met.

Title 11. Planning for New Urban Areas. The purpose of Title 11 to guide long range planning for urban reserves and areas added to the UGB. It is also provides interim protection for areas added to the UGB until city or county amendments to land use regulations to allow urbanization become applicable to the areas.

23. **Finding:** The amendments do not add areas to the UGB. Therefore, this Title is not 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.

In order to protect these areas, Metro shall not require any city or county to authorize an increase in the residential density of a single-family neighborhood in an area mapped solely as Neighborhood. In addition, specific limits on access to commercial services are applied to commercial uses within designated neighborhood centers in order to reduce air pollution and traffic congestion. This Title also calls on Cities to establish a level of service standard for parks and greenspaces that calls for a park facility within a specified distance of all residences.

24. **Finding:** Title 12 largely restricts Metro's authority to plan and regulate density in single-family neighborhoods. The EOAHB map amendments were originated by the City's legislative process, respond to locally identified needs, and are not at the direction of Metro. The amendments do not include changes to Metro's neighborhood center designations or authorize any large-format commercial uses. The City has already established a goal in its Parks 2020 Vision of providing a basic, developed Neighborhood Park facility within a half mile of every Portland resident, and a Community Park within a mile of every resident. Findings related to Title 3 related to water quality are incorporated here by reference. Therefore, these amendments comply with Title 12.

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.

25. **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 (NRI) and subsequent protection measures

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through the environmental overlay zones, which Metro has found to be in substantial compliance with Title 13.

No changes to the environmental overlay zones are proposed as part of this project. Therefore, the amendments are consistent with the requirements of Title 13. More specific findings related to environmental conservation and habitat protection are found in response to Comprehensive Plan Chapter 7 policies.

Title 14. Urban Growth Management Plan. Title 14 addresses the regional urban growth boundary.

26. Finding: 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, conform 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 EOAHB amendments.

Part III. Portland's Comprehensive Plan

Portland's 2035 Comprehensive Plan was adopted as part of 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 of 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. The State re-affirmed acknowledgement of the plan on January 25, 2021 with Completion Order 001921 following resolution of the Tasks 4 and 5 appeal of the Land Conservation and Development Commission's order of approval in 2018.

28. Finding: The City Council has identified the following guiding principles, goals and policies to be applicable to the EOAHB 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 policy framework of the plan. While the policies in the Comprehensive Plan effectively ensure that the guiding principles are met, the findings below further demonstrate that in addition to meeting those specific policies on balance, the EOAHB amendments are consistent with these guiding principles as described below.

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

29. Finding: The EOAHB amendments do not change the comprehensive plan designations on any currently designated employment lands, and do not change any zoning code provisions that apply to commercial or employment areas. Therefore, there is no direct impact to employment capacity or economic activity. The amendments help support business district vitality by allowing for more households to locate in Portland, closer to goods, services, and markets. The amendments also help support the city's general economic competitiveness by increasing the available housing capacity – and opportunities for more affordable mission-driven supportive housing.

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

30. Finding: Homelessness and the housing cost burden has a direct health impact on many Portlanders – either through added economic stress and the inability to afford medical care, or through the direct impact of living outdoors. The EOAHB project is supporting human health because it focused on increasing the available housing capacity – and opportunities for more affordable mission-driven supportive housing.

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: The EOAHB amendments support this principle by promoting the development of housing on existing developed sites. This expands the capacity to provide housing in Portland without impacting natural areas and more undeveloped land.

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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: The EOAH map amendments promote equity and environmental justice because they are proposed for sites that are owned by community and faith-based organizations intending to provide affordable housing and other mission-based community benefits on those sites. One of these sites is owned by a faith-based organization that would like to redevelop the site to offer housing at 30-50% median family income (MFI). Another of the sites is owned by long-time resident of inner N Portland with intentions of offering affordable housing to residents impacted by the gentrification and displacement that has occurred in that area. The EOAHB map amendments will expand the zoning entitlements and generally allow for more flexibility in uses and development types, ultimately resulting in projects with community benefits.

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

33. Finding: The EOAH map amendments add flexibility for these sites in terms of uses and development types. For the site with the existing church on NE Knott, the change creates the opportunity for housing that is programmatically connected to the host institution, which allows for social opportunities and community connection through the institutions. The site on N Mississippi will create opportunity for Portlanders impacted by the economic shifts of gentrification and displacement to remain in what has historically been the center of the Portland's Black community. Allowing housing on these sites creates opportunity for people to be less isolated and have stronger connections to their community.

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.

34. **Finding:** As noted above, the EOAHB amendments are consistent with the guiding principles of the Comprehensive Plan. As part of an integrated approach to meet multiple goals, the City Council has considered, weighed and balanced applicable policies, as described on page HTU-5 of the Comprehensive Plan, to determine that this ordinance on the whole complies with the Comprehensive Plan. As described below, the City Council’s decision to adopt the EOAHB amendments has considered the multiple goals of the comprehensive plan, including the guiding principles, to determine that the adoption of this ordinance will ensure that 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.

35. **Finding:** The findings show how the amendments are consistent with Metro’s Urban Growth Management Functional Plan and the Statewide Planning Goals, including Goal 2 which requires coordination. Metro, TriMet, and other state agencies received notice of the proposed amendments from the 35-day DLCD notice and the City’s legislative notice.

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.

36. **Finding:** The City Council defines “effective” as being successful in producing a desired or intended result. The desired or intended result is embodied in the Guiding Principles and goals and policies of the Comprehensive Plan. These findings demonstrate how the EOAHB amendments are consistent with the Comprehensive Plan, including advancing multiple goals. These changes represent updating regulatory implementation tools that respond to community needs and identified problems, especially in addressing the need to facilitate more housing.

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 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.

37. **Finding:** The EOAH amendments include select mapping changes to one of the Comprehensive Plan’s implementation tools, the zoning map. The map amendments provide more flexibility for community-based institutions to provide housing.

The City Council defines “flexibility” as a capability to adapt to new, different, or changing requirements and “innovation” as the introduction of something new. The code amendments allow institutional uses to innovate by incorporating housing into their missions.

While these regulatory changes are primarily focused on advancing housing policies in Chapter 5, Housing, the findings herein demonstrate that other policies in other chapters are also advanced, and that on balance, shows how Council weighed and balanced the applicable policies to determine that their decision on the whole complies with the Comprehensive Plan.

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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.

38. **Finding:** The EOAHB proposal includes- amendments to the 2035 Comprehensive Plan map. As noted above, the amendments are consistent with the guiding principles of the 2035 Comprehensive Plan.

The findings in this exhibit demonstrate how the EOAHB amendments are consistent with the 2035 Comprehensive Plan including advancing multiple goals, and utilizing regulatory implementation tools that promote current and future interests (including addressing shifting demographic and changing housing needs), provide certainty in terms of development entitlements while allowing for innovation by removing conditional use review requirements. The findings additionally show how the amendments are consistent with the Urban Growth Management Functional Plan, and the Statewide Planning Goals. Metro, TriMet, and other state agencies received notice of the proposed EOAH amendments from the 35-day DLCD notice and the City’s legislative notice.

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.
39. **Finding:** The EOAHB amendments do not change the structure of these plan elements. This policy does not apply.

Supporting Documents

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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)
40. **Finding:** The above-noted supporting documents are not impacted by the EOAH amendments. This Policy is not applicable.
 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.
41. **Finding:** As demonstrated in the findings for Statewide Planning Goal 11, the EOAHB amendments do not significantly impact the provision of public services 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. The EOAHB amendments do not amend the Citywide Systems Plan (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.*
42. **Finding:** As demonstrated in the findings for Statewide Planning Goal 12 (Transportation) and the goals and policies of Chapter 9 (Transportation), allowances for additional residential density have been evaluated to ensure that these changes do not impact the transportation system. The EOAHB amendments are consistent with and do not amend the Transportation System Plan. The two sites with zoning map amendments are found in parts of the city and with high public services. Therefore, the City continues to plan for public infrastructure investments to maintain and strengthen the multimodal transportation infrastructure.
 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.
43. **Finding:** David Douglas School District (DDSD) is currently the only school district in Portland with an adopted school facility plan that meets this policy. None of the zoning/comprehensive plan map changes recommended with EOAHB is a site in the DDSD.

Implementation tools

Policy 1.3. Implementation tools subject to the Comprehensive Plan. Maintain Comprehensive Plan

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implementation tools that are derived from, and comply with, the Comprehensive Plan.

Implementation tools include those identified in policies 1.4 through 1.9.

44. **Finding:** The EOAHB amendments maintain and amend the comprehensive plan implementation tools as described below in Policies 1.4 through 1.9. Consistency with the comprehensive policies and guiding principles for relevant amendments are demonstrated elsewhere in these findings.

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

45. **Finding:** Title 33 is the adopted and effective zoning code tool for the city. The EOAHB changes will amend the Zoning Map and the Comprehensive Map and make no changes to the Title 33.

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

46. **Finding:** The EOAHB amendments include Zoning Map amendments intended to implement the policy framework of the Comprehensive Plan. The Zoning Map is amended for two sites, both of which are consistent with the zoning and comprehensive plan map pattern of the vicinity.

Policy 1.6 Service coordination agreements. Maintain coordination agreements with local governments of adjoining jurisdictions concerning mutual recognition of urban service boundaries; special service districts concerning public facilities and services within Portland's Urban Services Boundary; and public school districts concerning educational facilities within Portland's Urban Services Boundary.

47. **Finding:** The city maintains several intergovernmental agreements concerning mutual recognition of urban service boundaries; special service districts concerning public facilities and services within Portland's Urban Services Boundary; and with public school districts. This policy is not relevant to the EOAHB amendments because there are no changes being made to these coordination agreements.

Policy 1.7 Annexations. Provide a process incorporating urban and urbanizable land within the City's Urban Services Boundary through annexation. See policies 8.11-8.19 for service extension requirements for annexations.

48. **Finding:** The city has a process for incorporating urban and urbanizable land. EOAHB amendments do not include any annexations nor change current processes for incorporation of land. Therefore, this policy is not relevant.

Policy 1.8 Urban renewal plans. Coordinate Comprehensive Plan implementation with urban renewal plans and implementation activities. A decision to adopt a new urban renewal district, adopt or amend goals and objectives that will guide investment priorities within a district, or amend the boundaries of an existing district, must comply with the Comprehensive Plan.

49. **Finding:** The EOAHB amendments do not include changes to existing, or any new urban renewal plans. Therefore, this policy is not relevant.

Policy 1.9 Development agreements. Consider development agreements entered into by the City of Portland and pursuant to Oregon Revised Statute 94 a Comprehensive Plan implementation tool.

50. **Finding:** The EOAHB amendments do not affect nor necessitate development agreements. Therefore, this policy is not relevant.

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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.

- 51. Finding:** The City Council finds that this is a fundamental policy of the Comprehensive Plan that guides the manner in which the City Council considers amendments to the Plan itself or any implementing regulations, such as the Zoning Code. The City Council interprets the policy to require the Council to consider whether, after considering all relevant facts, an amendment is equally or more supportive of the Comprehensive Plan. The City Council finds that an amendment is equally supportive when it is on its face directly supported by goals and policies in the Plan. The City Council finds that an amendment is more supportive of the Comprehensive Plan when the amendment will further advance goals and policies, particularly those that are aspirational in nature. The City Council finds that the policy requires consideration as to whether amendments are equally or more supportive of the Plan *as a whole*. The City Council finds that amendments do not need to be equally or more supportive with individual goals and policies, but rather amendments must be equally or more supportive of the entire Comprehensive Plan. Therefore, the City Council finds that there may be instances where specific goals and policies are not supported by the amendments but still the amendment is equally or more supportive of the entire Comprehensive Plan when considered cumulatively. Council notes that the Comprehensive Plan introduction explains that “[t]he Comprehensive Plan contains a broad range of policies for Council to consider. Each policy describes a desirable outcome. But it is unlikely that all policies are relevant to a particular decision and that a particular decision could be expected to advance all of the policies in the plan equally well. Even the strongest policies do not automatically trump other policies. Every decision is different, with different facts. The particular policies that matter will change from one decision to another. There is no set formula—no particular number of ‘heavier’ policies equals a larger set of ‘lighter’ policies. In cases where there are competing directions embodied by different policies, City Council may choose the direction they believe best embodies the plan as a whole.” 2035 Comprehensive Plan, page HTU-5.

The EOAHB amendments are legislative amendments to the Zoning Map and Comprehensive Plan Map. These findings identify how the amendments comply with the Comprehensive Plan. That is, the amendments are evaluated against the Comprehensive Plan’s Guiding Principles, goals, and policies, as detailed throughout this set of findings. As described in the finding for Policy 1.2, the factual basis of the supporting documents is not changed by this ordinance.

The City Council finds that these amendments are equally or more supportive of the Comprehensive Plan because they increase housing diversity and allow for construction of more affordable housing.

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Findings in Chapter 10 further address consistency with the Comprehensive Plan 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.

52. **Finding:** The EOAHB amendments provide additional residential capacity in Portland as described in Chapter 5 findings. This supports Metro’s plan for a tight urban growth boundary by reducing pressure to develop housing in new greenfield areas.

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.

53. **Finding:** See findings in Part I, Statewide Planning Goals which demonstrate consistency.

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.

54. **Finding:** The EOAHB amendments were developed to be consistent with applicable state and federal regulations, including the fair housing act.

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.

55. **Finding:** As demonstrated in the findings for Statewide Planning Goal 11 and Chapter 8 (Public Facilities and Services) and 9 (Transportation) of the Comprehensive Plan, City Council considered the impacts on the existing and future availability and capacity of urban public facilities and services consistent with this policy.

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.

56. **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 EOAHB amendments. In addition, the City sent a separate legislative notice to Multnomah County, adjacent cities, Metro and TriMet.

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.

57. **Finding:** These two map amendments are a follow-on to the original Expanding Opportunities for Affordable Housing package of code and map amendments that were adopted in June of 2020

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(Ordinance #190000). At the time of adoption, City Council directed staff to further study a package of five sites, evaluate (with community) the sites for map amendment suitability, and present a recommendation back to Council. Prior to the adoption of that ordinance, the PSC reviewed the EOAH amendments over the course of three meetings:

- Jan. 14, 2020 – Briefing
- Feb. 11, 2020 – Public hearing
- March 10, 2020 – Discussion and recommendation

Since this package is a continuation of the EOAH project and does not change the amendments previously adopted and the PSC has already reviewed and made a recommendation on the project, Council finds that it is not necessary for Package B of map amendments to be brought again before the PSC.

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.

58. Finding: The Community Involvement Committee was appointed in June 2018 and reviews and advises the way City staff engage with the public in land use and transportation planning. Staff consulted with the BPS Community Engagement Coordinator at the outset of the plan and worked closely with that staff along with the Executive Director of Ecumenical Ministries of Oregon to create an outreach and involvement plan. The Community Involvement Committee was not at the point of regularly meeting when this project began, and consequently they were not consulted with. The Community Engagement Coordinator was helpful in the design and implementation of outreach work for the project, including the public event that kicked it off in November 2018, and subsequent meetings with partner organizations and the SAC. The project’s community involvement program is detailed more in the findings for Chapter 2, Community Involvement.

Policy 1.18. Quasi-judicial amendments to the Comprehensive Plan Map. Applicants for quasi-judicial amendments to the Comprehensive Plan Map must show that the requested change adheres to Policies 1.10 through 1.15 and:

- Is compatible with the land use pattern established by the Comprehensive Plan Map.
- Is not in conflict with applicable adopted area-specific plans as described in Policy 1.19, or the applicable hearings body determines that the identified conflict represents a circumstance where the area specific plan is in conflict with the Comprehensive Plan and the proposed amendment is consistent with the Comprehensive Plan.

The Hearings Officer must review and make recommendations to the City Council on all quasi-judicial amendments to the Comprehensive Plan Map using procedures outlined in the Zoning Code.

59. Finding: This policy concerns quasi-judicial amendments to the Comprehensive Plan Map and is not applicable to this project, which is a legislative project.

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

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

- 60. Finding:** The EOAHB amendments do not include or amend area specific plans. Policy 1.19 directs that existing area-specific plans be used to provide additional detail or refinements at a smaller geographic scale, like centers or corridors. Area and community plans relevant to the EOAHB map changes have been reviewed for relevant policy guidance. Responses to these policies are contained in Part IV: Area-Specific Plans.

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.

61. **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. As noted above, this project is a continuation of the original package of EOAH amendments code and map amendments. During the testimony phase of that project, at both the PSC and Council hearings, several additional sites were identified for map amendments. Since these site nominations came late in the process, City Council directed staff to study the nominated sites, which is how EOAH Package B came to be. As a follow-on to an adopted project, Council adopts by reference the Chapter 2 findings for the first EOAH package (Ordinance #190000, Exhibit A) with additional findings for Package B below.

Package B: Targeted Outreach. The City Council directive to staff contained five sites for further study. Staff created a tailored outreach plan for each site that followed the same general pattern:

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- Staff contacted and met with the testifier(s) who initially nominated the site for inclusion
- Staff contacted and met with the property owner (if different from the nominator)
- Staff compiled a list of interested parties for each site, including anyone who testified about the site in the previous hearings, neighbors, neighborhood association representatives, relevant community groups, and any other interested parties as identified by any of the above parties
- Staff notified all of the identified interested parties of an open meeting to discuss the proposed map amendments
- Meetings were held (via Zoom) for four of the five sites on the following dates:
 - November 5, 2020: Property east of 6140 SW Boundary Street
 - November 16, 2020: 4505 & 4515 N Mississippi Street
 - November 19, 2020: 2800 N Vancouver Avenue
 - November 24, 2020: 120 & 130 NE Knott Street

Note: no meeting was held for the fifth site at 6161 SE Stark Street as there was no longer interest in moving forward with the proposal by either the nominator or the property owner.

Package B: Staff Report. On February 5, 2021 the Staff Report was published, presenting the staff's recommendations to City Council. On March 3, 2021, the Portland City Council held a virtual public hearing on the EOAHB package.

A notice of public hearing was mailed on February 5, 2021 to parties who participated in the Planning and Sustainability Commission hearings, to neighborhood associations, and to others who had requested notification of all legislative land use actions. A Measure 56 notice was mailed on February 5, 2021 to the owners of property subject to recommended map amendments. A postcard was also mailed on February 5, 2021 to property owners within 400 feet of the map amendment sites.

In light of the COVID-19 outbreak, as well as following directives outlined in Governor Brown's Executive Order no. 20 – 16, the March 3, 2021 hearing was held virtually, allowing the public to testify using a telephone, mobile device, or computer. The hearing was also streamed on YouTube and televised. All of the notices described above explained in detail how interested persons could participate in the virtual Council hearing by oral testimony or in writing. The above-described sequence ensured public participation in the decision making in a safe manner during the COVID – 19 outbreak.

In summary, the public engagement process provided opportunities for interested parties to comment on and influence the project at each step, including at the PSC and City Council. The outreach and engagement process utilized various methods and forums to interact and solicit input from a wide variety of perspectives. Staff made presentations to community groups and provided one-on-one communication with individuals and organizations requesting information, supporting the goal of meaningful community involvement.

