

# Exhibit A: Findings of Fact Report

## Lower Southeast Rising Area Plan

### April 2024

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

The Comprehensive Plan requires 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)

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

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

1. **Finding:** The City Council has identified and addressed all relevant and applicable goals and policies in these additional findings of fact.
2. **Finding:** As discussed in more detail below, the City Council has considered the public testimony on this matter and has weighed all applicable goals and policies and on balance has found the Lower Southeast Rising (LSER) Area Plan amendments are consistent with 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, 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.

The City has an acknowledged Goal 1 program. Community involvement efforts for the LSER Area Plan were conducted in accordance with that program. Therefore, the project is in compliance with Goal 1. More specific findings related to the city's community involvement efforts, including details for each phase of the project, are found in response to the policies in Chapter 2 of the Comprehensive Plan and are incorporated by reference. Based on these findings, the LSER Area Plan is consistent with Goal 1.

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

4. **Finding:** Goal 2, as it applies to the LSER Area Plan amendments, requires the City to follow its established procedures for legislative amendments to the Comprehensive Plan and Zoning Code. 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 LSER Area Plan 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 Commission and City Council that are incorporated in the record that provides the adequate factual basis for this decision.

The Council legislative record specifically incorporates all materials linked on the project website ([www.portland.gov/bps/planning/lower-se-rising](http://www.portland.gov/bps/planning/lower-se-rising)), the reports, memos and presentations provided to the Planning Commission and City Council, the written and verbal testimony submitted to the Planning Commission and City Council, notices sent to the public, and the LSER Area Plan electronic box available at <https://efiles.portlandoregon.gov/Record/14944170> that contains reports, documents, and information related to the project. On the Bureau of Planning and Sustainability's website, the following link ([www.portland.gov/bps/planning/lower-se-rising/project-documents](http://www.portland.gov/bps/planning/lower-se-rising/project-documents)) provides access to a portion of the legislative record. This link was available to the public and City Council during the public hearing process. The Planning Commission and City Council hearings were in a hybrid format, allowing the public to testify in person or using a telephone, mobile device or computer. All project documents were produced and distributed electronically but physical copies were available upon request.

Based on these findings, the LSER Area Plan is consistent with Goal 2.

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

5. **Finding:** Each category is addressed below:

**Open Spaces.** The LSER Area Plan includes Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by the Portland Bureau of Environmental Services (BES). These zone changes will help protect open space and natural resources by facilitating BES's work in undertaking habitat and floodplain restoration on the properties, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land. Therefore, the LSER Area Plan is consistent with the open space elements of Goal 5.

**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 LSER Area Plan amendments do not change this program. Therefore, the LSER Area Plan amendments are consistent with the scenic elements of Goal 5.

**Historic Resources.** The LSER Area Plan area includes two Historic Landmarks and several Significant Resources. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City's Historic Resources overlay zone. The LSER Area Plan amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445).

**Natural Resources.** The City protects natural resources by applying environmental zoning to significant natural resources that it identifies through a natural resources inventory. Existing natural resource protections are not amended with the LSER Area Plan amendments. Therefore, the LSER Area Plan amendments are consistent with the natural resource elements of Goal 5.

**Generally.** As noted in the findings for Chapter 4 (Design and Development, including Historic and Cultural Resources) and Chapter 7 (Environment and Watershed Health) of Portland's Comprehensive Plan, the LSER Area Plan amendments are consistent with the goals and policies of the acknowledged 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the LSER Area Plan 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 administrative rules for complying with Statewide Planning Goal 6. The City is in compliance with federal and state environmental standards and statutes, including the federal Clean Water Act and Clean Air Act. Existing City regulations, including Title 10 (Erosion Control), the Stormwater Management Manual, and the Environmental overlay zones, will remain in effect and are applicable to future development in the LSER Area Plan area. These other regulations are generally the mechanism used to assure compliance with this goal. As noted below in the findings for the 2035 Comprehensive Plan, the LSER Area Plan 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 LSER Area Plan 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 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.

The LSER Area Plan considered this information for both map designation and infrastructure planning purposes. In addition, the Plan does not change the City of Portland “Regulatory Landslide Hazard Area” designation in this area which involves additional site development review and requirements. The LSER Area Plan largely omits high hazards areas from Comprehensive Plan Map changes in order to limit the impacts of significant increases of development capacity in these areas. Any map changes in these areas were done in consideration of these data as well as infrastructure services and existing development patterns. The LSER Area Plan amendments do not include amendments to any maps, programs, or regulations that implement floodplain or landslide hazard policies.

Further, the LSER Area Plan amendments are consistent with this goal because City programs that are deemed in compliance with Metro Title 3 requirements for flood management, and erosion and sediment control (i.e., City Title 10 Erosion Control, and the balanced cut and fill requirements of City Title 24), as well as the environmental overlay zones are unchanged and ensure any new development will be done in a way to protect people and property from hazards.

As noted below in the findings for Chapter 7 (Environment and Watershed Health) and Chapter 4’s Hazard-Resilient Design section, the LSER Area Plan amendments are consistent with the goals and policies of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the LSER Area Plan amendments continue to protect people and property from natural hazards and are consistent with the requirements of Statewide Planning Goal 7.

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

8. **Finding:** Goal 8 imposes 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 a robust and diverse system of parks, recreation areas, and open spaces. The City's Parks 2020 Vision documents the City's long-term plan to provide a wide variety of high-quality park and recreation services and opportunities for all residents. The Parks 2020 Vision identifies a goal that 100% of Portlanders are within ½ mile of a Park or Natural Area. 100% of households in the LSER plan area live within a ½ mile of a park or natural area, compared to 81% of Portland households as a whole. Since the plan area is well-served by parks and natural areas, the Plan's amendments expanding multi-dwelling zoning and housing opportunity in the plan area will contribute to the citywide goal of increasing the percentage of households living within a ½ mile of a park or natural area.

The LSER Area Plan amendments include rezoning 6.5 acres of land to Open Space along or near Johnson Creek, which BES will use as part of floodplain and habitat restoration projects in the area, further expanding the plan area's open space and natural areas. Some of properties being rezoned to Open Space are adjacent to or near Errol Heights Park, therefore expanding the open space and natural area resources in and around the park.

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

**Goal 9. Economic Development.** To provide adequate opportunities throughout the state for a variety of economic activities vital to the 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, which are organized into different geographies that represent a distinct mix of business sectors and building types. In each of the geographies, the City analyzed the future employment growth and the developable land supply to accommodate that growth.

The LSER Area Plan includes Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area, which will contribute to maintaining an adequate supply of land for employment in Portland. The growth analysis undertaken for the LSER Area Plan estimates that the proposed amendments increase employment capacity in the plan area by an additional 120 jobs.

The Plan amendments include changing the land use designations on a 3.3 acre, BES-owned property located just north of SE Harney and east of SE 83rd from Industrial Sanctuary Comprehensive Plan Map designation (IG2 zoning) to Open Space Comprehensive Plan Map and Zoning Map designation. This property has been owned by BES since 2005 and will be included as part of BES's West Lents Floodplain Restoration Project to reduce flooding in the area, including nearby industrial and employment lands. This property is heavily forested and vegetated, is subject to environmental overlay zoning, and records indicate it has not had an industrial use for at least 28 years. A portion of this property is in the mapped 100-year floodplain and the National Wetlands Inventory classifies most of the property as Freshwater Forested/Shrub Wetland. BES modeling shows the property being substantially inundated during 25-year and 100-year flood events, with modeling for the latter estimating inundation of 3-4 feet depth. As part of the West Lents Floodplain Restoration Project, the rezoning of the Harney property to Open Space will support floodplain management, which will help reduce flooding on nearby employment lands. As noted below in the findings to Chapter 6 (Economic Development) of the 2035 Comprehensive Plan, City Council determines that the rezoning of this property to Open Space will on balance support the policies of the Comprehensive Plan and is supportive of policies to protect land for employment uses by helping to reduce flood risks to nearby employment lands.

These map changes are in the Dispersed Industrial geography, which has a marginal surplus of development capacity in the adopted EOA. These changes are relatively small and are within those margins.

In addition, as noted below in the findings for the 2035 Comprehensive Plan, the LSER Area Plan amendments are consistent with the goals and policies of Chapter 6 (Economic Development) of the City's 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the LSER Area Plan amendments are consistent with Statewide Planning Goal 9.

**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. Needed housing includes attached and detached single-family housing and multiple family housing for both owner and renter occupancy; government assisted housing, mobile home or manufactured dwelling parks; manufactured homes on individual lots; and housing for farmworkers.

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 citywide analyses to demonstrate compliance with Goal 10, including a buildable lands inventory and housing needs analysis that analyzed the state of housing supply, housing affordability issues and the City's ability to meet projected housing demand. The City adopted an updated 2045 Housing Needs Analysis (HNA) and 2023 Residential Buildable Lands Inventory (BLI) in December 2023 (Ordinance 191547). The HNA provides information on the future housing need in Portland to 2045 to inform future policy decisions that can influence future housing development, and the BLI identifies the supply of land available to provide this needed housing. The HNA establishes for Portland that 97,471 additional households are expected by 2045; after factoring in vacancy rates and second home replacements, Portland's needed housing is 106,571 additional units by 2045. The BLI estimates that Portland has the capacity for 236,977 additional housing units, which is sufficient capacity to meet the requirements under Statewide Planning Goal 10: Housing and ORS197.296.

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, even though 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).

The LSER Area Plan area includes parts of three currently designated centers and includes the newly-designated Brentwood-Darlington Neighborhood Center. The 2035 Comprehensive Plan describes centers as places that include amongst other elements, concentrations of housing and a variety of housing types. The Plan amendments include expanded multi-dwelling and commercial/mixed use zoning that will broaden the range of housing types in the plan area, where single-dwelling zoning is predominant. The Plan's amended Comprehensive Plan Map and Zoning Map designations create capacity for a projected additional 800 housing units, with 76 of these additional housing units anticipated by 2045.

The following actions within the LSER Area Plan support Goal 10's mandate of increasing housing choices, tools and programs for all household types and incomes:

- Zoning map changes that rezone land area from single dwelling to multi-dwelling designations and mixed-use designations, therein increasing future residential unit capacity. These zones also allow a broader range of housing types and affordability levels, including apartments, compared to the area's more broadly mapped single-dwelling zoning, where detached houses and townhouses predominate.
- Because existing inclusionary housing regulations apply only to development with 20 or more units, expanded multi-dwelling and commercial/mixed-use zoning creates the potential for inclusionary housing to apply to more development.
- Expanded multi-dwelling will also allow for the broader availability of multi-dwelling zone incentives that provide additional development bonuses for projects that have a higher proportion of affordable units than required by inclusionary housing, incentives for providing moderate-income three-bedroom units, and transfer of development rights allowances provided in exchange for preservation of existing units as affordable housing. These incentives support a broader range of housing options and affordability levels in the plan area.
- The project avoided upzones to existing unregulated low-cost apartments and manufactured home parks to avoid adding to redevelopment pressures and support their retention as low-cost housing.

As noted below, the LSER Area Plan 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 LSER Area Plan 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.

The LSER Area Plan amendments affect the amount of development anticipated in the plan area. A growth analysis undertaken for the plan area based on the Plan's expanded multi-dwelling and commercial/mixed-use zoning estimated that the zone changes will result in approximately 76 additional housing units and 31 additional jobs in the plan area by 2045. The total zoned capacity resulting from the zone changes is estimated to increase housing capacity by roughly 800 units, with employment capacity increased by 120 jobs, although only a portion of this

increase is expected to be built by 2045. The infrastructure bureaus provided assessments of the adequacy of infrastructure to accommodate the additional housing units and jobs by 2045 associated with the LSER Area Plan zone changes, summarized below.

#### Sanitary Sewer and Stormwater

The Bureau of Environmental Services (BES) assessed sanitary sewer service and stormwater facilities in the plan area and determined that existing infrastructure was generally adequate to accommodate the additional housing and jobs associated with the LSER zone changes.

#### Water

The Water Bureau assessed the increase in water demand that would result from the LSER zone changes and existing infrastructure conditions and concluded that no water system modifications are needed to meet water demands for any of the proposed zoning modifications.

Additional findings addressing water, sanitary sewage disposal, stormwater management, and school district capacity are found in findings in response to Comprehensive Plan Chapter 8 policies. Findings addressing transportation systems are in response to Chapter 9 policies. The findings in response to those goals and policies are incorporated by reference. Therefore, as described in these findings and incorporated by reference here, LSER Area Plan 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 must 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 [RTP]), and with other transportation providers.

Under Oregon Administrative Rules (OAR) 660-012-0060, if an amendment to an acknowledged comprehensive plan or zoning map would significantly affect an existing or planned transportation facility, then the local government must put in place certain remedies as provided in the rule. "Significant effect" as defined in the rule includes degrading the performance of a facility such that it will not meet state, regional or local performance standards. State, regional, and local transportation plans establish identical mobility targets based on volume to capacity, "V/C," ratios. These standards generally specify a maximum volume to capacity ratio of .99 for two-hour peak operating conditions through a 20-year horizon. Where roads already don't meet the standards, the land use amendments should not make the problem worse. While there are several initiatives underway to consider

changes to these performance measures to put more emphasis on multi-modal outcomes, those changes are not yet adopted.

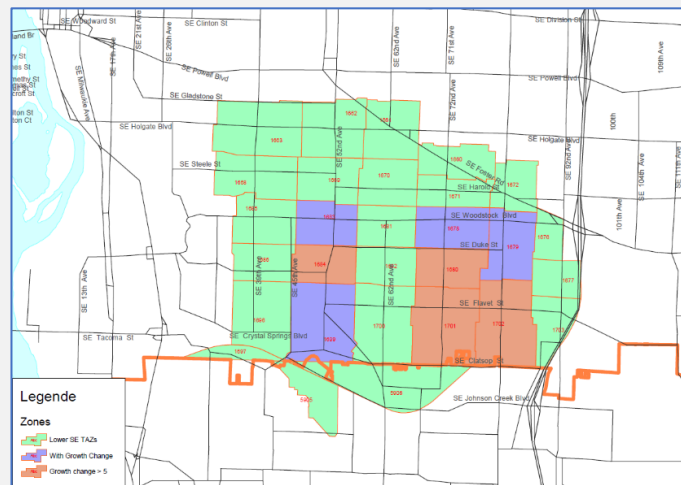
When there is a significant effect, remedies may include incorporating mitigation measures into the plan, adding new facilities to the TSP that address it, and changing the performance standards. A jurisdiction may balance the impact on one mode with improvements that will benefit another mode (for example, bike, pedestrian, or transit improvements may mitigate detrimental traffic impacts).

To understand the traffic impact of the LSER Area Plan zoning changes, BPS first estimated the increase in residential units and jobs by 2045 associated with the zone changes. This analysis yielded an estimated increase in the plan area of 76 additional housing units and 31 additional jobs by 2045, with these estimates allocated by Transportation Analysis Zones (TAZ) based on the locations of the zone changes. The growth analysis was based on the Buildable Lands Inventory (BLI) model, which estimates the development capacity of land, and an allocation of forecasted citywide housing and employment growth through 2045 to the plan area using recent (five-year) growth trends.

### Traffic Analysis

The Portland Bureau of Transportation (PBOT) used the City's 2040 RTP-Comp (Regional Transportation Plan – City Comprehensive Plan) PM peak hour travel demand model as the base model for the future traffic projection analysis. The analysis assumed that new added Lower Southeast area traffic will maintain the same travel patterns as the base model for both Trip Generation and Origin and Destination (OD) distribution.

The LSER Area Plan area makes up 29 TAZs in the City model, see location plot below.



The model incorporated BPS's future growth estimate of an additional 76 households (HH) and 31 jobs (Emp), allocated to TAZs based on the Zoning Map changes. Of the 29 LSER area TAZs, only 4 TAZs, marked as brown in above plot, have the total changes equal or greater than 5. The 4 TAZs make up 94% of the proposed total land use changes in the rezoning plan.

Within the plan area, PBOT staff calculated the potential traffic growth from the 4 TAZs, which resulted in a total of 28 additional 2040 PM peak hour vehicle trips. The 28 additional vehicle

trips are about 2% of the projected 2040 PM peak hour vehicle trips from/to the 4 TAZs in the base model.

PBOT staff reviewed the flow bundle traffic pattern from 2040 base model and assessed the potential additional traffic from the flow bundle pattern, which concluded that no more than 5 cars would be added to any streets surrounding the Lower SE Rising plan area. PBOT staff determined that this limited increase of trips due to growth associated with the Zoning Map changes does not amount to a significant effect on existing transportation facilities and amounted to a minimal change to existing traffic. PBOT staff also concluded that the small amount of additional trips will not have an impact on existing v/c ratios in the area, and that no street segments in the area would go beyond a 0.99 v/c ratio as result of these additional trips.

The LSER Area Plan also includes recommendations for bicycle and pedestrian system improvements, beyond what is already included in the City Transportation System Plan (TSP), as well as transit system improvements, to facilitate non-vehicular access through the plan area. This should further mitigate traffic impacts from the growth associated with the LSER Area Plan Comprehensive Plan Map and Zoning Map amendments. These transportation project recommendations are described in Part 2 of the Plan.

For these reasons, the Plan is consistent with OAR 660-012-0060.

As noted below and in the findings for the 2035 Comprehensive Plan, the LSER Area Plan amendments are consistent with the goals and policies of Chapter 9 (Transportation) of the 2035 Comprehensive Plan and the findings in response to those goals and policies are incorporated by reference. Therefore, the amendments are consistent with the requirements of Statewide Planning 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 LSER Area Plan amendments do not adopt or amend a local energy policy or implementing provisions.

The LSER Area Plan amendments support energy conservation with the following actions:

- Expands multi-dwelling and commercial/mixed-use zoning around neighborhood centers and along transit corridors, allowing for more housing in locations close to services and where people can walk, bike, or take transit to destinations, allowing for less driving and reduced energy consumption.
- Amendments expanding multi-dwelling and commercial/mixed-use zoning will allow for more compact housing in the plan area that is energy- and resource-efficient. According to a study published by Oregon DEQ, A Life Cycle Approach to Prioritizing Methods of Preventing Waste from the Residential Construction Sector in the State of Oregon, of 30 different material reduction and reuse practices evaluated, reducing home size and multi-family living achieved the largest greenhouse gas reductions along with significant reductions in other impact categories, including energy use. Reducing home size by 50 percent results in a projected 36 percent reduction in lifecycle greenhouse gas emissions.

