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## MEMO

**DATE:** September 15, 2021

**TO:** Planning and Sustainability Commission

**FROM:** Mindy Brooks, City Planner, Project Manager  
Daniel Soebbing, City Planner

**CC:** Andrea Durbin, Eric Engstrom, Sallie Edmunds

**SUBJECT:** September 28, 2021 PSC Work Session on Ezone Map Correction project

**ATTACHMENTS:**

- B 1-18: Vulnerability Risk Factor Maps
- C 1-3: Wildfire Documents
- D: Permission to Access Form
- E: Zoning Code Language for Map Error Corrections
- G1-31: Site-Specific Testimony and Staff Responses

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City staff are pleased to be coming back to you on September 28 for what we envision to be the final PSC work session and vote on the Ezone Map Correction Project.

At the hearing on August 24, commissioners asked for additional information regarding a number of topics listed below. A summary for each topic is provided in this memo along with an attachment with additional details.



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| Turjumaad iyo Fasiraad | Письмовий і усний переклад | Traducere și interpretariat | Chiaku me Awewen Kapas |  
翻訳または通訳 | 𑌕𑌆𑌇𑌈𑌉𑌊𑌋𑌌𑌍𑌎𑌏𑌐𑌑𑌒𑌓𑌔𑌕𑌖𑌗𑌘𑌙𑌚𑌛𑌜𑌝𑌞𑌟𑌠𑌡𑌢𑌣𑌤𑌥𑌦𑌧𑌨𑌩𑌪𑌫𑌬𑌭𑌮𑌯𑌰𑌱𑌲𑌳𑌴𑌵𑌶𑌷𑌸𑌹𑌺𑌻𑌼𑌽𑌾𑌿𑀀𑀁𑀂𑀃𑀄𑀅𑀆𑀇𑀈𑀉𑀊𑀋𑀌𑀍𑀎𑀏𑀐𑀑𑀒𑀓𑀔𑀕𑀖𑀗𑀘𑀙𑀚𑀛𑀜𑀝𑀞𑀟𑀠𑀡𑀢𑀣𑀤𑀥𑀦𑀧𑀨𑀩𑀪𑀫𑀬𑀭𑀮𑀯𑀰𑀱𑀲𑀳𑀴𑀵𑀶𑀷𑀸𑀹𑀺𑀻𑀼𑀽𑀾𑀿𑁀𑁁𑁂𑁃𑁄𑁅𑁆𑁇𑁈𑁉𑁊𑁋𑁌𑁍𑁎𑁏𑁐𑁑𑁒𑁓𑁔𑁕𑁖𑁗𑁘𑁙𑁚𑁛𑁜𑁝𑁞𑁟𑁠𑁡𑁢𑁣𑁤𑁥𑁦𑁧𑁨𑁩𑁪𑁫𑁬𑁭𑁮𑁯𑁰𑁱𑁲𑁳𑁴𑁵𑁶𑁷𑁸𑁹𑁺𑁻𑁼𑁽𑁾𑁿𑂀𑂁𑂂𑂃𑂄𑂅𑂆𑂇𑂈𑂉𑂊𑂋𑂌𑂍𑂎𑂏𑂐𑂑𑂒𑂓𑂔𑂕𑂖𑂗𑂘𑂙𑂚𑂛𑂜𑂝𑂞𑂟𑂠𑂡𑂢𑂣𑂤𑂥𑂦𑂧𑂨𑂩𑂪𑂫𑂬𑂭𑂮𑂯𑂰𑂱𑂲𑂳𑂴𑂵𑂶𑂷𑂸𑂺𑂹𑂻𑂼𑂽𑂾𑂿𑃀𑃁𑃂𑃃𑃄𑃅𑃆𑃇𑃈𑃉𑃊𑃋𑃌𑃍𑃎𑃏𑃐𑃑𑃒𑃓𑃔𑃕𑃖𑃗𑃘𑃙𑃚𑃛𑃜𑃝𑃞𑃟𑃠𑃡𑃢𑃣𑃤𑃥𑃦𑃧𑃨𑃩𑃪𑃫𑃬𑃭𑃮𑃯𑃰𑃱𑃲𑃳𑃴𑃵𑃶𑃷𑃸𑃹𑃺𑃻𑃼𑃽𑃾𑃿𑄀𑄁𑄂𑄃𑄄𑄅𑄆𑄇𑄈𑄉𑄊𑄋𑄌𑄍𑄎𑄏𑄐𑄑𑄒𑄓𑄔𑄕𑄖𑄗𑄘𑄙𑄚𑄛𑄜𑄝𑄞𑄟𑄠𑄡𑄢𑄣𑄤𑄥𑄦𑄧𑄨𑄩𑄪𑄫𑄬𑄭𑄮𑄯𑄰𑄱𑄲𑄳𑄴𑄵𑄶𑄷𑄸𑄹𑄺𑄻𑄼𑄽𑄾𑄿𑅀𑅁𑅂𑅃𑅄𑅅𑅆𑅇𑅈𑅉𑅊𑅋𑅌𑅍𑅎𑅏𑅐𑅑𑅒𑅓𑅔𑅕𑅖𑅗𑅘𑅙𑅚𑅛𑅜𑅝𑅞𑅟𑅠𑅡𑅢𑅣𑅤𑅥𑅦𑅧𑅨𑅩𑅪𑅫𑅬𑅭𑅮𑅯𑅰𑅱𑅲𑅳𑅴𑅵𑅶𑅷𑅸𑅹𑅺𑅻𑅼𑅽𑅾𑅿𑆀𑆁𑆂𑆃𑆄𑆅𑆆𑆇𑆈𑆉𑆊𑆋𑆌𑆍𑆎𑆏𑆐𑆑𑆒𑆓𑆔𑆕𑆖𑆗𑆘𑆙𑆚𑆛𑆜𑆝𑆞𑆟𑆠𑆡𑆢𑆣𑆤𑆥𑆦𑆧𑆨𑆩𑆪𑆫𑆬𑆭𑆮𑆯𑆰𑆱𑆲𑆳𑆴𑆵𑆶𑆷𑆸𑆹𑆺𑆻𑆼𑆽𑆾𑆿𑇀𑇁𑇂𑇃𑇄𑇅𑇆𑇇𑇈𑇉𑇊𑇋𑇌𑇍𑇎𑇏𑇐𑇑𑇒𑇓𑇔𑇕𑇖𑇗𑇘𑇙𑇚𑇛𑇜𑇝𑇞𑇟𑇠𑇡𑇢𑇣𑇤𑇥𑇦𑇧𑇨𑇩𑇪𑇫𑇬𑇭𑇮𑇯𑇰𑇱𑇲𑇳𑇴𑇵𑇶𑇷𑇸𑇹𑇺𑇻𑇼𑇽𑇾𑇿𑈀𑈁𑈂𑈃𑈄𑈅𑈆𑈇𑈈𑈉𑈊𑈋𑈌𑈍𑈎𑈏𑈐𑈑𑈒𑈓𑈔𑈕𑈖𑈗𑈘𑈙𑈚𑈛𑈜𑈝𑈞𑈟𑈠𑈡𑈢𑈣𑈤𑈥𑈦𑈧𑈨𑈩𑈪𑈫𑈬𑈭𑈮𑈯𑈰𑈱𑈲𑈳𑈴𑈶𑈵𑈷𑈸𑈹𑈺𑈻𑈼𑈽𑈾𑈿𑉀𑉁𑉂𑉃𑉄𑉅𑉆𑉇𑉈𑉉𑉊𑉋𑉌𑉍𑉎𑉏𑉐𑉑𑉒𑉓𑉔𑉕𑉖𑉗𑉘𑉙𑉚𑉛𑉜𑉝𑉞𑉟𑉠𑉡𑉢𑉣𑉤𑉥𑉦𑉧𑉨𑉩𑉪𑉫𑉬𑉭𑉮𑉯𑉰𑉱𑉲𑉳𑉴𑉵𑉶𑉷𑉸𑉹𑉺𑉻𑉼𑉽𑉾𑉿𑊀𑊁𑊂𑊃𑊄𑊅𑊆𑊇𑊈𑊉𑊊𑊋𑊌𑊍𑊎𑊏𑊐𑊑𑊒𑊓𑊔𑊕𑊖𑊗𑊘𑊙𑊚𑊛𑊜𑊝𑊞𑊟𑊠𑊡𑊢𑊣𑊤𑊥𑊦𑊧𑊨𑊩𑊪𑊫𑊬𑊭𑊮𑊯𑊰𑊱𑊲𑊳𑊴𑊵𑊶𑊷𑊸𑊹𑊺𑊻𑊼𑊽𑊾𑊿𑋀𑋁𑋂𑋃𑋄𑋅𑋆𑋇𑋈𑋉𑋊𑋋𑋌𑋍𑋎𑋏𑋐𑋑𑋒𑋓𑋔𑋕𑋖𑋗𑋘𑋙𑋚𑋛𑋜𑋝𑋞𑋟𑋠𑋡𑋢𑋣𑋤𑋥𑋦𑋧𑋨𑋩𑋪𑋫𑋬𑋭𑋮𑋯𑋰𑋱𑋲𑋳𑋴𑋵𑋶𑋷𑋸𑋹𑋺𑋻𑋼𑋽𑋾𑋿