As noted below in these findings, the EOAHB amendments are consistent with and comply with each of the applicable 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

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reference. The events and outreach strategies summarized here demonstrate consistency with the requirements of Statewide Planning Goal 1.

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.

62. Finding: This policy directs the City to maintain partnerships and coordinate community engagement on a programmatic level. As noted above, the EOAHB is the second package of map amendments for an already approved project. As such, it is a continuation of the work that was started with the first package of EOAH amendments. For that project, the project manager was a BPS District Liaison for Northeast Portland, who had relationships with community-based organizations within the district and beyond. During the first phase of this project, the District Liaison was able to broaden those relationships by focusing on faith and mission-based organizations specifically interested in potentially developing affordable housing. Many of those organizations, particularly in Northeast Portland, serve communities of color. For EOAH Package B, a new project manager led the project, but continued the work of building partnerships with community groups, particularly in Northeast Portland. Consequently, the project has provided the opportunity for a broader base of relationship-building between City staff and mission-based and social justice organizations.

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.

63. Finding: This policy directs the City to work with coalitions and associations to increase participation and improve communication on a programmatic level and is not specific to a particular legislative project.

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-

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represented groups impacted by the decision. Maximize economic, cultural, political, and environmental benefits through ongoing partnerships.

64. Finding: The EOAHB map amendments are proposed for two sites, one of which is owned by a faith-based organization and the other is owned by a longtime resident of Northeast Portland with ties to the that area’s historic Black community. On both sites, the intention is to provide affordable housing and other mission-based community benefits. The map changes will expand the zoning entitlements and generally allow for more flexibility in uses and development types, ultimately resulting in projects with community benefits.

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.

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

65. Finding: Council interprets this policy to mean that plans and investments each contribute to the elimination of these disproportionate burdens over the duration of the planning period. The goal of the changes proposed by EOAHB is to expand opportunities for the development of affordable housing by community-based organizations. The map changes proposed are intended to benefit organizations that are stymied by costs associated with develop. By eliminating these barriers, organizations may be better able to pursue development projects that will provide housing and other community benefits to communities of color and low-income populations.

Invest in education and training

Policy 2.5. Community capacity building. Enhance the ability of community members, particularly those in under-served and/or under-represented groups, to develop the relationships, knowledge, and skills to effectively participate in plan and investment processes.

Policy 2.6. Land use literacy. Provide training and educational opportunities to build the public’s understanding of land use, transportation, housing, and related topics, and increase capacity for meaningful participation in planning and investment processes.

Policy 2.7. Agency capacity building. Increase City staff’s capacity, tools, and skills to design and implement processes that engage a broad diversity of affected and interested communities, including under-served and under-represented communities, in meaningful and appropriate ways.

66. Finding: As noted above, the EOAHB is the second package of map amendments for an already approved project. As such, it is a continuation of the work that was started with the first package of EOAH amendments. Through that project, staff serving as the project manager was also a District Liaison for BPS. In that capacity and as project manager, staff was able to broaden outreach to more faith and community-based organizations. In the process of relationship building, staff had the opportunity to educate more groups on how to participate in the planning process, and how to access other City programs and initiatives, including the budget process. The City’s partnership with Metro, which funded the grant that includes the proposed zoning code and map changes, brought greater capacity at the staff level to engage and educate a broader swath of the community who are mission driven and social justice oriented. Staff used this legislative process as an opportunity to

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provide education in basic land use literacy and City processes, and in gaining access to City staff and decisionmakers.

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.

67. Finding: The City Council interprets this policy to create the opportunity for the community and advisory committees to have opportunities to communicate their issues and concerns to the PSC and City Council outside of the formal legislative process. These changes are a legislative process with formal opportunities to testify to communicate directly with City Council. Therefore, this policy does not apply.

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.

Policy 2.11. Open data. Ensure planning and investment decisions are a collaboration among stakeholders, including those listed in Policy 2.1. Where appropriate, encourage publication, accessibility, and wide-spread sharing of data collected and generated by the City.

68. Finding: Policies 2.9 through 2.11 concern how the City collects and makes available data that supports land use decisions. In this case, the Metro-funded grant process provided a mechanism for participating organizations to work directly with project consultants to advance their understanding of the development and real estate considerations impacting their site.

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 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.

69. Finding: As described in the findings above, the legislative process for the EOAHB follows up on the process for the first package of EOAH amendments, and as such the EOAHB built on the community engagement process for that portion of the project. The EOAHB was very clear in scope that it was to only focus on the five sites that Council directed staff to study. The process was clearly outlined

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in notices and documents as to how to testify to Council. The Staff Report was published with information about how to testify.

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.

During the first phase of the project EOAH, BPS staff presented at various community meetings to inform people of the proposed amendments. All meetings and events were open to the public and included opportunities for public comment.

Community involvement program

Policy 2.16. Community Involvement Program. Maintain a Community Involvement Program that supports community involvement as an integral and meaningful part of the planning and investment decision-making process.

Policy 2.17. Community engagement manual. Create, maintain, and actively implement a community engagement manual that details how to conduct community involvement for planning and investment projects and decisions.

Policy 2.18. Best practices engagement methods. Utilize community engagement methods, tools, and technologies that are recognized as best practices.

Policy 2.19. Community Involvement Committee. The Community Involvement Committee (CIC), an independent advisory body, will evaluate and provide feedback to City staff on community involvement processes for individual planning and associated investment projects, before, during, and at the conclusion of these processes.

Policy 2.20. Review bodies. Maintain review bodies, such as the Planning and Sustainability Commission (PSC), Design Commission, Historic Landmarks Commission, and Adjustment Committee, to provide an opportunity for community involvement and provide leadership and expertise for specialized topic areas.

Policy 2.21. Program evaluation. Periodically evaluate the effectiveness of the Community Involvement Program and recommend and advocate for program and policy improvements. The Community Involvement Committee (CIC) will advise City staff regarding this evaluation.

Policy 2.22. Shared engagement methods. Coordinate and share methods, tools, and technologies that lead to successful engagement practices with both government and community partners and solicit engagement methods from the community.

Policy 2.23. Adequate funding and human resources. Provide a level of funding and human resources allocated to the Community Involvement Program sufficient to make community involvement an integral part of the planning, policy, investment and development process.

70. Finding: These policies concern the City's Community Involvement Program and are not applicable because the EOAHB amendments do not change this program.

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

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prioritizing projects and/or other types of implementation.

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.

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

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.

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

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.

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.

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.

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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.

71. **Finding:** Policies 2.24 through 2.37 concern how the community involvement program is designed and developed to support planning and investment projects. As described in the findings above, the legislative process for the EOAHB followed up on the process for the first package of EOAH amendments. The EOAHB was very clear in scope that it was to only focus on the five sites that Council directed staff to study. As such, a new process was not designed for the EOAHB. Findings for the full process design and evaluation of the EOAH were included with the ordinance adopting that package of amendments (Ordinance #190000).

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.

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.

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 land use decisions, consistent with federal regulations.

72. **Finding:** Consistent with Policies 2.38 – 2.41 and BPS community involvement practices, meetings, open house events, and all public meetings, described in more detail in the findings above and in the findings for the original EOAH package (Ordinance #190000), were held at locations that could accommodate people with disabilities, meetings were noticed, and information was provided online. Information about accommodation and translation was provided on all notices. The City sent the required Measure 56 notice to the property owners initially proposed for a zoning map amendment on February 5, 2021. The City also 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. The City sent a legislative notice on February 5, 2021 to interested parties, and others that participated in the PSC hearings to inform them of the opportunity to testify at the March 3, 2021 City Council public hearing.

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.

73. Finding: These goals address the large-scale form of the city, and the spatial layout of the city as a whole. The EOAHB map changes primarily relate to land use regulations at a parcel-specific level. In general, the impact of the EOAHB proposal is focused on a specific collection of institutional properties. This impact is fine grained, and site-specific, and does not impact the large-scale spatial layout of the City. As described below, the EOAHB code and map changes are consistent with and comply with each of the applicable goals and policies of Chapter 3.

Citywide design and development

Policy 3.1 Urban Design Framework. Use the Urban Design Framework (UDF) as a guide to create inclusive and enduring places, while providing flexibility for implementation at the local scale to meet the needs of local communities.

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.

74. Finding: These policies and the UDF encourage a centers and corridors based growth pattern. The EOAHB project zone changes are consistent with these policies because the sites are located close to frequent service bus lines. Both of the sites being re-zoned to a higher density with the EOAHB project are within a few blocks walk from a designated center and near to corridors and transit station areas.

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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. Incorporate requirements into the Zoning Code to provide public and community benefits as a condition of development projects to receive increased development allowances.

3.3.e. When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.

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

3.3.g. Encourage developers to engage directly with a broad range of impacted communities to identify potential impacts to private development projects, develop mitigation measures, and provide community benefits to address adverse impacts.

75. **Finding:** The EOAH map amendments create community benefits by expanding the options available to the community and faith-based organizations that own those properties to develop affordable housing on their property in the future. Both of these properties are owned by individuals or organizations that serve communities of color, low-income and under-served people. The map changes will expand the zoning entitlements and generally allow for more flexibility in uses and development types, ultimately resulting in projects with community benefits.

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.

76. **Finding:** The City Council interprets this policy to be focused on creating a supportive built environment for children, the elderly and people with disabilities. Specifically, the policy is focused on the built environment of centers, corridors and residential areas where children, the elderly and people with disabilities inhabit the city. Allowing housing to be developed on institutional sites creates the opportunity for housing that is programmatically connected to the host institution. Many older adults find social opportunities and community connection through institutions that are impacted by the EOAHB changes. The changes enable these institutions to consider senior housing development on their site. This creates opportunity for older adults to retain connections to their community.

Policy 3.5. Energy and resource efficiency. Support energy-efficient, resource-efficient, and

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sustainable development and transportation patterns through land use and transportation planning.

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.

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

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.

77. Finding: Policies 3.5 through 3.8 address energy, resource and land efficiency, integration of nature into design, and high-performance design. The EOAHB amendments are map related and do not change any design-related development standards, or natural resources standards. The EOAHB amendments encourage efficient use of land by facilitating the development of housing on underutilized land on institutional use sites.

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.

78. Finding: The EOAHB map changes are proposed for two sites that are owned by community and faith-based entities planning to provide affordable housing or other mission-based community benefits on those sites. The map changes will expand the zoning entitlements and generally allow for more flexibility in uses and development types for those organizations, ultimately resulting in more affordable housing projects.

Policy 3.10. Rural, urbanizable, and urban land. Preserve the rural character of rural land outside the Regional Urban Growth Boundary. Limit urban development of urbanizable land beyond the City Limits until it is annexed and full urban services are extended.

79. Finding: The EOAHB amendments provide for increased residential capacity within the City Limits, and do not impact rural land outside the UGB. This policy does not apply.

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

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- Neighborhood boundaries and transitions

80. Finding: The EOAH code and map changes impact institutional uses in the community – primarily community-based and faith-based organizations. The map changes being made provide more flexibility to add housing to these sites, along with small scale additions to the non-residential use. These changes help community institutions respond to changing demographics and provide additional ways to maintain these sites as important community places.

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 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.

81. Finding: Policies 3.12 through 3.20 provide guidance on how centers identified on the comprehensive plan map should evolve over time. The policies address investments, uses, the relationship of centers to transportation networks, design, and development. The EOAHB amendments do not directly affect planned investments in Centers, or any of the ways centers are connected to the rest of the City. While the EOAHB amendments do not directly impact development in centers, they do reinforce the importance of centers because both of the sites being re-zoned to a higher density with the EOAHB project are within a few blocks walk from a designated center.

Central City

Policy 3.21. Role of the Central City. Encourage continued growth and investment in the Central City,

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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.

82. **Finding:** The EOAHB amendments do not impact any land within 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.

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.

83. **Finding:** Policies 3.27 through 3.30 provide direction on the desired characteristics and functions of the Gateway Regional Center. None of the EOAHB map changes are in the Gateway Regional Center. The EOAHB code changes encourage housing development and are therefore consistent with these policies.

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.

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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.

84. Finding: Policies 3.31 through 3.34 provide direction on the desired characteristics and functions of the town centers. The EOAHB amendments do not change the boundary any of the Town Centers on the Urban Design Framework. While the EOAH amendments do not directly impact development in town centers, they do reinforce the importance of centers because both of the sites being re-zoned to a higher density with the EOAH project are within a few blocks walk from a designated 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.

85. Finding: Policies 3.35 through 3.38 provide direction on the desired characteristics and functions of neighborhood centers. The EOAH amendments do not change the neighborhood center boundaries on the Urban Design Framework. These policies are principally targeted at multi-dwelling and mixed-use zones. While the EOAHB amendments do not directly impact development in centers, they do reinforce the importance of centers because both of the sites being re-zoned to a higher density with the EOAH project are within a few blocks walk from a designated center.

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

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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.

86. Finding: Policies 3.39 through 3.43 provide direction on the desired characteristics and functions of the Inner Ring Districts. These are the pre-automobile neighborhoods within short distance of the Central City. They include some of Portland's oldest neighborhoods, including Buckman, Albina, and Northwest Portland. In the mid-20th-century many older buildings in these neighborhoods were demolished to make way for transportation infrastructure and parking. These policies encourage infill development to re-establish the historic pedestrian-oriented urban form and acknowledge the close proximity of the Central City's array of services, jobs, and amenities. The EOAHB project is consistent with these policies because it will allow more flexibility to re-purpose land for housing and other small-scale community uses.

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.

87. Finding: Policies 3.44 through 3.47 provide direction on the desired characteristics and functions of corridors as well as street design and future land use changes. The EOAHB amendments do not change the boundary of corridors on the Urban Design Framework, impact transportation facility design, or amend the TSP. Both of the EOAHB zoning/comprehensive plan map change sites are near corridors. These map changes are consistent with these policies because they provide for more housing capacity along or near corridors.

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.

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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.

88. **Finding:** Policies 3.48 through 3.51 provide direction on the desired characteristics and functions of civic corridors as well as street design and future land use changes. The EOAHB amendments do not change the boundary of corridors on the Urban Design Framework, impact transportation facility design, or amend the TSP.

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.

89. **Finding:** This policy provides direction on the desired characteristics and functions of corridors as well as street design and future land use changes. The EOAHB amendments do not change the boundary of neighborhood corridors on the Urban Design Framework or amend the TSP. Both of the EOAH zoning/comprehensive plan map change sites are near neighborhood corridors. These map changes are consistent with these policies because they provide for more housing capacity along neighborhood corridors.

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 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.

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90. Finding: These policies generally relate to station planning and supportive active transportation infrastructure and future land use changes. The EOAHB amendments do not change the boundary of station areas on the Urban Design Framework or amend the TSP. Both of the EOAHB zoning/comprehensive plan map change sites are near designated station areas. These map changes are consistent with these policies because they provide for more transit-supportive housing capacity.

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.

91. Finding: These policies primarily relate to the design and construction of improvements for City Greenways and not to the development requirements for lots that abut them. This policy does not apply.

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.

92. Finding: Habitat corridors are mapped on Figure 3-6 of the Comprehensive Plan. The EOAHB amendments do not affect limits on building coverage, nor change Title 11 tree preservation and density requirements that apply in development situations. None of the EOAH zoning/comprehensive plan map change sites are in or near habitat corridors.

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.

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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).

93. Finding: The City Council interprets the verb “enhance”, which is not defined in the 2035 Comprehensive Plan, to mean to intensify or improve. The City Council interprets this policy to acknowledge the role that regional truck corridors play in our transportation system and to take steps to improve those functions. Portland’s approach to regional truck corridors is unchanged because the EOAHB amendments do not amend the Citywide System Plan or the Transportation System Plan; and do not impact employment land. Therefore, the City continues to plan for public infrastructure investments to maintain and strengthen the regional truck corridors in the employment areas.

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.

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,

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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.

94. **Finding:** The EOAHB project does not impact any land in the Willamette Greenway or along the Columbia shoreline. These policies are not applicable.

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.

95. **Finding:** The EOAHB amendments do not impact any land within 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 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,

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regular lot patterns, and streets lined by planting strips and street trees in Inner Neighborhood residential areas.

96. Finding: Policies 3.87 through 3.91 provide direction on the desired characteristics and functions of the Inner Neighborhoods. The Inner Neighborhoods were developed and shaped during the Streetcar Era of the late 19th and early 20th centuries. The Inner Neighborhoods are characterized by a regular pattern of neighborhood business districts located along former streetcar streets interspersed with residential areas. These policies express the overall design approach in Inner Neighborhoods. They address block patterns, infill development, building orientation and design, and active transportation. The EOAHB project is consistent with these policies because it will allow more flexibility for infill development on underutilized land. The design-oriented policies are not applicable because EOAHB does not include any changes to building or street design standards.

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.

97. Finding: Policies 3.92 through 3.97 provide direction on the desired characteristics and functions of the Eastern Neighborhoods Pattern Area. They address street patterns, site development, natural features, and active transportation. The EOAHB amendments primarily address use-related standards (where housing is allowed without a land use review), and do not change any site development standards, transportation standards, or natural resources standards. These policies do not apply.

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

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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 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.

98. Finding: Policies 3.98 through 3.102 provide direction on the desired characteristics and functions of the Western Neighborhoods Pattern Area. They address commercial development patterns, natural features, and trails. The EOAHB amendments do not include land in the Western Neighborhoods. These policies do not apply.

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.

99. **Finding:** These goals and many of the policies in this chapter address site and building design. In general most of the goals and the policies in this chapter do not apply because the EOAHB map amendments do not change any existing design or development standards that have an impact on building form or site design. As described below, the EOAHB map changes are consistent with and comply with each of the applicable goals and policies of Chapter 4.

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.

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.

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Policy 4.8. Alleys. Encourage the continued use of alleys for parking access, while preserving pedestrian access. Expand the number of alley-facing accessory dwelling units.

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.

100.Finding: Policies 4.1 through 4.9 relate to site and building design. They address issues such as design features, site planning, building orientation, public space, and temporary transitional structures. The EOAHB amendments are map amendments. These policies do not apply because the EOAHB amendments do not change any site or building design regulations. Housing or other structures that are built as a result of these amendments will be otherwise required to meet the development standards of the base zone.

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.

101.Finding Policies 4.10 through 4.14 relate to site and building design. They address issues such as site planning, solar access, and design approaches that reduce crime or mitigate seismic hazards. The EOAHB amendments are map amendments. These policies do not apply because the EOAHB amendments do not change any site or building design regulations. Housing or other structures that are built as a result of these amendments will be otherwise required to meet the development standards of the base zone. The existing development standards include setbacks and step-downs to promote light and air and solar access, requirements for pedestrian and bike facilities to promote active living, windows and building orientation standards consistent with crime prevention best practices.

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 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.

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Policy 4.17. Demolitions. Encourage alternatives to the demolition of sound housing, such as rehabilitation and adaptive reuse, especially affordable housing, and when new development would provide no additional housing opportunities beyond replacement.