Reducing home size is a significant leverage point for environmental impact reduction and may be equivalent to achieving minimum levels of "green" certification.

- The Plan includes recommendations for transportation projects, such as corridor safety improvements, an expanded system of neighborhood greenways, and transit system improvements, that will facilitate access by walking, biking, and transit, further supporting alternatives to driving and allowing for a reduction in energy use associated with travel by car.

Therefore, the LSER Area Plan amendments are consistent with the requirements of Statewide Planning Goal 13.

**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 Goal 10, the LSER Area Plan amendments will increase the residential development capacity in the plan area, located inside the urban growth boundary, further enabling the City to accommodate its forecasted growth. Therefore, the LSER Area Plan 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:** Statewide Planning 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 City implements Statewide Planning Goal 15 through application of the Greenway and River overlay zones. The LSER Area Plan does not affect any land or water within the Willamette River Greenway. Therefore, the LSER Area Plan amendments are consistent with Statewide Planning Goal 15.

## 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 LSER plan area includes a number of places identified in the Metro 2040 Growth Concept as places for growth, including portions of the Lents town center, two main streets (SE Woodstock and SE Foster), corridors (SE 52<sup>nd</sup>, 82<sup>nd</sup>, SE Chavez, SE Holgate), and a station community (Flavel light station area). The LSER Area Plan amendments focus an expansion of multi-dwelling and commercial/mixed use zoning in or around some of these 2040 Growth Concept areas, including at the edges of the Lents town center, along SE Woodstock and along SE 52<sup>nd</sup>, and around portions of SE 82<sup>nd</sup>, SE Chavez, and SE Holgate. The Plan also expands multi-dwelling zoning and commercial/mixed-use zoning along SE 72<sup>nd</sup> in conjunction with plans for new transit service, further focusing growth in locations that allow more housing and residents close to services and transit.

Currently, 74% of the plan area is zoned single-dwelling, while much smaller percentages of land are zoned multi-dwelling (10%) and commercial/mixed use (6%). The LSER Area Plan amendments contribute to addressing the imbalance of single-dwelling and multi-dwelling and mixed-use zoning to allow for a broader range of housing types and costs that give meaningful choices for a variety of economically diverse households, while also allowing for additional housing and residents that can support the viability of neighborhood businesses and local services. The Plan's amendments expand the amount of multi-dwelling and commercial/mixed-use zoning in the plan area by over 93 acres. The total zoned capacity resulting from the zone changes is estimated to increase housing capacity by roughly 800 units, with employment capacity increased by 120 jobs, although only a portion of this increase is expected to be built by 2045.

Therefore, the LSER Area Plan amendments are consistent with Metro Title 1.

**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 implements zoning regulations (Title 33.430, 33.440, 33.465, 33.515, 33.537, 33.563, 33.631, 33.640), as well as erosion control and balanced cut-and-fill standards (Title 10 and Title 24). In addition, the City administers a Stormwater Management Manual (SWMM) at the time of development review that further supports water quality and watershed health. Metro has found the City to be in substantial compliance with Title 3.

The LSER plan area includes Johnson Creek and portions of the Johnson Creek floodplain as Title 3 mapped areas. These areas have existing environmental overlay zones that are not being changed for the LSER Area Plan. The LSER Area Plan amendments expanding development allowances do not overlap with any of the mapped Title 3 areas. Furthermore, the Plan includes Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will help protect Title 3 resources by facilitating BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.

Therefore, the LSER Area Plan amendments are consistent with Metro Title 3.

**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 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.



All previous Metro compliance reports have determined that land in Portland within an “Industrial Sanctuary” Comprehensive Plan Map designation meets all Title 4 requirements for mapped RSIA Land and Industrial Land. Similarly, all land in Portland within a Mixed Employment Comprehensive Map designation meets Title 4 requirements for Employment Areas.

The LSER Area Plan amendments change Comprehensive Plan designations in two areas that are designated for industrial or employment uses on the Title 4 Map. The Plan amendments include changing the land use designations on a 3.3 acre property located just north of SE Harney and east of SE 83<sup>rd</sup> that is designated as Industrial land on the Title 4 map. The Comprehensive Map change is from Industrial Sanctuary (IG2 zoning) to Open Space (OS zoning). This property (referred to as the Harney property) has been owned by Bureau of Environmental Services (BES) since 2005 and will be included as part of BES’s West Lents Floodplain Restoration Project to reduce flooding in the area, including on nearby industrial and employment lands. This property is heavily forested and vegetated and is subject to environmental overlay zoning. A portion of this property is in the mapped 100-year floodplain and the National Wetlands Inventory classifies most of the property as Freshwater Forested/Shrub Wetland. BES modeling shows the property being substantially inundated during 25-year and 100-year flood events, with modeling for the latter estimating inundation of 3-4 feet depth. As part of the West Lents Floodplain Restoration Project, the rezoning of the Harney property to Open Space will support floodplain management, which will help reduce flooding on nearby employment lands. Records indicate that the property has not had an industrial use for at least 28 years. The rezoning of this property to Open Space will on balance serve to protect land for industrial and employment uses by helping to reduce flood risks to nearby employment lands.

The second change the LSER Amendments makes is to a small number of properties, totaling 4.4 acres, clustered at the intersection of SE Flavel and SE 82<sup>nd</sup>, from Mixed Employment (EG1 zoning) to Mixed Use – Civic Corridor (CM2 zoning). This area is designated as Employment Land on the Title 4 Map. Existing uses on these properties are primarily retail sales and service, which are limited in the EG1 zone, and also some residential (currently non-conforming uses) and a community service use. The area was zoned commercial until 1996, when it was rezoned to the current employment zoning. These properties are primarily small in size, limiting their ability to be used for light industrial and other employment uses. These properties are located within the new Brentwood-Darlington Neighborhood Center and the rezoning of these properties to commercial/mixed use will support the continuation and growth of the existing retail sales and service uses, and expand the ability of this area to provide commercial services to nearby residents in an area that has been historically underserved. The majority (49 acres) of the employment land along SE 82<sup>nd</sup> will retain employment and industrial zoning. On balance the rezoning of these properties will support expanding opportunities for commercial services and jobs, while on the whole having little impact on Portland’s industrial and employment land.

According to Title 4, a city may amend its comprehensive plan map to change its designation of land on the Employment and Industrial Areas Map upon a demonstration that:

- (1) The property is not surrounded by land designated on the map as Industrial Area, Regionally Significant Industrial Area or a combination of the two;

The proposed map changes are not surrounded by land designated as Industrial or Regionally Significant Industrial.

- (2) The amendment will not reduce the employment capacity of the city or county;

Neither area is currently used for industrial or employment uses. The Open Space area is vacant land that is highly constrained land that is within the 100-year floodplain of Johnson Creek that has environmental overlay zoning. The properties at the intersection of SE Flavel and SE 82<sup>nd</sup> with existing uses that are primarily retail sales and service and the change to Commercial Mixed Use is expected to maintain those uses. The growth analysis undertaken for the LSER Area Plan estimates that the proposed amendments increase employment capacity in the plan area by an additional 120 jobs.

- (3) If the map designates the property as Regionally Significant Industrial Area, the subject property does not have access to specialized services, such as redundant electrical power or industrial gases, and is not proximate to freight loading and unloading facilities, such as transshipment facilities;

The properties are not designated as Regionally Significant Industrial Areas.

- (4) The amendment would not allow uses that would reduce off-peak performance on Main Roadway Routes and Roadway Connectors shown on the Regional Freight Network Map in the RTP below volume-to capacity standards in the plan, unless mitigating action is taken that will restore performance to RTP standards within two years after approval of uses;

The Open Space property will not allow uses that are expected to increase automobile traffic. The Commercial Mixed Use properties are currently used as retail sales and service. Any future change in use or intensity is not expected to adversely affect off-peak performance. As described in the findings for Statewide Goal 12, traffic modelling analysis showed that the LSER zone changes will have no discernable impact on the area's transportation facilities, including the area's designated freight routes.

- (5) The amendment would not diminish the intended function of the Central City or Regional or Town Centers as the principal locations of retail, cultural and civic services in their market areas; and

The project area is not located in the Central City or a Regional or Town Center.

- (6) If the map designates the property as Regionally Significant Industrial Area, the property subject to the amendment is ten acres or less; if designated Industrial Area, the property subject to the amendment is 20 acres or less; if designated Employment Area, the property subject to the amendment is 40 acres or less.

The change to land designated Industrial is 3.3 acres, less than the 20 acre threshold. The change to land designated Employment is 4.4 acres, less than the 40 acre threshold.

Therefore, the LSER Area Plan amendments are consistent with 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.

The LSER plan area includes a number of places identified by Title 6 as having key roles as urban places within the Regional Framework Plan. These include portions of the Lents town center, two main streets (SE Woodstock and SE Foster), corridors (SE 52nd, 82nd, SE Chavez, SE Holgate), and a station community (Flavel light station area). The LSER Area Plan amendments enhance the roles of these places, consistent with Title 6, by focusing an expansion of multi-dwelling and commercial/mixed use zoning in or around them, including at the edges of the Lents town center, along SE Woodstock and along SE 52nd, and around portions of SE 82nd, SE Chavez, and SE Holgate. Expanded commercial/mixed use zoning in these locations supports their roles as hubs for commercial services and activity, while the expanded multi-dwelling zoning allows more housing and residents to live close to these services and transit, supporting their functions as vibrant urban places.

The LSER Area Plan also supports the roles of these places by recommending transportation projects that will improve pedestrian and bicycle access to the centers, main streets, corridors, and station communities in and near the plan area (described in Part 2 of the LSER Area Plan). The Plan also includes transportation recommendations, some of which have been incorporated into TriMet's Forward Together service concept, for improved transit service along the area's corridors and providing enhanced connections to nearby centers, including continuous bus service along SE Woodstock connecting the Woodstock main street commercial district to the Lents town center and light rail station.

Therefore, the LSER Area Plan amendments are consistent with Metro Title 6.

**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 *2035 Comprehensive Plan* includes city-wide affordable housing production goals that greatly exceed those adopted by the

outdated Title 7 (Ordinance 178832). In addition, the zoning code includes inclusionary housing regulations within Chapter 33.245 that require affordable housing for buildings with more than 20 units.

The LSER Area Plan amendments expand the types, densities, and affordability levels of housing allowed in the plan area by expanding the mapping of multi-dwelling zoning and bringing allowances for a greater diversity of housing types in an area of Portland where single-dwelling zoning is predominant. The LSER Area Plan's Zoning Map amendments are estimated to increase the capacity for residential household growth in the Lower Southeast Rising Plan Area by roughly 800 units. The additional multi-dwelling zoning provides more options for affordable housing through inclusionary housing regulations and by facilitating compact housing types that are less expensive than single-dwelling houses. The multi-dwelling zone regulations also provide development bonuses to encourage moderate income family housing and barrier-free units.

The Plan's amendments expand the amount of multi-dwelling and commercial/mixed-use zoning, where inclusionary housing requirements apply, by over 93 acres. These Plan amendments expand opportunities for regulated affordable housing, providing housing stability for future low-income residents. The Plan contributes to the preservation of existing affordable housing by a zoning approach that avoids upzones in locations with existing unregulated low-cost apartments and manufactured home parks, in order to avoid adding to redevelopment pressures and contribute to housing stability for residents. The Plan also includes recommendations for future community stabilization actions that include identifying opportunity sites for affordable housing and encouraging development by affordable housing providers to increase the amount of regulated affordable housing in the plan area.

**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.

21. **Finding:** The required notice was provided to Metro more than 35 days before the first evidentiary hearing on October 10, 2023. 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 Metro 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 the City's 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 LSER Area Plan amendments do not change any definitions in the 2035 Comprehensive Plan that are also found in Title 10. All applicable requirements of Metro 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 also provides interim protection for areas added to the UGB until city or county amendments to land use regulations to allow urbanization to become applicable to the areas.

23. **Finding:** The LSER Area Plan amendments do not add areas to the UGB. Therefore, this Metro Title 11 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 LSER Area Plan amendments were originated by the City's legislative process, in response to locally-identified needs, and are not at the direction of Metro. The LSER Area Plan amendments do not include changes to Metro's neighborhood center designations. 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. Therefore, these amendments comply with Metro 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 environmental overlay

zone protection measures, 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. Furthermore, The LSER Area Plan amendments include rezoning 6.5 acres of land to Open Space along or near Johnson Creek, which BES will use as part of floodplain and habitat restoration projects in the area, further expanding the plan area's natural areas. Therefore, the LSER Area Plan amendments are consistent with the applicable requirements of Metro Title 13.

**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, Metro 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 LSER Area Plan 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.

28. **Finding:** The City Council has identified the following guiding principles, goals and policies to be applicable to the LSER Area Plan, except as additionally noted otherwise below.

## 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 amendments in the LSER Area Plan 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:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of supporting a robust and resilient regional economy, thriving local businesses and growth in living-wage jobs and household prosperity.

The LSER Area Plan amendments support a low-carbon economy by supporting the development of compact housing within the proposed Brentwood-Darlington neighborhood center and close to services and transit, therein helping people have access to transportation and employment choices that can reduce cost of living as well as carbon emissions. The expansion of commercial zoning proposed in the new neighborhood center and along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors also support this guiding principle by expanding opportunities for commercial services and employment in an area that previously had little commercial zoning, expanding opportunities for residents to have access to local commercial services and additional jobs without having to drive. Analysis of the proposed zone changes estimate that the proposed zone changes will expand employment capacity in the plan area by 120 jobs. The LSER Area Plan amendments contribute to more equitably distributed household prosperity through zoning map changes expanding multi-dwelling zoning that will allow for the creation of more housing choices as well as affordable housing, and through expansion of commercial zoning, which will provide additional opportunities for the establishment of

small businesses, providing additional local opportunities for connecting residents to economic opportunity in an area with lower household incomes than Portland as a whole. The LSER Area Plan also proposes transportation improvements, including transportation safety projects and improved transit, that will increase access to economic, educational, and housing opportunities will result in better health outcomes for those households, employment growth, and greater economic prosperity. Therefore, the LSER Area Plan amendments are consistent with the economic prosperity guiding principle.

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

30. **Finding:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of minimizing health impacts and increasing opportunities for Portlanders to lead healthy, active lives.

The LSER Area Plan was undertaken as a joint land use and transportation plan to address the lack of safe transportation infrastructure in the area and the lack of local commercial services, with human health a central focus of the plan. The plan area has amenities that support human and environmental health, such as a system of local parks, Mt. Scott Community Center, and Johnson Creek and the Springwater Corridor. However, the area's current incomplete pedestrian and bicycle facility network, infrequent marked pedestrian crossings on busy streets, and lack of commercial services within walking distance negatively impacts safety and the ability to live healthy, active lives. A complete neighborhoods analysis indicated that the plan area, particularly the Brentwood-Darlington neighborhood and southern portions of Lents, lacks that local services and safe transportation infrastructure necessary for complete neighborhoods, counter to City objectives for fostering Portland as a place where most residents live in complete neighborhoods, where residents have safe and convenient access to the goods and services they need on a daily basis.

Health and equity perspectives were used in the development of the LSER Area Plan to ensure that the benefits of future changes supported health and would be accessible to all in the area, particularly underrepresented communities affected by the combined impacts of environmental inequities, climate change, and systemic racism—communities of color, immigrants, and people excluded from economic opportunities living or working in the area.

The Health Assessment Background Report was included as part of the LSER Area Plan process to understand area health outcomes, health behaviors, and health determinants, make connections to themes identified in the plan's existing conditions analysis and the community's identification of issues, and to serve as a guide for review of future project decisions. The LSER Area Plan's proposals for land use amendments and transportation projects address many of the health-related issues identified in the Health Assessment Background Report, such as the need to safe transportation infrastructure, the lack of local commercial services, and the need for affordable housing options and housing stability.

The Plan's amendments and recommended transportation projects form an interconnected and multi benefit platform for supporting improved human health in the plan area. The amendments are designed to further access to economic, educational, and housing



opportunities and choices, as well as improve housing stability, transportation choices, and access to nature, recreation, local shops, and community services.

Some of the plan elements proposed to support healthy outcomes and people include:

- Zoning Map changes to allow for more commercial services within walking distance of residents, including within the proposed Brentwood-Darlington neighborhood center, which is intended to provide a hub of services for the plan area.
- Zoning Map amendments expanding multi-dwelling zoning in the proposed new neighborhood center and along transit corridors, to allow more people to live within walking distance of services and transit, and allowing for more and less-expensive housing options to meet the critical need for stable and affordable housing.
- Zoning Map approaches that avoid zone changes to existing unregulated low-cost apartments and manufactured home parks to avoid adding to redevelopment pressures and support housing stability.
- Zoning Map amendments that expand Open Space zoning near Johnson Creek, applied to properties that the Bureau of Environmental Services will use for floodplain and habitat restoration, which will expand green elements and access to nature in an area with higher proportions of lower-income residents than the broader city.
- Recommendations for transportation projects on busy corridors to address safety, such as improved pedestrian crossings, bicycle lanes, and sidewalk infill.
- Recommendations for neighborhood greenway projects to address pedestrian and bicycle safety and provide a continuous network of pedestrian and bicycle facilities providing connections to local destinations, such as schools, parks, and commercial areas.
- Recommendations for future implementation actions to support community stability and access to economic opportunity, such as affordable housing strategies and community-based economic development.

The LSER Area Plan also aligns with and is guided by Portland's Healthy Connected Communities framework, the city's goal of neighborhood hubs, linked by a network of corridors and greenways that connect Portlanders to services and destinations. This means the LSER plan area should have businesses, frequent transit service, libraries, schools, and other amenities close enough for residents to safely and easily walk, bike or roll to meet most of their daily needs. The framework was used to coordinate the Plan's land use amendments and recommended transportation projects to support the plan area's future as a healthy and connected community.

Therefore, the LSER Area Plan amendments are consistent with the human health guiding principle.

**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:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of including space

for the health of natural resources and the ecosystem in the design and development of the city. This space can be in parks, streams, natural areas, along streets as well as on sites with development. The best performance occurs when the supply and design of these different types of spaces create, or “weave”, intentional or ad-hoc pathways for wildlife through the city.