𑌀𑌁𑌂𑌃𑌄𑌅𑌆𑌇𑌈𑌉𑌊𑌋𑌌𑌍𑌎𑌏𑌐𑌑𑌒𑌓𑌔𑌕𑌖𑌗𑌘𑌙𑌚𑌛𑌜𑌝𑌞𑌟𑌠𑌡𑌢𑌣𑌤𑌥𑌦𑌧𑌨𑌩𑌪𑌫𑌬𑌭𑌮𑌯𑌰𑌱𑌲𑌳𑌴𑌵𑌶𑌷𑌸𑌹𑌺𑌻𑌼𑌽𑌾𑌿𑍀𑍁𑍂𑍃𑍄𑍅𑍆𑍇𑍈𑍉𑍊𑍋𑍌𑍍𑍎𑍏𑍐𑍑𑍒𑍓𑍔𑍕𑍖𑍗𑍘𑍙𑍚𑍛𑍜𑍝𑍞𑍟𑍠𑍡𑍢𑍣𑍤𑍥𑍦𑍧𑍨𑍩𑍪𑍫𑍬𑍭𑍮𑍯𑍰𑍱𑍲𑍳𑍴𑍵𑍶𑍷𑍸𑍹𑍺𑍻𑍼𑍽𑍾𑍿𑎀𑎁𑎂𑎃𑎄𑎅𑎆𑎇𑎈𑎉𑎊𑎋𑎌𑎍𑎎𑎏𑎐𑎑𑎒𑎓𑎔𑎕𑎖𑎗𑎘𑎙𑎚𑎛𑎜𑎝𑎞𑎟𑎠𑎡𑎢𑎣𑎤𑎥𑎦𑎧𑎨𑎩𑎪𑎫𑎬𑎭𑎮𑎯𑎰𑎱𑎲𑎳𑎴𑎵𑎶𑎷𑎸𑎹𑎺𑎻𑎼𑎽𑎾𑎿𑏀𑏁𑏂𑏃𑏄𑏅𑏆𑏇𑏈𑏉𑏊𑏋𑏌𑏍𑏎𑏏𑏐𑏑𑏒𑏓𑏔𑏕𑏖𑏗𑏘𑏙𑏚𑏛𑏜𑏝𑏞𑏟𑏠𑏡𑏢𑏣𑏤𑏥𑏦𑏧𑏨𑏩𑏪𑏫𑏬𑏭𑏮𑏯𑏰𑏱𑏲𑏳𑏴𑏵𑏶𑏷𑏸𑏹𑏺𑏻𑏼𑏽𑏾𑏿𑐀𑐁𑐂𑐃𑐄𑐅𑐆𑐇𑐈𑐉𑐊𑐋𑐌𑐍𑐎𑐏𑐐𑐑𑐒𑐓𑐔𑐕𑐖𑐗𑐘𑐙𑐚𑐛𑐜𑐝𑐞𑐟𑐠𑐡𑐢𑐣𑐤𑐥𑐦𑐧𑐨𑐩𑐪𑐫𑐬𑐭𑐮𑐯𑐰𑐱𑐲𑐳𑐴𑐵𑐶𑐷𑐸𑐹𑐺𑐻𑐼𑐽𑐾𑐿𑑀𑑁𑑂𑑃𑑄𑑅𑑆𑑇𑑈𑑉𑑊𑑋𑑌𑑍𑑎𑑏𑑐𑑑𑑒𑑓𑑔𑑕𑑖𑑗𑑘𑑙𑑚𑑛𑑜𑑝𑑞𑑟𑑠𑑡𑑢𑑣𑑤𑑥𑑦𑑧𑑨𑑩𑑪𑑫𑑬𑑭𑑮𑑯𑑰𑑱𑑲𑑳𑑴𑑵𑑶𑑷𑑸𑑹𑑺𑑻𑑼𑑽𑑾𑑿𑒀𑒁𑒂𑒃𑒄𑒅𑒆𑒇𑒈𑒉𑒊𑒋𑒌𑒍𑒎𑒏𑒐𑒑𑒒𑒓𑒔𑒕𑒖𑒗𑒘𑒙𑒚𑒛𑒜𑒝𑒞𑒟𑒠𑒡𑒢𑒣𑒤𑒥𑒦𑒧𑒨𑒩𑒪𑒫𑒬𑒭𑒮𑒯𑒰𑒱𑒲𑒳𑒴𑒵𑒶𑒷𑒸𑒻𑒻𑒼𑒽𑒾𑒿𑓀𑓁𑓃𑓂𑓄𑓅𑓆𑓇𑓈𑓉𑓊𑓋𑓌𑓍𑓎𑓏𑓐𑓑𑓒𑓓𑓔𑓕𑓖𑓗𑓘𑓙𑓚𑓛𑓜𑓝𑓞𑓟𑓠𑓡𑓢𑓣𑓤𑓥𑓦𑓧𑓨𑓩𑓪𑓫𑓬𑓭𑓮𑓯𑓰𑓱𑓲𑓳𑓴𑓵𑓶𑓷𑓸𑓹𑓺𑓻𑓼𑓽𑓾𑓿𑔀𑔁𑔂𑔃𑔄𑔅𑔆𑔇𑔈𑔉𑔊𑔋𑔌𑔍𑔎𑔏𑔐𑔑𑔒𑔓𑔔𑔕𑔖𑔗𑔘𑔙𑔚𑔛𑔜𑔝𑔞𑔟𑔠𑔡𑔢𑔣𑔤𑔥𑔦𑔧𑔨𑔩𑔪𑔫𑔬𑔭𑔮𑔯𑔰𑔱𑔲𑔳𑔴𑔵𑔶𑔷𑔸𑔹𑔺𑔻𑔼𑔽𑔾𑔿𑕀𑕁𑕂𑕃𑕄𑕅𑕆𑕇𑕈𑕉𑕊𑕋𑕌𑕍𑕎𑕏𑕐𑕑𑕒𑕓𑕔𑕕𑕖𑕗𑕘𑕙𑕚𑕛𑕜𑕝𑕞𑕟𑕠𑕡𑕢𑕣𑕤𑕥𑕦𑕧𑕨𑕩𑕪𑕫𑕬𑕭𑕮𑕯𑕰𑕱𑕲𑕳𑕴𑕵𑕶𑕷𑕸𑕹𑕺𑕻𑕼𑕽𑕾𑕿𑖀𑖁𑖂𑖃𑖄𑖅𑖆𑖇𑖈𑖉𑖊𑖋𑖌𑖍𑖎𑖏𑖐𑖑𑖒𑖓𑖔𑖕𑖖𑖗𑖘𑖙𑖚𑖛𑖜𑖝𑖞𑖟𑖠𑖡𑖢𑖣𑖤𑖥𑖦𑖧𑖨𑖩𑖪𑖫𑖬𑖭𑖮𑖯𑖰𑖱𑖲𑖳𑖴𑖵𑖶𑖷𑖸𑖹𑖺𑖻𑖼𑖽𑖾𑗀𑖿𑗁𑗂𑗃𑗄𑗅𑗆𑗇𑗈𑗉𑗊𑗋𑗌𑗍𑗎𑗏𑗐𑗑𑗒𑗓𑗔𑗕𑗖𑗗𑗘𑗙𑗚𑗛𑗜𑗝𑗞𑗟𑗠𑗡𑗢𑗣𑗤𑗥𑗦𑗧𑗨𑗩𑗪𑗫𑗬𑗭𑗮𑗯𑗰𑗱𑗲𑗳𑗴𑗵𑗶𑗷𑗸𑗹𑗺𑗻𑗼𑗽𑗾𑗿𑘀𑘁𑘂𑘃𑘄𑘅𑘆𑘇𑘈𑘉𑘊𑘋𑘌𑘍𑘎𑘏𑘐𑘑𑘒𑘓𑘔𑘕𑘖𑘗𑘘𑘙𑘚𑘛𑘜𑘝𑘞𑘟𑘠𑘡𑘢𑘣𑘤𑘥𑘦𑘧𑘨𑘩𑘪𑘫𑘬𑘭𑘮𑘯𑘰𑘱𑘲𑘳𑘴𑘵𑘶𑘷𑘸𑘹𑘺𑘻𑘼𑘽𑘾𑘿𑙀𑙁𑙂𑙃𑙄𑙅𑙆𑙇𑙈𑙉𑙊𑙋𑙌𑙍𑙎𑙏𑙐𑙑𑙒𑙓𑙔𑙕𑙖𑙗𑙘𑙙𑙚𑙛𑙜𑙝𑙞𑙟𑙠𑙡𑙢𑙣𑙤𑙥𑙦𑙧𑙨𑙩𑙪𑙫𑙬𑙭𑙮𑙯𑙰𑙱𑙲𑙳𑙴𑙵𑙶𑙷𑙸𑙹𑙺𑙻𑙼𑙽𑙾𑙿𑚀𑚁𑚂𑚃𑚄𑚅𑚆𑚇𑚈𑚉𑚊𑚋𑚌𑚍𑚎𑚏𑚐𑚑𑚒𑚓𑚔𑚕𑚖𑚗𑚘𑚙𑚚𑚛𑚜𑚝𑚞𑚟𑚠𑚡𑚢𑚣𑚤𑚥𑚦𑚧𑚨𑚩𑚪𑚫𑚬𑚭𑚮𑚯𑚰𑚱𑚲𑚳𑚴𑚵𑚷𑚶𑚸𑚹𑚺𑚻𑚼𑚽𑚾𑚿𑛀𑛁𑛂𑛃𑛄𑛅𑛆𑛇𑛈𑛉𑛊𑛋𑛌𑛍𑛎𑛏𑛐𑛑𑛒𑛓𑛔𑛕𑛖𑛗𑛘𑛙𑛚𑛛𑛜𑛝𑛞𑛟𑛠𑛡𑛢𑛣𑛤𑛥𑛦𑛧𑛨𑛩𑛪𑛫𑛬𑛭𑛮𑛯𑛰𑛱𑛲𑛳𑛴𑛵𑛶