Policy 4.18. Compact single-family options. Encourage development and preservation of small resource-efficient and affordable single-family homes in all areas of the city.

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

102.Finding: Policies 4.15 through 4.19 address uses and design in residential areas. The EOAHB amendments are map amendments. These policies do not apply because the EOAHB package does not change any architectural or building design standards.

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.

103.Finding: Policies 4.20 through 4.29 address design and development in centers and along corridors. The policies provide guidance on development scale, streetscapes, gathering spaces, public art, and historic preservation. The EOAHB amendments are map amendments. These policies do not apply because the EOAHB amendments do not change any

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existing design or development standards that have an impact on building form or the relationship of buildings to the street. The EOAHB amendments do not impact programs related to street design, public art, or the planning and creation of public open space. Historic preservation is addressed in separate findings below (policies 4.46 through 4.58).

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.

104.Finding: Policies 4.30 through 4.32 address scale and use transitions. The EOAHB amendments are map amendments. The EOAHB amendments do not change any existing building size, setback, or landscaping standards that apply where zoning designations transition. Any housing built taking advantage of the new allowances would still have to meet existing development standards that apply to these transitional situations.

The zoning/comprehensive plan map change at 4505/4515 N Mississippi included with the EOAHB package will re-designate property from residential to multi-dwelling. The City's multi-dwelling zones (33.120) contain standards for special setbacks and building "step downs" where there is an abutting lower density single-dwelling zone.

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.

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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.

Policy 4.39. Airport noise. Partner with the Port of Portland to require compatible land use designations and development within the noise-affected area of Portland International Airport, while providing disclosure of the level of aircraft noise and mitigating the potential impact of noise within the affected area.

Policy 4.40. Telecommunication facility impacts. Mitigate the visual impact of telecommunications and broadcast facilities near residentially zoned areas through physical design solutions.

105.Finding: Policies 4.33 through 4.40 generally address impacts that can negatively affect adjacent residential uses and areas. They are implemented through a variety of design and impact-related performance standards in the zoning code. For the single dwelling zones, current base zone development standards address potential off-site impacts through existing setback requirements, tree density standards, limitations on commercial uses and signage. Offsite impacts are additionally addressed in Chapter 33.262. Existing regulations in the Portland International Airport Noise Impact Zone (33.470) are unchanged, and areas with high noise impacts (68 and higher DNL) where new residential uses are prohibited are unaffected by the housing type allowances in the EOAHB amendments. These policies do not apply because the EOAHB amendments do not change any site or building design regulations, or any of the specific implementing regulations related to these policies. Housing or other structures that are built as a result of these amendments will be otherwise required to meet the development standards of the base zone, and the applicable off-site impact standards.

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.

106.Finding: The City has designated scenic resources in an adopted inventory and protects them through an overlay zone (Chapter 33.480) which address landscaping, setbacks, screening, building facades and tree removal. The EOAHB amendments do not change this program. Neither of the EOAHB zoning map/comprehensive plan map sites are in the scenic overlay.

Historic and cultural resources

Policy 4.46. Historic and cultural resource protection. Protect and encourage the restoration of

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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.

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.

107.Finding: These policies address historic and cultural resources. Both of the zoning/comprehensive plan map amendment sites in the EOAHB package are located in Conservation Districts:

- 120 & 120 NE Knott are noncontributing resources in the Eliot Conservation District
- 4505 & 4515 N Mississippi are both contributing resources in the Mississippi Conservation District

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Existing historic resource protections—including applicable demolition and design protections-- would continue to apply on sites containing inventoried and designated historic resources. In general, the EOAHB amendments create added flexibility for adaptive re-use of these sites, consistent with policies 4.56 and 4.57.

There are no known archeological resources on any of the sites impacted by the EOAHB amendments.

Policy 4.48 has two objectives: 1) to encourage development and 2) to preserve and complement historic resources. City Council finds that meeting this policy requires allowing new development within the existing built environment. This includes new development that is adjacent to individual historic resources. Regarding the second part, City Council finds that Policy 4.48 requires mechanisms for the protection of historic resources and provisions for requiring new development to complement those resources. As used in the Comprehensive Plan, “Preserve” means to save from significant change or loss and reserve for a special purpose. “Complement” means to add to, enhance, or improve. The Council also acknowledges that sensitive infill development on a site with historic resources can also provide economic opportunities that can support the preservation, restoration and reuse of those historic structures.

Policy 4.49 discusses the role of base zoning in historic districts and requires consideration of the character of the historic resources in the district. The established urban fabric found in Historic and Conservation Districts includes characteristics of the built environment present during the historic period of significance, as well as those present today. This fabric may include, but is not limited to, block and street patterns, architectural style, massing, and height. Information about the established urban fabric found in a Historic or Conservation District can be found in the nomination for historic designation, the district design guidelines, and the built environment today.

4505 & 4515 N Mississippi

In the case of the Mississippi Avenue site, new structures and certain alterations to existing structures on the site are subject to Historic Resource Review, with the Community Design Guidelines serving as the approval criteria. Additionally, contributing structures in the Mississippi Conservation District are subject to a 120-Day Demolition Delay.

The recommended zoning change at the site is to the RM2 designation, a multi-dwelling designation, with a Multi-Dwelling — Corridor Comprehensive Plan designation. The RM2 zone has a 45-foot base height limit. The RM2 zoning regulations also include step-down requirements to 35 feet within 25 feet of a single-dwelling zone lot line boundary. Additionally, the owner of Therefore, the City Council finds that RM2 zoning on this site complements the historic resources on the site, the contributing resources within the Mississippi Conservation District, and the Mississippi District as a whole. Because new development on the site will require Historic Resource Review, there is a mechanism in place for consideration of architectural style and the relationship of the new buildings to contributing buildings and the street and block pattern of the district. Finally, the owner of 4515 N Mississippi, Dianne Clay, stated in her testimony to City Council dated May 13, 2020 that she provides affordable housing in a rooming house on the site that provides rooms at 25% below market rate for the area, and that she intends to expand the facility on that site to provide additional affordable housing if the map changes are adopted, allowing for the rehabilitation of the building on that site. Council finds that placing an RM2 zone on the site

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complements the historic resources on the site by providing economic opportunities for the reuse and rehabilitation of the building.

120 & 130 NE Knott

In the case of the Knott Street site, new structures on the site are subject to Historic Resource Review, with the Community Design Guidelines serving as the approval criteria. Since the structures on both sites are noncontributing resources, certain alterations would be subject to Historic Resource Review. Demolition review or delay are not required for noncontributing structures. The site also has a parking lot where housing could potentially be added without impacting historic structures. Parking lots were not features of the landscape during the period of time when the surrounding district initially developed, so redevelopment in that location will bring the site closer to having a built character similar to the surrounding historic neighborhood.

The recommended zoning change at the site is to the CM3 designation, a mixed-use designation. Buildings in this zone can be 55 to 75 feet high. The adjacent properties to the east, south, and west also have the same mixed-use designations, creating a corridor of mixed-use zoning. Only one of the 4 surrounding properties has a structure with historic significance. To the east of the site is the Albina Library building, which is a designated landmark. The required Historic Resource Review provides a mechanism to consider how any new development on this site can relate to the adjacent landmark building. There is a parking lot owned by the Multnomah County Library to the south of the site. The property to the west of the site is an electric substation. To the north of the site is a non-contributing late 20th Century two-story apartment building with R1 zoning. The R1 zone allows buildings to be up to 35 feet and is often used as a buffer between mixed-use zones and the lower-scale single dwelling zones.

Public art

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

108.Finding: This policy is not applicable. No changes to public art programs or new incentives are proposed with the EOAHB project.

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.

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.

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

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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.

109.Finding: Policies 4.61 through 4.72 address resource efficiency and resilience – primarily related to building design. This includes consideration of energy use, water use, use of recycled and healthy building materials, seismic standards, and adoptive re-use. The EOAHB amendments are map amendments. These policies do not apply because the amendments do not change any existing design or development standards that have an impact on building form or resource efficiency. The EOAHB amendments do not impact programs related to water or energy efficiency, recycling, or seismic resiliency.

The EOAHB amendments support Policy 4.60 because they enable adaptive re-use of underutilized land associated with institutional uses for needed housing.

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.

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.

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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.

110.Finding. Policies 4.73 through 4.78 provide direction regarding the interface between development and natural features and functions. They address site and building design and access to nature. The EOAHB amendments are map amendments. These policies do not apply because the amendments do not change any existing design or development standards that have an impact on building form or site design. The EOAHB amendments to not impact programs related to accessing 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 4.82. Portland Harbor Facilities. Reduce natural hazard risks to critical public and private energy and transportation facilities in the Portland Harbor.

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.

111.Finding: Policies 4.79 through 4.84 provide direction regarding the interface of development with natural hazards. The policies address climate, geology, disaster recovery, and reducing risks at harbor-related facilities.

The EOAHB amendments are map amendments. These policies generally do not apply because the EOAHB amendments do not change any site or building design regulations.

The EOAH amendments to not change existing city programs related to disaster planning and reducing hazard-related risks. 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

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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.

The EOAHB amendments have no impact on harbor lands, so policy 4.82 is not applicable.

Additional findings related to this topic are found in response to Comprehensive Plan policies 8.104 through 8.111, and state Goal 7.

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.

112.Finding: Policies 8.85 through 4.88 address ways that programs and land use plans can facilitate better access to healthy food. The EOAHB amendments are map amendments. These policies do not apply because the EOAHB amendments do not change any programs related to food access, and the land use changes being made are specific to existing conditional use sites. This project did not rezone broad areas or neighborhoods in a way that could have created the opportunity to consider more opportunities for gardens, markets, or corner grocery stores. The mixed use zoning proposed for one of the two EOAHB sites will provide a small increase in land available for neighborhood-serving business.

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.

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.

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.

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.

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.

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113.Finding: The EOAHB map amendments support these Housing goals by allowing faith- and community-based organizations to add more housing to their sites, increasing the affordable housing supply and therefore providing more equitable access to housing. The map amendments are proposed for two sites, both of which are in areas of high public services and access to transit and transportation options, thus offering more housing potential with equitable access. As described below, the EOAHB map changes are consistent with and comply with each of the applicable goals and policies of Chapter 5.

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.

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.The EOAHB amendments impact the City’s capacity for housing development by rezoning two sites to a higher density. This is summarized in findings responding to policy 10.1 below. The zoning changes on these sites impact approximately 0.8 acres of land that are being rezoned for higher intensity development, adding zoned capacity for additional housing units within the City.

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 combination of voluntary approaches, regulations, or incentives.” The EOAHB amendments promote the evolving needs of Portland households by allowing for more zoned housing capacity in the City. All of the sites with zoning map amendments will be changed to a more intensive zone, either to a higher-density Multi-dwelling or Mixed Commercial zone. These changes will allow for more flexibility in housing types in the most urban locations. The amendments will also offer mission-based organizations that want to develop housing on their land more options for home ownership opportunities and multi-unit housing alternatives for lower-income populations.

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: All of the sites being re-zoned to a higher density with the EOAHB project are within a few blocks walk from a designated center on the Portland Comprehensive Plan.

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

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centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.

117.Finding: As noted above, the sites being re-zoned to a higher density with the EOAHB project are within a few blocks walk from a designated center. One of the sites is being rezoned to RM2, which is a low-density multi-dwelling zone that allows for a range of middle housing options, including plexes, townhouses, and small apartment buildings. This greater range of housing options accommodates a broader diversity of income levels, allowing more people to live close to centers and corridors.

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.

118.Finding: The EOAHB amendments encourage the adaptation of existing institutional facilities to incorporate needed housing, expanding the variety of housing available. By utilizing available land on these sites, new housing can more easily be developed with the streamlined regulations adopted under the first EOAH project, some of which will likely be adaptable to accommodate various household types and changing demographics.

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. The EOAHB amendments encourage accessibility because they expand the amount of land that is zoned for multi-dwelling housing forms. Larger multi-unit buildings will have more requirements for physical accessibility. The proposed map amendments are on land owned by faith- and community-based organizations that are interested in developing housing that will serve a diverse range of needs. These sites are in centers and areas of high public services.

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 EOAHB amendments facilitate the development of housing by rezoning some land. The sites impacted by this change are located in inner North/Northeast Portland neighborhoods that have historically been home to a higher proportion of protected class populations. Both of the organizations with plans for projects on their sites are mission-driven entities with an interest in development of affordable housing. The EOAHB project therefore support furthering fair housing.

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 EOAHB map amendments remove regulatory barriers to providing more housing in areas where there are fewer choices today. One of the map amendments changes the zoning from Single-dwelling to Multi-dwelling, while the other increases the allowed density of housing on the

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site. This will allow development by right of more housing types, which will potentially provide more housing choice for a broader range of people.

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, and decisions by landlords to redevelop property.

The EOAH project rezones some institutional and residential land to a higher density. Beneficiaries could include the institution itself (St. Phillip the Deacon Church), people affiliated with the institution, and people seeking housing in North and Northeast Portland, where both rezone sites are located. Because the two sites are owned either by a mission driven entity or a provider of affordable housing, both of which have an interest in creating affordable housing opportunities, these changes may lead to a larger supply of affordable housing, which will generally benefit lower income Portlanders. Some immediate neighbors of the redesignated parcels may be impacted by increased activity on the site – construction or the impacts of additional housing (traffic, parking, etc.). These impacts will not be concentrated in any one location.

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.

123.Finding: This policy is not relevant because this ordinance amends the zoning code and land banking programs are not authorized or managed through the zoning code. The EOAHB amendments support the creation of more affordable housing units by rezoning land to allow for higher residential density.

Policy 5.18. Rebuild communities. Coordinate plans and investments with programs that enable

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communities impacted by involuntary displacement to maintain social and cultural connections, and re-establish a stable presence and participation in the impacted neighborhoods.

124.Finding: Both of the sites subject to zoning changes with the EOAHB project are located in the Albina area of inner NE Portland, where urban revitalization over the past two decades has caused cultural and economic displacement. Allowing housing on these sites will create revenue for the cultural institution of St. Phillip the Deacon and create opportunities for the development of regulated affordable housing with a priority to previously displaced individuals or households.

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.

125.Finding: Allowing more housing to be developed on the subject sites creates the opportunity for housing that is programmatically connected to the host institution. Many older adults find social opportunities and community connection through institutions that are impacted by the EOAHB changes (faith-based organizations). The changes enable these institutions to consider senior housing development on their site. This creates opportunity for older adults to retain connections to their community.

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.

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.

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.

126.Finding: The Census Bureau uses a set of income thresholds that vary by family size and composition to determine who classifies as impoverished. If a family's total income is less than the family's threshold then that family and every individual in it is considered to be living in poverty. High poverty areas are interpreted to mean areas with more than 25% poverty rate. According to US HUD, census tracts around Cully, Portsmouth, Wilkes, Centennial, Powelhurst-Gilbert, Lents, Montavilla, Buckman, Elliot, and the Central City have these higher poverty rates. Housing needs are coordinated as these high poverty areas are also the areas that qualify for the Low-Income Housing Tax Credit, a tool that is frequently used in combination with other city-incentives including CET and SDC waivers to produce regulated affordable housing units. The EOAHB amendments support development of these affordable units by providing additional land in these areas in the Eliot Neighborhood zoned for multi-dwelling development that could be eligible for various affordable housing incentives.

These policies are also intended to ensure that affordable housing is not concentrated in areas where land values are the lowest, which often correspond to lower opportunities. More housing is encouraged in areas with better access to those ingredients that help support prosperity. Neighborhoods in Portland offer varying levels of opportunity (see Figure 5-1 – Housing Opportunity Map), with housing in high-opportunity neighborhoods tending to be expensive compared to more affordable housing in areas that offer fewer opportunities. The EOAHB project

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zone changes are consistent with this policy because both of the zone change sites are in the high or medium opportunity areas as shown on Figure 5-1 of the Comprehensive Plan.

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.

127.Finding: The sites being re-zoned to a higher density with the EOAHB project are within a few blocks walk from a designated center on the Portland Comprehensive Plan.

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.

128.Finding: David Douglas School District (DDSD) is the only school district in Portland with an adopted school facility plan. Neither of the zoning/comprehensive plan map changes recommended with EOAHB is a site in the DDSD.

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.

129.Finding: The EOAHB amendments are consistent with this policy because it is a response to community-based organizations that have requested greater zoning flexibility to provide affordable housing on sites they control.

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.

130.Finding: The EOAHB amendments support the voluntary production of regulated affordable housing by community-based organizations. The two sites receiving zone changes with the EOAHB project are owned by entities with plans to develop or expand affordable housing projects or provide other related community benefits. The package of map amendments will allow increased housing density, thus encouraging housing production. While there is no guarantee that these sites will be developed with affordable housing, the two property owners requesting the map changes have stated in testimony on the record that they intend to use the sites to maintain or develop affordable housing. The property owner of the St. Philip the Deacon site (120 NE Knott) stated in their testimony dated May 19, 2020 that they intend to develop the site for affordable housing and have been working with Leaven Community Housing Coalition and an architect to come up with a proposal for that site. The owner of 4515 N Mississippi, Dianne Clay, stated in her testimony to City Council dated May 13, 2020 that she provides affordable housing in a rooming house on the site that provides rooms at 25% below market rate for the area, and that she intends to expand the facility on that site to provide additional affordable housing if the map changes are adopted.

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

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131.Finding: As of August 1, 2016, new residential development and additions that are valued above \$100,000 are required to pay a one-percent affordable housing construction excise tax. This tax pays for affordable housing programs, including: production and preservation of housing for people with incomes at or below 60% (MFI), incentives for inclusionary zoning, and State of Oregon homeownership programs. The EOAHB amendments do not impact this program.

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.

132.Finding: Council interprets this policy to apply to ongoing intergovernmental coordination, and not a directive to be applied with each land use plan amendment. This policy is not applicable.

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

133.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. As described above in response to Policy 5.26, the EOAHB amendments support the production of regulated affordable housing by community-based organizations.

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 energy-efficiency investments to reduce overall housing costs.

134.Finding: The EOAHB project includes zoning/comprehensive map changes that would allow increased housing density. Increasing density encourages more energy-efficient housing and also provides for lowered housing transportation costs by allowing more housing to locate near urban amenities. As people live closer together, the average size of their private living space shrinks, their heating and cooling costs decline, and they have less need for individual vehicles.

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.

Policy 5.32 Affordable Housing in Centers. Encourage income diversity in and around centers by allowing a mix of housing types and tenures.

135.Finding: The EOAHB project zone changes are consistent with these policies because both of the zone change sites are in the high or medium opportunity areas as shown on Figure 5-1 of the Comprehensive Plan and are within a few blocks walk from a designated center on the Portland Comprehensive Plan.

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.

136.Finding: The EOAHB zoning map/comprehensive plan map changes do not impact 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

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assistance programs for households whose needs are not met by the private market.

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.

137.Finding: Inclusionary housing regulations were adopted in 2018. The EOAHB amendments do not change that program.

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.