The LSER Area Plan has plan objectives and land use map amendments that support the environmental health guiding principle. The Plan’s vision calls for supporting the role of the plan area’s network of parks and natural areas in providing people with access to recreation and nature, and – together with the area’s urban forest – in helping to cool the area’s neighborhoods and support wildlife. Expanded commercial/mixed use and multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors will allow for redevelopment that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the area’s urban forest and helping to minimize urban heat islands on these corridors.

The LSER Area Plan amendments include rezoning eight properties (6.5 acres) to Open Space that are along or close to Johnson Creek that are owned by the Bureau of Environmental Services (BES). These zone changes will facilitate BES’s work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.

Therefore, the LSER Area Plan amendments are consistent with the environmental health guiding principle.

**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:** Council finds that this guiding principle requires the Council, when taking actions that implement the Comprehensive Plan, to not overlook the importance of promoting equity and environmental justice for under-served and under-represented communities.

The LSER Area Plan supports this guiding principle in both its process and the resulting Plan by using an equity lens that examined how benefits from future investments could benefit everyone, especially historically disadvantaged communities that have not had good access to services and been subject to displacement. Equity was a foundation of the LSER Area Plan, with the Plan’s focus on the Brentwood-Darlington area specifically intended to address gaps in access to services and safe transportation infrastructure in an area with higher percentages of people of color and lower-income households than Portland as a whole. Equity continued to be supported as a key consideration by the community in advisory committee discussions and other forums. This project is intended help implement

Comprehensive Plan equitable development policies that call for guiding development and public facility investments to produce positive outcomes for all Portlanders, reduce disparities, address infrastructure deficiencies, and address housing affordability and displacement.

Some of the ways the Lower Southeast Rising Area Plan addresses equity issues include:

- Public engagement inclusive of lower-income residents and communities of color, with outreach material sent to all addresses in the plan area, surveys made available in five languages, outreach to residents of affordable housing complexes, outreach and interviews with residents of affordable apartment complexes and manufactured home parks, and targeted outreach to communities of color – including working with the Latino Network to reach Spanish-speaking community members and through focus group discussions with the area’s Vietnamese- and Chinese-language communities.
- Designating a new Neighborhood Center, located around SE Flavel and anchored by commercial hubs at SE 72nd and SE 82nd, that is situated to be conveniently accessible to residents of the low-cost apartments and manufactured home parks in the area.
- Expanded zoning for multi-dwelling housing, which includes requirements for affordable units as part of larger projects, to increase affordable housing options.
- Zoning approaches to preserve existing low-cost housing, such as by not applying higher-density zoning to properties with existing low-cost apartments to avoid adding to redevelopment pressures, and preserving zoning for manufactured home parks in and around the proposed Neighborhood Center to prevent their redevelopment.
- Recommended transportation system improvements will make it easier for lower-income residents to access local services, schools, parks and employment areas without having to be dependent on a car and associated costs.
- Plan amendments rezoning seven acres of land near Johnson Creek to Open Space will provide equity benefits, as the Bureau of Environmental Services’ ownership and restoration of these properties for floodplain management will provide equity benefits to vulnerable residents and businesses in the floodplain who may face significant challenges in managing the impacts of flooding.
- A range of recommended community stabilization approaches to support housing stability and increase access to economic opportunity, so that lower-income residents and communities of color can benefit from area improvements.

Therefore, the LSER Area Plan and its amendments are consistent with the equity guiding principle.

**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 2035 Comprehensive Plan describes resilience as “reducing the vulnerability of our neighborhoods, businesses, and built and natural infrastructure to withstand challenges – environmental, economic and social – that may result from major hazardous events.”

The 2035 Comprehensive Plan’s description of the resilience guiding principle identifies floods, extreme heat events, and economic and energy shocks as among the challenges that need to be addressed; and identifies resilient neighborhoods with local services and multi-modal streets, a low-carbon economy, and resilient natural systems as among the approaches that contribute to resilience. The LSER Area Plan contributes to resilience in a number of ways, including:

- The LSER Area Plan amendments include rezoning 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space. These zone changes will facilitate BES’s work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.
- The Plan supports neighborhood resilience by designating a new neighborhood center with expanded commercial/mixed use zoning and adjacent multi-dwelling zoning, which over time will allow more residents the opportunity to live within walking distance of commercial services without having to be dependent on cars to access services.
- The Plan’s recommendations for transportation safety projects that prioritize pedestrian, bicycle and transit access, including corridor and neighborhood greenway improvements, will facilitate the ability of residents to access services and community destinations by walking, biking, or transit, supporting a low-carbon economy and community.
- The Plan includes recommendations to support an expanded role for the Brentwood-Darlington Community Center in serving as a resilience center for the community during emergencies and extreme-weather events, functioning as a warming/cooling center, temporary shelter, with resilient energy sources to provide charging stations for mobile phones and other needs.
- The Plan’s expansion of commercial/mixed use and multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors will allow for redevelopment that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the area’s urban forest and helping to minimize urban heat islands on these corridors.

Therefore, the LSER Area Plan amendments are consistent with the resilience guiding principle.

# 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 LSER Area Plan 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 LSER Area Plan 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. Therefore, this goal is met.

**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 LSER Area Plan 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. Therefore, this goal is met.

**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 LSER Area Plan amendments are consistent with the 2035 Comprehensive Plan. Therefore, this goal is met.

**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.

**Finding:** The LSER Area Plan amendments include implementation tools and strategies, both regulatory and non-regulatory. The LSER Area Plan Land Use Growth Concept has been refined and translated into both a Comprehensive Plan Map and a Zoning Map. Upon LSER Area Plan adoption, both the citywide 2035 Comprehensive Plan Map and the Zoning Map will be updated and modified to integrate the newly adopted land use designations for the plan area. Developed in tandem with the Plan’s land use recommendations, the Plan also

includes transportation project recommendations as another set of implementation approaches to realize the Plan's objectives to improve access to services and destinations with the plan area. The Plan also includes recommendations for future actions to support community stability, including actions to increase the availability of affordable housing and connect residents to economic opportunity. Implementing the LSER Area Plan will require City of Portland bureaus, other public agencies and community partners to work together to realize the vision of the plan and achieve its objectives. Implementing agencies and community partners were involved in the Plan's advisory groups to coordinate on the Plan's amendments and recommended implementation approaches.

These findings demonstrate how the LSER Area Plan amendments and recommendations are consistent with the 2035 Comprehensive Plan. Therefore, this goal is met.

**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.

37. **Finding:** As noted above, the findings show how the LSER Area Plan amendments are consistent with Metro's Urban Growth Management Functional Plan and the Statewide Planning Goals. The findings in this report also show how the LSER Area Plan amendments effectively forward the intent of the Comprehensive Plan. Therefore, this goal is met.

## 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.

**38. Finding:** The verb “maintain” is defined in the 2035 Comprehensive Plan as to keep what you have, conserve, continue. The City Council interprets this policy to mean that the City retains all the elements of the comprehensive plan. The LSER Area Plan amendments maintain the 2035 Comprehensive Plan while simultaneously updating the Comprehensive Plan to carry out the community’s vision for the Lower Southeast Rising area.

The LSER Area Plan amends the 2035 Comprehensive Plan’s Urban Design Framework to add a new neighborhood center and two new neighborhood corridors to serve as places for local services, multimodal transportation access, and housing to implement the LSER Area Plan’s community vision and objectives. The LSER Area Plan amends the Comprehensive Plan Map to implement the LSER Area Plan’s Land Use Growth Concept, and recommends amendments to the Transportation System Plan (TSP) to revise the Project List and the street classifications for select streets in the plan area. The City Council finds that the amendments to the Comprehensive Plan’s Urban Design Framework and Comprehensive Plan Map improve the long-range planning direction for the development and redevelopment of the Lower Southeast Rising plan area, consistent with the goals and policies of the Comprehensive Plan.

## Supporting Documents

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

- 1. Inventories and analyses.** The following inventories and analyses are supporting documents to the Comprehensive Plan:
  - Economic Opportunities Analysis (EOA)
  - Buildable Lands Inventory (BLI)
  - Natural Resource Inventory (NRI)
  - Housing Needs Analysis (HNA)
- 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.
- 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.*
- 4. School Facility Plans.** School facility plans that were developed in consultation with the City, adopted by school districts serving the City, and that meet the requirements of ORS

195 are considered supporting documents to the Comprehensive Plan.

39. **Finding:** The LSER Area Plan amendments were developed consistent with the supporting documents of the adopted 2035 Comprehensive Plan. The LSER Area Plan amendments do not change or update any inventories or analyses and does not amend the PFP or CSP. The LSER Area Plan includes recommendations to amend the Transportation System Plan (TSP) to revise the Project List and specific classifications of select streets in the plan area. The LSER Area Plan does not change any school facility plans.

## Implementation tools

**Policy 1.3. Implementation tools subject to the Comprehensive Plan.** Maintain Comprehensive Plan implementation tools that are derived from, and comply with, the Comprehensive Plan. *Implementation tools include those identified in policies 1.4 through 1.9.*

40. **Finding:** The City Council interprets this policy to mean that the City retains all of the implementation tools identified in policies 1.4 through 1.9. The LSER Area Plan amendments change the Zoning Code (1.4) and the Zoning Map (1.5) in a way, as described in these findings, that complies with the 2035 Comprehensive Plan.

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

41. **Finding.** The only LSER Area Plan amendments to the Zoning Code are changes to the Civic and Neighborhood Corridors maps in Chapters 33.120 and 33.130. These Zoning Code map amendments bring consistency with the Plan's amendments to the Comprehensive Plan's Urban Design Framework, specifically the designation of two additional neighborhood corridors, to implement the Plan's Land Use Growth Concept.

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

42. **Finding.** The LSER Area Plan Land Use Growth Concept has been refined and translated into both a Comprehensive Plan Map and a Zoning Map. The changes to the Comprehensive Plan and Zoning maps includes areas where:

- The Zoning Map and the Comprehensive Plan Map designations are both proposed to change
- The Zoning Map designation will stay the same, but the Comprehensive Plan Map designation is proposed to change to a higher designation.

In the case of properties where the zoning is proposed to remain as it is today, the zoning may change in the future either through a quasi-judicial zone change requested by an individual property owner or through a legislative process.

Upon the effective date of the LSER Area Plan, both the citywide 2035 Comprehensive Plan Map and the Zoning Map will be updated and modified to integrate the newly adopted land use designations for the area within the LSER Area Plan boundaries.

**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.

**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.

**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.

**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.

43. **Finding:** The City Council finds that policies 1.6 through 1.9 do not apply because the LSER Area Plan amendments do not include changes or amendments to service coordination agreements, annexation processes, urban renewal plans, or development agreements. The LSER Area Plan does include a recommended action to consider forming a tax increment financing district in the plan area to fund community development priorities. However, this action is not being taken with the adoption of the LSER Area Plan.

## 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.

44. **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. The City Council finds that there is no precise mathematical equation for determining when the Plan as a whole is supported but rather such consideration requires City Council discretion in evaluating the competing interests and objectives of the plan.

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 LSER Area Plan amendments include legislative amendments to the Zoning Map and minor amendments to the Zoning Code, which are implementation tools of the 2035 Comprehensive Plan. These findings identify how the LSER Area Plan amendments comply with the 2035 Comprehensive Plan. That is, the amendments are evaluated against the 2035 Comprehensive Plan’s Guiding Principles, goals, and policies, as detailed throughout this set of findings. The City Council finds that these amendments are equally or more supportive of the Comprehensive Plan than the existing Zoning Code and Map regulations because the amendments better promote a broad range of policies objectives, including those related to expanding housing options and housing diversity, providing opportunities for neighborhood business districts and commercial services, focusing growth in centers and corridors, equitable development, fostering connected communities where more people can live close to services and transit, and environmental health. Council finds that the LSER Area Plan is more supportive of the Comprehensive Plan particularly with regard to the goals and policies below:

- Expanding housing options and diversity, which is called for in policies such as Policy 3.36 Housing in neighborhood centers, Goal 5.A Housing diversity, Goal 5.B. Equitable access to housing, Policy 5.4 Housing types, Policy 5.5 Housing in centers, Policy 5.6 Middle housing, and Policy 5.32 Affordable housing in centers.
- Neighborhood business districts and services in centers and corridors, reflected in Goal 3.D A system of centers and corridors, Policy 3.12 Role of centers, Policy 3.13 Variety of centers Policy 3.35 Role of neighborhood centers, Policy 3.52

Neighborhood corridors, Policy 6.62 Neighborhood business districts, Policy 6.63 District function, Policy 6.66 Neighborhood-serving businesses, Policy 6.67 Retail development, and Policy 6.73 Centers.

- Support housing growth in centers and corridors, called for in Goals 3.C and 3.D, Policy 3.2 Growth and stability, Policy 3.12 Role of centers, Policy 3.14 Housing in centers, Policy 3.35 Role of Neighborhood Centers, Policy 3.36 Housing, Policy 3.44 Growth and mobility, Policy 3.52 Neighborhood corridors, Policy 5.5 Housing in centers, Policy 5.23 Higher-density housing, and Policy 5.32 Affordable housing in centers.
- Promote equitable development, as noted in goals and policies including Goal 3.A A city designed for people, Policy 3.3 Equitable development, Policy 3.9 Growth and development, Goal 5.B Equitable access to housing, Policy 5.3 Housing potential, Policy 5.12 Impact analysis, Policy 5.14 Preserve communities, Policy 5.15 Gentrification/displacement risk, Policy 5.21 Access to opportunities, Goal 9.E Equitable transportation, and Policy 9.25 Transit equity.
- Fostering connected communities, reflected in Goals 3.A, 3.D and 3.E, Policy 3.12 Role of centers, Policy 3.13 Variety of Centers, Policy 3.19 Center connections, Policy 3.37 Transportation in neighborhood centers, Policy 3.44 Growth and mobility, Policy 3.45 Connections, Policy 3.52 Neighborhood Corridors, Goal 5.C Healthy connected city, Policy 5.21 Access to opportunities, Policy 5.23 Higher density housing, Goal 9.E Equitable transportation, Policy 9.18 Pedestrian networks, Policy 9.21 Accessible bicycle system, Policy 9.24 Transit service, and Policy 9.47 Connectivity.
- Environmental health, particularly in relationship to the Plan's expansion of Open Space zoning adjacent to Johnson Creek to support floodplain and habitat restoration, consistent with Goal 3.G Nature in the City, Policy 3.65 Habitat connection tools, Goal 7.B Healthy watersheds and environment, Policy 7.1 Environmental quality, Policy 7.6 Hydrology, Policy 7.10 Habitat connectivity, Policy 7.54 Floodplain restoration, Policy 7.55 Connected floodplains, and Policy 7.57 Greenspace network.

The City Council finds that the evaluation to determine if the LSER Area Plan amendments are on balance equally or more supportive than the existing language or designation must consider all of the goals and policies, as demonstrated by these findings. The City Council has weighed and balanced the applicable goals and policies and concludes that, on the whole, adopting the LSER Area Plan amendments is more supportive of the 2035 Comprehensive Plan than keeping the Zoning Map and Zoning Code as they currently exist.

**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.

45. **Finding:** As noted earlier in these findings, the LSER Area Plan amendments are consistent with and designed to further the applicable elements of the Metro Urban Growth

Management Functional Plan. See findings in Part II, Metro Urban Growth Management Functional Plan, which demonstrate consistency.

**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.

46. **Finding:** As noted earlier in these findings, the LSER Area Plan amendments are consistent with and designed to further the applicable elements of the Statewide Planning Goals. See findings in Part I, Statewide Planning Goals, which demonstrate consistency. Therefore, this policy is met.

**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.

47. **Finding:** The LSER Area Plan amendments were developed to be consistent with applicable state and federal regulations and do not amend any Zoning Code sections that are required by state or federal regulations, including FEMA flood regulations and state building code requirements.

**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.

48. **Finding:** As demonstrated in the findings for Statewide Planning Goal 11 and Chapter 8 (Public Facilities and Services) 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.

49. **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 LSER Area Plan amendments. In addition, the City sent a separate legislative notice to Multnomah County, adjacent cities, Metro and TriMet. Additionally, the LSER Area Plan is a result of contributions from the following agencies and advisory group partners: ODOT, TriMet, Prosper Portland, and Portland Public Schools. No government agencies raised issues or concerns with the LSER Area Plan amendments.

**Policy 1.16. Planning Commission review.** Ensure the Planning Commission (PC) reviews and makes recommendations to the City Council on all proposed legislative amendments to

Comprehensive Plan elements, supporting documents, and implementation tools. The PC advises City Council on the City's long-range goals, policies, and programs for land use and planning. The membership and powers and duties of the PC are described in the Zoning Code.

50. **Finding:** The Planning Commission reviewed, made recommendations, and received over 40 written or verbal comments on the LSER Area Plan amendments during their meetings on the Plan. The Planning Commission held a public hearing on the LSER Area Plan on October 10, 2023, followed by a work session on November 14, 2023, when the PC voted to recommend adoption of the Plan to City Council.

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

51. **Finding:** This policy requires the establishment of a Citizen Involvement Committee, which was appointed in June 2018 and reviews and advises the way City staff engage with the public in land use and transportation planning. This policy does not apply. Nonetheless, the LSER Area Plan project's community involvement program is detailed more in the findings for Chapter 2, Community Involvement. Additionally, the City Council determined that the LSER Area Plan was undertaken in compliance with community involvement goals and policies, as indicated in the findings for Comprehensive Plan 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.

52. **Finding:** This policy concerns quasi-judicial amendments to the Comprehensive Plan Map and is not applicable to this 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 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.

53. **Finding:** The LSER Area Plan is an area-specific plan that provides additional detail and refinements applicable in the plan area, within the policy framework provided by the overall Comprehensive Plan. The LSER Area Plan does not include any area-specific policies that will be adopted as part of the Comprehensive Plan and does not amend any existing 2035 Comprehensive Plan goals or policies.

The LSER Area Plan amends the Comprehensive Plan Map to implement the LSER Area Plan's Land Use Growth Concept, and amends the Comprehensive Plan's Urban Design Framework to add the Brentwood-Darlington Neighborhood Center and adds two new neighborhood corridors. The LSER Area Plan recommends amendments to the Transportation System Plan (TSP) to revise the Project List and the street classifications for select streets in the plan area. These recommendations will be considered for adoption as part of the next update to the TSP. The primary implementing tools amended by the LSER Area Plan consist of amendments to the Zoning Map and minor amendments to the maps in the Zoning Code.