𑛷𑛸𑛹𑛺𑛻𑛼𑛽𑛾𑛿𑜀𑜁𑜂𑜃𑜄𑜅𑜆𑜇𑜈𑜉𑜊𑜋𑜌𑜍𑜎𑜏𑜐𑜑𑜒𑜓𑜔𑜕𑜖𑜗𑜘𑜙𑜚𑜛𑜜𑜝𑜞𑜟𑜠𑜡𑜢𑜣𑜤𑜥𑜦𑜧𑜨𑜩𑜪𑜫𑜬𑜭𑜮𑜯𑜰𑜱𑜲𑜳𑜴𑜵𑜶𑜷𑜸𑜹𑜺𑜻𑜼𑜽𑜾𑜿𑝀𑝁𑝂𑝃𑝄𑝅𑝆𑝇𑝈𑝉𑝊𑝋𑝌𑝍𑝎𑝏𑝐𑝑𑝒𑝓𑝔𑝕𑝖𑝗𑝘𑝙𑝚𑝛𑝜𑝝𑝞𑝟𑝠𑝡𑝢𑝣𑝤𑝥𑝦𑝧𑝨𑝩𑝪𑝫𑝬𑝭𑝮𑝯𑝰𑝱𑝲𑝳𑝴𑝵𑝶𑝷𑝸𑝹𑝺𑝻𑝼𑝽𑝾𑝿𑞀𑞁𑞂𑞃𑞄𑞅𑞆𑞇𑞈𑞉𑞊𑞋𑞌𑞍𑞎𑞏𑞐𑞑𑞒𑞓𑞔𑞕𑞖𑞗𑞘𑞙𑞚𑞛𑞜𑞝𑞞𑞟𑞠𑞡𑞢𑞣𑞤𑞥𑞦𑞧𑞨𑞩𑞪𑞫𑞬𑞭𑞮𑞯𑞰𑞱𑞲𑞳𑞴𑞵𑞶𑞷𑞸𑞹𑞺𑞻𑞼𑞽𑞾𑞿𑟀𑟁𑟂𑟃𑟄𑟅𑟆𑟇𑟈𑟉𑟊𑟋𑟌𑟍𑟎𑟏𑟐𑟑𑟒𑟓𑟔𑟕𑟖𑟗𑟘𑟙𑟚𑟛𑟜𑟝𑟞𑟟𑟠𑟡𑟢𑟣𑟤𑟥𑟦𑟧𑟨𑟩𑟪𑟫𑟬𑟭𑟮𑟯𑟰𑟱𑟲𑟳𑟴𑟵𑟶𑟷𑟸𑟹𑟺𑟻𑟼𑟽𑟾𑟿𑠀𑠁𑠂𑠃𑠄𑠅𑠆𑠇𑠈𑠉𑠊𑠋𑠌𑠍𑠎𑠏𑠐𑠑𑠒𑠓𑠔𑠕𑠖𑠗𑠘𑠙𑠚𑠛𑠜𑠝𑠞𑠟𑠠𑠡𑠢𑠣𑠤𑠥𑠦𑠧𑠨𑠩𑠪𑠫𑠬𑠭𑠮𑠯𑠰𑠱𑠲𑠳𑠴𑠵𑠶𑠷𑠸𑠺𑠹𑠻𑠼𑠽𑠾𑠿𑡀𑡁𑡂𑡃𑡄𑡅𑡆𑡇𑡈𑡉𑡊𑡋𑡌𑡍𑡎𑡏𑡐𑡑𑡒𑡓𑡔𑡕𑡖𑡗𑡘𑡙𑡚𑡛𑡜𑡝𑡞𑡟𑡠𑡡𑡢𑡣𑡤𑡥𑡦𑡧𑡨𑡩𑡪𑡫𑡬𑡭𑡮𑡯𑡰𑡱𑡲𑡳𑡴𑡵𑡶𑡷𑡸𑡹𑡺𑡻𑡼𑡽𑡾𑡿𑢀𑢁𑢂𑢃𑢄𑢅𑢆𑢇𑢈𑢉𑢊𑢋𑢌𑢍𑢎𑢏𑢐𑢑𑢒𑢓𑢔𑢕𑢖𑢗𑢘𑢙𑢚𑢛𑢜𑢝𑢞𑢟𑢠𑢡𑢢𑢣𑢤𑢥𑢦𑢧𑢨𑢩𑢪𑢫𑢬𑢭𑢮𑢯𑢰𑢱𑢲𑢳𑢴𑢵𑢶𑢷𑢸𑢹𑢺𑢻𑢼𑢽𑢾𑢿𑣀𑣁𑣂𑣃𑣄𑣅𑣆𑣇𑣈𑣉𑣊𑣋𑣌𑣍𑣎𑣏𑣐𑣑𑣒𑣓𑣔𑣕𑣖𑣗𑣘𑣙𑣚𑣛𑣜𑣝𑣞𑣟𑣠𑣡𑣢𑣣𑣤𑣥𑣦𑣧𑣨𑣩𑣪𑣫𑣬𑣭𑣮𑣯𑣰𑣱𑣲𑣳𑣴𑣵𑣶𑣷𑣸𑣹𑣺𑣻𑣼𑣽𑣾𑣿𑤀𑤁𑤂𑤃𑤄𑤅𑤆𑤇𑤈𑤉𑤊𑤋𑤌𑤍𑤎𑤏𑤐𑤑𑤒𑤓𑤔𑤕𑤖𑤗𑤘𑤙𑤚𑤛𑤜𑤝𑤞𑤟𑤠𑤡𑤢𑤣𑤤𑤥𑤦𑤧𑤨𑤩𑤪𑤫𑤬𑤭𑤮𑤯𑤰𑤱𑤲𑤳𑤴𑤵𑤶𑤷𑤸𑤹𑤺𑤻𑤼𑤽𑤾𑤿𑥀𑥁𑥂𑥃𑥄𑥅𑥆𑥇𑥈𑥉𑥊𑥋𑥌𑥍𑥎𑥏𑥐𑥑𑥒𑥓𑥔𑥕𑥖𑥗𑥘𑥙𑥚𑥛𑥜𑥝𑥞𑥟𑥠𑥡𑥢𑥣𑥤𑥥𑥦𑥧𑥨𑥩𑥪𑥫𑥬𑥭𑥮𑥯𑥰𑥱𑥲𑥳𑥴𑥵𑥶𑥷𑥸𑥹𑥺𑥻𑥼𑥽𑥾𑥿𑦀𑦁𑦂𑦃𑦄𑦅𑦆𑦇𑦈𑦉𑦊𑦋𑦌𑦍𑦎𑦏𑦐𑦑𑦒𑦓𑦔𑦕𑦖𑦗𑦘𑦙𑦚𑦛𑦜𑦝𑦞𑦟𑦠𑦡𑦢𑦣𑦤𑦥𑦦𑦧𑦨𑦩𑦪𑦫𑦬𑦭𑦮𑦯𑦰𑦱𑦲𑦳𑦴𑦵𑦶𑦷𑦸𑦹𑦺𑦻𑦼𑦽𑦾𑦿𑧀𑧁𑧂𑧃𑧄𑧅𑧆𑧇𑧈𑧉𑧊𑧋𑧌𑧍𑧎𑧏𑧐𑧑𑧒𑧓𑧔𑧕𑧖𑧗𑧘𑧙𑧚𑧛𑧜𑧝𑧞𑧟𑧠𑧡𑧢𑧣𑧤𑧥𑧦𑧧𑧨𑧩𑧪𑧫𑧬𑧭𑧮𑧯𑧰𑧱𑧲𑧳𑧴𑧵𑧶𑧷𑧸𑧹𑧺𑧻𑧼𑧽𑧾𑧿𑨀𑨁𑨂𑨃𑨄𑨅𑨆𑨇𑨈𑨉𑨊𑨋𑨌𑨍𑨎𑨏𑨐𑨑𑨒𑨓𑨔𑨕𑨖𑨗𑨘𑨙𑨚𑨛𑨜𑨝𑨞𑨟𑨠𑨡𑨢𑨣𑨤𑨥𑨦𑨧𑨨𑨩𑨪𑨫𑨬𑨭𑨮𑨯𑨰𑨱𑨲𑨳𑨴𑨵𑨶𑨷𑨸𑨹𑨺𑨻𑨼𑨽𑨾𑨿𑩀𑩁𑩂𑩃𑩄𑩅𑩆𑩇𑩈𑩉𑩊𑩋𑩌𑩍𑩎𑩏𑩐𑩑𑩒𑩓𑩔𑩕𑩖𑩗𑩘𑩙𑩚𑩛𑩜𑩝𑩞𑩟𑩠𑩡𑩢𑩣𑩤𑩥𑩦𑩧𑩨𑩩𑩪𑩫𑩬𑩭𑩮𑩯𑩰𑩱𑩲𑩳𑩴𑩵𑩶𑩷𑩸𑩹𑩺𑩻𑩼𑩽𑩾𑩿𑪀𑪁𑪂𑪃𑪄𑪅𑪆𑪇𑪈𑪉𑪊𑪋𑪌𑪍𑪎𑪏𑪐𑪑𑪒𑪓𑪔𑪕𑪖𑪗𑪘𑪙𑪚𑪛𑪜𑪝𑪞𑪟𑪠𑪡𑪢𑪣𑪤𑪥𑪦𑪧𑪨𑪩𑪪𑪫𑪬𑪭𑪮𑪯𑪰𑪱𑪲𑪳𑪴𑪵𑪶𑪷𑪸𑪹𑪺𑪻𑪼𑪽𑪾𑪿𑫀𑫁𑫂𑫃𑫄𑫅𑫆𑫇𑫈𑫉𑫊𑫋𑫌𑫍𑫎𑫏𑫐𑫑𑫒𑫓𑫔𑫕𑫖𑫗𑫘𑫙𑫚𑫛𑫜𑫝𑫞𑫟𑫠𑫡𑫢𑫣𑫤𑫥𑫦𑫧𑫨𑫩𑫪𑫫