138.Finding: The EOAHB project includes zoning/comprehensive map changes that would allow increased housing density. Increasing density encourages more energy-efficient housing and also provides for lowered housing transportation costs by allowing more housing to locate near urban amenities. As people live closer together, the average size of their private living space shrinks, their heating and cooling costs decline, and they have less need for individual vehicles.

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 mobile home park.

139.Finding: Existing mobile home parks have been recently rezoned to RMP (Residential Manufactured Dwelling Park) to implement this policy. The EOAHB amendments do not impact any land with RMP zoning. Therefore, this policy does not apply.

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.

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.

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

140.Finding: The EOAHB amendments do not change employment-related development regulations.

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.

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141.Finding: Council finds that Policies 5.38 through 5.43 all aim to support opportunities for homeownership for all Portlanders, including historically under-served and under-represented Portlanders. They also encourage compact single-dwelling homes, and homes affordable to middle-income Portlanders.

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 and do not apply to this legislative project.

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: The EOAHB amendments provide more flexibility for the provision of supportive housing on institutional sites.

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.

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

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.

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.

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.

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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.

144.Finding: Policies 5.47 through 5.53 relate to the design of housing. The EOAH amendments do not change any development standards that govern the design of housing. These policies do not apply.

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.

145.Finding: The EOAHB amendments do not alter regulations establishing tenant protections including required relocation assistance when properties are sold and/or redeveloped (PCC 30.01.085). As a result, this policy does not apply.

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.
- 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.

146.Finding: The EOAHB amendments do not change the comprehensive plan designations of any currently designated employment lands. Therefore, there is no impact to employment capacity. The amendments help support business district vitality by allowing for more households to locate in Portland, closer to goods, services, and markets. As described below, the EOAHB map changes are consistent with and comply with each of the applicable goals and policies of Chapter 6.

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).

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.

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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 6.11. Sharing economy. Encourage mechanisms that enable individuals, corporations, non-profits, and government to market, distribute, share, and reuse excess capacity in goods and services. This includes peer-to-peer transactions, crowd funding platforms, and a variety of business models to facilitate borrowing and renting unused resources.

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.

147.Finding: Policies 6.1 through 6.12 provide direction regarding economic and employment growth. The EOAHB amendments do not affect any land designated for industrial or employment uses. The amendments do not affect the base development capacity in the commercial mixed-use areas. Therefore, there is no impact to employment capacity.

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.

148.Finding: The EOAHB amendments do not change the comprehensive plan designations of any currently designated employment lands. Therefore, there is no impact to employment capacity.

Policy 6.14. Brownfield redevelopment. Overcome financial-feasibility gaps to cleanup and redevelop 60 percent of brownfield acreage by 2035.

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

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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:

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 6.18. Evaluate land needs. Update the Economic Opportunities Analysis and short-term land supply strategies every five to seven years.

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

149. Finding: Policies 6.13 through 6.16 provide direction regarding land supply and development sites and regulations in employment areas. The EOAHB amendments do not change the comprehensive plan designations or regulations affecting any currently designated employment lands. The amendments do not change the development standards or requirements for designated employment lands. Therefore, these policies are not applicable.

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.

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Policy 6.25. Import substitution. Encourage local goods production and service delivery that substitute for imports and help keep the money Portlanders earn in the local economy.

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.

150.Finding: The EOAHB amendments address housing on two specific sites, and do not impact the city and regional business climate. Policies 6.20 through 6.26 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 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 6.28. East Portland job growth. Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.

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.

Policy 6.30. Disparity reduction. Encourage investment in, and alignment of, public efforts to reduce racial, ethnic, and disability-related disparities in income and employment opportunity.

Policy 6.31. Minority-owned, woman-owned and emerging small business (MWESB) assistance. Ensure that plans and investments improve access to contracting opportunities for minority-owned, woman-owned, and emerging small businesses.

Policy 6.32. Urban renewal plans. Encourage urban renewal plans to primarily benefit existing residents and businesses within the urban renewal area through:

- Revitalization of neighborhoods.
- Expansion of housing choices.
- Creation of business and job opportunities.
- Provision of transportation linkages.
- Protection of residents and businesses from the threats posed by gentrification and displacement.
- The creation and enhancement of those features which improve the quality of life within the urban renewal area.

151. Finding: Policies 6.27 through 6.32 address industrial districts, job creation, access to employment opportunities, reduction of employment disparities, and the creation of urban renewal plans. The EOAHB amendments do not address or amend urban renewal plans, or have any impact on employment land, or access to employment opportunity. These policies do not apply.

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.

152.Finding: The EOAHB amendments have no impact on the Central City or Marquam Hill. 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.

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.

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Policy 6.39. Harbor access lands. Limit use of harbor access lands to river- or rail-dependent or related industrial land uses due to the unique and necessary infrastructure and site characteristics of harbor access lands for river-dependent industrial uses.

Policy 6.40. Portland Harbor Superfund Site. Take a leadership role to facilitate a cleanup of the Portland Harbor that moves forward as quickly as possible and that allocates cleanup costs fairly and equitably. Encourage a science-based and cost-effective cleanup solution that facilitates re-use of land for river- or rail-dependent or related industrial uses.

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 6.42. Columbia East. Provide a mix of industrial and limited business park development in Columbia East (east of 82nd Avenue) that expand employment opportunities supported by proximity to Portland International Airport and multimodal freight access.

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 6.45. Industrial brownfield redevelopment. Provide incentives, investments, technical assistance and other direct support to overcome financial-feasibility gaps to enable remediation and redevelopment of brownfields for industrial growth.

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 6.48. Fossil fuel distribution. Limit fossil fuels distribution and storage facilities to those necessary to serve the regional market.

Policy 6.49. Industrial growth and watershed health. Facilitate concurrent strategies to protect and improve industrial capacity and watershed health in the Portland Harbor and Columbia Corridor areas.

Policy 6.50. District expansion. Provide opportunities for expansion of industrial areas based on evaluation of forecasted need and the ability to meet environmental, social, economic, and other goals.

Policy 6.51. Golf course reuse and redevelopment. Facilitate a mix of industrial, natural resource, and public open space uses on privately-owned golf course sites in the Columbia Corridor that property owners make available for reuse.

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.

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- 153. Finding:** Policies 6.36 through 6.55 provide direction regarding industrial and employment districts. The EOAHB amendments do not change the comprehensive plan designations or regulations affecting any currently designated industrial or employment lands. Therefore, there is no impact to the development capacity of the City's industrial and employment districts.

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 6.58. Development impacts. Protect the livability of surrounding neighborhoods through adequate infrastructure and campus development standards that foster suitable density and attractive campus design. Minimize off-site impacts in collaboration with institutions and neighbors, especially to reduce automobile traffic and parking impacts.

Policy 6.59. Community amenities and services. Encourage campus development that provides amenities and services to surrounding neighborhoods, emphasizing the role of campuses as centers of community activity.

Policy 6.60. Campus edges. Provide for context-sensitive, transitional uses, and development at the edges of campus institutions to enhance their integration into surrounding neighborhoods, including mixed-use and neighborhood-serving commercial uses where appropriate.

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.

- 154. Finding.** Policies 6.56 through 6.61 provide direction regarding campus institutions. The EOAHB amendments do not change the comprehensive plan designations or regulations affecting any currently designated campus institutional lands. Therefore, there is no impact to the development capacity of the City's campus institutional lands.

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.

- 155. Finding.** Policies 6.62 through 6.64 provide direction regarding neighborhood districts, which primarily have commercial/mixed use zoning. One of the zoning map amendments at the St. Philip the Deacon site supports this policy by changing approximately 25,500 square feet of land from a residential to a commercial/mixed use zone. The property owner of the St. Philip the Deacon site (120 NE Knott) stated in their testimony dated May 19, 2020 that they intend to develop the site for affordable housing and have been working with Leaven Community Housing Coalition and an

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architect to come up with a proposal for that site. The property owner has also stated that they will continue to provide church and social services on the site, therefore it will be a mixed-use site, and could also potentially provide a small increase to the amount of land available for small neighborhood-serving business

Policy 6.65. Home-based businesses. Encourage and expand allowances for small, low-impact home based businesses in residential areas, including office or personal service uses with infrequent or by-appointment customer or client visits to the site. Allow a limited number of employees, within the scale of activity typical in residential areas. Allow home-based businesses on sites with accessory dwelling units.

Policy 6.66. Neighborhood-serving business. Provide for neighborhood business districts and small commercial nodes in areas between centers to expand local access to goods and services. Allow nodes of small-scale neighborhood-serving commercial uses in large planned developments and as a ground floor use in high density residential areas.

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 6.68. Investment priority. Prioritize commercial revitalization investments in neighborhoods that serve communities with limited access to goods and services.

Policy 6.69. Non-conforming neighborhood business uses. Limit non-conforming uses to reduce adverse impacts on nearby residential uses while avoiding displacement of existing neighborhood businesses.

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 6.72. Community economic development. Encourage collaborative approaches to align land use and neighborhood economic development for residents and business owners to better connect and compete in the regional economy.

6.72.a. Encourage broad-based community coalitions to implement land use and economic development objectives and programs.

6.72.b. Enhance opportunities for cooperation and partnerships between public and private entities that promote economic vitality in communities most disconnected from the regional economy.

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6.72.c. Encourage cooperative efforts by area businesses, Business Associations, and Neighborhood Associations to work together on commercial revitalization efforts, sustainability initiatives, and transportation demand management.

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.

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.

156.Finding: Policies 6.62 through 6.73 provide direction regarding neighborhood commercial districts, which primarily have commercial/mixed use zoning. One of the zoning map amendments supports this policy by changing approximately 25,500 square feet of land from a residential to a commercial/mixed use zone. The property owner of the St. Philip the Deacon site (120 NE Knott) stated in their testimony dated May 19, 2020 that they intend to develop the site for affordable housing and have been working with Leaven Community Housing Coalition and an architect to come up with a proposal for that site. The property owner has also stated that they will continue to provide church and social services on the site, therefore it will be a mixed-use site, and could also potentially provide a small increase to the amount of land available for small neighborhood-serving business.

Chapter 7: Environmental and Watershed Health

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

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.

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.

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.

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

157.Finding: These goals focus on City programs and actions to improve environmental quality, watershed health, and resilience. They also provide direction regarding planning for natural resource protection, and provide a framework governing the City's environmental overlay zones. There are also a number of watershed specific policies in this Chapter that provide additional guidance. The EOAHB amendments do not include amendments to any programs or regulations that implement these goals. As described below, the EOAH code and map changes are consistent with and comply with each of the applicable goals and policies of Chapter 7.

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.

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.

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.

Policy 7.6. Hydrology. Through plans and investments, improve or support efforts to improve

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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.
- Promote restoration and protection of floodplains.

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.

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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.

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.

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 7.18. 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.

158.Finding: Policies 7.1 through 7.18 are focused on City programs and actions to improve environmental quality and resilience. These policies address City actions, coordination, and in some cases regulatory systems related to development. The EOAHB amendments do not include amendments to any programs or regulations that implement these policies. 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.

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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.

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.

159.Finding: These policies provide direction regarding planning for natural resource protection. 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

The City’s environmental zones are the primary zoning tool to protect resources and functional values that have been identified by the City as providing benefits to the public. The EOAHB amendments do not change these zones or regulations. The amendments do not include or change any land acquisition programs which will continue to be coordinated between City bureaus and other agencies and organizations.

The EOAHB zoning map/comprehensive plan map changes do not include any sites with identified significant natural resources protected through the environmental overlay zone. These policies do not apply.

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

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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.

160. Policies 7.23 through 7.26 provide direction regarding the protection of significant natural resources in development situations. 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. The EOAHB amendments do not change the environmental overlay regulations.

Aggregate resources

Policy 7.27. Aggregate resource protection. Protect aggregate resource sites for current and future use where there are no major conflicts with urban needs, or where these conflicts may be resolved.

Policy 7.28. Aggregate resource development. When aggregate resources are developed, ensure that development minimizes adverse environmental impacts and impacts on adjacent land uses.

Policy 7.29. Mining site reclamation. Ensure that the reclamation of mining sites protects public health and safety, protects fish and wildlife (including at-risk species), enhances or restores habitat (including rare and declining habitat types), restores adequate watershed conditions and functions on the site, and is compatible with the surrounding land uses and conditions of nearby land.

161. **Finding:** Policies 7.27 through 7.29 provide direction regarding aggregate resources. The EOAHB amendments do not impact aggregate resources or mine sites. These policies do not apply.

Columbia River Watershed

Policy 7.30. In-water habitat. Enhance in-water habitat for native fish and wildlife, particularly in the Oregon Slough and near-shore environments along the Columbia River.

Policy 7.31. Sensitive habitats. Enhance grassland, beach, riverbanks, wetlands, bottomland forests, shallow water habitats, and other key habitats for wildlife traveling along the Columbia River migratory corridor, while continuing to manage the levees and floodplain for flood control.

Policy 7.32. River-dependent and river-related uses. Maintain plans and regulations that recognize the needs of river-dependent and river-related uses while also supporting ecologically-sensitive site design and practices.

162. **Finding:** Policies 7.30 through 7.32 provide direction regarding habitat and river-related uses in the Columbia River Watershed. The EOAHB amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat enhancement, or river-dependent or river-related uses. None of the sites subject to zoning or comprehensive plan map amendments abut or are near the Columbia River.

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.

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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 7.36. South Reach ecological complex. Enhance habitat quality and connections between Ross Island, Oaks Bottom, and riverfront parks and natural areas south of the Central City, to enhance the area as a functioning ecological complex.

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.

Policy 7.42. Forest Park. Enhance Forest Park as an anchor habitat and recreational resource.

163.Finding: Policies 7.33 through 7.42 provide direction regarding habitat and river-related uses in the Willamette River Watershed. The EOAHB amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. Both of the zone change/comprehensive plan map amendment sites in the EOAHN package are in the Willamette Watershed, but they are urban sites with no water features or identified natural resources.

Columbia Slough Watershed

Policy 7.43. Fish passage. Restore in-stream habitat and improve fish passage within the Columbia Slough, including for salmonids in the lower slough.

Policy 7.44. Flow constriction removal. Reduce constriction, such as culverts, in the slough channels, to improve the flow of water and water quality.

Policy 7.45. Riparian corridors. Increase the width, quality, and native plant diversity of vegetated riparian buffers along Columbia Slough channels and other drainageways within the watershed, while also managing the slough for flood control.

Policy 7.46. Sensitive habitats. Enhance grasslands and wetland habitats in the Columbia Slough, such as those found in the Smith and Bybee Lakes and at the St. Johns Landfill site, to provide habitat for sensitive species, and for wildlife traveling along the Columbia and Willamette river migratory corridors.

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Policy 7.47. Connected rivers habitats. Enhance upland habitat connections to the Willamette and Columbia rivers.

Policy 7.48. Contaminated sites. Ensure that plans and investments are consistent with and advance programs that facilitate the cleanup, reuse, and restoration of contaminated sites that are adjacent, or that discharge stormwater, to the Columbia Slough.

Policy 7.49. Portland International Airport. Protect, restore, and enhance natural resources and functions in the Portland International Airport plan district, as identified in Portland International Airport/Middle Columbia Slough Natural Resources Inventory. Accomplish this through regulations, voluntary strategies, and the implementation of special development standards.

164.Finding: Policies 7.43 through 7.49 provide direction regarding the environment and watershed health in the Columbia Slough Watershed. The EOAHB amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. None of the zone change/comprehensive plan map amendment sites are in the Columbia Slough Watershed. These policies do not apply.

Fanno and Tryon Creek Watersheds

Policy 7.50. Stream connectivity. Encourage the daylighting of piped portions of Tryon and Fanno creeks and their tributaries.

Policy 7.51. Riparian and habitat corridors. Protect and enhance riparian habitat quality and connectivity along Tryon and Fanno creeks and their tributaries. Enhance connections between riparian areas, parks, anchor habitats, and areas with significant tree canopy. Enhance in-stream and upland habitat connections between Tryon Creek State Natural Area and the Willamette River.

Policy 7.52. Reduced hazard risks. Reduce the risks of landslides and streambank erosion by protecting trees and vegetation that absorb stormwater, especially in areas with steep slopes or limited access to stormwater infrastructure.

165.Finding: Policies 7.50 through 7.52 provide direction regarding habitat and river-related uses in the Fanno and Tryon Creek Watersheds. The EOAHB amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. None of the zone change/comprehensive plan map amendment sites are in the Fanno and Tryon Creek Watersheds. These policies do not apply.

Johnson Creek Watershed

Policy 7.53. In-stream and riparian habitat. Enhance in-stream and riparian habitat and improve fish passage for salmonids along Johnson Creek and its tributaries.

Policy 7.54. Floodplain restoration. Enhance Johnson Creek floodplain functions to increase flood-storage capacity, improve water quality, and enhance fish and wildlife habitat.

Policy 7.55. Connected floodplains, springs, and wetlands. Enhance hydrologic and habitat connectivity between the Johnson Creek floodplain and its springs and wetlands.

Policy 7.56. Reduced natural hazards. Reduce the risks of landslides, streambank erosion and downstream flooding by protecting seeps, springs, trees, vegetation, and soils that absorb stormwater in the East Buttes.

Policy 7.57. Greenspace network. Enhance the network of parks, trails, and natural areas near the Springwater Corridor Trail and the East Buttes to enhance habitat connectivity and nature-based

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recreation in East Portland.

166.Finding: Policies 7.53 through 7.57 provide direction regarding the environment and watershed health in the Johnson Creek Watershed. The EOAHB amendments do not affect the environmental zones that apply in this area or programs related to habitat or watershed health. The amendments also do not amend the Johnson Creek Basin Plan District. None of the zone change/comprehensive plan map amendment sites are in the Johnson Creek Watershed. 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.

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.

167.Finding: The policies in this chapter, and these goals, generally address provision of public services, and adequacy of services as it relates to growth and development. The adopted 2035

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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.

Many of these goals and policies are not applicable because they guide public agencies that provide public facilities, on how those facilities should be provided. That said, some goals and policies in this chapter are potentially relevant to changes in the comprehensive plan map – if the map changes shift development to places that are more difficult to serve, or places where it is infeasible to provide a service.

The policy-specific findings below address water, sewer, stormwater, and school facilities.

Transportation facilities are addressed under Chapter 9 (Transportation), below.

The findings for Statewide Planning Goal 11 also address public facilities and are incorporated by reference.

As described below, the EOAHB code and map changes are consistent with and comply with each of the applicable goals and policies of Chapter 8.

Service provision and urbanization

Policy 8.1. Urban services boundary. Maintain an Urban Services Boundary for the City of Portland that is consistent with the regional urban growth policy, in cooperation with neighboring jurisdictions. The Urban Services Boundary is shown on the Comprehensive Plan Map.

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

Policy 8.3. Urban service delivery. Provide the following public facilities and services at urban levels of service to urban lands within the City’s boundaries of incorporation:

- Public rights-of-way, streets, and public trails
- Sanitary sewers and wastewater treatment
- Stormwater management and conveyance
- Flood management
- Protection of the waterways of the state
- Water supply
- Police, fire, and emergency response
- Parks, natural areas, and recreation
- Solid waste regulation

Policy 8.4. Supporting facilities and systems. Maintain supporting facilities and systems, including public buildings, technology, fleet, and internal service infrastructure, to enable the provision of public facilities and services.