Other area-specific plans with relevant policies are addressed in Part IV of these findings. To the degree that a particular policy from an area-specific plan adopted prior to May 24, 2018, may conflict, per Policy 1.19.c. this inconsistency is superseded by the more recently adopted Comprehensive Plan policies. Therefore, the LSER Area Plan amendments are consistent with these policies.

## 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.

54. **Finding:** The City Council interprets the Chapter 2 goals and policies as calling for a broad range of meaningful community engagement approaches that complement the legally required public notices and meetings. The public engagement process provided opportunities for all interested parties to comment on and influence the early development

of the LSER Area Plan amendments, the PSC's Recommended Draft and the final decision before City Council.

### **Engagement context**

The LSER Area Plan was the result of advocacy by community organizations that sought to address community needs related to transportation and land use issues in the Brentwood-Darlington Neighborhood and parts of adjacent neighborhoods. The core area of the LSER Area Plan is the Brentwood-Darlington Neighborhood, which was annexed to the City of Portland in 1986. Development up to that time typically did not include sidewalks, creating significant gaps in the area's transportation infrastructure that continues to the current time. The area also has little commercial zoning, so that the area has no substantial neighborhood business district and has few local commercial services, with the majority of the area's zoning (74%) being single-dwelling, limiting the diversity of housing options.

An immediate precursor to the LSER Area Plan was the "Brentwood-Darlington 'Say Our Name!' Neighborhood Assessment and Action Plan," completed in 2017. This was a community led project to set goals and identify strategies for increasing access to complete community assets in Brentwood-Darlington while maintaining affordable housing and avoiding displacement. This project was a partnership between the City of Portland, community stakeholders and advocates, and key agency partners, conducted by a group formed to complete a Portland State University Master of Urban and Regional Planning (MURP) workshop project.

Following the "Say Our Name" project, community groups, led initially by the SouthEast in Active Motion coalition and the Brentwood-Darlington Neighborhood Association, advocated for a planning effort to address the area's transportation and land use needs. In response, the City of Portland applied for and was awarded a grant from the State of Oregon's Transportation and Growth Management (TGM) Program to undertake the Lower Southeast Rising Area Plan, which has been led jointly by the Portland Bureau of Planning and Sustainability (BPS) and the Bureau of Transportation (PBOT). Reflecting the LSER Area Plan's origins in community advocacy, the TGM grant application received letters of support from 17 community groups and organizations, including neighborhood associations, school community groups, Southeast Uplift, the Johnson Creek Watershed Council, Portland Mercado, and Rose Community Development.

### **Outreach and Engagement**

The Lower Southeast Rising project was informed and shaped by extensive community engagement. A project advisory committee, composed of plan area residents and business representatives, met from May 2021 through July 2023, and played a key role in informing the work of project staff, discussing options, and helping to refine proposals. The Plan's community engagement included:

- **Phase 1 – Issue identification.** In Summer 2021, over 15,000 mailers were sent to all addresses in the plan area to announce the plan and seek input via a survey, completed by over 1,500 community members. Staff undertook community stakeholder interviews and canvassed affordable housing apartments and mobile home parks to learn about



issues in the area. Staff also partnered with Latino Network to hear from Latino families about needs and issues, tabled at the Lents Farmers Market, met with neighborhood and business associations, and held a bike ride through the project area. In Winter 2021 staff created a “Pin It Portland” online mapping tool, for people to identify issues and their locations, and received over 600 responses.

- **Phase 2 – Implementation Alternatives.** In Summer 2022, staff held an online open house and survey (provided in five languages) that presented and sought feedback on alternative land use scenarios and land use and transportation priorities. Over 500 responses were received, which were supplemented with input from Latino Network focus group discussions, meetings with community groups, and neighborhood walks and bike rides. This input shaped the refinement of the Plan’s proposals, which were released as the Discussion Draft Plan after months of discussion with the project advisory group and refinement.
- **Phase 3 – Discussion Draft.** Staff released the Discussion Draft for public review in May 2023 and received feedback from over 300 community members through a variety of means. This included an online open house and survey, an online Map App tool showing zone change proposals for specific properties, tabling at community events and gathering places – where staff talked to over 150 people, neighborhood and business association meetings, focus group discussions with the area’s Spanish-, Vietnamese-, and Chinese-language communities, and an online virtual event held on May 24. Staff also sent out 6,000 mailers to owners of properties being considered for zone changes and to nearby residents.
- **Phase 4 – Proposed Draft.** The Proposed Draft Plan was released for public review and the Map App was opened for testimony to the PSC on September 8, 2023. The legally required Measure 56 notices of the proposed zone changes were mailed to property owners at the same time, preceded by Legislative notices that were sent on August 31, 2023. Staff also announced the Proposed Draft and the October 10 Planning Commission public hearing through the project notification list (with over 1,100 subscribers), emails to community stakeholders, and via social media. To provide accessible information about the Proposed Draft and how to provide input to the Planning Commission, the BPS website project page was updated with information that highlighted the key elements of the Plan and links to all related Plan documents. Besides opportunities to provide written testimony via the Map App or by mail, the public was provided opportunities to comment and suggest amendments in front of the Planning Commission. All testimony provided, both verbal and written, is available through the online testimony reader which makes hearings more accessible and the process more transparent.

### **Recommended Draft and City Council hearing**

The Recommended Draft of the LSER Area Plan was published on April 9, 2024. The project website was updated to reflect the Planning Commission review and recommendation and any related changes and how to comment during the City Council phase, as well as updated

plan information and links to relevant documents. The project MapApp website was also updated and continued to include the search by address and testimony functions.

The public was provided opportunities to comment and suggest amendments in front of the City Council. Throughout the testimony period and at its conclusion summaries of the testimony received to date, including issues raised, excerpts of key themes and frequency of mention, were prepared.

Therefore, the LSER Area Plan amendments are consistent with these goals.

## Partners in decision making

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

**2.1.a** Individual community members.

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

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

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

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

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

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

55. **Finding:** These policies direct the City to maintain partnerships and coordinate community engagement on a programmatic level and is not specific to a particular legislative project. Nevertheless, the partnerships noted in Policy 2.1.a-f and 2.2 were engaged at various stages of the LSER Area Plan work through interviews, advisory committees, public meetings, surveys, focus groups, and events. The project team conducted on-going communication and responded to requests for additional information from neighborhood associations, coalitions, community-based organizations, under-represented communities as well as individuals among others as evidenced by the range of comments and testimony received. The project team engaged with a range of community partners to increase participation and better reflect the diversity of the people in the plan area. Therefore, the LSER Area Plan is consistent with these policies.

## Environmental justice

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

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

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

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

56. **Finding:** For policies 2.3 and 2.4, the 2035 Comprehensive Plan defines “ensure” to mean “to make sure that something will happen or be available”.

The LSER Area Plan is consistent with these policies in both its approach to integrating environmental justice and equity into the project process and in the resulting Plan amendments and recommendations. The Plan used an equity lens that examined how benefits from future investments could benefit everyone, especially historically disadvantaged communities that have not had good access to services and been subject to displacement. Equity was a foundation of the LSER Area Plan, with the Plan’s focus on the Brentwood-Darlington area specifically intended to address gaps in access to services and safe transportation infrastructure in an area with higher percentages of people of color and lower-income households than Portland as a whole. Equity and environmental justice continued to be supported as key considerations by the community in advisory committee discussions and other forums. This project is intended help implement Comprehensive Plan equitable development policies that call for guiding development and public facility investments to produce positive outcomes for all Portlanders, reduce disparities, address infrastructure deficiencies, and address housing affordability and displacement.

Some of the ways the Lower Southeast Rising Area Plan addresses equity and environmental justice issues include:

- Designating a new Neighborhood Center, located around SE Flavel and anchored by commercial hubs at SE 72nd and SE 82nd, that is situated to be conveniently accessible to residents of the low-cost apartments and manufactured home parks in the area.
- Expanded zoning for multi-dwelling housing, which includes requirements for affordable units as part of larger projects, to increase affordable housing options.
- Zoning approaches to preserve existing low-cost housing, such as by not applying higher-density zoning to properties with existing low-cost apartments to avoiding adding to redevelopment pressures, and preserving zoning for manufactured home

parks in and around the proposed Neighborhood Center to prevent their redevelopment.

- Recommended transportation system improvements will make it easier for lower-income residents to access local services, schools, parks and employment areas without having to be dependent on a car and associated costs.
- Plan amendments rezoning seven acres of land near Johnson Creek to Open Space will provide equity benefits, as the Bureau of Environmental Services' ownership and restoration of these properties for floodplain management will provide equity benefits to vulnerable residents and businesses in the floodplain who may face significant challenges in managing the impacts of flooding.
- A range of recommended community stabilization approaches to support housing stability and increase access to economic opportunity, so that lower-income residents and communities of color can benefit from area improvements.
- Recommendations for expanding the role of the Brentwood-Darlington Community Center as a resource for the community, connecting community members and residents who may have been displaced, to community resources and providing opportunities for residents to remain connected to their community in the event that their living situation changes.

Therefore, the LSER Area Plan amendments are consistent with these policies.

## 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.

57. **Finding:** While the City Council generally interprets these policies to not apply to specific legislative projects and largely concern broad approaches to educating community members and City staff around capacity building, land use literacy and broadening engagement, they are particularly embodied in the LSER Area Plan, both the process and resulting plan. As noted in findings for the Comprehensive Plan Guiding Principles, Chapter 2 goals, and Policies 2.1 and 2.2, the LSER Area Plan amendments engaged and developed partnerships with community organizations and underserved communities and supported their participation and capacity building throughout the project. Furthermore, the Plan's Community Stabilization section includes recommended future actions to involve community organizations and the broader community in efforts to build community

capacity, including through community-based economic development and community-based housing approaches. Therefore, the LSER Area Plan amendments are consistent with these policies.

## Community assessment

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

58. **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 PC and City Council outside of the formal legislative process. The LSER Area Plan amendments 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.

59. **Finding:** City council finds that Policies 2.9 through 2.11 concern how the City collects and makes available data that supports land use decisions. For the LSER Area Plan, project staff collected a range of data on plan area demographics, existing conditions, land use issues, and transportation infrastructure conditions. Early in the project, information on existing issues in the plan area was also informed by stakeholder interviews, canvassing at apartment complexes and manufactured home parks, an online survey, focus group discussions undertaken by Latino Network, and through an online "Pin It, Portland" mapping tool that allowed community members to identify issues and their locations. Information gathered was made available on the project website. The City later used an on-line "Map App" database to receive, organize and document public comments and testimony on the LSER Area Plan Discussion Draft, Proposed Draft, and Recommended Draft. The database was viewable to the public, as well as to the PC and staff, through a web browser. The MapApp was also used to provide property-specific summaries of the LSER Area Plan amendments, providing opportunities to visually evaluate the locations affected by the changes. Therefore, the LSER Area Plan amendments are consistent with these policies.

## 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.

60. **Finding:** City Council finds that Policies 2.12 through 2.15 provide direction regarding roles, responsibilities, feedback opportunities, and documentation for participants and decision makers. Roles and responsibilities of participants and decision makers were identified in the LSER Area Plan Public Involvement Plan. Summaries of public involvement activities and feedback were posted periodically online and sent to the project’s notification list (sent to over 1,100 subscribers), including in September 2021, February 2022, and Summer 2022. Based on community and staff identification of issues and community priorities, the project scope was developed and solidified during the concept phase of the project and shared in a Preferred Framework Report in October 2022 and through website content. As described in the findings for Statewide Planning Goal 1 (Citizen Involvement) and Comprehensive Plan Policies 2.1 and 2.2, the legislative process was clearly outlined in notices, documents, the project website and the MapApp. This information included visual and narrative information about what phase the project was in and how to comment, and then how to testify and potentially influence deliberations during the Proposed Draft testimony period and the Recommended Draft testimony period.

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. Findings on this outreach are included in this document.

During the public review and comment phases of the project, BPS staff presented at various community meetings to inform people of the proposed amendments. All meetings and events were open to the public, considered accessibility and translation needs, and included opportunities for public comment. Part 1 of the Recommended Draft includes brief summaries of the public engagement activities at each phase of the legislative process. Therefore, the LSER Area Plan is consistent with these policies.

## 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 Commission (PC), 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.

61. **Finding:** The City Council interprets policies 2.16 through 2.23 to concern the City's Community Involvement Program, including the Community Involvement Committee, and are not applicable because the LSER Area Plan amendments do not change this program. Council finds that community members were afforded opportunities to be involved in and inform all phases of the planning process which meet the goals and purposes of the community involvement program and therefore these policies.

## Process design and evaluation

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

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

**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.

**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.

62. **Finding:** City Council interprets that policies 2.24 through 2.37 concern how the community involvement program is designed and developed to support planning and investment projects. The community involvement process conducted in support of the LSER Area Plan amendments engaged a broad range of stakeholders, including but not limited to renters, low-income and BIPOC communities in the area. Identification of stakeholders was informed by area demographic information and input from community members. The project's Public Involvement Plan identified groups who have a stake in the future of LSER Area Plan and included equity considerations in identifying impacted populations, which guided the projects public outreach approach.

The Plan amendments were informed early in the process by engaging affected and interested people through a range of approaches. The initial phases of project involved community members in identifying issues that needed to be addressed. In Summer 2021, over 15,000 mailers were sent to all addresses in the plan area to announce the plan and seek input via a survey, completed by over 1,500 community members. Staff undertook community stakeholder interviews and canvassed affordable housing apartments and mobile home parks to learn about issues in the area. Staff also partnered with Latino Network to hear from Latino families about needs and issues and broaden whose perspectives were heard, tabled at the Lents Farmers Market, met with neighborhood and business associations, and held a bike ride through the project area. In Winter 2021 staff created a "Pin It Portland" online mapping tool, for people to identify issues and their locations, and received over 600 responses. Community feedback received from these outreach activities informed the development of the Plan's draft proposals.

In Summer 2022, staff held an online open house and survey (provided in five languages) that presented and sought feedback on alternative land use scenarios and land use and transportation priorities, informed by earlier community feedback. Over 500 responses were received, which were supplemented with input from Latino Network focus group discussions, meetings with community groups, and neighborhood walks and bike rides. This input shaped the refinement of the Plan's proposals, which were released as the Discussion Draft Plan after months of discussion with the project advisory group and refinement.

Staff released the Discussion Draft for public review in May 2023 and received feedback from over 300 community members through a variety of means. This included an online open house and survey, an online Map App tool showing zone change proposals for specific properties, tabling at community events and gathering places – where staff talked to over 150 people, neighborhood and business association meetings, and an online virtual event held on May 24. Staff also sent out 6,000 mailers to all owners of properties being considered for zone changes and to nearby residents. Refinement of the Plan's proposals

during this period was also informed by targeted outreach to the plan area's Spanish-, Vietnamese- and Chinese-language communities to broaden community feedback on the Plan's proposals utilizing culturally-appropriate engagement strategies.

Staff also work to inform and engage residents and businesses in the area through project notification emails, replying to email and phone calls, meetings with neighborhood associations and business associations, through online project news updates, as well as through flyers left at schools and businesses. Outreach was designed to reach an array of stakeholders, including those not living within the plan area, such as property owners, business owners, school communities, and customers of area businesses.

In support of the various stages of the project, the BPS website had a project webpage with the available documents, an online "story map" in four languages summarizing the project proposals, and a Map App page with a comment and testimony function. The City used the on-line Map App database to receive, organize and document public comments and testimony on the LSER Area Plan Discussion Draft, Proposed Draft, and Recommended Draft. The database was viewable to the public, as well as to the PC and staff, through a web browser. The MapApp was also used to provide property-specific summaries of the LSER Area Plan amendments, providing opportunities to visually evaluate the locations affected by the changes. A number of people testified at both the Planning Commission and City Council public hearings, which resulted in further amendments to the final amendments.

Therefore, the LSER Area Plan is consistent with these policies.

## 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.

63. **Finding:** Consistent with Policies 2.38 through 2.41 and BPS community involvement practices, meetings, open house events, and all public meetings, described in more detail in the findings for Statewide Goal 1 and Comprehensive Plan policies 2.1 and 2.2, were held to accommodate people with disabilities, noticed with sufficient lead time, and information on the plan was provided to meeting participants as well as online. As part of staff's on-going project communications, an email contact list was maintained with over 1,100 recipients.

Emails providing project updates were sent on periodic basis throughout the project. To engage community members with limited English proficiency, besides being available in English, project surveys and a summary of the project proposals were provided in the four other languages most frequently spoken in the plan area: Spanish, Vietnamese, Chinese, and Russian. This was supplemented by focus group discussions with members of the plan area's Spanish-, Vietnamese-, and Chinese-language communities facilitated by native speakers of these languages.

The City mailed the required Measure 56 notice on September 2023 (mailed in time to be received on September 12) to all owners of property within the plan area whose properties were proposed for Comprehensive Plan Map and Zoning Map amendments, in conjunction with the publishing of the Proposed Draft, prior to the October 10, 2023, Planning Commission hearing. The City also sent a legislative notice on August 31, 2023, to interested parties, including neighborhood associations, business associations, and other affected jurisdictions, that have requested notice of proposed land use changes. The Planning Commission hearing was also publicized via the project notification list and through the project webpage.

The City also sent a legislative notice on April 10, 2023, to interested parties, and others that participated in the Planning Commission hearings to inform them of the opportunity to testify at the April 25, 2024, City Council public hearing.

Therefore, the LSER Area Plan is consistent with these policies.