If any commissioner would like staff to present one or more of these topics at the work session, please let us know on or before September 20 so we can prepare PowerPoint materials. Also, if any commissioner would like to propose an amendment, please get those to staff on or before September 20.

Topics:

- A. **General information** about the project
- B. **Demographics**, vulnerability and relationship to proposed ezone changes
- C. **Wildfire** and vegetation management
- D. **Wetlands** definition, mapping protocols and timelines
- E. **Smoothing** the overlay zone boundaries
- F. **Map error corrections** after the project is over
- G. **Site by site analysis** of impacts of ezones on potential site development and land divisions

**A. General Information**

The intent behind the ezones is to protect systems of natural resources in a consistent way to make sure functions like stream flow, channel migration, flood control, water quality and habitat corridors remain intact. If the project proposals were to take a piecemeal approach, in which some portions of a stream, wetland or forest are protected differently than other portions, it would create a situation where new development could negatively impact stream flow, or cause flooding, erosion, or landslides, on other properties. Project staff have attempted to avoid arbitrary applications of ezones by creating a systematic mapping methodology that is based on clear and objective criteria. The Ezone Map Correction Project is ensuring that the original intent of the ezones is being applied to the resources in a consistent and replicable way. This is why staff are not proposing that individual properties be treated differently from other properties – the policy approaches are being applied to the resource features as systems.

Table 1 provides the existing and proposed total 'c' and 'p' zones in the project area;

<b>Table 1: Comparison Existing and Proposed Ezones</b>			
	<b>'c' zone acres</b>	<b>'p' zone acres</b>	<b>Total acres</b>
<b>Existing</b>	5276.3	7903.6	13,179.9
<b>Proposed</b>	4212.6	9115.4	13,328.1
<b>% Change</b>	<b>-20.2%</b>	<b>+15.3%</b>	<b>+1.12%</b>

Below is a breakdown by ezones changes on individual properties. Because this is a correction project, there are both increases and decreases based on adjusting the zone boundaries to match the existing natural resources.



Number of private properties with:

- Any change to ezone – 12,040
- Existing ezones are increasing – 7,334
- Existing ezones are decreasing – 4,706
- No ezone today, but new ezones are proposed – 3,280
- Existing ezone today, but the ezone is recommended for complete removal - 931

*Note the changes may be very small or very large, depending on the site and resources.*

Since the start of public testimony in July 2020, project staff have conducted 256 site visits at the request of property owners. The site visits and other edits that staff made by reviewing aerial imagery at the request of property owners have produced 223 changes to feature mapping. The majority of these changes resulted in *reductions* to the proposed coverage of ezones. In each situation, staff are verifying the feature mapping and confirming that the adopted protection policies are appropriately applying to the resources on the site. OHSU and Audubon are two examples of site verifications that reduced the application of the ezones. The other changes are primarily on individual residential properties.

Finally, in May, staff produced a table that summarized all testimony and all site visits completed and attached maps. That table has been updated to reflect site visits completed since May, including the testimony received by the September 10 deadline. The table is available on the [project website](#) under PSC Materials.

## **B. Demographics**, vulnerability and relationship to proposed ezone changes

The City of Portland uses a measure of “Vulnerability Risk”, which includes the collective ranking of the following factors: (1) Renters; (2) Communities of color; (3) Educational attainment; and (4) Households with income at or below 80 percent of median family income (MFI) for the city. This information is collected from the census and provide a census tract-level understanding of where the most vulnerable people live in Portland.