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Policy 8.5. Planning service delivery. Provide planning, zoning, building, and subdivision control services within the boundaries of incorporation, and as otherwise provided by intergovernmental agreement within the City’s Urban Services Boundary.

168. **Finding:** The City Council interprets policies 8.1 through 8.5 provide direction on the provision of public facilities and services and the process of urbanization. The EOAHB amendments do not urbanize land that is not already urban or include new public facility or infrastructure projects. These policies do not apply.

Service coordination

Policy 8.6. Interagency coordination. Maintain interagency coordination agreements with neighboring jurisdictions and partner agencies that provide urban public facilities and services within the City of Portland’s Urban Services Boundary to ensure effective and efficient service delivery. See Policy 8.3 for the list of services included. Such jurisdictions and agencies include, but may not be limited to:

- Multnomah County for transportation facilities and public safety.
- State of Oregon for transportation and parks facilities and services.
- TriMet for public transit facilities and services.
- Port of Portland for air and marine facilities and services.
- Metro for regional parks and natural areas, and for solid waste, composting, and recycling facilities and transfer stations.
- Gresham, Milwaukie, Clackamas County Service District #1, and Clean Water Services for sanitary sewer conveyance and treatment.
- Multnomah County Drainage District No. 1, Peninsula Drainage District No 1, and Peninsula Drainage District No. 2 for stormwater management and conveyance, and for flood mitigation, protection, and control.
- Rockwood People’s Utility District; Sunrise Water Authority; and the Burlington, Tualatin Valley, Valley View, West Slope, Palatine Hill, Alto Park, and Clackamas River Water Districts for water distribution.
- Portland Public Schools and the David Douglas, Parkrose, Reynolds, Centennial, and Riverdale school districts for public education, park, trail, and recreational facilities.

Policy 8.7. Outside contracts. Coordinate with jurisdictions and agencies outside of Portland where the City provides services under agreement.

Policy 8.8. Public service coordination. Coordinate with the planning efforts of agencies providing public education, public health services, community centers, urban forest management, library services, justice services, energy, and technology and communications services.

Policy 8.9. Internal coordination. Coordinate planning and provision of public facilities and services, including land acquisition, among City agencies, including internal service bureaus.

Policy 8.10. Co-location. Encourage co-location of public facilities and services across providers where co-location improves service delivery efficiency and access for historically under-represented and under-served communities.

169. **Finding:** The City Council interprets policies 8.6 through 8.10 to provide direction on coordination with neighboring jurisdictions and partner agencies that provide urban public facilities and

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services within the City of Portland's Urban Services Boundary. The EOAHB amendments do not include new public facility or infrastructure projects or amendments to public service coordination agreements. These policies do not apply.

Service extension

Policy 8.11. Annexation. Require annexation of unincorporated urbanizable areas within the City's Urban Services Boundary as a prerequisite to receive urban services.

Policy 8.12. Feasibility of service. Evaluate the physical feasibility and cost-effectiveness of extending urban public services to candidate annexation areas to ensure sensible investment and to set reasonable expectations.

Policy 8.13. Orderly service extension. Establish or improve urban public services in newly-annexed areas to serve designated land uses at established levels of service, as funds are available and as responsible engineering practice allows.

Policy 8.14. Coordination of service extension. Coordinate provision of urban public services to newly-annexed areas so that provision of any given service does not stimulate development that significantly hinders the City's ability to provide other urban services at uniform levels.

Policy 8.15. Services to unincorporated urban pockets. Plan for future delivery of urban services to urbanizable areas that are within the Urban Services Boundary but outside the city limits.

Policy 8.16. Orderly urbanization. Coordinate with counties, neighboring jurisdictions, and other special districts to ensure consistent management of annexation requests, and to establish rational and orderly process of urbanization that maximize efficient use of public funds.

Policy 8.17. Services outside the city limits. Prohibit City provision of new urban services, or expansion of the capacity of existing services, in areas outside city limits, except in cases where the City has agreements or contracts in place.

Policy 8.18. Service district expansion. Prohibit service district expansion or creation within the City's Urban Services Boundary without the City's expressed consent.

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

170. **Finding:** The City Council interprets policies 8.11 through 8.19 to provide direction on extending public services. The EOAHB amendments do not involve rural land or include new public facility or infrastructure projects or service extensions. These policies do not apply.

Public investment

Policy 8.20. Regulatory compliance. Ensure public facilities and services remain in compliance with state and federal regulations. Work toward cost-effective compliance with federal and state mandates through intergovernmental coordination and problem solving.

Policy 8.21. System capacity. Establish, improve, and maintain public facilities and services at levels appropriate to support land use patterns, densities, and anticipated residential and employment growth, as physically feasible and as sufficient funds are available.

Policy 8.22. Equitable service. Provide public facilities and services to alleviate service deficiencies and meet level-of-service standards for all Portlanders, including individuals, businesses, and property owners.

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8.22.a. In places that are not expected to grow significantly but have existing deficiencies, invest to reduce disparity and improve livability.

8.22.b. In places that lack basic public facilities or services and also have significant growth potential, invest to enhance neighborhoods, fill gaps, maintain affordability, and accommodate growth.

8.22.c. In places that are not expected to grow significantly and already have access to complete public facilities and services, invest primarily to maintain existing facilities and retain livability.

8.22.d. In places that already have access to complete public facilities and services, but also have significant growth potential, invest to fill remaining gaps, maintain affordability, and accommodate growth.

Policy 8.23. Asset management. Improve and maintain public facility systems using asset management principles to optimize preventative maintenance, reduce unplanned reactive maintenance, achieve scheduled service delivery, and protect the quality, reliability, and adequacy of City services.

Policy 8.24. Risk management. Maintain and improve Portland's public facilities to minimize or eliminate economic, social, public health and safety, and environmental risks.

Policy 8.25. Critical infrastructure. Increase the resilience of high-risk and critical infrastructure through monitoring, planning, maintenance, investment, adaptive technology, and continuity planning.

Policy 8.26. Capital programming. Maintain long-term capital improvement programs that balance acquisition and construction of new public facilities with maintenance and operations of existing facilities.

171. **Finding:** The City Council interprets policies 8.20 through 8.26 to provide direction on investment priorities for public facilities. The EOAHB amendments do not include new public facility or infrastructure projects. These policies do not apply.

Funding

Policy 8.27. Cost-effectiveness. Establish, improve, and maintain the public facilities necessary to serve designated land uses in ways that cost-effectively provide desired levels of service, consider facilities' lifecycle costs, and maintain the City's long-term financial sustainability.

Policy 8.28. Shared costs. Ensure the costs of constructing and providing public facilities and services are equitably shared by those who benefit from the provision of those facilities and services.

Policy 8.29. System development. Require private or public entities whose prospective development or redevelopment actions contribute to the need for public facility improvements, extensions, or construction to bear a proportional share of the costs.

Policy 8.30. Partnerships. Maintain or establish public and private partnerships for the development, management, or stewardship of public facilities necessary to serve designated land uses, as appropriate.

172. **Finding:** The City Council interprets policies 8.27 through 8.30 to provide direction on funding public facilities and services within the City of Portland's Urban Services Boundary. The EOAHB amendments do not include new public facility or infrastructure projects. These policies do not apply.

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 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.

173.Finding: The City Council interprets policies 8.31 through 8.38 to provide direction on the associated public benefits that should be considered in conjunction with investment in public facilities and services within the City of Portland’s Urban Services Boundary. The EOAHB 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 8.41. Utility function. Improve and maintain the right-of-way to support equitable distribution of utilities, including water, sanitary sewer, stormwater management, energy, and communications, as appropriate.

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

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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 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.

Policy 8.49. Coordination. Coordinate the planning, design, development, improvement, and maintenance of public rights-of-way among appropriate public agencies, private providers, and adjacent landowners.

8.49.a. Coordination efforts should include the public facilities necessary to support the uses and functions of rights-of-way, as established in policies 8.40 to 8.46.

8.49.b. Coordinate transportation and stormwater system plans and investments, especially in unimproved or substandard rights-of-way, to improve water quality, public safety, including for pedestrians and bicyclists, and neighborhood livability.

Policy 8.50. Undergrounding. Encourage undergrounding of electrical and telecommunications facilities within public rights-of-way, especially in centers and along Civic Corridors.

Policy 8.51. Right-of-way vacations. Maintain rights-of-way if there is an established existing or future need for them, such as for transportation facilities or for other public functions established in policies 8.40 to 8.46.

Policy 8.52. Rail rights-of-way. Preserve existing and abandoned rail rights-of-way for future rail or public trail uses.

174.Finding: The City Council interprets policies 8.39 through 8.52 to apply to new public facilities, uses, or infrastructure projects in the right-of-way; and right of way vacations. The EOAHB amendments do not include new public facility, uses, 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.

175.Finding: The City Council interprets policies 8.53 through 8.60 to apply to designated trails. Neither if the EOAHB map amendments impact trail designations. These policies do not apply.

Sanitary system

Policy 8.61. Sewer connections. Require all developments within the city limits to be connected to sanitary sewers unless the public sanitary system is not physically or legally available per City Code and state requirements; or the existing onsite septic system is functioning properly without failure or complaints per City Code and state requirements; and the system has all necessary state and county permits.

Policy 8.62. Combined sewer overflows. Provide adequate public facilities to limit combined sewer overflows to frequencies established by regulatory permits.

Policy 8.63. Sanitary sewer overflows. Provide adequate public facilities to prevent sewage releases to surface waters as consistent with regulatory permits.

Policy 8.64. Private sewage treatment systems. Adopt land use regulations that require any proposed private sewage treatment system to demonstrate that all necessary state and county permits are obtained.

Policy 8.65. Sewer extensions. Prioritize sewer system extensions to areas that are already developed at urban densities and where health hazards exist.

Policy 8.66. Pollution prevention. Reduce the need for wastewater treatment capacity through land use programs and public facility investments that manage pollution as close to its source as practical

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and that reduce the amount of pollution entering the sanitary system.

Policy 8.67. Treatment. Provide adequate wastewater treatment facilities to ensure compliance with effluent standards established in regulatory permits.

176. **Finding:** The City Council interprets policies 8.61 through 8.67 to apply to the provision of sanitary sewer facilities. Policy 8.61, in particular, applies to development. Staff has reviewed sanitary sewer availability at both sites where a zoning map and/or comprehensive plan designation is recommended. Both of the sites have adequate access to sanitary sewers. With regard to Policies 8.62 and 8.63, the rezoning of St. Phillip the Deacon site will facilitate redevelopment of an existing parking lot, which was built before current stormwater management standards were adopted, and likely drains into a combined sewer. Development on the parking lot will be required to comply with Title 17, and the Stormwater Management Manual, which will require incorporation of features to detain and delay the release of stormwater during rain events. This reduces the risk of sewer overflows.

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 8.70. Natural systems. Protect and enhance the stormwater management capacity of natural resources such as rivers, streams, creeks, drainageways, wetlands, and floodplains.

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.

Policy 8.72. Stormwater discharge. Avoid or minimize the impact of stormwater discharges on the water and habitat quality of rivers and streams.

Policy 8.73. On-site stormwater management. Encourage on-site stormwater management, or management as close to the source as practical, through land use decisions and public facility investments.

Policy 8.74. Pollution prevention. Coordinate policies, programs, and investments with partners to prevent pollutants from entering the stormwater system by managing point and non-point pollution sources through public and private facilities, local regulations, and education.

Policy 8.75. Stormwater partnerships. Provide stormwater management through coordinated public and private facilities, public-private partnerships, and community stewardship.

177. **Finding:** The City Council interprets policies 8.68 through 8.75 to apply to the provision of stormwater facilities. 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. The Citywide Systems Plan includes projects to address facilities needed for conveyance, flow control and pollution reduction. Development of new buildings on sites will be required to comply with Title 17, and the Stormwater Management Manual, which will require incorporation of features to detain and delay the release of stormwater during rain events, and remove pollutants.

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Land use changes can impact the feasibility of implementing these policies if development is encouraged in places that constrain the types of facilities encouraged by these standards. In general, development feasibility may be constrained by the lack of access to storm or combined sewer pipes, the presence of soil that does not allow on-site stormwater infiltration, or lack of access to drainage ditches, rivers and streams.

Staff has reviewed potential stormwater management at both sites where a zoning map and/or comprehensive plan designation is recommended. Both have adequate access to storm or combined sewer pipes as a mechanism of stormwater disposal. The land use changes are therefore consistent with these policies.

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.

Policy 8.79. Drainage district coordination. Coordinate with drainage districts that provide stormwater management, conveyance, and flood mitigation, protection, and control services within the City's Urban Services Boundary.

Policy 8.80. Levee coordination. Coordinate plans and investments with special districts and agencies responsible for managing and maintaining certification of levees along the Columbia River.

178.Finding. The City Council interprets policies 8.76 through 8.80 to apply to the management of floodplains. Neither of the sites where a zoning map and/or comprehensive plan designation is recommended are in the floodplain. These policies do not apply.

Water systems

Policy 8.81. Primary supply source. Protect the Bull Run watershed as the primary water supply source for Portland.

Policy 8.82. Bull Run protection. Maintain a source-protection program and practices to safeguard the Bull Run watershed as a drinking water supply.

Policy 8.83. Secondary supply sources. Protect, improve, and maintain the Columbia South Shore wellfield groundwater system, the Powell Valley wellfield groundwater system, and any other alternative water sources designated as secondary water supplies.

Policy 8.84. Groundwater wellfield protection. Maintain a groundwater protection program and practices to safeguard the Columbia South Shore wellfield and the Powell Valley wellfield as drinking water supplies.

Policy 8.85. Water quality. Maintain compliance with state and federal drinking water quality regulations.

Policy 8.86. Storage. Provide sufficient in-city water storage capacity to serve designated land uses, meet demand fluctuations, maintain system pressure, and ensure supply reliability.

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Policy 8.87. Fire protection. Provide adequate water facilities to serve the fire protection needs of all Portlanders and businesses.

Policy 8.88. Water pressure. Provide adequate water facilities to maintain water pressure in order to protect water quality and provide for the needs of customers.

Policy 8.89. Water efficiency. Reduce the need for additional water facility capacity and maintain compliance with state water resource regulations by encouraging efficient use of water by customers within the city.

Policy 8.90. Service interruptions. Maintain and improve water facilities to limit interruptions in water service to customers.

Policy 8.91. Outside user contracts. Coordinate long-term water supply planning and delivery with outside-city water purveyors through long-term wholesale contracts.

179. The City Council interprets policies 8.81 through 8.91 to apply to the provision of water service. Primarily these policies govern how the City manages its water system and are not applicable to development. Staff has reviewed water availability at the sites where a zoning map and/or comprehensive plan designation is recommended. Both sites have adequate access to the City water system.

Parks and recreation

Policy 8.92. Acquisition, development, and maintenance. Provide and maintain an adequate supply 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 8.94. Capital programming. Maintain a long-range park capital improvement program, with criteria that considers acquisition, development, and operations; provides opportunities for public input; and emphasizes creative and flexible financing strategies.

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.

Policy 8.100. Self-sustaining Portland International Raceway (PIR). Provide for financially self-

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sustaining operations of PIR, and broaden its programs and activities to appeal to families, diverse communities, and non-motorized sports such as biking and running.

Policy 8.101. Self-sustaining and inclusive golf facilities. Provide financially self-sustaining public golf course operations. Diversify these assets to attract new users, grow the game, provide more introductory-level programming, and expand into other related recreational opportunities such as foot golf and disk golf.

Policy 8.102. Specialized recreational facilities. Establish and manage specialized facilities within the park system that take advantage of land assets and that respond to diverse, basic, and emerging recreational needs.

Policy 8.103. Public-private partnerships. Encourage public-private partnerships to develop and operate publicly-accessible recreational facilities that meet identified public needs.

180.Finding: The City Council interprets policies 8.92 through 8.103 to primarily address City-owned parks and natural areas and not development on private land. The EOAHB amendments do not change current parks and recreation programs. Therefore, these policies do not apply. Policy 8.96 addresses trails, which were discussed in earlier findings above. Policy 8.98 addresses trees. There are trees on the sites where a zoning map and/or comprehensive plan designation is recommended; however, existing City regulations in Titles 11 and 33 provide a means to ensure this policy is honored as development occurs.

Public safety and emergency response

Policy 8.104. Emergency preparedness, response, and recovery coordination. Coordinate land use plans and public facility investments between City bureaus, other public and jurisdictional agencies, businesses, community partners, and other emergency response providers, to ensure coordinated and comprehensive emergency and disaster risk reduction, preparedness, response, and recovery.

Policy 8.105. Emergency management facilities. Provide adequate public facilities – such as emergency coordination centers, communications infrastructure, and dispatch systems – to support emergency management, response, and recovery.

Policy 8.106. Police facilities. Improve and maintain police facilities to allow police personnel to efficiently and effectively respond to public safety needs and serve designated land uses.

Policy 8.107. Community safety centers. Establish, coordinate, and co-locate public safety and other community services in centers.

Policy 8.108. Fire facilities. Improve and maintain fire facilities to serve designated land uses, ensure equitable and reliable response, and provide fire and life safety protection that meets or exceeds minimum established service levels.

Policy 8.109. Mutual aid. Maintain mutual aid coordination with regional emergency response providers as appropriate to protect life and ensure safety.

Policy 8.110. Community preparedness. Enhance community preparedness and capacity to prevent, withstand, and recover from emergencies and natural disasters through land use decisions and public facility investments.

Policy 8.111. Continuity of operations. Maintain and enhance the City's ability to withstand and recover from natural disasters and human-made disruptions in order to minimize disruptions to public services.

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181.Finding: The City Council interprets policies 8.104 through 8.111 to address the provision of public safety and emergency response services and not development on private land. These policies do not apply.

Solid waste management

Policy 8.112. Waste management. Ensure land use programs, rights-of-way regulations, and public facility investments allow the City to manage waste effectively and prioritize waste management in the following order: waste reduction, recycling, anaerobic digestion, composting, energy recovery, and then landfill.

182.Finding: The City Council interprets this policy to address the provision of waste management services and not development on private land. The changes being made by the EOAHB project do not impact these waste management services. 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.Finding: David Douglas School District (DDSD) is the only school district in Portland with an adopted school facility plan with identified enrollment capacity limitations. Neither of the EOAHB sites is located within the DDSD.

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 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 8.121. School access. Encourage public school districts to consider the ability of students to safely walk and bike to school when making decisions about the site locations and attendance boundaries of schools.

Policy 8.122. Private institutions. Encourage collaboration with private schools and educational

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institutions to support community and recreational use of their facilities.

184. Finding: The City Council interprets policies 8.115 through 8.122 to address school facilities and school sites. The changes being made by the EOAHB project do not impact school facility management of school sites. These policies do not apply.