## 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.

64. **Finding:** This goal calls for a built environment that supports the ability of Portlanders to meet their needs, including but not limited to needs for housing, employment, commercial and community services, education, and access to recreation and open space. LSER Area Plan amendments and transportation project recommendations will help meet many of these needs, including by zone changes that expand opportunities for local commercial and community services, expand housing options, and through recommendations for transportation improvements that will enhance the ability of residents to safely access destinations by walking, biking, or taking transit. The Plan supports this goal in a number of ways, including:

- Designating a new neighborhood center with expanded commercial/mixed use zoning and adjacent multi-dwelling zoning, which over time will allow more residents the opportunity to live within walking distance of commercial services without having to be dependent on cars to access services, and will provide new opportunities for community gathering places and social interaction.
- Recommendations for transportation projects that prioritize pedestrian, bicycle and transit access, including corridor and neighborhood greenway improvements, will facilitate the ability of residents to access services and community destinations by walking, biking, or transit. Furthermore, the improved access is targeted to benefit disadvantaged communities who live in an area with significant gaps in pedestrian and bicycle infrastructure, helping to reduce disparities in access to safe active transportation options.
- Recommendations for an expanded network of neighborhood greenway, including connections to parks, natural areas, recreation, and to the Springwater Corridor Trail, will enhance active transportation options and connections to recreation opportunities and create a healthier environment.
- Amendments support expanded access to housing through expanded multi-dwelling and commercial/mixed use zoning, which will allow for a broader variety of housing types and costs and that can accommodate a wider range of households in an area where single-dwelling zoning predominates and where housing choices are limited.
- The Plan address equity and helps reduce disparity by expanding possibilities for affordable housing, including expanded where inclusionary housing requirements for affordable housing apply and increased options of multi-unit housing provided by broader mapping of multi-dwelling and commercial/mixed-use zoning. The Plan’s expansion of multi-dwelling housing opportunities around centers and along transit corridors will also allow more people, including lower-income households, to live close

to commercial and community services, as well as to the area's transit options and its educational and recreational resources.

Therefore, this goal is met.

**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.

65. **Finding:** The LSER Area Plan addresses this goal in three main ways: (1) by contributing to a compact urban form by focusing growth in and around centers and transit corridors through expansion of multi-dwelling and mixed-use zoning in these locations; (2) by making recommendations for transportation projects focused on expanding safe active transportation options in the plan area; and (3) by focusing development away from areas with natural hazard risks and by rezoning properties owned by BES along and near Johnson Creek to Open Space to support work on floodplain and habitat restoration, which will improve resilience to flooding associated with climate change by help mitigate flood risk in the area and contribute to restoring natural systems. Therefore, this goal is met.

**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.

66. **Finding:** Goals 3.C and 3.D call for focusing growth within an interconnected system of centers, corridors, and transit station areas. The LSER Area Plan supports these goals as it focuses growth and improvements in and around the area's centers and corridors, and designates a new Brentwood-Darlington neighborhood center with expanded commercial/mixed use and multi-dwelling zoning, which will allow for more commercial services and employment in the plan area and expand options for housing and residents close to services. Consistent with Goal 3.C, the Plan's zone changes are focused closely around the area's designated centers and corridors, and leaves the majority (71%) of the plan area in single dwelling zoning, supporting stability in most of the area's lower-density residential areas. The Plan's recommended transportation projects support Goal 3.d as they include a range of multi-modal corridor and neighborhood greenway improvements designed to connect residents to the area's centers and corridors and the services found in these locations, as well as providing connections to the areas system of schools, parks and natural areas. The LSER Area Plan is therefore consistent with and support Goal 3.C. and 3.D.

**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.

67. **Finding:** The LSER plan area includes a network of parks, schools, natural areas, and the Springwater Corridor Trail that serve as important public realm and open space resources in the area. The LSER Area Plan’s recommended transportation projects, particularly its expanded system of neighborhood greenways, support this goal as they will serve to provide active transportation connections to these public realm and open space resources so that residents can more easily and safely walk, bike, and roll to these destinations, which will ultimately contribute to a more interconnected network of open spaces. The LSER Area Plan also includes amendments rezoning 6.5 acres of land to Open Space along or near Johnson Creek, owned by BES, that BES will use for floodplain and habitat restoration, further contributing to the area’s network of natural areas and open space and supporting efforts to improve water quality and environmental health. Therefore, the LSER Area Plan amendments are consistent with this policy.

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

68. **Finding:** The LSER plan includes employment areas identified in the Comprehensive Plan as Commercial areas and as Dispersed Employment areas. The LSER Area Plan amendments are consistent with this goal as they include Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area, which will contribute to maintaining an adequate supply of land for employment in Portland. The growth analysis undertaken for the LSER Area Plan estimates that the proposed amendments increase employment capacity in the area by an additional 120 jobs. The Plan’s expansion of commercial/mixed use zoning in the newly-designated Brentwood-Darlington neighborhood center and around smaller commercial hubs on transit corridors will allow expansion of the area’s commercial districts. In addition, the Plan’s rezoning of 6.5 acres of land along or close to Johnson Creek and owned by BES to Open Space will facilitate BES’s work in undertaking floodplain restoration on the properties to help reduce flooding that has impacted employment land in the area, and contribute to their viability for employment uses.

**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.

69. **Finding:** Within the LSER plan area, the Comprehensive Plan identifies the Johnson Creek and adjacent land as an urban habitat corridor. Consistent with this goal, the LSER Area Plan also includes amendments rezoning 6.5 acres of land to Open Space along or near Johnson Creek, owned by BES, that will be used for floodplain and habitat restoration, further contributing to the natural system functions of Johnson Creek and its role as an important habitat corridor.

## 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.

70. **Finding:** The Urban Design Framework (UDF) provides guidance on Portland’s evolving built and natural form, including the centers and corridors where growth is focused. The LSER Area Plan is consistent with this policy in a number of ways, including at a fundamental level using the UDF as a guide to reinforce the roles of places identified in the UDF as centers and corridors, as well as habitat corridors. Designated centers and corridors within the plan area include the Woodstock and Heart of Foster neighborhood centers, part of the Lents Town Center; the 82<sup>nd</sup> Avenue, SE Chavez, and SE Foster Boulevard civic corridors, and the Woodstock neighborhood corridor. The Plan’s amendments expand commercial/mixed use zoning in and around these centers and corridors, reinforcing their intended roles as places of commercial activity and housing growth. The Plan also builds on the UDF by designating an additional neighborhood center, along with designating portions of SE 52<sup>nd</sup> and SE 72<sup>nd</sup> neighborhood corridors, which will be added to the UDF in response to the community’s interest in fostering these as inclusive mixed-use places that will be a focus for commercial activity, transit, and housing growth. The roles of the UDF-identified centers and corridors as places of activity and growth is also supported by the Plan’s system of recommended transportation projects, which are designed to provide connections to the area’s centers and to improve the multi-modal functions of designated corridors. Also consistent with this policy, the Plan includes amendments that rezone land to Open Space along or near Johnson Creek that will be used for floodplain and habitat restoration, consistent with the UDF designation of Johnson Creek as an important urban habitat corridor.

Therefore, the LSER amendments are consistent with this policy.

**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.

71. **Finding:** The LSER Area Plan is consistent with this policy as its Comprehensive Plan Map and Zoning Map amendments direct most growth to the area’s designated centers and corridors, including the newly-designated Brentwood-Darlington Neighborhood Center. Outside these areas, the Plan supports the continuation of the scale and characteristics of most of the area’s lower-density neighborhoods, with 71% of plan area zoning remaining single-dwelling. Also, the majority of rezones from single-dwelling zoning is to the small-scale RM1 multi-dwelling zone, which is intended to be compatible with single-dwelling areas and limits development scale to be similar to that of single-dwelling zones (for example, the majority of rezones from single-dwelling zoning involves changes from R2.5 to RM1 zoning, both of which zones limit building height to 35 feet). Therefore, the LSER Area Plan amendments are consistent with this policy.

**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.

72. **Finding:** One of the ways to reduce disparities and produce positive outcomes for all Portlanders, is to increase housing stability by creating more opportunities for preserving and creating affordable housing, and by provide a range of housing options for different types of households. The LSER Area Plan’s Zoning Code and Zoning Map amendments bring

regulatory approaches that contribute to equitable access to housing and housing stability in a range of ways. One way the LSER Area Plan helps achieve this is through a zoning approach that avoids increasing zoning entitlements to locations with existing unregulated low-cost housing and manufactured home parks to avoid adding to redevelopment pressures, as part of a broader effort to support housing stability for the area's lower-income residents, including people of color. The LSER Area Plan's expanding mapping of multi-dwelling and mixed-use zoning also contributes to housing equity for low-income households by expanding where inclusionary housing regulations apply (which requires affordable units to be included as part of larger buildings). The Plan's expanded mapping of multi-dwelling zoning also supports housing for a diversity of household types through the wide range of housing types allowed in those zones, and through the regulatory incentives they provide for moderate-income family housing and for visitable or accessible units that expand housing options for people with mobility limitations, including older adults and people with disabilities. The Plan's amendments also expand equitable access to opportunity through rezoning properties around the intersection of SE 82<sup>nd</sup> and SE Flavel to commercial/mixed-use zoning to support this area's role as a hub for commercial services that can serve the many lower-income residents in the surrounding area, which includes a number of manufactured home parks and low-cost apartment complexes.

This policy is also supported by the Plan's recommended transportation projects that prioritize pedestrian, bicycle and transit access, including corridor and neighborhood greenway improvements, that will facilitate the ability of residents to access services and community destinations by walking, biking, or transit. Furthermore, the improved access is targeted to benefit disadvantaged communities who live in an area with significant gaps in pedestrian and bicycle infrastructure, helping to reduce disparities in access to safe active transportation options.

Therefore, the LSER Area Plan is consistent with this policy.

**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.

73. **Finding:** The LSER project considered the potential risk of involuntary displacement due to the Plan's proposed zone change. For the LSER Area Plan amendments, the Council interprets "involuntary displacement" to occur when a resident is forced to relocate due to factors that are beyond the resident's control, including but not limited to increased rents and decisions by landlords to redevelop property. Analysis undertaken as part of the LSER project's Economic Analysis Background Report found that there is minimal risk of displacement associated with the Plan's amendments due to the high rate of ownership in the area and the strategic and targeted nature of the proposed zone changes, which avoid locations with existing unregulated low-cost housing. The analysis also found that the Plan's zone changes are not likely to increase redevelopment and residential displacement, as the Plan's predominant rezoning involves expansion of low-rise multi-dwelling zones (RM1 and RM2), which will not increase the likelihood of redevelopment beyond what is already economically feasible in the existing single-dwelling zones, and will overall create the



opportunity for more needed housing by allowing more units on a site when redevelopment does occur. The LSER Area Plan Comprehensive Plan Map and Zoning Map Amendments affect only a small portion of the plan area's land, just 6.7 percent, leaving the rest of the area's zoning unchanged. The LSER Area Plan also works to provide for housing stability for low-income households in the long-term and increase the supply of affordable housing by expanding where inclusionary housing regulations apply through broader mapping of multi-dwelling and mixed-use zoning; and addresses residential stability in the near term by avoiding zone changes to locations with existing low-cost apartments and manufactured home parks in order to avoid adding to redevelopment pressures. The Plan also includes recommended actions to support community stability by investing in affordable housing and through community economic development efforts to support small businesses and connect residents to economic opportunity. The City Council finds that these measures are sufficient to mitigate the anticipated impacts to protected classes and low-income households, contribute to housing stability, help preserve communities, and help create permanently affordable housing options for those households that might be displaced due to redevelopment enabled by the LSER Area Plan amendments or associated infrastructure improvements.

**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.

74. **Finding:** The LSER Area Plan includes recommended transportation projects for the plan area, which has significant gaps in sidewalks, safe crossings, bicycle facilities and transit service. Improving deficiencies in transportation facilities in the plan area addresses disparities and equity, as the area has higher-portions of lower-income households and communities of color than Portland as a whole, especially in eastern areas around SE 82<sup>nd</sup>, where there are a number of manufactured home parks and low-cost apartment complexes. The recommended transportation projects include safety improvements along busy streets, as well improvements to pedestrian and bicycle connections to local destinations, including schools, parks, and commercial areas. These improvements are intended to bring infrastructure up to a basic level of safety, and will not involve major, high-profile infrastructure that could contribute to increased housing costs and displacement. The Plan also includes recommendations for future actions to support community stabilization, including affordable housing strategies and community-based economic development to address housing stability and access to economic opportunity. Therefore, the LSER Area Plan amendments are consistent with this policy.

**3.3.c.** Encourage use of plans, agreements, incentives, and other tools to promote equitable outcomes from development projects that benefit from public financial assistance.

75. **Finding:** The City Council finds that the use of various tools to promote equitable outcomes specifically for projects that benefit from public financial assistance is a programmatic response, and not a regulatory response to be included in the Zoning Code. The LSER Area Plan amendments address equitable outcomes and housing affordability in a different way

through expansion of where inclusionary housing requirements apply and through bonuses for affordable housing.

**3.3d.** Incorporate requirements into the Zoning Code to provide public and community benefits as a condition of development projects to receive increased development allowances.

76. **Finding:** All of the development bonuses associated with the LSER Area Plan's expansion of multi-dwelling and commercial/mixed-use zoning link receiving additional development scale to the provision of community benefits, specifically affordable housing and physically-accessible units. The City Council interprets community benefits to include outcomes that provide affordable housing, an outcome which meets important community needs identified in the Comprehensive Plan, and that provide services and opportunities needed by the community, such as daycares and affordable commercial space. The development bonuses provided by the LSER Area Plan through the expansion of multi-dwelling and mixed use zoning include: 1) broader applicability of inclusionary housing requirements and bonuses for projects providing affordable units; 2) a deeper housing affordability bonus for projects in which at least half of units are affordable at 60 percent of area median income; 3) a bonus for moderate-income three-bedroom units; and 4) a bonus for projects that include visitable or accessible units to expand housing options for community members with mobility limitations. Therefore, the LSER Area Plan is consistent with this policy.

**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.

77. **Finding:** Analysis undertaken as part of the LSER project's Economic Analysis Background Report found that there is minimal risk of displacement associated with the Plan's amendments due to the high rate of ownership in the area and the strategic and targeted nature of the proposed zone changes, which provide only a modest amount of additional development scale and avoid locations with existing unregulated low-cost housing. The analysis also found that the Plan's zone changes are not likely to increase redevelopment and residential displacement, as the Plan's predominant rezoning involves expansion of low-rise multi-dwelling zones (RM1 and RM2), which will not increase the likelihood of redevelopment beyond what is already economically feasible in the existing single-dwelling zones, and will overall create the opportunity for more needed housing by allowing more units on a site when redevelopment does occur. Furthermore, the expansion of multi-dwelling and commercial/mixed-use zoning in the area brings with it expanded applicability of inclusionary housing requirements, so that larger buildings in these zones will be required to include affordable units, and will make available development bonuses and provisions that link additional development scale to the provision of affordable housing units, such as the deeper housing affordability bonus and affordable housing preservation transfers of development rights. The City Council interprets the provision of affordable housing units through inclusionary housing and other affordable housing bonuses to serve as appropriate mitigation for the value provided by the additional development scale allowed by the

bonuses. In addition, the City has other existing mechanisms, such as the construction excise tax dedicated to affordable housing, that helps to mitigate displacement 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.

78. **Finding:** The LSER Project coordinated with PBOT, BES, Prosper Portland and other City agencies and affordable housing developers on the Plan's amendments and recommended transportation investments, with a major objective being to contribute to more equitable access to opportunity while supporting community stability. The recommended transportation projects include safety improvements along busy streets, as well improvements to pedestrian and bicycle connections to local destinations, including schools, parks, and commercial areas, and were designed to address disparities in access to safe transportation infrastructure faced by the area's historically disadvantaged communities. These improvements are intended to bring infrastructure up to a basic level of safety, and will not involve major, high-profile infrastructure that could contribute to increased housing costs and displacement. The Plan also includes recommendations for future actions to support community stabilization, including affordable housing strategies and community-based economic development to address housing stability and access to economic opportunity. The Plan also includes recommendations for expanding the role of the Brentwood-Darlington Community Center as a resource for the community, connecting community members and residents who may have been displaced, to community resources and providing opportunities for residents to remain connected to their community in the event that their living situation changes. Therefore, the LSER Area Plan is consistent with this policy.

**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.

79. **Finding:** The verb "encourage", which is defined in the 2035 Comprehensive Plan, means to promote or foster using some combination of voluntary approaches, regulations, or incentives. The LSER Area Plan's expansion of multi-dwelling and commercial/mixed use zoning includes broader applicability of Neighborhood Contact requirements that encourage dialogue between developers and impacted communities, which can include discussion of impacts, mitigation and community benefits. Therefore, the LSER Area Plan is consistent with this policy.

**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.

80. **Finding:** The City Council interprets this policy to be focused on creating a supportive built environment for people of all ages and abilities, including children, the elderly, and people with disabilities. This policy is supported by the LSER Area Plan's recommended transportation projects, which focus on safety improvements to busy corridors, such as pedestrian crossings and sidewalk infill, as well as an expanded neighborhood greenway

system to provide safe connections to area destinations, such as parks, schools, so that people of all ages and abilities can safely and conveniently access local destinations by walking, biking, or rolling.

Accessibility for all ages and abilities is also supported by the LSER Area Plan's expanded multi-dwelling zoning, which provides incentives for physically-accessible units that offer more housing options and remove access barriers for people with disabilities or mobility limitations. Furthermore, the expanded multi-dwelling zoning and its accessibility provisions facilitate physically-accessible housing close to services and transit, allowing more options for accessing services, which is especially important for those who are not able to drive. An accessible built environment is also promoted by the Plan's expansion of commercial/mixed-use zoning in and around the area's centers and corridors, as multi-level buildings built in such zones often include elevators and accessible or adaptable units. Therefore, the LSER Area Plan is consistent with this policy.

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

81. **Finding:** Consistent with the Policies 3.5 – 3.7, the LSER Area Plan promotes sustainable and resource-efficient development and transportation. The Plan supports efficient use of land in coordination with low-carbon transportation access by expanding multi-dwelling and commercial/mixed-use zoning along transit corridors and in and around mixed-use centers, allowing for more housing and residents to live close to commercial service and transit, and to access services without needing to drive. This is further supported by the Plan's recommended transportation projects, which focus on safety improvements along busy corridors and expansion of the area's system of neighborhood greenways to facilitate the ability of area residents to access local destinations by walking, biking, rolling, or taking transit. The LSER Area Plan amendments expanding multi-dwelling and mixed-use zoning will allow for more compact, resource-efficient units in the plan area. According to a study published by Oregon DEQ, A Life Cycle Approach to Prioritizing Methods of Preventing Waste from the Residential Construction Sector in the State of Oregon, of 30 different material reduction and reuse practices evaluated, reducing home size and multi-family living achieved the largest greenhouse gas reductions along with significant reductions in other impact categories. Reducing home size by 50 percent results in a projected 36 percent reduction in lifecycle greenhouse gas emissions. Reducing home size is a significant leverage point for environmental impact reduction and may be equivalent to achieving minimum levels of "green" certification. Furthermore, the Plan's rezoning to Open Space of 6.5 acres of BES-owned land along or near Johnson Creek, which will be utilized for floodplain and

habitat restoration, will support expansion of natural areas along Johnson Creek, consistent with Policy 3.7. Therefore, the LSER Area Plan is consistent with policies 3.5 through 3.7.