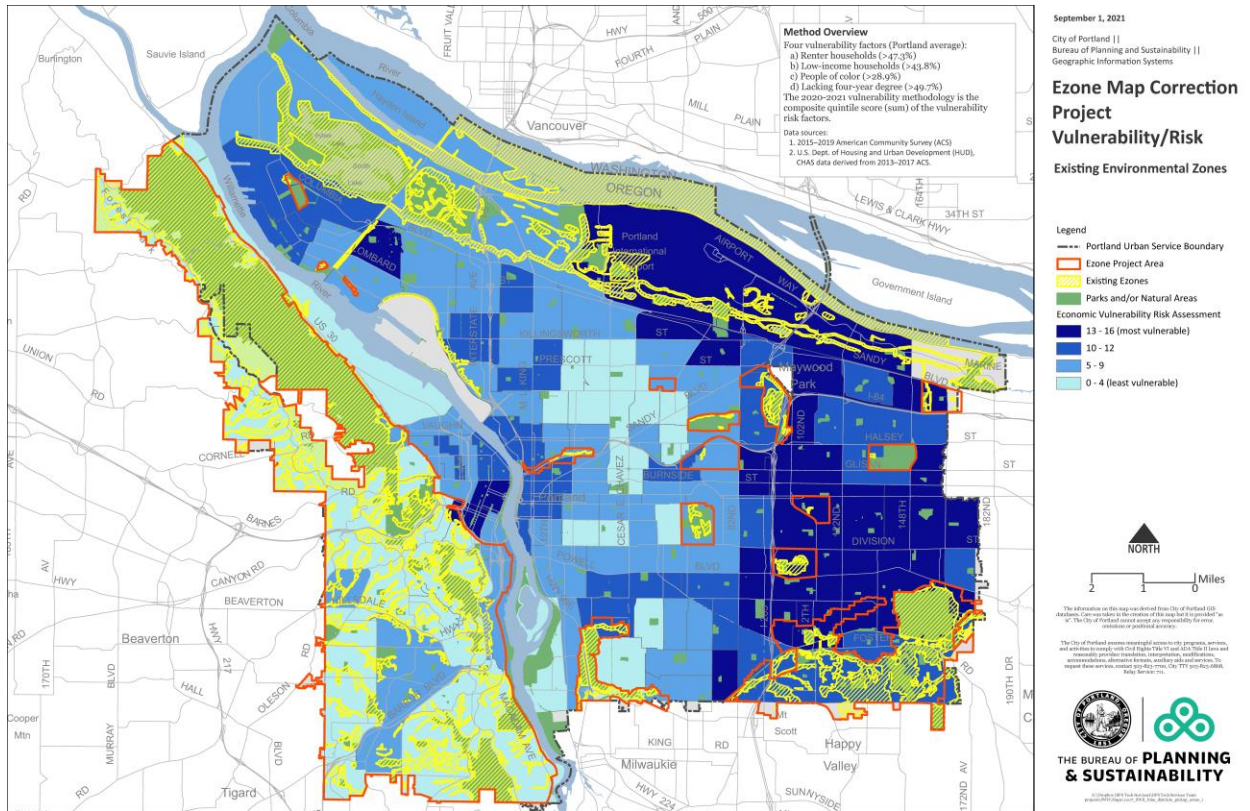
Within the Ezone Map Correction Project area, the census tracts with the highest vulnerability risk are in the following neighborhoods: Powellhurst/Gilbert, Lents, Eastmoreland/Reed, Wilkes, Kenton and St. Johns. The areas with the lowest vulnerability risk are in the Northwest Hills and Southwest Hills. The majority of the changes to the ezones are on the west side of the Willamette River where the vulnerability risks are the lowest.

**Maps B.1 – B.18 found in Attachment B** show the existing and proposed ezones within the census tracks with the highest vulnerability. Map B.1 and B.2 below show the vulnerability indices citywide overlaid with the ezones. The individual maps (B.3-B.18) are zoomed in views of each of the vulnerable Census Tracts overlaid with the existing and proposed ezones. There are 15 tracts that score high in the vulnerability analysis that intersect with ezones in the project area. In several of these tracts, the majority of the existing and proposed ezones are primarily located in parks, and they intersect with few private properties. But there are several tracts in which the existing and proposed ezones have

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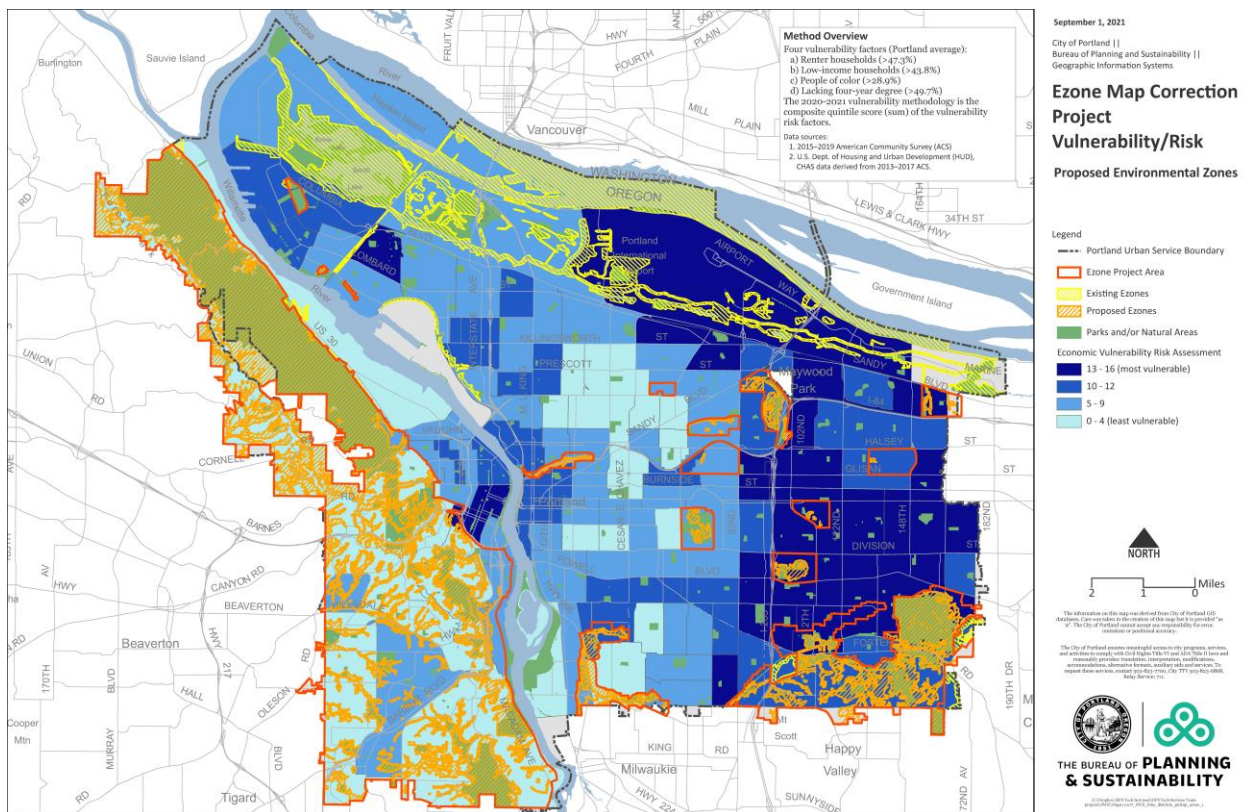


significant overlap with a substantial number of the residential lots that are located therein. Tract 89.01 is the most obvious example of this (maps B.13 and B.14). Within this Tract, there are both areas where ezones are proposed to expand to increase coverage on lots, and places where there are proposed reductions, in which ezones are being removed from lots.



Map B.1: Existing Ezones and Vulnerable Populations





**Map B.2: Proposed Ezones and Vulnerable Populations**

Because the data is only available at the census tract-level, this analysis does not provide detailed information about where exactly people live who are more vulnerable to regulatory changes or who may not have the same level or type of access to those who are making decisions about regulatory changes. It only provides a general summary of the areas of Portland where those people may live. The potential impacts of ezones are highly specific to individual properties, but the Census data only provides information at a neighborhood level scale.

Additional information: [Existing Conditions Report](#) (pg 66-69) and PSC memo dated August 25, 2020.

### C. Wildfire

Wildfire is becoming an increasing concern in Portland and the region. But the issues of wildfire must be discussed in the context of the other risks that homeowners face. For example, vegetation near homes can burn but that vegetation is also holding hillsides in place reducing landslide risks in times of heavy rain; vegetation reduces in-stream rate and volume and erosion, thus minimizing impacts to downstream properties; and trees provide shade and air-cooling benefits. The long-term approach to vegetation management must consider all of the risks and requires a strategic, multi-disciplinary approach. That type of strategic evaluation is not within the scope of the Ezone Map Correction Project. However,



PSC has included a few minor code amendments and has forwarded on a request for the upcoming update of Title 11, Tree Code, to consider additional allowances for tree pruning within wildfire hazard zones.