Technology and communications

Policy 8.123. Technology and communication systems. Maintain and enhance the City's technology and communication facilities to ensure public safety, facilitate access to information, and maintain City operations.

Policy 8.124. Equity, capacity, and reliability. Encourage plans and investments in technology and communication infrastructure to ensure access in all areas of the city, reduce disparities in capacity, and affordability, and to provide innovative high-performance, reliable service for Portland's residents and businesses.

185. Finding: The City Council interprets policies 8.123 and 8.124 to address the provision technology and communication services and not development on private land. This policy does 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.

Policy 8.126. Coordination. Coordinate with energy providers to encourage investments that ensure reliable, equitable, efficient, and affordable energy for Portland residents and businesses.

186. Finding: The EOAHB amendments do not amend the sections of the zoning code that regulate the production of energy or other types of energy infrastructure and do not affect coordination efforts. This policy does not apply.

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.

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.

GOAL 9.H. Cost Effectiveness. The City analyzes and prioritizes capital and operating investments to cost effectively achieve the above goals while responsibly managing and protecting our past investments in existing assets.

GOAL 9.I. Airport Futures. Promote a sustainable airport (Portland International Airport [PDX]) by meeting the region's air transportation needs without compromising livability and quality of life for future generations.

187.Finding: The City Council generally interprets the goals and the policies of Chapter 9 to address transportation improvements, programming, funding priorities and maintenance and not development on private land. That said, there are several specific policies that address the intersection between land use and transportation, which are applicable to this ordinance. These policies are addressed individually below. As described below, the EOAH code and map changes are consistent with and comply with each of the applicable goals and policies of Chapter 9.

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 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.

188.Finding: Policies 9.1 through 9.4 provide direction regarding transportation system classifications and the Transportation System Plan. The EOAHB amendments do not change the functional classification of any existing or proposed transportation facility, nor do they change the standards implementing a functional classification system.

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.

189.Finding: The EOAHB zoning map and comprehensive plan map amendments are enabling denser housing within Portland. Both of the sites being rezoned are near frequent transit lines. This generally supports reducing VMT and increasing non-automobile mode splits by allowing more housing to be built in urban areas near transit.

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

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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 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

190. Finding: Policies 9.6 through 9.10 provide direction regarding planning for the transportation system. 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.

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.

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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.

191.Finding: The EOAHB amendments do not change the functional classification of any existing or proposed transportation facility, nor do they change the standards implementing a functional classification system.

Policy 9.11 requires coordination between land use and transportation facilities. Council interprets coordination to mean that there is a relationship between land use designations and the functional classification of streets. Nodes or corridors of denser land use classification should be served by streets with a higher functional classification. For example, land use and transportation would not be coordinated if a neighborhood center was accessible only via local service streets. This relationship should be multimodal. This does not require that every multi-dwelling or mixed-use parcel have frontage on a higher classification street – only that areas of denser land use generally be served by higher classifications.

A summary of the street classifications associated with the EOAH comprehensive plan and zoning map amendments is below.

#	Site	Recommended Land Use		Street Classification
		CP Designation	Zoning	
1	St Phillip the Deacon (120 & 130 NE Knott)	Mixed Use Urban Center	CM3	Local Service Street, City Bikeway, Neighborhood Walkway within a Pedestrian District. Higher classifications are found nearby on MLK, N Williams, and NE Russell.
2	Mississippi Site (4505 & 4515 N Mississippi)	Multi-Dwelling Corridor	RM2	Local Service Street for all classifications, abutting a Pedestrian District. Higher classifications are found nearby on N Albina.

As shown on the table above, both sites are located on local service streets; however, both are within a block of a street that is classified as a collector or higher (NE MLK and N Albina). Both sites are also both located on or within a block of a City Bikeway, Neighborhood Walkway, Pedestrian District, and a Major Transit Priority Street.

In summary, there is a coordinated relationship between land use and transportation because all of the changes that add additional density are served by or are in close proximity to collectors and other larger streets with multimodal designations.

Streets as public spaces

Policy 9.14. Streets for transportation and public spaces. Integrate both placemaking and 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

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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.

192.Finding: Policies 9.14 through 9.16 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 longer than 3 miles or shorter trips 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.

Policy 9.27. Transit service to centers and corridors. Use transit investments to shape the city's

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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 9.36. Portland Harbor. Coordinate with the Port of Portland, private stakeholders, and regional partners to improve and maintain access to marine terminals and related river dependent uses in Portland Harbor.

9.36.a. Support continued reinvestment in, and modernization of, marine terminals in Portland Harbor.

9.36.b. Facilitate continued maintenance of the shipping channels in Portland Harbor and the Columbia River.

9.36.c. Support more long-distance, high-volume movement of goods to river and oceangoing ships and rail.

Policy 9.37. Portland Heliport. Maintain Portland's Heliport functionality in the Central City.

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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.

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.

193.Finding: Policies 9.17 through 9.40 primarily address the design and use of transportation infrastructure, and the goal of developing a more multimodal system. The policies are applicable to land use changes such as those in the EOAHB package to the extent that the changes encourage walking, make bicycling more attractive than driving, and make transit the preferred mode of travel for trips that are longer than 3 miles. Land use changes can impact travel behavior by changing the distribution of where growth occurs, and the proximity of new housing to transit systems, and walkable and bikeable street networks.

The impact of the EOAHB project is to amend the zoning and comprehensive map for two sites. Staff examined the distribution of the recommended zoning map/comprehensive plan map changes. Both of these sites are located close to frequent service bus lines. On balance, by enabling more housing in these locations, there will be a greater capacity for housing to be located close to transit, which is consistent with this policy.

Policy 9.38 addresses automobile mobility and VMT, which can be impacted by land use changes. Mobility and VMT is discussed in response to Policy 9.49 below.

Airport Futures

Policy 9.41. Portland International Airport. Maintain the Portland International Airport as an important regional, national, and international transportation hub serving the bi-state economy.

Policy 9.42. Airport regulations. Implement the Airport Futures Plan through the implementation of the Portland International Airport Plan District.

9.42.a. Prohibit the development of a potential third parallel runway at PDX unless need for its construction is established through a transparent, thorough, and regional planning process.

9.42.b. Support implementation of the Aircraft Landing Zone to provide safer operating conditions for aircraft in the vicinity of Portland International Airport by limiting the height of structures, vegetation, and construction equipment.

9.42.c. Support the Port of Portland's Wildlife Hazard Management Plan by implementing airport-specific landscaping requirements in the Portland International Airport Plan District to reduce conflicts between wildlife and aircraft.

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Policy 9.43. Airport partnerships. Partner with the Port of Portland and the regional community to address the critical interconnection between economic development, environmental stewardship, and social responsibility. Support an ongoing public advisory committee for PDX to:

9.43.a. Support meaningful and collaborative public dialogue and engagement on airport related planning and development.

9.43.b. Provide an opportunity for the community to inform the decision-making related to the airport of the Port, the City of Portland, and other jurisdictions/organizations in the region.

9.43.c. Raise public knowledge about PDX and impacted communities.

Policy 9.44. Airport investments. Ensure that new development and redevelopment of airport facilities supports the City's and the Port's sustainability goals and policies, and is in accordance with Figure 9-3 — Portland International Airport. Allow the Port flexibility in configuring airport facilities to preserve future development options, minimize environmental impacts, use land resources efficiently, maximize operational efficiency, ensure development can be effectively phased, and address Federal Aviation Administration's airport design criteria.

194. **Finding:** Policies 9.41 through 9.44 provide policy direction related to Portland International Airport and are not relevant to the zoning and comprehensive plan map amendments that are the focus of the EOAHB amendments. The amendments also do not change the **Portland International Airport Plan District**. 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 Comprehensive 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

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Comprehensive 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.

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%

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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%
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.

Table 9-2: Oregon Metro Interim Deficiency Thresholds and Operating Standards	
Location	Standards

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	Mid-Day One-Hour Peak *	PM 2-Hour Peak *	
		1st Hour	2nd Hour
Central City, Gateway, Town Centers, Neighborhood Centers, Station Areas	0.99	1.1	0.99
I-84 (from I-5 to I-205), I-5 North (from Marquam Bridge to Interstate Bridge, OR 99- E (from Lincoln St. to OR 224), US 26 (from I-405 to Sylvan Interchange), I-405	0.99	1.1	0.99
Other Principal Arterial Routes	0.90	0.99	0.99
*The demand-to-capacity ratios in the table are for the highest two consecutive hours of the weekday traffic volumes. The mid-day peak hour is the highest 60-minute period between the hours of 9 a.m. and 3 p.m. The 2nd hour is defined as the single 60-minute period, either before or after the peak 60-minute period, whichever is highest.			

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.

***Post Central City:**

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).

***Pre-Central City:**

Policy 9.51 Multimodal Mixed-Use Area. Designate a Central City Multimodal Mixed-Use Area (MMA) in the geography indicated in Figure 9-2, which will render state congestion / mobility standards inapplicable to proposed plan amendments under OAR 660-0012-0060(10), subject to ODOT concurrence and execution of an agreement between ODOT and the City of Portland. The agreement should emphasize potential safety and operational impacts.

195.Finding: Policies 9.45 through 9.51 generally address the system-wide management of the City’s transportation system. Policy 9.49 addresses state and regional system performance standards, and includes standards related to vehicle congestion. The EOAHB proposal could have an impact on these performance standards if the map changes within the proposal allow an increase in

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development near transportation facilities where levels of congestion exceed these standards. In other words, the proposal cannot cause a facility to exceed these standards or make a facility that is already failing worse.

To evaluate these impacts project staff reviewed the impact of the recommended zoning map/comprehensive plan map changes. Both of these aspects of the EOAH proposal could cause growth and traffic to be distributed differently than planned.

Staff used traffic modelling completed as part of the 2035 Comprehensive Plan adoption process as a benchmark. As part of that process the Metro Regional Travel Demand Model was run and used (based on the City's land use plan) to identify which street segments were likely to have traffic volumes over the designed capacity within the 20-year planning horizon (volume to capacity ratios). This model projection was calibrated to the region's 20-year growth forecast. With that information, both the Portland Bureau of Transportation and ODOT identified areas of concern – where standards might not be met, or where the amount of traffic would be close to designed capacity (where there may be congestion).

Copies of the modelling and maps produced for this analysis were placed in the record with the first EOAH Package (Ordinance 190000), and are incorporated here by reference. Staff considered the two zoning map/comprehensive plan map changes in relationship to those known areas of concern. The two sites are not adjacent to street segments or intersections of concern identified by PBOT and ODOT during the Comprehensive Plan Update. Therefore, the changes being made with the EOAHB project will not have a significant effect on traffic congestion.

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.

196.Finding. Policies 9.52 through 9.54 provide direction regarding transportation demand management. The City has created TDM financial incentive programs but has elected to only require participation in those programs for larger developments (10 or more units). The EOAHB amendments do not affect existing TDM outreach programs (e.g. Smart Trips and Safe Routes to Schools) but new households that are accommodated by these regulatory and zoning changes will benefit from these programs.

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

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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.

197.Finding: Policies 9.55 and 9.58 address parking management and off-street parking. These policies do not apply because the EOAHB amendments do not change how the City manages parking.

Policies 9.56 and 9.57 address the management of space within the right of way. These policies do not apply because the EOAHB amendments do not change how the City manages the right of way.

Policies 9.59 and 9.60 address the management of space within the right of way. These policies do not apply because the EOAHB amendments do not change how the City manages the right of way.

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.

198.Finding: Changes to the Bicycle Parking Code, including changes that apply to institutional uses were made in a separate ordinance that was adopted by City Council in 2019. This policy does not apply because this ordinance does not include any changes to the bicycle parking regulations.

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

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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.

199.Finding: The potential impacts on the transportation system from the EOAHB amendments were analyzed. See findings for Policy 9.49 above.

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.

200.Finding: Policies 9.64 through 9.67 address the funding and management of the City's transportation system and programs and not development on private land. The EOAHB amendments do not change the system development charges for new housing units. These policies do not apply.

Connected and Automated Vehicles

Policy 9.68 New mobility priorities and outcomes. Facilitate new mobility vehicles and services with the lowest climate and congestion impacts and greatest equity benefits; with priority to 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 new mobility vehicles and services and 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 new mobility vehicles and services.

9.68.b. Ensure that new mobility vehicles and services improve active transportation and shared ride 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, carbon footprint, 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 vehicles and services with the least

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climate pollution, and electric and other zero direct emission vehicles operated by fleets and carrying multiple passengers.

9.68.d. Make the benefits of new mobility available on an equitable basis to all segments of the community while ensuring traditionally disadvantaged communities are not disproportionately hurt by new mobility vehicles and services. 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 new mobility vehicles and services.

Policy 9.69 New mobility tools. Use a full range of tools to ensure that new mobility vehicles and services 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 new mobility vehicles and services 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, crashes and citations, 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/flex 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 new mobility vehicles and services.

9.69.d. Develop sustainable user-pays funding mechanisms to support new mobility vehicle infrastructure and service investments, transportation system maintenance, and efficient system management.

9.69.e. Ensure that new mobility vehicles and vehicles that connect to smart City infrastructure, 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 and service impacts on the transportation system, including factors such as congestion level, carbon footprint, vehicle miles traveled, vehicle occupancy, and vehicle energy efficiency.

201.Finding: Policies 9.68 and 9.69 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.

202. The EOAHB package includes two zoning/comprehensive plan map amendments. This chapter includes the land use designation descriptions, and policies related to amending the zoning code and maps. The findings below describe how the EOAH project is consistent with this goal. As described below, the EOAHB map changes are consistent with and comply with each of the applicable goals and policies of Chapter 10.

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.

203. The EOAH amendments include zoning and comprehensive plan map changes on two sites. Findings documenting consistency with the plan goals and policies have been provided above.

The land use designations and corresponding zones being applied with this project are shown below. Two designations are being applied: Multi-Dwelling Corridor and Mixed Use Urban Center. The Policy 10.1 descriptions of those designations are below.

Summary of Map Changes

#	Site	Existing		Recommended	
		CP Designation	Zoning	CP Designation	Zoning
1	St Phillip the Deacon (120 & 130 NE Knott)	Multi-Dwelling Corridor	RM2	Mixed Use Urban Center	CM3d
2	Mississippi Site (4505 & 4515 N Mississippi)	Single Dwelling 2,500	R2.5	Multi-Dwelling Corridor	RM2

Multi-Dwelling

Multi-Dwelling — Corridor. This designation allows medium-scale multi-dwelling development. The scale of development is intended to accommodate transit-supportive densities while providing transitions to nearby single-dwelling residential. The designation is intended for areas near, in, and along centers, civic and neighborhood corridors, and transit station areas, where urban public services, generally including complete local street networks and access to frequent transit, are available or planned. Areas within this designation generally do not have development constraints. Maximum density is based on a floor area ratio, not on a units-per-square-foot basis. Minimum density is 30 units per acre. The corresponding zone is RM2.

Mixed Use

Mixed Use Urban Center. This designation is intended for areas that are close to the Central City and within Town Centers where urban public services are available or planned including access to high-capacity transit, very frequent bus service, or streetcar service. The designation allows a broad range of commercial and employment uses, public services, and a wide range of housing options. Areas within this

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designation are generally mixed-use and very urban in character. Development will be pedestrian oriented with a strong emphasis on design and street level activity, and will range from low- to mid-rise in scale. The range of zones and development scale associated with this designation are intended to allow for more intense development in core areas of centers and corridors and near transit stations, while providing transitions to adjacent residential areas. The corresponding zones are Commercial Mixed Use 1 (CM1), Commercial Mixed Use 2 (CM2), Commercial Mixed Use 3 (CM3), and Commercial Employment (CE). This designation is accompanied by the Design overlay zone.

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.

204.Finding: The EOAHB recommendation includes two changes to the zoning map, which are listed in the findings responding to Policy 10.1 above. As shown in that table, the zones being applied are all corresponding zones for the designations being applied, as shown on Figure 10-1 of the Comprehensive Plan.

Policy 10.3. Amending the Zoning Map.

10.3.a. Amending a base zone may be done legislatively or quasi-judicially.

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.

205.Finding: The EOAHB recommendation includes two changes to the zoning map, which are listed in the findings responding to Policy 10.1 above. As shown in that table, the zones being applied are all corresponding zones for the designations being applied, as shown on Figure 10-1 of the Comprehensive Plan.

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

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supply, sanitary sewage disposal, stormwater management, transportation, school district capacity (where a school facility plan exists), and police and fire protection.

206.Finding: Findings addressing water, sanitary sewage disposal, stormwater management, and school district capacity are found in findings in response to Chapter 8 policies. Findings addressing transportation systems are in response to Chapter 9 policies. The two sites with map amendments are less than an acre in size and will result in an insignificant change in growth projections; consequently, police and fire protection is adequately supported.

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.

207.Finding: The EOAHB amendments apply an overlay zone to one site, as summarized below. No plan districts are added or changed.

Summary of Overlay Zone Changes

#	Site	Overlay Added
1	St Phillip the Deacon (120 & 130 NE Knott)	Adding “d” overlay

The Design (“d”) overlay is being added to this site because the description for the Mixed Use Urban Center Designation in Comprehensive Plan Policy 10.1 states that “This designation is accompanied by the Design overlay zone.” In this case the Comprehensive Plan identifies the Mixed Use Urban Center Designation as a place where the “d” is always applied due to the high expectation for growth and dense development.

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:

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:

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- 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.

208.Finding: The EOAHB package contains only map amendments. No zoning code amendments are proposed. These policies do not apply.

Part IV. Area-Specific Plans

As required by 2035 Comprehensive Plan Policy 1.19, the following area-specific plan provides additional policy direction that is relevant within the policy framework provided by the overall Comprehensive Plan.

Albina Community Plan (adopted 1993)

Both of the sites are in the Albina Community Plan district.

The Albina Community Plan (ACP) includes policies and action items aimed to ensure the continued affordability in the district for homeowners and renters. Several action items were focused on preventing displacement as the neighborhood became physically upgraded, as a result of improvement funds provided by the public sector, as well as private market infusions that upgraded the housing stock and commercial buildings. Land use policies target increased densities along corridors, while maintaining the predominantly single-dwelling neighborhoods. A new implementation tool adopted with the Plan allowed for accessory dwelling units on single-dwelling zoned properties.

Policy 1, Land use included Policy B, Livable Neighborhoods, which states “Protect and improve the livability of neighborhoods within the Albina community. Direct new investment to areas that have experienced or are experiencing a loss of housing. Foster the development of complete neighborhoods that have services and retail within or conveniently near them. Promote increases in residential density without creating economic pressure for the clearance of sound housing.”

Policy E states, “Focus new development at locations along transportation corridors that offer opportunities for transit supportive development and foster the creation of good pedestrian environments.”

Policy 5, Housing states “Increase housing opportunities for current and future Albina residents by preserving and rehabilitating the existing housing stock...and building higher density housing near business centers and major transit routes.” Objectives include:

“Create a portion of the Albina Community’s housing stock as permanently affordable rental housing through nonprofit ownership” and “Seek to increase opportunities for affordable housing and reductions in displacement that might otherwise result from neighborhood stabilization and rising property values.”