**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.

82. **Finding:** The LSER Area Plan amendments are consistent with this policy by advancing innovative approaches that link land use and transportation strategies to contribute to creating low-carbon, inclusive, complete neighborhoods where residents can access local services to meet daily needs without having to drive, and have a range of housing options that they can afford. This is supported by the Plan’s amendments focusing expansion of multi-dwelling and commercial/mixed zoning along transit corridors and in mixed-use centers so residents can live close to services and transit, in combination with the Plan’s recommended transportation projects that will facilitate the ability of residents to access local and city destinations by walking, biking, and transit. The Plan’s expanded multi-dwelling and commercial-mixed use zones will also bring expanded applicability of these zones’ design-related standards that reflect Portland’s role in innovative design, such as provisions intended to limit urban heat island impacts, people-centered design standards for outdoor spaces that focus on design supportive of human health and active living, and options for urban green options such as ecoroofs to serve as alternatives to conventional landscaping. Therefore, the LSER Area Plan is consistent with this policy.

**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.

83. **Finding:** The LSER Area Plan is consistent with this policy as the project considered the impacts of the draft amendments and recommended transportation projects on the characteristics of area neighborhoods and its residents, particularly under-represented communities more vulnerable to displacement. The Plan’s Comprehensive Plan Map and Zoning Map amendments limit the amount of change and impacts in the plan area by directing most growth to the area’s designated centers and corridors, allowing more residents to live close to services and transit. Outside these areas, the Plan supports the continuation of the scale and characteristics of most of the area’s lower-density neighborhoods, with 71% of plan area zoning remaining single-dwelling. Also, the majority of rezones from single-dwelling zoning is to the small-scale RM1 multi-dwelling zone, which is intended to be compatible with single-dwelling areas and limits development scale to be similar to that of single-dwelling zones (for example, the majority of rezones from single-dwelling zoning involves changes from R2.5 to RM1 zoning, both of which zones limit building height to 35 feet).

Some community members raised concerns about the parking impacts of multi-dwelling development that does not provide off-street parking. There are no Comprehensive Plan

policies requiring consideration of parking, rather, policies are focused on decreasing reliance on individual vehicles. New buildings with 10 or more units in the multi-dwelling and commercial/mixed-use zones are required to meet Title 17 Transportation and Parking Demand Management requirements, which require incentives to be provided to residents to encourage alternatives to private automobiles, such as providing transit passes or other incentives for walking, biking, or car sharing. Potential parking impacts associated with the additional development allowed by the zone changes are also addressed by the Plan's transportation recommendations, which will help reduce the need for private vehicles and associated off-street parking spaces through transportation projects that make alternatives to car travel more feasible and attractive, such as recommended pedestrian and bicycle infrastructure improvements, as well as recommended transit improvements that have been incorporated into TriMet's Forward Together plan, which includes plans for two new frequent service transit lines through the plan area.

Regarding potential impacts on residential displacement, analysis undertaken as part of the LSER project's Economic Analysis Background Report found that there is minimal risk of displacement associated with the Plan's amendments due to the high rate of ownership in the area and the strategic and targeted nature of the proposed zone changes, which avoid locations with existing unregulated low-cost housing such as affordable apartment complexes and manufactured home parks to avoid adding to redevelopment pressures. The analysis found that the Plan's zone changes are not likely to increase redevelopment and residential displacement, as the Plan's predominant rezoning involves expansion of low-rise multi-dwelling zones (RM1 and RM2), which will not increase the likelihood of redevelopment beyond what is already economically feasible in the existing single-dwelling zones, and will overall create the opportunity for more needed housing by allowing more units on a site when redevelopment does occur. The Plan's mapping amendments affect only a small portion of the plan area's land, just 6.7 percent, leaving the rest of the area's zoning unchanged. The LSER Area Plan also works to provide for housing stability for low-income households in the long-term and increase the supply of affordable housing by expanding where inclusionary housing regulations apply through broader mapping of multi-dwelling and mixed-use zoning. The Plan also includes recommended actions to support community stability by investing in affordable housing and through community economic development efforts to support small businesses and connect residents to economic opportunity.

The Plan's recommended transportation projects were designed after careful consideration of neighborhood context. The recommended projects include safety improvements along busy streets, as well improvements to pedestrian and bicycle connections to local destinations, including schools, parks, and commercial areas, and were designed to address disparities in access to safe transportation infrastructure faced by the area's historically disadvantaged communities. These improvements are intended to bring infrastructure up to a basic level of safety, and will not involve major, high-profile infrastructure projects that could contribute to increased housing costs and displacement. With the combination of the Plan's community-responsive approach to its land use amendments and transportation recommendations, the LSER Area Plan is consistent with this policy.

**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.

84. **Finding:** The LSER Area Plan does not affect rural land outside the UGB. Therefore, 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
- Neighborhood boundaries and transitions

85. **Finding:** The City Council interprets this policy as providing direction on the design of development and public facilities in relationship to significant places. The LSER Area Plan is adopting land use changes and a set of planning-level recommendations for future transportation projects. The design process, when design could acknowledge significant places in the area, occurs later during the implementation of development projects and public facilities. Furthermore, the Plan amendments do not impact symbolic features or iconic structures and no changes to historic resource protections are made with these amendments. Therefore, this policy is not applicable.

## 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.

86. **Finding:** Policies 3.12 through 3.20 provide guidance on the desired characteristics and functions of centers. A central objective of the LSER Area Plan is to provide more opportunities for neighborhood businesses and housing, which is implemented in part by Plan amendments that strengthening the role of the area's centers in serving as anchors for complete neighborhoods, services, and housing, consistent with Policy 3.12. The LSER Area Plan is consistent with these policies in a number of ways, including:

- Designation of a new Brentwood-Darlington Neighborhood Center, with expanded commercial/mixed use and multi-dwelling zoning, allowing for emergence of a neighborhood business district in an area that lacks this, and expanding options for housing and allowing more people to live close to the center's commercial and community services and jobs. This newly designated center adds to the variety of centers in Portland and will enhance opportunities for local access to services and housing in the plan area, consistent with Policy 3.13.
- Within the new Brentwood-Darlington Neighborhood Center, the expanded multi-dwelling zoning is located within a half-mile of the center's core commercial areas, consistent with Policy 3.14, with the center's medium-scale multi-dwelling zoning applied within a quarter mile of the core commercial hub at SE 72<sup>nd</sup> and SE Flavel. The role of housing in centers is also supported by the Plan's expansions of multi-dwelling zoning at the edges of the Woodstock, Heart of Foster, and Lents centers.
- The newly-designated Brentwood-Darlington Neighborhood Center will also include community services, consistent with policies 3.12 and 3.16, as it includes Whitman Elementary School and Flavel Park, ensuring that the center will function as a hub for both commercial and community services. Also consistent with these policies, Plan amendments expand the boundaries of the Heart of Foster Neighborhood Center to include Mt. Scott Community Center and Arleta Triangle, which will reinforce the role of this center as a hub for community activity and services. Including schools, community centers, and parks within the area's centers also supports Policy 3.17, as these places provides opportunities to support art and culture within the community.
- The Plan's recommended transportation projects and Transportation System Plan (TSP) designations also support these policies, especially policies 3.15, 3.18, and 3.19, in that



these projects and designations are designed to bring transportation investments to support the role of centers as places that prioritize access by walking, biking, rolling, and transit; and includes recommendations for an expanded system of neighborhood greenways connecting residents to the area's centers, schools, parks, and natural areas. The Plan includes recommendations for designating the new neighborhood center as a pedestrian district in the TSP, as well as expanding the Heart of Foster center and pedestrian district to include the Mt. Scott Community Center and Arleta Triangle to prioritize these areas for pedestrian access and community activity. The Plan's transportation recommendations also include neighborhood greenway connections from the new neighborhood center to the Springwater Corridor Trail and adjacent natural areas, consistent with Policy 3.20, which will also be supported by trees and other green elements when new development along the center's corridors triggers requirements for street frontage improvements and street trees.

- Also in support of Policy 3.19, the Plan includes recommendations for improved transit service, developed in coordination with TriMet, which will provide more frequent and convenient transit connections to centers in the plan area and beyond. This includes continuous transit service along SE Woodstock that will connect the Woodstock Neighborhood Center and the Lents Town Center, a connection that currently does not exist.

Collectively, these components of the LSER Area Plan support policies 3.12 through 3.20.

## Central City

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

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

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

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

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

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

87. **Finding:** Policies 3.21-3.26 provide guidance on the key attributes and infrastructure of the Central City. The geography of the LSER Area Plan is not within the Central City. These policies do not apply.

## 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.

88. **Finding:** Policies 3.27 through 3.30 provide direction on the desired characteristics and functions of the Gateway Regional Center. The geography of the LSER Area Plan is not within the Gateway Regional Center. These policies do not apply.

## Town Centers

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

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

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

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

89. **Finding:** Policies 3.31 through 3.34 provide direction on the desired characteristics and functions of town centers. The LSER plan area includes a portion of the Lents Town Center. LSER Area Plan amendments that apply RM2 multi-dwelling zoning within the boundaries of the Lents Town Center between SE 80<sup>th</sup> and SE 82<sup>nd</sup> are consistent with these policies, especially Policy 3.32, as they expand housing capacity within this center, within a quarter mile of the commercial hub at SE Foster and SE 82<sup>nd</sup>. The additional housing supported by the Plan's expanded allowances for multi-dwelling housing in the center will allow more people to live close to the center's services and expand the local customer base, helping to support the viability of the center's businesses.

The LSER Area Plan also includes transportation project recommendations that will support the role of the Lents Town Center as a multi-modal transportation hub, consistent with Policy 3.33, including corridor improvements along Woodstock within and connecting to the center, as well as neighborhood greenway projects that will improve bicycle and pedestrian connections to the center.

Also in support of Policy 3.33, the Plan includes recommendations for improved transit service, developed in coordination with TriMet, which will provide more frequent and convenient transit connections to the Lents Town Center. This includes continuous transit service along SE Woodstock that will connect the Woodstock Neighborhood Center to the Lents Town Center, a connection that currently does not exist.

Therefore, the LSER Area Plan is consistent with these policies.

## 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.

90. **Finding:** Policies 3.35 through 3.38 provide direction on the desired characteristics and functions of neighborhood centers. The LSER plan area includes the currently-designated Woodstock Neighborhood Center and parts of the Heart of Foster Neighborhood Center. A central objective of the LSER Area Plan is to strengthen the role of the area's neighborhood centers in serving as anchors for complete neighborhoods, services, and housing, consistent with Policy 3.35. The LSER Area Plan is consistent with these policies in a number of ways, including:

- Designation of a new Brentwood-Darlington Neighborhood Center, with expanded commercial/mixed use and multi-dwelling zoning, allowing for emergence of a neighborhood business district in an area that lacks this, and expanding options for housing and allowing more people to live close to the center's commercial and community services and jobs. This newly designated center will enhance opportunities for local access to services and housing in the plan area, consistent with policies 3.35 and 3.36.

- Within the new Brentwood-Darlington Neighborhood Center, the expanded multi-dwelling zoning is located within a half-mile of the center's core commercial areas, consistent with Policy 3.36, with the center's medium-scale multi-dwelling zoning applied within a quarter mile of the core commercial hub at SE 72<sup>nd</sup> and SE Flavel. The role of housing in neighborhood centers is also supported by the Plan's expansions of multi-dwelling zoning at the edges of the Woodstock and Heart of Foster neighborhood centers. Furthermore, the expanded multi-dwelling zoning in and around the area's neighborhood centers is consistent with this policy in that the multi-dwelling zones allow a wide range of housing types, including townhouses, low-rise apartment buildings, and clusters of detached houses, which will add diversity to the housing provided by the single-dwelling zoning that surrounds the neighborhood centers.
- The newly-designated Brentwood-Darlington Neighborhood Center will also include community services, consistent with Policy 3.35, as it includes Whitman Elementary School and Flavel Park, ensuring that the center will function as a hub for both commercial and community services. Also consistent with these policies, Plan amendments expand the boundaries of the Heart of Foster Neighborhood Center to include Mt. Scott Community Center and Arleta Triangle, which will reinforce the role of this neighborhood center as a hub for community activity and services. Including these parks, the community center, and the Arleta Triangle with its community gathering functions into these neighborhood centers is also consistent with Policy 3.38 by including gathering places as part of these centers.
- The Plan's recommended transportation projects and TSP designations also support these policies, particularly Policy 3.37, in that these projects and designations are designed to support the role of the area's neighborhood centers as hubs for multimodal transportation networks and as places that prioritize access by walking, biking, rolling, and transit; and includes recommendations for an expanded system of neighborhood greenways connecting residents to the area's centers, schools, parks, and natural areas. The Plan includes recommendations for designating the new neighborhood center as a pedestrian district in the TSP, as well as expanding the Heart of Foster neighborhood center and pedestrian district to include the Mt. Scott Community Center and Arleta Triangle to prioritize these areas for pedestrian access and community activity.
- Also in support of Policy 3.37, the Plan includes recommendations for improved transit service, developed in coordination with TriMet, which will provide more frequent and convenient transit connections between centers in the plan area and beyond. This includes new continuous transit service along SE Woodstock that will connect the Woodstock Neighborhood Center and the Lents Town Center.

Collectively, these components of the LSER Area Plan support policies 3.35 through 3.38.

## Inner Ring Districts

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

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

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

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

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

91. **Findings:** Policies 3.39 through 3.43 concern Inner Ring Districts, which the Comprehensive Plan defines as "parts of the Inner Neighborhoods that are within walking distance of the Central City, as shown on the Pattern Areas map in Chapter 3: Urban Form." The LSER Area Plan project area is located outside the geography of the Inner Ring Districts. These policies are not applicable to the LSER Area Plan amendments.

## 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.

92. **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. These corridors are mapped on the Corridors map in Chapter 3 (Urban Form) of the Comprehensive Plan. The LSER Area Plan area includes the 82nd Avenue, SE Chavez, and SE Foster Boulevard civic corridors, and the Woodstock neighborhood corridor. The Plan's amendments expand commercial/mixed use zoning along these corridors, reinforcing their intended roles as places for commercial activity and growth. The Plan also builds on Portland system of corridors by designating portions of SE 52nd and SE 72nd as neighborhood corridors, in response to the community's interest in fostering these as places that will be a focus for commercial activity and housing growth. Consistent with policies 3.44 and 3.45, the roles of these corridors as places for growth and multimodal transportation is also supported by the Plan's recommended transportation projects, which include improvements to support the multimodal functions and safety of designated corridors, such as through improved pedestrian crossings, enhanced bike lanes, and sidewalk infill, while continuing to support vehicle access and the freight needs of corridor businesses.

Also in support of Policy 3.45, the Plan includes recommendations for improved transit service, developed in coordination with TriMet, which will provide more frequent and convenient transit service along area corridors. This includes new continuous transit service along the SE Woodstock neighborhood corridor that will connect the Woodstock Neighborhood Center and the Lents Town Center.

The LSER Area Plan's transportation components are planning-level recommendations and do not include the design details of street improvements, as the design process for street improvements occurs later in the implementation process. However, design-related standards for development in the commercial/mixed use and multi-dwelling zones that are being expanded along the area's corridors are supportive of policies 3.46 and 3.47, as they include requirements for street-facing building design, such as entrances, ground-floor windows, and front landscaping for residential buildings, that support the development of a street environment along corridors that is supportive of commercial activity, residential living, and provides opportunities for green elements and a quality pedestrian environment. Furthermore, new development allowed by the zone changes along corridors will trigger requirements for wider sidewalks and street trees, providing opportunities for an improved street environment and green infrastructure along the area's corridors.

Collectively, these components of the LSER Area Plan support Policies 3.44 through 3.47.

## Civic Corridors

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

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

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

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

93. **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. Civic Corridors are mapped on the Corridors map in Chapter 3 (Urban Form) of the Comprehensive Plan. The LSER plan area is bounded at its western edge by the SE Chavez civic corridor, along part of its northern edge by the SE Foster civic corridor, and includes the SE 82nd civic corridor near its eastern edge. Because these civic corridors are not within the core focus area of the LSER Area Plan, they are not a major focus of the Plan's amendments and transportation recommendations. The Plan does include Zoning Map amendments that are consistent with Policy 3.48, including expanded multi-dwelling zoning close to SE Chavez around the commercial hub at SE Holgate, as well as zone changes in this area from R5 to R2.5 single-dwelling zoning, consistent with existing Comprehensive Plan Map designations. These zone changes will support the role of the SE Chavez civic corridor as a place with transit-supportive densities of housing. The Plan's amendments applying CM2 commercial/mixed use zoning around the intersection of SE 82<sup>nd</sup> and SE Flavel also support this policy by expanding opportunities for commercial services, jobs, and housing at this location along the SE 82<sup>nd</sup> civic corridor, located within the newly-designated Brentwood-Darlington Neighborhood Center. In conjunction with the land use changes along SE 82<sup>nd</sup> near SE Flavel, the Plan includes a recommendation for changing the TSP Street Design classification of this portion of the SE 82<sup>nd</sup> civic corridor to Civic Main Street, to provide guidance on street design supportive of its intended role as setting for a neighborhood business district and pedestrian activity, consistent with Policy 3.49.

Policies 3.50 and 3.51 address the multi-modal transportation and freight roles of civic corridors. The LSER Area Plan does not change existing mode-related classifications or transportation facilities on civic corridors. Therefore, these two policies are not applicable.