**Attachment C.1** is a handout produced by BPS, Portland Fire and Rescue, Urban Forestry and Bureau of Development Services to help homeowners understand what is currently allowed in Portland to manage vegetation to reduce wildfire risk. **Attachment C.2** is a handout about fire protection produced by OR Department of Forestry. The ezones largely comply with the state guidance:

- Ground cover should be non-flammable, (e.g., rock outcroppings, or fire-resistant including green grass, succulents or wildflowers).
  - The ezones allow for removal of invasive plants and planting native plants; fire-resistant ground covers are encouraged.
  - The PSC amendment will allow firebreaks of non-combustible materials.
- Shrubs and trees should be maintained in a green condition and substantially free of dead plant material or ladder fuels.
  - The ezones allow for removal of dead and dying trees that pose an immediate risk.
  - Ladder fuels, such as ivy and blackberries, can be removed within ezones.
- All dead branches overhanging portions of roofs should be removed.
  - The ezones allow for removal of trees and tree branches within 10 feet of structures.
- Trees and shrubs should be arranged so that fire cannot spread or jump.
  - Pruning to create separation between trees and the shrub layer is allowed in ezones.

**Attachment C.3** is the report cited in testimony, *Wildfire Readiness Assessment: Gap Analysis Report* (2009). Two key findings that related to ezones are quoted below:

“The Environmental Overlay Zone provides some balance between protecting natural resources and allowing development, but the land use review process for vegetation removal is cumbersome and expensive, and may not allow enough flammable native vegetation to be cleared or pruned away from buildings even when permits are issued.” (pg 9)

“Modify existing regulations to improve the permitting process and allow an increase of the defensible space around homes.” (pg 12)

Multnomah County is currently updating the *Community Wildfire Protection Plan*. BPS and staff from other city bureaus, are participating. The outcomes of this work may include suggestions about specific changes to zoning codes to reduce the risk of wildfire. These amendments would be part of a follow up project, which could include not only changes to the ezone code, but also a comprehensive look at building codes and other aspects of City

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Code, and proposals for managing vegetation on public and private property. Proposals could also include outreach, technical assistance and guidance that will instruct property owners on how they can manage properties using existing provisions in the code.

#### **D. Wetlands**

Concurrent with but independent of the Ezone Map Correction Project, the Bureau of Environmental Services (BES) has been conducting the Wetland Inventory Project (WIP). This is a rigorous wetland mapping and characterization project that follows Oregon Department of State Lands (DSL) wetland mapping guidance.

BPS staff recommended to PSC, and on July 27 PSC voted to approve, two amendments. The first amendment was to include the WIP data in the Natural Resources Inventory (NRI). The NRI is a city-wide inventory of all existing natural resource features and serves as a factual basis for planning and decision making. The second amendment was to apply a consistent protection policy to wetlands located in resource sites where no wetland policy was previously adopted.

The WIP approach and methodology was presented in Attachment 3 to a [memo to PSC dated July 16, 2021](#), . On July 27, Matt Vesh from BES joined the PSC work session and explained the WIP project. The presentation is available on [YouTube](#) and the discussion of wetlands starts at approximately 49:25 minutes.

BES hired a wetland consultant, SWCA Environmental, to conduct wetland determinations on properties where a “potential wetland” was identified. Wetland determinations are done following DSL’s mapping protocols and are performed in the spring. The first round of wetland determinations were completed in June 2021. Determinations will begin again in March 2022. If a property owner wants a free wetland determination completed, they must fill out a *Permission to Access* form available in [Attachment D](#).

If a wetland determination is performed but the property owner wishes to contest the results, they may hire a consultant to conduct a more in depth wetland determination and have that approved by DSL. Once “Concurred” by DSL as meeting the state’s mapping protocols, the City will simply replace the BES wetland determination with the concurred delineation. This can happen at any time and the ezones can be corrected to match (see E below).

#### **E. Map Error Corrections**

The purpose of the Ezone Map Correction Project is to conduct a comprehensive and consistent correction to ezones throughout the city. However, there will be situations where additional site-specific corrections are needed. There is an existing zoning code process already in place and that has been used for many years to correct zone boundaries.



**Attachment E** is the zoning code language for map error corrections. City code 33.855.070.A says that a correction may be made for mapping errors if the map line was intended to follow a topographic feature (e.g., stream top of bank or edge of wetland) and does not do so, or if there is a discrepancy between maps and there is legislative intent about where the line is supposed to go. That means, after the Ezone Project is completed, if a property owner submits a survey of a stream top of bank or a wetland delineation (see previous section), the ezone boundaries can be corrected.

Map errors are a quasi-judicial Type II land use review with a staff-level decision that is appealable to the Hearings Officer. It is a free process and can be done at any time by any property owner. The reason it is free to property owners in these situations is because if the City has made an error in the mapping, the city becomes the applicant not the property owner.

## **F. Smoothing**

There is always tension between wanting to be clear and specific in the zoning code and wanting to provide for simple and flexible implementation. In the past, the later has been used to draw the ezone boundaries – broad brush, smooth zoning lines. The issue is that these lines don't follow the resources and often times it is very difficult to understand where a zone line is supposed to be on a property. This makes correcting the maps challenging.