- 209. Finding:** The EOAHB amendments support the above objectives by providing higher density and mixed use opportunities adjacent to the Williams/Vancouver and MLK corridor (St. Phillip the Deacon site) and providing multi-dwelling opportunities at the Mississippi site by increasing the density from the current single-dwelling zoning.

Part V. Comprehensive Plan and Zoning Code Text 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.

210.Finding: The EOAHB amendments do not make changes to the text of the Zoning Code. This does not apply.

Part VI. Comprehensive Plan Map and Zoning 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.

211.Finding: The City Council interprets this criterion to require the EOAHB amendments to show consistency on balance. The City Council has applied all applicable policies and the findings in this exhibit demonstrate that the amendments to the Comprehensive Plan Map are supportive of all relevant Comprehensive Plan goals and policies and are therefore, on balance, consistent with the Comprehensive Plan, and are consistent with the Urban Growth Management Functional Plan, the Statewide Planning Goals, and relevant area plans.

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.

212.Finding: The EOAHB recommendation includes two changes to the zoning map, which were listed in the findings responding to Policy 10.1 above. As shown in that table, the zones being applied are all corresponding zones for the designations being applied, as shown on Figure 10-1 of the Comprehensive Plan. One of the sites is being designated Mixed Use –Urban Center and one is being designated Multi-Dwelling Corridor.

Mixed Use Urban Center

The St. Phillip the Deacon site (120 & 130 NE Knott Street) is designated Mixed Use Urban Center, with a proposed zone of CM3. The site is close to the Central City, with frequent transit service and does not abut a single-dwelling zone.

The purpose of that zone is:

The Commercial/Mixed Use 3 (CM3) zone is a large-scale zone intended for sites in high-capacity transit station areas, in town centers, along streetcar alignments, along civic corridors, and in locations close to the Central City. It is intended to be an intensely urban zone and is not appropriate for sites where adjacent properties have single-dwelling residential zoning. The zone allows a wide range and mix of commercial and residential uses, as well as employment uses that have limited off-site impacts. Buildings in this zone will generally be up to six stories tall unless height and floor area bonuses are used, or plan district provisions specify other height limits. Development is intended to be pedestrian-oriented, with buildings that contribute to an urban environment with a strong street edge

EOAH Project
Exhibit A Findings of Fact Report

of buildings. The scale of development is intended to be larger than what is allowed in lower intensity commercial/mixed use and residential zones. The Design overlay zone is applied to this zone.

The Mississippi Site (4505 & 4515 N Mississippi) is designated Multi-Dwelling - Corridor, with a proposed zone of RM2. The Emmanuel site is located on the margins of a Town Center, and a 0.4 mile walk from a Yellow Line light rail station and a frequent service bus (#4). The abutting zones are R2.5, RM2, and CM3.

The purpose of that zone is:

The RM2 zone is a medium-scale multi-dwelling zone that is generally applied in and around a variety of centers and corridors that are well-served by transit. Allowed housing is characterized by buildings of up to three or four stories with a higher percentage of building coverage than in the RM1 zone, while still providing opportunities for landscaping and outdoor spaces that integrate with residential neighborhood characteristics. The major types of new housing development will be a diverse range of multi-dwelling structures and other compact housing that contribute to the intended urban scale of centers and corridors, while providing transitions in scale and characteristics to lower-scale residential neighborhoods.

Therefore, all proposed zoning map amendments are consistent with the Comprehensive Plan map.

B. Adequate public services.

1. Adequacy of services applies only to the specific zone change site.
2. 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.
 - 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.
 - 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.

EOAH Project
Exhibit A Findings of Fact Report

- 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.

213.Finding: The findings above in response to Chapter 8 (Public Facilities) policies address water, sewer, stormwater adequacy; and school facilities. Transportation facilities are addressed in findings in response to Chapter 9 (Transportation) policies. The findings for Statewide Planning Goal 11 also address public facilities and are incorporated by reference.

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;

214.Finding: The Design (“d”) overlay is being added to the St. Phillip the Deacon site because the description for the Mixed Use Urban Center Designation in Comprehensive Plan Policy 10.1 states that “This designation is accompanied by the Design overlay zone.” In this case the specific situation is that Comprehensive Plan identifies the Mixed Use Urban Center Designation as a place where the “d” is always applied due to the high expectation for growth and dense development.

- 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

215.Finding: The application Design (“d”) Overlay Zone is consistent with Policy 10.1 of the Comprehensive Plan. 33.420.021 states that the design overlay is applied automatically with the CM3 zone. The purpose of the Design overlay is:

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.

The application of the Design overlay to CM3 sites is consistent with this purpose statement because it serves to promote quality high-density development near transit.

- 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.

EOAH Project
Exhibit A Findings of Fact Report

216.Finding: There are no changes to scenic viewpoints as a result of the EOAHB amendments. This criterion does not apply.

- END -

Expanding Opportunities for Affordable Housing: Package B

Amendments to the Comprehensive Plan Map
and the Zoning Map

STAFF REPORT
FEBRUARY 2021



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Acknowledgments

Portland City Council

Ted Wheeler, *Mayor*

Jo Ann Hardesty, *Commissioner*

Mingus Mapps, *Commissioner*

Carmen Rubio, *Commissioner*

Dan Ryan, *Commissioner*

Bureau of Planning and Sustainability

Carmen Rubio, *Commissioner-in-charge*

Andrea Durbin, *Director*

Joe Zehnder, *Chief Planner*

Project Staff

Eric Engstrom, *Principal Planner*

JP McNeil, *Planner, Project Manager*

Carmen Piekarski, *GIS Analyst*

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Section I: Introduction

Project Summary

This report contains recommendations to Council for several proposed Zoning Map and Comprehensive Plan Map amendments for sites where community-based projects, including affordable housing developments, are planned or would be feasible.

This project is a continuation of the deferred portion of the Expanding Opportunities for Affordable Housing (EOAH) project adopted by City Council in June 2020. That project included amendments to the Zoning Code, Zoning Map, and Comprehensive Plan Map to facilitate development of affordable housing on land in the ownership of Community Based Organizations (CBO's). With the adoption of the EOAH, City Council deferred its consideration of changing the comprehensive plan and zoning designations for certain properties and directed staff to study and prepare a follow-up recommendation on five additional sites that were identified in both the EOAH report and testimony as potential sites for map Zoning Map and Comprehensive Plan Map changes. This second phase of the EOAH presents the study and recommendation for those additional sites.

The EOAH ordinance also directed staff to initiate a mapping project to identify where zoning could create community benefits and address past harms. That directive is presently being addressed under a separate BPS project, which is described in BPS's proposed budget.

Process

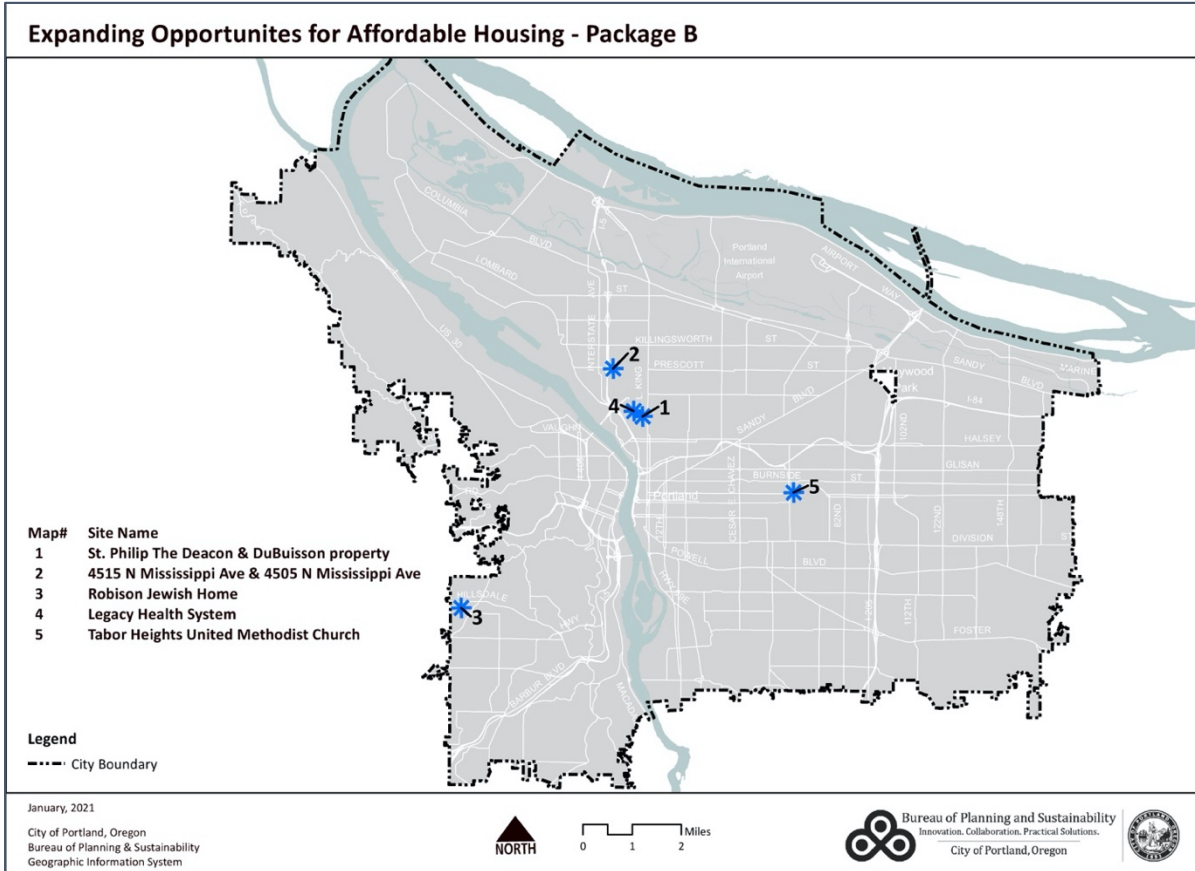
During the fall of 2020, staff worked with property owners, neighbors, partner bureaus, and other stakeholders, to evaluate each site to determine the appropriateness and ripeness of the proposed rezoning. Staff then convened meetings of interested parties and neighbors to discuss the proposals and hear community feedback. Staff also convened a meeting with representatives from other City bureaus to flag any infrastructure issues that would impact the rezoning proposals.

Once the additional research and outreach portion of EOAH – Package B was completed, staff compiled this report for presentation to City Council in advance of a hearing, to be held in early 2021. The Planning and Sustainability Commission (PSC) already held a public hearing on the EOAH project and made a recommendation. Since this project is the continuation of the deferred portion of EOAH, it addresses concerns raised in the testimony during the previous EOAH hearings before City Council and it responds to Council's directive to return directly to Council after further study of particular sites, it was determined that this project did not need to be returned to the PSC.

Consistent with PCC 33.740.030, a public notice will be sent to interested parties and neighbors in advance of the Council Hearing, including those who provided oral or written testimony at the previous Council hearings on EOAH. A notice was also sent to the state Department of Land Conservation and Development in accordance with statewide planning regulations.

Sites and recommendations

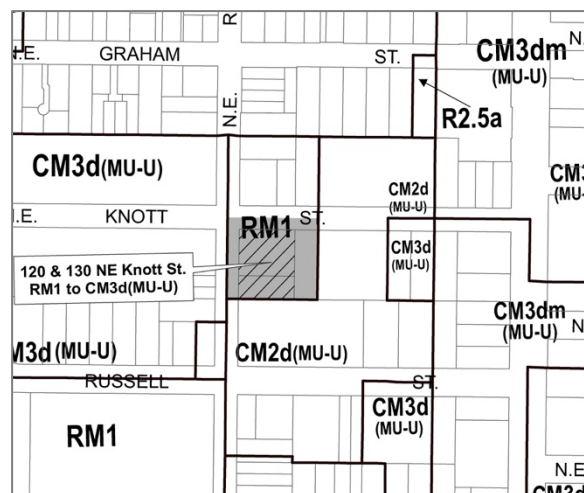
The five sites identified for further study are identified and discussed below. The sites are scattered across the city and each has unique attributes and constraints.



1. **120 and 130 NE Knott Street (St Phillip the Deacon).** This was site was nominated for rezoning by the owner of 120 NE Knott, St Phillip the Deacon Church. Of the five sites included in this report, this one has the most articulated development proposal. The site is presently zoned RM1 and is proposed to be rezoned to CM3d. The one-story church and associated parking occupy two of three tax lots that comprise the site and a single dwelling unit occupies the lot at 130 NE Knott. The church has explored the idea of purchasing 130 NE Knott for inclusion in their redevelopment plans though it is unclear at this point if that will happen. Regardless, staff recommends rezoning 130 NE Knott as well as 120 NE Knott in order to maintain zoning continuity and not create a situation where a single lot is zoned differently than the adjacent lots.

Much of the surrounding area is zoned CM2 or CM3 with the exception of some RM1 zoned lots to the north, across NE Knott Street. The site is located within the Eliot Conservation District. The Matt Dishman Community Center occupies the block diagonally to the west, a Pacific Power transformer facility is located across NE Rodney to the west, and the Albina Branch of the Multnomah County Library and its parking area are located south and east of the site. The church has applied for a Metro Bond grant to redevelop the site with a ground floor church and affordable housing on the floors above.

No major infrastructure concerns were raised by the Bureau of Environmental Services (BES), the Water



Bureau, or the Portland Bureau of Transportation (PBOT). BES noted some capacity issues with the available combined sewer and PBOT noted that on-street parking would be a concern; however, neither issue would preclude redevelopment of the site.

A virtual meeting that was held on November 24 was attended by representatives of the church, the property owners, neighbors, and members of the Eliot Neighborhood Association (NA). At that meeting, the church representatives provided a brief overview of the redevelopment concept for the site and responded to questions from neighbors. Questions were raised about the size and bulk of the new development and the uses proposed at the site. Church representatives stated that the proposed development would not max out the increased height and FAR allowances in the CM3 zone and also indicated the new housing on the site would be available to those making between 30-50% Median Family Income (MFI). There were no objections to the zone change proposal raised at the meeting. One neighbor that owns a property in the RM1 zone on the north side of NE Knott Street reached out to staff after the meeting with questions about the proposal and allowances in the CM3 zone.

Based on the lack of opposition to the proposal from neighborhood interests, the near term prospects for a development project, and the lack of major infrastructure concerns, staff recommends approval of the zone change. This change is consistent with the intent of the EOAH project.

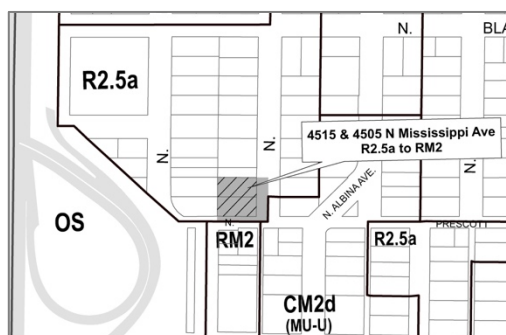
- 2. 4505 and 4515 N Mississippi Avenue.** The property owner of 4515 N Mississippi Ave, Dianne Clay, requested that this site to be rezoned from R2.5a to RM2. It is located at the corner of N Mississippi Ave and N Prescott St. The site is currently occupied by a single dwelling unit in which the property owner rents out the individual rooms at what she states are below market rates. She would like to expand this operation to provide additional affordable housing units and is seeking grant money from Prosper Portland to make improvements to her site. Rezoning the site to RM2 would allow her to expand the use of the site and may help her qualify for Prosper grant funding. 4505 N Mississippi Avenue also contains a single dwelling unit. The owners of that property have no plans to redevelop the site; this site is included because it would create a continuous area of RM2 between 4515 N Mississippi and the RM2 zoned area south of N Prescott Street. This site differs from the others in this report, as it is the only one not owned by a community-based organization; however, Dianne Clay is a longtime resident with deep roots in the neighborhood and operates Clay Property Management, which provides affordable housing to residents impacted by gentrification and displacement in the area and states that approval of the rezoning proposal would assist her in doing so.

The R2.5a properties are located in the Mississippi Conservation District and are surrounded by R2.5a zoning to the north and west, RM2 zoning opposite NE Prescott Street to the south, and CM2d zoning to the east. Primary uses in the immediate area are single dwelling and multidwelling residential.

No major infrastructure concerns were identified at this site. BES noted that the site is upstream of a facility with surcharge issues but this would not preclude rezoning the site to RM2.

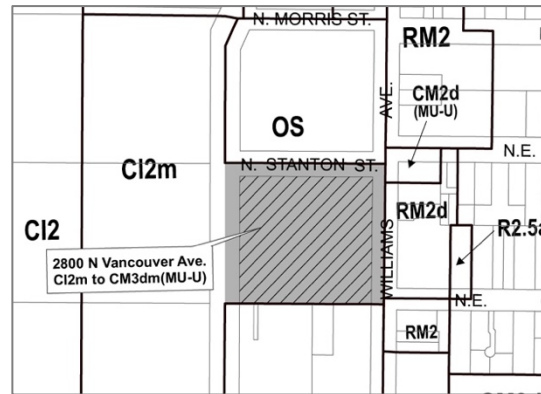
A meeting was held to discuss the proposal via Zoom on November 16 and was attended by the two property owners and a representative of the Humboldt NA. Dianne Clay gave a quick overview of her site and what her hopes are for it. There were no objections raised to the zone change and the Humboldt NA spoke in favor of proposals that support the development of more affordable housing in the neighborhood.

Based on the lack of opposition to the proposal from neighborhood interests and lack of major infrastructure



concerns, staff recommends approval of the zone change. Staff recognizes that, while this site is not owned by a CBO, the zone change is compatible with Council’s goal to increase affordable housing and support community-based initiatives. It is particularly relevant considering the location in the City’s historic African-American community and considering Council’s directive in the EOA ordinance to study zoning tools that create community benefits, address past harms, and promote fair housing.

3. **2800 N Vancouver Ave (Legacy Site).** This site was nominated to be rezoned from C12m to CM3dm by representatives of the Eliot NA. It is owned by Legacy Health System and occupies a full block bound by N Vancouver Ave, N Graham St, N Williams Ave, and N Stanton St and is adjacent to the Legacy Emmanuel Medical Center, located west of the site. It contains a medical office building and associated parking lot. Dawson Park occupies the block to the north. To the east is a mixture of multidwelling and single dwelling zoned properties.



The two blocks to the south are also owned by Legacy and were recently rezoned to CM3d as part of the first iteration of the EOA project. The Williams and Russell Project is a collaborative project of Legacy, Prosper Portland, and the Williams and Russell Project Working Group (PWG) to redevelop the southern of those two blocks to serve the historically African-American community that was once centered in this area. Legacy is donating the 1.7-acre site for that purpose.