## 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.

94. **Finding:** This policy provides direction on the desired characteristics and functions of neighborhood corridors. Neighborhood corridors are mapped on the Corridors map in Chapter 3 (Urban Form) of the Comprehensive Plan. The LSER Area Plan area includes the Woodstock neighborhood corridor. The Plan's amendments expand commercial/mixed use zoning on the SE Woodstock neighborhood corridor around the Arleta Triangle at SE 72nd, reinforcing this neighborhood corridor's intended roles as a place for commercial activity, while other Plan amendments change zoning to expand opportunities for multi-family housing along this neighborhood corridor, consistent with this policy. The Plan designates

portions of SE 52nd and SE 72nd as neighborhood corridors and expands commercial/mixed use and multi-dwelling zoning along these corridors, consistent with this policy, in response to community interest in fostering these corridors as places that will be a focus for commercial activity and housing growth. Also consistent with this policy, the roles of these existing and newly-designated neighborhood corridors as places for growth and transportation connections is supported by the Plan's recommended transportation projects, which include improvements to support the multimodal functions and safety of these neighborhood corridors, such as through improved pedestrian crossings, enhanced bike lanes, and sidewalk infill, while continuing to support vehicle access.

Also consistent with this policy, the Plan includes recommendations for improved transit service, developed in coordination with TriMet, which will provide more frequent and convenient transit service along the area's neighborhood corridors. This includes new continuous transit service along the SE Woodstock neighborhood corridor that will connect the Woodstock Neighborhood Center and the Lents Town Center.

Therefore, the LSER Area Plan is consistent with this policy.

## 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.

95. **Finding:** Policies 3.53 through 3.59 provide direction on the desired characteristics and functions of transit station areas. The LSER plan area does not include any transit stations, although the Lents transit station and Flavel transit station are just outside the plan area along the I-205 freeway. Since the LSER plan area does not include transit stations and the



Plan amendments to not affect land in transit station areas, Policies 3.56 thru 3.59 do not apply.

## 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.

96. **Finding:** Policies 3.60 through 3.63 provide direction on the desired characteristics and functions of city greenways. The generalized locations of city greenways are mapped on the City Greenways map, part of the Urban Design Framework in Chapter 3 (Urban Form) of the Comprehensive Plan. The LSER amendments do not change the city greenway designations on the Urban Design Framework. The LSER plan area includes the existing Springwater Corridor Trail, which is identified as being part of the City Greenways system. LSER Area Plan amendments rezoning 6.5 acres of land close to the Springwater Corridor to Open Space support these policies by expanding on the open space components of this designated city greenway and adding to its distinctive green, natural area elements.

The Comprehensive Plan City Greenways map also includes a future north-south “enhanced greenway corridor” within the plan area. The Plan’s transportation recommendations expand the area’s system of neighborhood greenways to provide a more complete network of prioritized pedestrian and bicycle connections to the area’s schools, parks, commercial areas, and to the Springwater Corridor trail. The Plan’s identified transportation system improvements are planning-level recommendations and the design process for these neighborhood greenway connections will take place later during project implementation. However, the Plan’s expanded network of neighborhood greenways, which – consistent with policies for city greenways – will include traffic calming and connections to open spaces and natural areas, provide opportunities for a greenway alignment to be improved in the future to a higher level of design to serve as a city greenway, which is intended to have distinctive street design and green elements.

The LSER Area Plan is therefore consistent with Policies 3.60 through 3.63.

## 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.

97. **Finding:** Policies 3.64 through 3.66 provide direction on the desired characteristics and functions of urban habitat corridors. The generalized locations of urban habitat corridors are shown on the Urban Habitat Corridors map, part of the Urban Design Framework in Chapter 3 (Urban Form) of the Comprehensive Plan. The LSER Area Plan area includes a mapped urban habitat corridor in the vicinity of Johnson Creek. Consistent with these policies, the Plan includes amendments that rezone 6.5 acres of land to Open Space along or near Johnson Creek that will be used for floodplain and habitat restoration, consistent with the Urban Design Framework designation of Johnson Creek as an important urban habitat corridor. The application of Open Space zoning for purposes of habitat restoration supports these policies' objectives for the role of city greenways in enhancing and connecting wildlife habitat. Also consistent with the function of city greenways in enhancing and connecting habitat areas, the Plan's rezoning to Open Space of BES properties in the vicinity of Johnson Creek and SE 45<sup>th</sup> Place will facilitate their incorporation into the Johnson Creek Oxbow Restoration Project, which will reconnect Johnson Creek and Errol Creek with their natural floodplains to improve water quality, reduce flood risk in the surrounding neighborhood, and provide habitat for ESA-listed salmon, birds and other wildlife. Therefore, the LSER Area Plan is consistent with these policies.

## Employment areas

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

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

98. **Finding:** Comprehensive Plan Figure 3-7 identifies four employment area geographies – Central City, industrial/employment, commercial and institutional. The LSER Area Plan includes two of these geographies: the commercial geography, located along corridors such

as SE Woodstock and SE Foster; and the industrial/employment geography, located in areas along and near the southern portion of SE 82<sup>nd</sup>. Consistent with Policy 3.67, the LSER Area Plan amendments expanding commercial/mixed use zoning along the area's corridors and designation of the new Brentwood-Darlington Neighborhood Center, consider and support the roles of the area's commercial geographies in a number of ways. The Plan's expansion of commercial/mixed-use zoning in the new neighborhood center supports the establishment of a neighborhood business district in the plan's core area, which has historically lacked a neighborhood business district; and, together with expanded commercial/mixed use zoning at smaller commercial hubs, supports the growth of the area's commercial employment areas. Opportunities for small businesses is also supported by the Plan's designation of portions of SE 52<sup>nd</sup> and SE 72<sup>nd</sup> as neighborhood corridors, which will allow for small ground-floor commercial uses in multi-dwelling zones along these corridors. The growth analysis undertaken for the LSER Area Plan estimates that the proposed amendments increase employment capacity by an additional 120 jobs. Also consistent with Policy 3.67, the Plans recommended transportation projects will improve access to the plan area's commercial and employment districts once implemented.

The LSER Area Plan amendments change Comprehensive Plan designations in two areas that are identified as part of the industrial and employment geographies. The Plan amendments include changing the land use designations on a 3.3 acre property located just north of SE Harney and east of SE 83<sup>rd</sup> that is designated as industrial land. The Comprehensive Map change is from Industrial Sanctuary (IG2 zoning) to Open Space (OS zoning). This property (referred to as the Harney property) has been owned by Bureau of Environmental Services (BES) since 2005 and will be included as part of BES's West Lents Floodplain Restoration Project to reduce flooding in the area, including on nearby industrial and employment lands. This property is heavily forested and vegetated and is subject to environmental overlay zoning. A portion of this property is in the mapped 100-year floodplain and the National Wetlands Inventory classifies most of the property as Freshwater Forested/Shrub Wetland. BES modeling shows the property being substantially inundated during 25-year and 100-year flood events, with modeling for the latter estimating inundation of 3-4 feet depth. As part of the West Lents Floodplain Restoration Project, the rezoning of the Harney property to Open Space will support floodplain management, which will help reduce flooding on nearby employment lands. Records indicate that the property has not had an industrial use for at least 28 years. The rezoning of this property to Open Space will on balance serve to protect land for industrial and employment uses by helping to reduce flood risks to nearby employment lands.

The second change the LSER Amendments makes is to a small number of properties, totaling 4.4 acres, clustered at the intersection of SE Flavel and SE 82<sup>nd</sup>, from Mixed Employment (EG1 zoning) to Mixed Use – Civic Corridor (CM2 zoning), which correspondingly shift them from the industrial/employment geography to the commercial geography. Existing uses on these properties are primarily retail sales and service, which are limited in the EG1 zone, and also some residential (currently non-conforming uses) and a community service use. The area was zoned commercial until 1996, when it was rezoned to the current employment zoning. These properties are primarily small in size, limiting their

ability to be used for light industrial and other employment uses. These properties are located within the new Brentwood-Darlington Neighborhood Center and the rezoning of these properties to commercial/mixed use will support the continuation and growth of the existing retail sales and service uses, and expand the ability of this area to provide commercial services to nearby residents in an area that has been historically underserved. The majority (49 acres) of the employment land along SE 82<sup>nd</sup> will retain employment and industrial zoning. On balance the rezoning of these properties will support expanding opportunities for commercial services and jobs, while on the whole having little impact on Portland's industrial and employment land. Therefore, the LSER Area Plan amendments are consistent with Policy 3.67.

Comprehensive Plan Figure 3-7 also identifies regional truckways and priority truck streets, which are the subject of Policy 3.68. The LSER plan area does not include any of the mapped regional truckways or priority truck streets. Therefore, Policy 3.68 does not apply.

## 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, 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.

99. **Finding:** Policies 3.69 through 3.82 provide direction on the desired characteristics and functions of the River Pattern Area, which includes areas along the Willamette and Columbia Rivers. The LSER plan area is not in the Rivers Pattern Area. These policies do not apply.

## 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.

100. **Finding:** Policies 3.83 through 3.86 provide direction on the desired characteristics and functions of the Central City Pattern Area. The LSER plan area is not in the Central City Pattern Area. These policies do not apply.

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

101. **Finding:** Policies 3.87 through 3.91 provide direction on the desired characteristics and functions of the Inner Neighborhoods Pattern Area. Portions of LSER plan area are within the Inner Neighborhood Pattern Area, including areas west of SE 72<sup>nd</sup> and areas generally north of SE Duke. The LSER Area Plan amendments are consistent with these policies in a number of ways. Consistent with Policy 3.87, the commercial/mixed-use zoning (CM1 and CM2) applied along corridors in this area include regulations that continue established patterns along Inner Neighborhood corridors, such as requirements for buildings to be located close to sidewalks and requirements for ground-floor windows, and these zone changes are focused along the corridors, in keeping with established patterns. Consistent with policies 3.88 and 3.90, the Plan amendments and recommended transportation improvements continue the area's patterns of compact blocks and highly interconnected grid of streets, while utilizing the existing street network to expand the area's system of neighborhood greenways to improve active transportation connections. Consistent with policies 3.89 and 3.91, the Plan's Zoning Map amendments and associated Zoning Code regulations continue patterns of the existing small-scale residential areas with the majority of the zone changes to multi-dwelling zoning, especially off of the major corridors, being to the small-scale RM1 zone, which has development standards for development scale and features such as front setbacks that are similar to those of the single-dwelling zones. Furthermore, analysis undertaken as part of the project's Economic Analysis Background Report indicates that new development in the multi-dwelling zones will most likely take place on vacant or underutilized sites, serving to fill in gaps in the area's urban patterns, consistent with Policy 3.89.

Therefore, the LSER Area Plan is consistent with these policies.

## 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.

**102.Finding:** Policies 3.92 through 3.97 provide direction on the desired characteristics and functions of the Eastern Neighborhoods Pattern Area, which the Comprehensive Plan defines as eastern portions of the city, mostly located east of 82nd Avenue and largely annexed to Portland in the 1980s and 1990s. Portions of the LSER plan area are located within the Eastern Neighborhood Pattern Area, primarily between SE 72<sup>nd</sup> and SE 82<sup>nd</sup> south of SE Duke, and southern portions of the Lents neighborhood south of SE Flavel. Most of the newly-designated Brentwood-Darlington Neighborhood Center and the employment areas around SE 82<sup>nd</sup> are located within the Eastern Neighborhood Pattern Area. Residential lots in this portion of the plan area often have characteristics typical of the Eastern Neighborhoods pattern area, such as large blocks and large, deep residential lots. In the multi-dwelling zones within this area, including areas where the Plan is expanding multi-dwelling zoning, development will need to meet development standards that continue Eastern Neighborhood characteristics, consistent with these policies. These development standards specific to Eastern Neighborhood areas include deep rear setbacks to keep the centers of the area's large blocks greener and less built up, requirements for narrow deep sites to be aggregated before development can occur, and requirements for landscaped front setbacks. Furthermore, consistent with policy 3.97, the Plan's recommended transportation projects include improvements to enhance pedestrian and bicycle connections to the newly-designated Brentwood-Darlington Neighborhood Center and to employment areas around SE 82<sup>nd</sup>.

Therefore, the LSER Area Plan is consistent with these policies.

## Western Neighborhoods Pattern Area

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

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

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

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

103. **Finding:** Policies 3.98 through 3.102 provide direction on the desired characteristics and functions of the Western Neighborhoods Pattern Area. The LSER plan area is not in the Western Neighborhoods Pattern Area. 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.

104. **Finding:** City Council interprets the term distinctive physical, historic, and cultural qualities of its location to mean characteristics of the existing and historic built environment of a district or place including, but not limited to, block pattern, arrangement and design of streets and pedestrian realm, street wall, street-level activity, building use, construction type, architectural style, exterior materials, design details, massing, and height.

Portions of LSER plan area are within the Inner Neighborhood Pattern Area, as identified in the Comprehensive Plan Urban Design Framework, including areas west of SE 72nd and areas generally north of SE Duke. The LSER Area Plan amendments and the corresponding Zoning Code regulations that will guide the design of development will contribute to development that responds to and enhances characteristics of this area in a number of ways. The commercial/mixed-use zoning (CM1 and CM2) applied along corridors in this area include regulations that continue established patterns along Inner Neighborhood corridors, such as requirements for buildings to be located close to sidewalks and requirements for ground-floor windows, and these zone changes are focused along the corridors, in keeping with established patterns. The Plan amendments and recommended transportation improvements continue the area's patterns of compact blocks and interconnected grid of streets, utilizing the existing street network to expand the area's system of neighborhood greenways to improve active transportation connections. The Plan's Zoning Map amendments and associated Zoning Code regulations continue patterns of the existing small-scale residential areas with the majority of the zone changes to multi-dwelling zoning, especially off of the major corridors, being to the small-scale RM1 zone, which has development standards for development scale and features such as front setbacks that are similar to those of the single-dwelling zones.

Other parts of the LSER plan area are located within the Eastern Neighborhood Pattern Area, primarily between SE 72nd and SE 82nd south of SE Duke, and southern portions of the Lents neighborhood south of SE Flavel. Most of the newly-designated Brentwood-Darlington Neighborhood Center and the employment areas around SE 82nd are located within the Eastern Neighborhood Pattern Area. Residential lots in this portion of the plan area often have characteristics typical of the Eastern Neighborhoods pattern area, such as large blocks and large, deep residential lots. In the multi-dwelling zones within this area, including areas where the Plan is expanding multi-dwelling zoning, development will need to meet development standards that continue Eastern Neighborhood characteristics. These development standards specific to Eastern Neighborhood areas include deep rear setbacks to keep the centers of the area's large blocks greener and less built up, requirements for narrow deep sites to be aggregated before development can occur to support better site design, and requirements for landscaped front setbacks.

Based on the above findings, The LSER Area Plan is supportive of this goal for context supportive design and development. Therefore, this goal is met.

**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.

105. **Finding:** The LSER Area Plan area includes two Historic Landmarks and several Significant Resources. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City's Historic Resources overlay zone. The LSER Area Plan amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445). Therefore, this goal is met.

**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.

106. **Finding:** Consistent with Goal 4.C, the LSER Area Plan promotes human and environmental health through a broad range of provisions, including through land use map amendments that will allow more people to live within walking distance of commercial and community services and transit; in coordination with recommended transportation projects that will facilitate the ability of residents to access local destinations by walking, biking or rolling; as well as through zone changes of BES-owned properties to Open Space zoning near Johnson Creek to support their use in habitat and floodplain restoration.

The LSER Area Plan was undertaken as a joint land use and transportation plan to address the lack of safe transportation infrastructure in the area and the lack of local commercial services, with human health a central focus of the plan. The plan area has amenities that support human and environmental health, such as a system of local parks, Mt. Scott Community Center, and Johnson Creek and the Springwater Corridor. However, the area's current incomplete pedestrian and bicycle facility network, infrequent marked pedestrian crossings on busy streets, and lack of commercial services within walking distance negatively impacts safety and the ability to live healthy, active lives. A complete neighborhoods analysis indicated that the plan area, particularly the Brentwood-Darlington neighborhood and southern portions of Lents, lacks that local services and safe transportation infrastructure necessary for complete neighborhoods, counter to City objectives for fostering Portland as a place where most residents live in complete neighborhoods, where residents have safe and convenient access to the goods and services they need on a daily basis. Some of the plan elements proposed to support healthy outcomes and people include:

- Zoning Map changes to allow for more commercial services within walking distance of residents, including within the proposed Brentwood-Darlington neighborhood center, which is intended to provide a hub of services for the plan area.

- Zoning Map amendments expanding multi-dwelling zoning in the proposed new neighborhood center and along transit corridors, to allow more people to live within walking distance of services and transit, and allowing for more and less-expensive housing options to meet the critical need for stable and affordable housing.
- Zoning Map amendments that expand Open Space zoning near Johnson Creek, applied to properties that the Bureau of Environmental Services will use for floodplain and habitat restoration, which will expand green elements and access to nature in an area with higher proportions of lower-income residents than the broader city.
- Recommendations for transportation projects on busy corridors to address safety, such as improved pedestrian crossings, bicycle lanes, and sidewalk infill.
- Recommendations for neighborhood greenway projects to address pedestrian and bicycle safety and provide a continuous network of pedestrian and bicycle facilities providing connections to local destinations, such as schools, parks, and commercial areas. In facilitating active transportation options, the Plan’s recommended transportation projects will also support reduced vehicle trips and associated carbon emissions, consistent with this goal.

The LSER Area Plan also supports the environmental health component of this goal. The Plan’s vision calls for supporting the role of the plan area’s network of parks and natural areas in providing people with access to recreation and nature, and – together with the area’s urban forest – in helping to cool the area’s neighborhoods and support wildlife. Expanded commercial/mixed use and multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors will allow for redevelopment that will trigger requirements for street trees, which the area currently lacks, contributing to the area’s urban forest and helping to minimize urban heat islands on these corridors. The LSER Area Plan amendments include rezoning eight properties (6.5 acres) to Open Space that are along or close to Johnson Creek that are owned by the Bureau of Environmental Services (BES). These zone changes will facilitate BES’s work in undertaking habitat and floodplain restoration on the properties to be used for habitat and floodplain restoration, and will contribute to broader efforts to restore the habitat functions and water quality of Johnson Creek and adjacent land.

Therefore, this goal is met.

**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.

**107.Finding:** The 2035 Comprehensive Plan describes resilience as “reducing the vulnerability of our neighborhoods, businesses, and built and natural infrastructure to withstand challenges – environmental, economic and social – that may result from major hazardous events.” LSER Area Plan contributes to resilience and is consistent with this goal in a number of ways, including:

- The Plan’s amendments expanding multi-dwelling and commercial/mixed-use zoning will allow for a broader range of housing types that can be more responsive to changing demographics, which is also supported by expanded applicability within the plan area of

multi-dwelling zone provisions that provide incentives to encourage the development of affordable units, physically-accessible design, and moderate-income family housing.