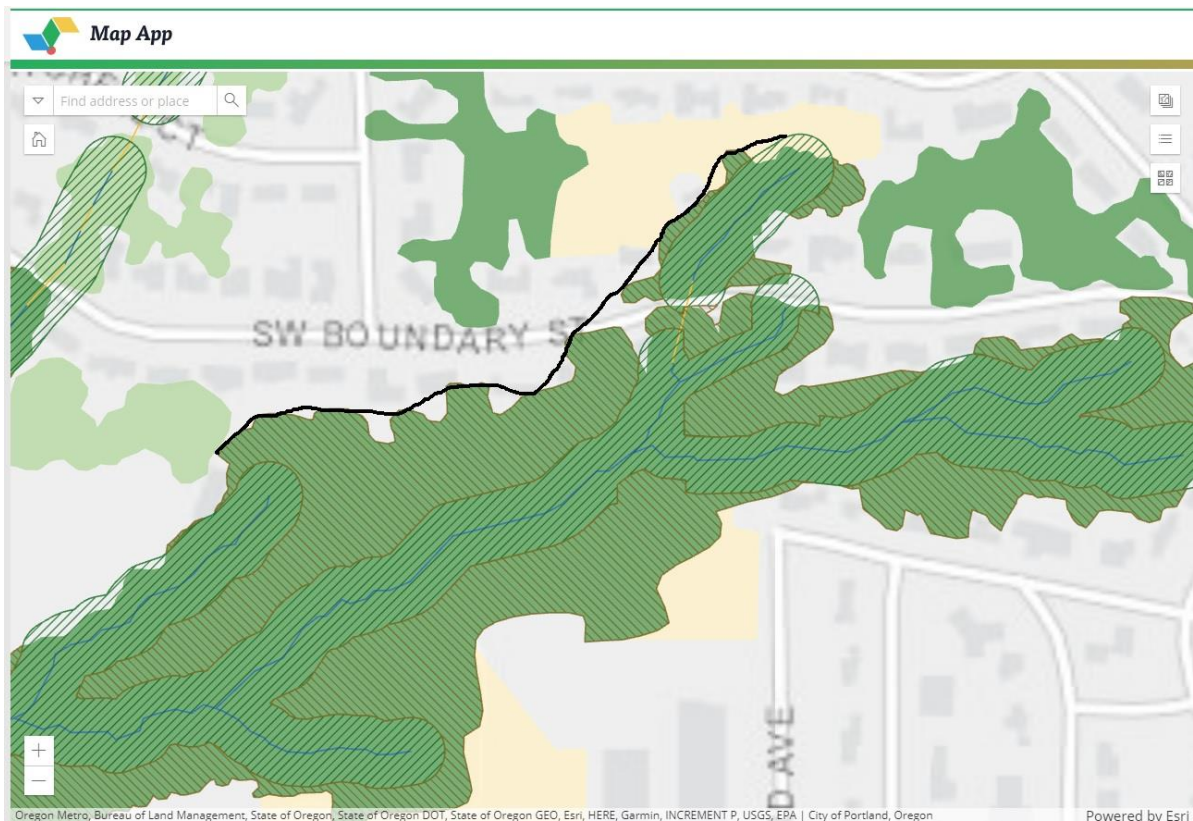
As part of this correction project, staff chose to use the best mapping available and tether the zoning lines to the natural resource features themselves. So, when someone asks why the 'c' zone is where it is, staff can say because it follows the edge of tree canopy that is contiguous to the stream. There is clear, specific legislative intent about where the zoning boundary should be located.

See below for an example of two ways to draw the zoning lines. The underlying solid dark green is the forest mapping based on aerial photography and verified by site visits. The blue lines are streams based on LiDAR and verified by site visits. The green hatch applied to streams and riparian areas is the proposed 'p' zone and the brown hatch applied to forest contiguous to streams is the proposed 'c' zone. The black line is a hand drawn "smooth" line that captures the forest contiguous the streams. The black line is subjective, while the proposed ezones follow the resources themselves..

Note – **There is no Attachment F.**







## G. Site-Specific Testimony and Staff Responses

There are a number of properties where the owner or a neighborhood recently testified either in person or in writing regarding concerns about either the feature mapping or the application of ezones on a specific site. Attachment G presents each of these properties, a summary of the testimony and concerns, and staff's analysis. Potential impacts to development or fiscal impacts are described to the extent they can be.

A few important notes:

1. Future development depends on many factors, not just the ezones. For example, the standards of the 'c' zone might be met by a development proposal, but the engineering to address landslide hazard may be very expensive or there may not be a sewer hook up resulting in a need to extend a sewer line or street frontage improvements may be required.
2. Property value is complex. A site might already be developed to the maximum extent allowed by the base zone and the project is applying a 'p' zone to a wetland located partially on the site. This may have no impact on property value because no additional development would be allowed anyway. But if the site is dividable, it could impact property value depending on the extent of the 'p' zone coverage. Other factors beyond



ezones that may impact property value are the neighborhood itself, views, proximity to parks, etc.

The properties included in Attachment G are listed below with the attachment's page number to make it easier to find a specific site. In the attached documents, staff responded to specific concerns that were raised about feature mapping, the application of ezones to specific features, or the impact that the application of those ezones would have on the developability of specific sites. Some of the testimony that was submitted also touched on other topics that were not related to these specific topics. The site-specific memos are not intended to address these other topics, some of which are addressed elsewhere in this memo:

- G.1 – 4810 SW 60<sup>th</sup> Place, Kenneth McGhehey – pg 1
- G.2 – 10134 SW 55<sup>th</sup> Avenue, Kathy Staat McGowan – pg 3
- G.3 – 2231 SW Montgomery Drive, John Rabkin – pg 5
- G.4 – 4007 SW Comus Street, Dave Salholm – pg 7
- G.5 – 4919 SW Texas Street, David Youmans – pg 12
- G.6 – 6917 SW 49<sup>th</sup> Avenue, Dominic Corrado – pg 14
- G.7 – 3352 SW Spring Garden St, Erik Swanson – pg 17
- G.8 – 1011 S Comus Street, Thomas Hatch – pg 19
- G.9 – 11411 S Elysium Avenue, John van Staveren – pg 21
- G.10 – 5838 SE 111th Avenue, Jack Benson – pg 23
- G.11 – 15580 NE Siskiyou Court, Donald Bowerman (on behalf of William and Margret Bitar) – pg 25
- G.12 – Marquam Park, Roger Brown – pg 27
- G.13 – 11346 S Northgate Avenue, Dana Krawczuck (on behalf of Paul Francis and Jennifer Johnson) – pg 29
- G.14 – Cornell Mountain, Robin Abadia and Cassandra Dickson – pg 31
- G.15 – 4210 SW 58<sup>th</sup> Avenue, Devin Holmes – pg 36
- G.16 – 7933 WI/SW 40th Avenue, Matthew Robinson – pg 38
- G.17 – Various Resource Sites, group testimony (supported by 40 people) – pg 40
- G.18 – 11660 SW Lancaster Road, Douglas Kinnaird – pg 51
- G.19 – 11888 S Breyman Avenue, Michael Robinson (on behalf of Leslie Goss and Sam Gruener) – pg 52
- G.20 – 4700 SW Humphrey Blvd, Jamie Howsley – pg 54
- G.21 – Quail Park Association, John Gibbon – pg 56
- G.22 – 1250 SW Englewood Drive, Karen Rafnel – pg 58
- G.23 – 10701 SW 25<sup>th</sup> Avenue, Laurie Rutenberg and Gary Schoenberg – pg 62
- G.24 – 4504 SE Tenino Street, Amanda Spencer – pg 70
- G.25 – 13927 SE Tenino Street, Sandra Lohstroh – pg 72
- G.26 – 3300 SW Evergreen Lane, James Cameron – pg 74
- G.27 – 3315 SW Marigold Street, Antonie Jetter – pg 76
- G.28 – SW Lancaster Road and SW Coronado St, Kari Hallenburg – pg 78



G.29 – 9735 NW Skyline Blvd, Kim and Mike Johnson – pg 80

G.30 – NW Red Cedar Court #25 (R541487), Kim and Mike Johnson – pg 82

G.31 – Friends of Terwilliger Parkway, Robin Vesey – pg 84

If a commissioner would like staff to provide additional evaluation of any site, please let us know on or before September 20.