Neither the Water Bureau or BES identified any infrastructure concerns for this site. PBOT noted that the N Graham right-of-way has been vacated and would need to be dedicated to the City if the site is redeveloped. The existing roadway in the old ROW would need to be brought up to City standards as well. PBOT also noted that there are several failing intersections north of the site where the Fremont Bridge empties freeway traffic onto the surface streets. Neither of these issues would necessarily preclude a rezoning of the site to CM3.

Staff convened a meeting on November 19 with a representative from Legacy, Eliot NA representatives, and a representative of the Williams and Russell PWG. At the meeting, the NA representatives explained the reasons for testifying in favor of including this site with the original EOA project. These reasons included:

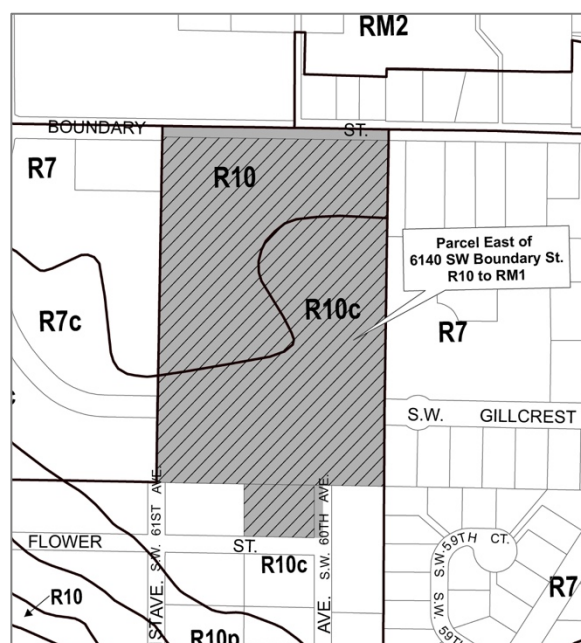
- Addressing the history of past wrongs in this area that resulted from Urban Renewal efforts and condemnation of lands that the City then gave to Legacy to be redeveloped. The Williams and Russell Project is a step towards righting that past wrong but more can be done. Rezoning this site is a step in that direction and could lead to the site being redeveloped with affordable housing and services for the community.
- Concerns about safety and crime on the north side of the block along N Stanton and near Dawson Park. The NA representatives would like to see the site redeveloped in an effort to activate the streetscape and provide the benefits of more “eyes on the street.”
- The site is prime real estate along a prime commercial corridor that is being underutilized as a medical office and parking lot. There are better ways for the site to be incorporated into and better serve the community.

The Williams and Russell PWG representative supported the idea of the rezone and redevelopment of this block, but also noted that rezoning the site would not alone solve many of the problems cited but the

neighborhood representatives. Legacy Health Systems does not support rezoning the site. They have no plans to redevelop the site at this time but are considering long term plans on their constrained, urban site.

Staff does not recommend that this site be rezoned at this time. This is based on the opposition of the property owner to the proposal and also to the fact that rezoning the site would do little or nothing towards achieving the ends desired by the NA. Rezoning the site would not provide any additional incentive to Legacy to redevelop the site or to donate it to the community for affordable housing. Further, the type and scale of development allowed in the C12 zone is comparable to what would be allowed in the CM3 zone. Both allow institutional, residential, and commercial uses and both would also have the 'm' Centers Main Street Overlay Zone, which requires active ground floor uses. Leaving the current zoning designation would not preclude Legacy or a future property owner from redeveloping the site for affordable housing with ground floor retail or services.

4. **Property east of 6140 SW Boundary Street (Cedar Sinai Park Site).** The property owner, Cedar Sinai Park (CSP), requested the zone change on this site from R10/R10c to RM1/RM1c. CSP operates the Robison Jewish Home and Rose Schnitzer Manor, providing long term care and assisted living services, on adjacent sites to the west and north. SW Boundary Street runs along the northern edge of the site and SW Gillcrest Court terminates along the southeastern boundary. The site is mostly vacant, with the exception of a small parking lot in the northwest corner, and is split-zoned approximately in half, with the northern portion zoned R10 and the southern portion zoned R10c. The 'c' Environmental Conservation Overlay area is forested and contains walking trails that are used by CSP residents and neighbors. Zoning to the west, south, and east is all single dwelling zone designations of R7 or R10, while the area to the north is zoned RM1.



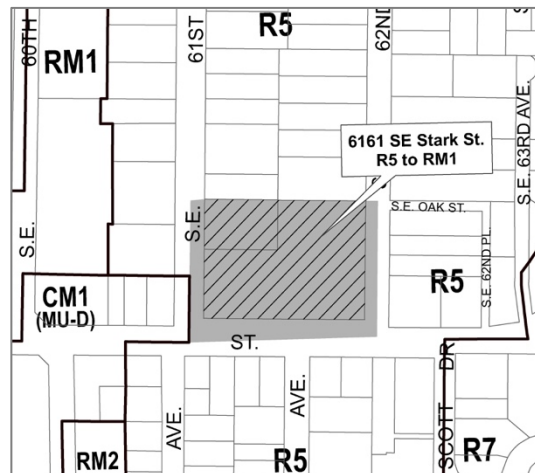
CSP does not have specific plans for the site but state that they would like to develop the northern portion of the site with affordable housing for seniors and retain the forest and walking trails on the southern portion.

The Water Bureau had no issues with water service at this site; however, both BES and PBOT had concerns. BES indicated that they do not support the rezone proposal at this time due to inadequate sewer and stormwater capacity that must first be addressed. PBOT noted concerns with traffic volumes on SW Boundary east of the site as well as connectivity concerns. Boundary street neighbors have raised the issue of cut-through traffic from the existing CSP facilities to PBOT in the past and the new development could exasperate that (discussed further below). A traffic study would need to be conducted to further evaluate this issue. The connectivity concerns stem from the SW Gillcrest terminus at the southeast boundary of the site. While typically PBOT would want to see this street extended onto the site for connectivity purposes, the location of a future street would be in the 'c' Overlay Zone. Further study would be needed to weigh the connectivity benefits with the natural resource value of the site.

On November 5, staff convened a virtual meeting of the Boundary Street neighbors, Hayhurst NA representatives, and CSP staff. At the meeting, CSP presented background information on their organization, its mission, and the services they provide and gave a rough outline of what future development of this site could be if it were rezoned. Neighbors were then given the opportunity to comment on the proposal. The most cited issue centered on existing cut-through traffic from the CSP facilities and the inability to curb the flow of traffic from staff, visitors, and deliveries to CSP. Neighbors stated they would have trouble supporting the rezoning proposal until the cut-through traffic issue was addressed and also would not support a plan that includes improvements to the eastern portion of Boundary Street to accommodate higher traffic volumes. They were also concerned that CSP does not have a specific development proposal for the site and that granting the rezoning proposal would not limit the site to the CPS proposal for affordable senior housing. Following the meeting, the Hayhurst NA provided a letter to staff that summarized these concerns and expressed opposition to the rezoning proposal.

Given the opposition from the neighbors and the Hayhurst NA as well as the lack of support from BES and PBOT, staff does not recommend approval of the proposal to rezone this site. A more appropriate path forward for CSP would be to request the rezone through the quasi-judicial process offered by the Bureau of Development Services (BDS) rather than through the legislative process. The quasi-judicial process would be more effective at ironing out these issues and working out substantive solutions to them. A quasi-judicial consideration would allow more site-specific analysis and would provide a mechanism for the City to attach binding conditions of approval to the re-zoning that address the concerns noted above.

5. **6161 SE Stark Street (Tabor Heights United Methodist Church).** This site was nominated for rezoning from R5 to CM1 in the testimony for the EOA by a neighbor. Staff contacted this neighbor, who no longer wanted to be involved in the process. Staff also contacted the property owner and was in touch with a member of the church's Board of Directors. The church representative did not provide a solid response as to whether they would like to move forward with the proposal. Without an advocate for the site's rezoning, staff did not pursue the matter further and did not conduct any community outreach. Staff does not recommend rezoning this site. There is no known community based initiative or affordable housing project being planned here at this time.



Staff Recommendation

Staff recommends that City Council:

- Adopt this report;
- Amend the Comprehensive Plan Map and Zoning Map as shown in this report; and
- Adopt the ordinance and associated findings.

Section II: Comprehensive Plan Map and Zoning Map Amendments

This section presents the proposed Comprehensive Plan Map and Zoning Map amendments that City Council directed staff to study. The section is formatted to facilitate readability by showing draft map amendments on the right-hand pages and related commentary on the facing left-hand pages.

The proposed Comprehensive Plan Map and Zoning Map changes fall into one or more of these categories:

- The site is adjacent to the zoning that is proposed, or the proposed zone matches the sites underlying Comprehensive Plan map designation;
- The site is in the ownership of an institution or community-based organization.
- The change creates a pathway for providing community benefits.

The Comprehensive Plan and Zoning Map changes are primarily on land in the ownership of community-based organizations seeking to utilize some of their land for community benefits, specifically affordable housing. Addressing zoning-related barriers to the development of affordable housing will expand opportunities for such development.

Commentary

Property information:

Owner: St Phillip the Deacon Church
Address: 120 NE Knott St
Tax Account #: R102180 and R102181

Proposed change:

Comprehensive Plan Map amendment:
from Multi-Dwelling - Neighborhood to Mixed Use - Urban Center

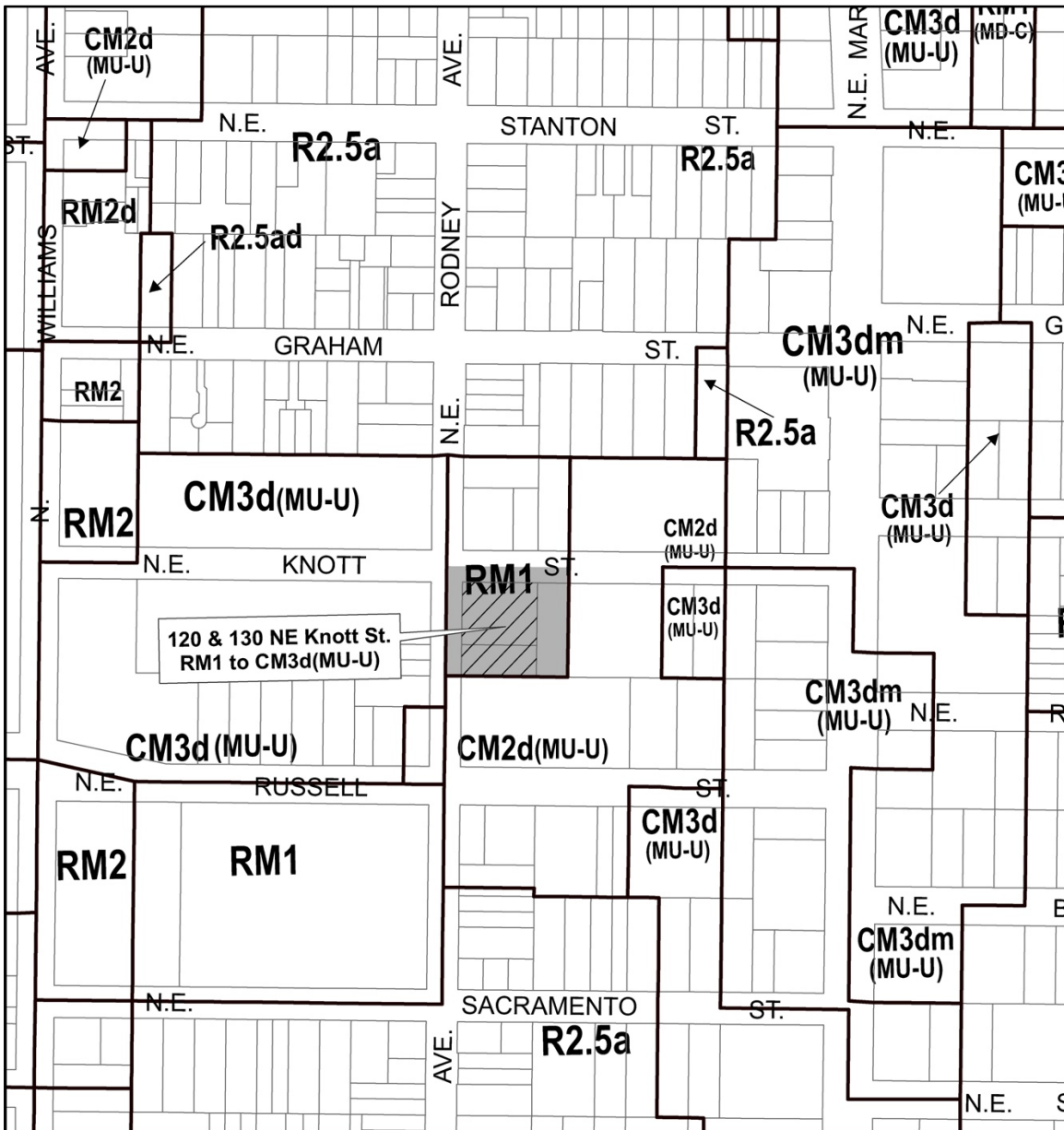
Zone Map amendment:

from RM1 to CM3d

Other zoning designations:

Elliot Conservation District
Albina Community Plan District

St Phillip the Deacon Church owns the two tax lots on the corner of NE Knott Street and NE Rodney street, which they anticipate using to develop affordable housing and community service uses and maintain the religious institutional uses. The adjacent lot to the east that is also proposed for rezone is in private ownership but is included in order to avoid creating an isolated lot of RM1 zoning. Typically, zoning boundaries should follow the street or encompass whole street faces and be mapped more broadly than a single lot. NE Knott and NE Rodney Streets are Local Service Streets in the Transportation System Plan (TSP).



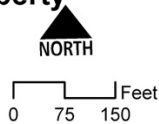
Expanding Opportunities for Affordable Housing - Package B

Map 1: St. Philip The Deacon & DuBuisson property

January, 2021

City of Portland, Oregon ||
Bureau of Planning and Sustainability ||
Geographic Information Systems

- Legend
- Existing Zoning
 - Proposed Change Area
 - Common Ownership



Commentary

Property information:

Owner: Dianne Clay
Address: 4515 N Mississippi Ave
Tax Account #: R135550

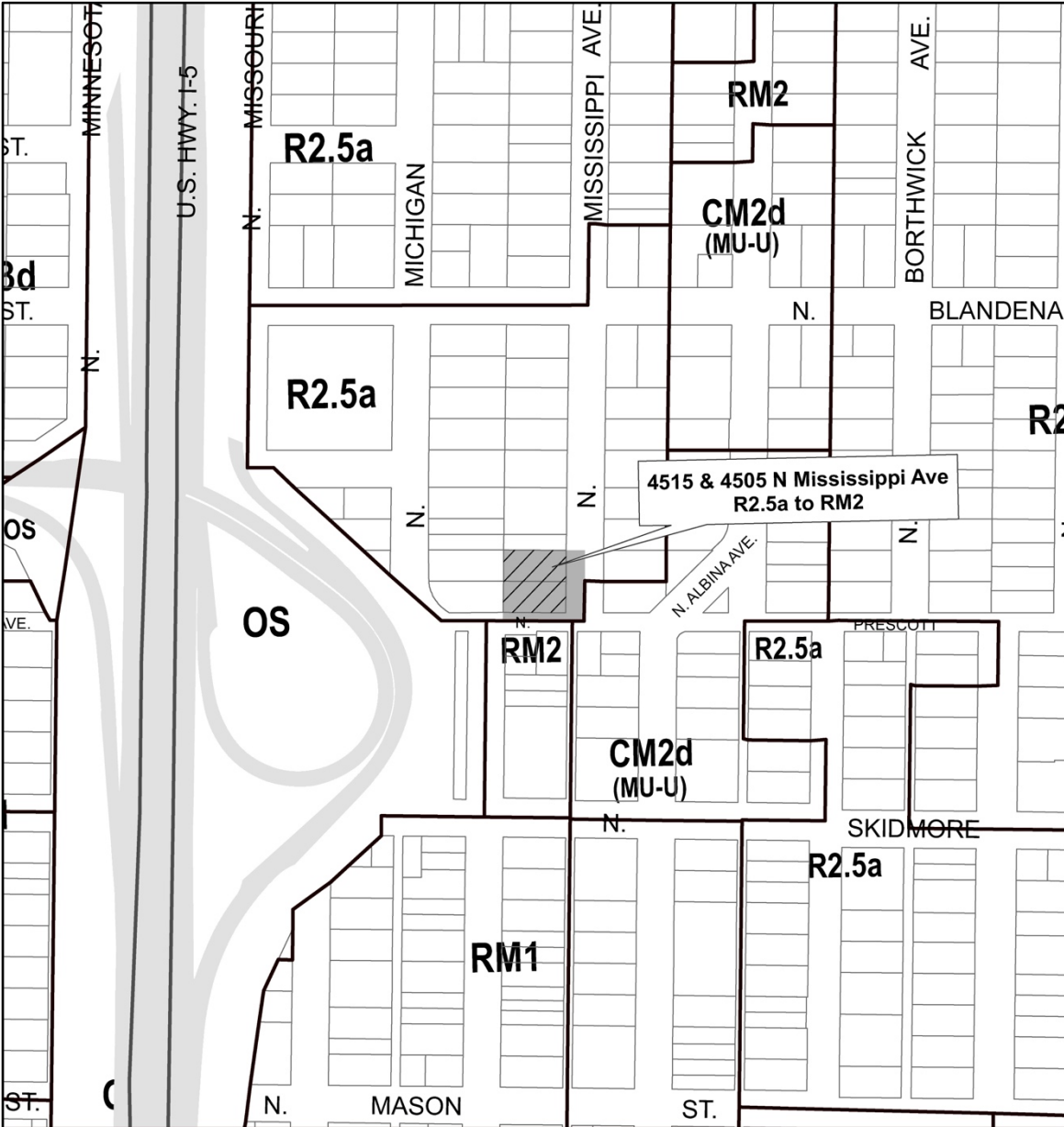
Owner: James Sansangasakun and Oranuch Chatsrinopakun
Address: 4505 N Mississippi Ave
Tax Account #: R135551

Proposed change:
Comprehensive Plan Map amendment:
from Single-Dwelling 2,500 to Multi-Dwelling - Corridor

Zone Map amendment:
from R2.5a to RM2

Other zoning designations:
Mississippi Conservation District

These two sites are located at the corner of N Mississippi and N Prescott and are in single dwelling residential use. They are privately owned. The owner of 4515 presently rents out the rooms individually as a rooming house at below market rates. She anticipates expanding that use on the site and would like to apply for Prosper Portland Grants to assist her in doing so. The owners of 4505 N Mississippi intend to maintain the single dwelling use on the site. That site was included in the zone change proposal to avoid an isolated "spot-zoning" situation at 4515 N Mississippi. N Mississippi and N Prescott are both designated as Local Service Streets in the Transportation System Plan (TSP).



Expanding Opportunities for Affordable Housing - Package B


Map 2: 4515 N Mississippi Ave & 4505 N Mississippi Ave

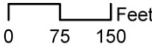
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Legend

- Existing Zoning
- Proposed Change Area
- Common Ownership


 NORTH


 0 75 150 Feet


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