- The Plan supports neighborhood economic resilience by designating a new neighborhood center with expanded commercial/mixed use zoning and adjacent multi-dwelling zoning, which over time will allow more residents the opportunity to live within walking distance of commercial services without having to be dependent on cars to access services.
- The Plan's recommendations for transportation safety projects that prioritize pedestrian, bicycle and transit access, including corridor and neighborhood greenway improvements, will facilitate the ability of residents to access services and community destinations by walking, biking, or transit; providing more options for accessing destinations that are not dependent on vehicle ownership and car travel.
- The Plan's Community Stabilization section includes recommendations for residential and neighborhood business stabilization to support the community's resilience. These recommendations include support for an expanded role for the Brentwood-Darlington Community Center in serving as a resilience center for the community during emergencies and extreme-weather events, functioning as a warming/cooling center, temporary shelter, with resilient energy sources to provide charging stations for mobile phones and other needs.
- The Plan's expansion of commercial/mixed use and multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors will allow for redevelopment that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the area's urban forest and helping to minimize urban heat islands on these corridors. Also, the majority of zone changes from single-dwelling zoning is to the RM1 multi-dwelling zone, which has a similar maximum lot coverage to the R5 and R2.5 single-dwelling zones, thereby providing similar opportunities for tree plantings. Some of the Plan's expanded multi-dwelling zoning is in the Eastern Neighborhoods Pattern Area, where requirements for deep rear setbacks apply in order to continue existing patterns of backyards and opportunities for trees and other green elements, which will help reduce urban heat island impacts.
- The LSER Area Plan amendments include rezoning 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties, and will contribute to broader efforts to reduce flood risk on nearby residential and employment land.

Therefore, this goal is met.

## 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.

**108.Finding:** The LSER Area Plan amendments expanding multi-dwelling and commercial/mixed use zoning have been mapped to be responsive to neighborhood characteristics, and will be accompanied by existing Zoning Code development standards that are responsive to the Inner Neighborhood and Eastern Neighborhood pattern areas located within the LSER plan area, consistent with these policies.

Portions of LSER plan area are within the Inner Neighborhood Pattern Area, as identified in the Comprehensive Plan Urban Design Framework, including areas west of SE 72nd and areas generally north of SE Duke. The LSER Area Plan amendments and the corresponding Zoning Code regulations that will guide the design of development will contribute to development that responds to and enhances characteristics of this area in a number of ways. The commercial/mixed-use zoning (CM1 and CM2) applied along corridors in this area include regulations that continue established patterns along Inner Neighborhood corridors, such as requirements for buildings to be located close to sidewalks and requirements for ground-floor windows, and these zone changes are focused along the corridors, in keeping with established patterns. Even with the Zoning Map amendments, the majority of the plan area's zoning (71%) will remain single-dwelling residential, limiting changes to the existing characteristics of area neighborhoods. The Plan's Zoning Map amendments and associated Zoning Code regulations continue patterns of existing small-scale residential areas, with the majority of the zone changes to multi-dwelling zoning, especially off of the major corridors, being to the small-scale RM1 zone, which has development standards for development scale and features such as front setbacks and yards that are similar to those of the single-dwelling zones that predominate in the area.

Other parts of the LSER plan area are located within the Eastern Neighborhood Pattern Area, primarily between SE 72nd and SE 82nd south of SE Duke, and southern portions of the Lents neighborhood south of SE Flavel. Most of the newly-designated Brentwood-Darlington Neighborhood Center and the employment areas around SE 82nd are located within the Eastern Neighborhood Pattern Area. Residential lots in this portion of the plan area often have characteristics typical of the Eastern Neighborhoods pattern area, such as large blocks and large, deep residential lots. In the multi-dwelling zones within this area, including areas where the Plan is expanding multi-dwelling zoning, development will need to meet development standards that continue Eastern Neighborhood characteristics. These development standards specific to Eastern Neighborhood areas include deep rear setbacks to keep the centers of the area's large blocks greener and less built up, requirements for landscaping as part of commercial development, requirements for narrow deep sites to be aggregated before development can occur to support better site design, and requirements for landscaped front setbacks.

Therefore, the LSER Area Plan is consistent with Policies 4.1, 4.2 and 4.3 above.

**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.

**109.Finding:** The LSER Area Plan helps implement this policy through Zoning Code regulations that will apply in conjunction with the Plan’s expanded multi-dwelling zoning that promote the inclusion of natural features and green infrastructure as part of development. This includes multi-dwelling zone regulations that promote the inclusion of green infrastructure such as ecoroof and stormwater planters as part of developments, FAR transfer provisions to provide an incentive for preserving large trees, requirements for outdoor spaces, requirements for large sites to include common areas, and requirements in the Eastern Neighborhoods Pattern Area for deep rear setbacks that will help keep the centers of the area’s large blocks greener and less built up. Multi-dwelling zone limitations on large surface parking lots will provide opportunities for site area to be used for landscaping, trees, and other green features. Requirements for landscaped front setbacks will help foster a green street environment, while providing more space for street tree canopy and helping to reduce urban heat island impacts. Implementing multi-dwelling zone regulations also encourage alternatives to conventional landscaping by allowing ecoroofs and stormwater planters to serve as required landscaping. Similar provisions for green features also apply in the commercial/mixed-use zones that the Plan amendments are expanding within the plan area. Furthermore, the Plan’s expansion of commercial/mixed use and multi-dwelling zoning along the SE 52nd and SE 72nd corridors will allow for redevelopment that will trigger requirements for wider sidewalks and street trees, as well as opportunities for vegetated stormwater management facilities, helping to minimize urban heat islands and provide for green infrastructure on these corridors.

Therefore, the LSER Area Plan is consistent with this policy.

**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.

**110.Finding:** Consistent with these policies, the LSER Area Plan provides for new and enhanced accessible, safe and attractive street environments and places for pedestrians through public and private development. The Plan’s recommended transportation projects will improve the pedestrian environment and safety in the plan area, including recommendations for enhanced pedestrian crossings and sidewalk infill along busy corridors, and an expanded

system of neighborhood greenways providing improved pedestrian connections to neighborhood commercial areas, parks, schools, and other local destinations. Also consistent with these policies, the Plan's amendments expanding multi-dwelling and commercial/mixed use zoning along the area's corridors and in and around designated centers will allow for more people to live within walking distance of services and transit. Furthermore, the expanded commercial/mixed use zones include regulatory standards for commercial corridors that will contribute to an attractive pedestrian environment through requirements for building design, ground-floor windows, and entrances oriented to public sidewalks, and through Plan amendments that will apply the Centers Main Street Overlay Zone (m-overlay) to the new Brentwood-Darlington Neighborhood Center's core commercial areas, which includes enhanced standards for ground-floor windows, requirements for ground-floor active uses, and limitations on vehicle areas along street frontages. Also, the Plan includes recommendations for TSP street design classifications that will provide guidance for pedestrian-supportive street design along the area's newly designated neighborhood corridors, and for designating the new neighborhood center as a pedestrian district.

Therefore, the LSER Area Plan is consistent with these policies.

**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.

**111.Finding:** Policy 4.8 provides direction on encouraging the use of alleys for parking and for accessory dwelling units. The LSER Area Plan amendments do not change existing regulations in the single-dwelling and multi-dwelling zones, applicable to locations with existing alleys, that require parking access to be from the alley and that allow for accessory dwelling units to be located on alleys. Therefore, the LSER Area Plan is consistent with this policy.

**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.

**112.Finding:** Policy 4.9 provides direction on encouraging temporary activities and structures in places that are transitioning to urban areas. While the LSER Area Plan supports the transition of the area's corridors and centers to more intensely urban built environments, the area's commercial/mixed-use zoning allows for transitional use of existing surface parking lots for outdoor markets, events, food carts, and other temporary activities. Therefore, the LSER Area Plan is consistent with this policy.

## 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.

**113. Finding:** Policies 4.10 through 4.14 provide direction regarding the promotion of health and safety in development. The LSER Area Plan helps implement these policies through Zoning Code regulations that will apply in conjunction with the Plan's expanded multi-dwelling and commercial/mixed use zoning. Regulations promote site design supportive of physical activity through requirements for outdoor spaces, and through requirements for buildings to provide pedestrian connections to streets and meet pedestrian connectivity requirements. Regulations address access to light and air by including requirements for building setbacks and through applying maximum heights and requiring building height to step down adjacent to single-dwelling zoning. Multi-dwelling and commercial/mixed use zone requirements for front setbacks for residential units help limit privacy impacts to residents of ground-level units. The requirements for outdoor spaces also provide access to light and air. Regulations requiring entrances and windows to be oriented to streets also support passive surveillance by facilitating "eyes on the street." New construction and remodels are required to meet modern building codes to ensure fire prevention and reduce seismic risks. The Plan's expanded multi-dwelling and commercial/mixed-use zoning will also expand the applicability of provisions providing additional FAR transfer allowances for historic properties in conjunction with seismic upgrades, which is intended to help address the need to reduce seismic risks to historic buildings and their residents.

Therefore, the LSER Area Plan is consistent with this policy.

## 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.

**114. Finding:** This policy applies to residential areas outside mixed-use districts. LSER Area Plan amendments help implement this policy by providing opportunities for more housing choices within the plan area's residential areas through rezoning single-dwelling areas to multi-dwelling zoning, which allows for a broader range of housing types than allowed in the single-dwelling zones and includes bonus options to provide incentives for affordable housing, moderate-income family housing, and physical-accessible housing units that accommodate people with mobility limitations. The expanded multi-dwelling zoning also provides options for adding units within existing buildings as part of adaptive reuse, and for the addition of accessory dwelling units and other types of residential units to existing



development. The Plan amendments address compatibility with existing residential scale in that the majority of the multi-dwelling zone expansion is to RM1 zoning, which is intended to be compatible with lower-density residential areas and provides for a similar scale of development to single-dwelling residential zones. Therefore, this policy is met.

**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.

**115.Finding:** The LSER Area Plan amendments expanding multi-dwelling and commercial/mixed use zoning have been mapped to be responsive to neighborhood characteristics and patterns, and will be accompanied by existing Zoning Code development standards that are responsive to the characteristics of the Inner Neighborhood and Eastern Neighborhood pattern areas located within the LSER plan area.

Portions of LSER plan area are within the Inner Neighborhood Pattern Area, as identified in the Comprehensive Plan Urban Design Framework, including areas west of SE 72nd and areas generally north of SE Duke. The LSER Area Plan amendments and the corresponding Zoning Code regulations that will guide the design of development will contribute to development that responds to and enhances characteristics of this area in a number of ways. The commercial/mixed-use zoning (CM1 and CM2) applied along corridors in this area include regulations that continue established patterns along Inner Neighborhood corridors, such as requirements for buildings to be located close to sidewalks and requirements for ground-floor windows, and these zone changes are focused along the corridors, in keeping with established patterns in which commercial uses are focused on corridors. Even with the Zoning Map amendments, the majority of the plan area's zoning (71%) will remain single-dwelling residential, limiting changes to the existing characteristics of area neighborhoods. The Plan's Zoning Map amendments and associated Zoning Code regulations continue patterns of existing small-scale residential areas, with the majority of the zone changes to multi-dwelling zoning, especially off of the major corridors, being to the small-scale RM1 zone, which has development standards for development scale and features such as front setbacks and yards that are similar to those of the single-dwelling zones that predominate in the area.

Other parts of the LSER plan area are located within the Eastern Neighborhood Pattern Area, primarily between SE 72nd and SE 82nd south of SE Duke, and southern portions of the Lents neighborhood south of SE Flavel. Most of the newly-designated Brentwood-Darlington Neighborhood Center and the employment areas around SE 82nd are located within the Eastern Neighborhood Pattern Area. Residential lots in this portion of the plan area often have characteristics typical of the Eastern Neighborhoods pattern area, such as large blocks and large, deep residential lots. In the multi-dwelling zones within this area, including areas where the Plan is expanding multi-dwelling zoning, development will need to meet development standards that continue Eastern Neighborhood characteristics. These development standards specific to Eastern Neighborhood areas include deep rear setbacks to keep the centers of the area's large blocks greener and less built up, requirements for

landscaping as part of commercial development, requirements for narrow deep sites to be aggregated before development can occur to support better site design, and requirements for landscaped front setbacks.

These development standards regulate general patterns, while allowing flexibility for a variety of architectural styles and design expression. Therefore, this policy is met.

**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.

116. **Finding:** The LSER Area Plan helps implement this policy through Zoning Code regulations that will apply in conjunction with the Plan's expanded multi-dwelling zoning that support adoptive reuse and renovation of existing buildings. This includes provisions applicable in the multi-dwelling and commercial/mixed-use zones intended to promote preservation of historic structures. These include options for transferring FAR from sites preserving historic resources and allowing additional amounts of FAR to be transferred in conjunction with seismic upgrades to historic structures, as well as FAR transfers in exchange for preservation of the affordability of existing housing. Multi-dwelling zone regulations also support this policy by providing flexibility when units are being added within an existing structure to not have to come all the way into conformance with minimum density requirements. Furthermore, the Plan's approach to Zoning Map changes avoided zone changes to existing unregulated low-costs apartments and manufactured home parks to encourage their continuation and to avoid adding to redevelopment pressures. Therefore, this policy is met.

**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.

117. **Finding:** The LSER Area Plan rezones portions of the plan area from single-dwelling zones to multi-dwelling zones. The multi-dwelling zoning will provide greater flexibility for the numbers and types of units on residential sites. Clusters of small-detached houses are among the housing types allowed by right in the multi-dwelling zones and are a commonly-build housing type in the low-rise multi-dwelling zones that are proposed for expansion in the LSER Area Plan area. The majority of the expanded multi-dwelling zoning consists of the RM1 zone, which is intended to be compatible with the characteristics of single-dwelling residential areas and also supports the preservation of existing houses by providing flexibility for internal conversions and for the addition of accessory dwelling units and other small, detached housing types. Therefore, this policy is met.

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

118. **Finding:** The LSER Area Plan supports this policy by increasing the amount of zoning for multi-dwelling housing in the area, promoting the development of compact, multi-dwelling development, which is inherently more resource efficient than lower-density housing types. According to a study published by Oregon DEQ, A Life Cycle Approach to Prioritizing Methods of Preventing Waste from the Residential Construction Sector in the State of Oregon, of 30 different material reduction and reuse practices evaluated, reducing home size

and multi-family living achieved the largest greenhouse gas reductions along with significant reductions in other impact categories, including energy use. Reducing home size by 50 percent results in a projected 36 percent reduction in lifecycle greenhouse gas emissions. Reducing home size is a significant leverage point for environmental impact reduction and may be equivalent to achieving minimum levels of "green" certification. Furthermore, Zoning Code regulations associated with the Plan's expanded multi-dwelling and commercial/mixed-use zoning require outdoor space for residents, including common spaces such as courtyards for large sites, supporting healthy active living opportunities for residents. Therefore, this policy is met.

## 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.

119. **Finding:** Consistent with policies 4.20 – 4.22, the LSER Area Plan amendments expand opportunities for services in centers and focus zoning for higher-density housing in and around the area's designated centers. The Plan's amendments expand commercial/mixed-use zoning in the newly-designated Brentwood-Darlington Neighborhood Zoning, focusing this zoning along SE 72<sup>nd</sup> around SE Flavel to support the creation of a neighborhood commercial main street, allowing for more commercial services in the area. The Plan's amendments focus medium-scale multi-dwelling zoning (RM2) adjacent to the center's commercial core, transitioning to small-scale multi-dwelling zoning (RM1) in other parts of the new center. The expanded multi-dwelling zoning will allow more people to live within walking distances of the center's services, which include an existing elementary school and park, while providing an expanded customer base that can support the viability of neighborhood businesses. Furthermore, the Plan's amendments expand multi-dwelling zoning in and around the plan area's other designated centers, including the Lents Town Center, Heart of Foster Neighborhood Center, and the Woodstock Neighborhood Center, providing opportunities for more residents to live close to these centers' services and transit.

In addition, the Plan's transportation components recommend designating the Brentwood-Darlington Neighborhood Center as a pedestrian district in the TSP, while applying a street design designation of Neighborhood Main Street for the commercial areas of SE 52<sup>nd</sup> and 72<sup>nd</sup>, and a Civic Main Street designation for the commercially-zoned portion of SE 82<sup>nd</sup>, which will provide guidance on street design to support their intended roles as places of commercial and community activity. The wider sidewalks that will be required for new

development in these areas, combined with Zoning Code development standards for ground-floor windows, street-oriented entrances, and allowances for features such as plazas and courtyards, will support the creation of a pedestrian-oriented environment in these areas. Therefore, the LSER Area Plan is consistent with these policies.

**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.

120. **Finding:** Consistent with Policy 4.23, the LSER Area Plan includes transportation recommendations that will improve the plan area's network of pedestrian and bicycle connections, with a focus on the area's centers and corridors. Consistent with this policy, the Plan's recommended transportation projects include a focus on improvements along the area's corridors, such as SE Woodstock, SE 52<sup>nd</sup>, and SE 72<sup>nd</sup>, that will include enhanced pedestrian crossings and sidewalk infill to improve the pedestrian environment, as well as improved bicycle facilities. The Plan also includes recommendations for an expanded system of neighborhood greenways that will provide improved pedestrian and bicycle connections to the area's centers, schools, parks, and other destinations. Furthermore, the Plan includes a recommendation to designate the new Brentwood-Darlington Neighborhood Center as a Pedestrian District in the TSP, which brings with it higher standards for sidewalk width and frequent pedestrian crossings. Therefore, this policy is met.

**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.

121. **Finding:** Policy 4.24 prohibits driver through facilities in the Central City and limits development of new ones in Inner Ring Districts and centers. New drive-through facilities are already prohibited in the mixed-use zones in the plan area. Furthermore, the Plan amendments rezone portions of SE 82<sup>nd</sup> around SE Flavel, located within the new Brentwood-Darlington Neighborhood Center, from EG1 – which allows new drive-through facilities, to CM2 – which will prevent new drive-throughs within this center. This policy is therefore met.

**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.

122. **Finding:** The LSER Area Plan is consistent with Policy 4.25 as it relates to residential development along its busiest corridors, including SE Woodstock, SE 52<sup>nd</sup>, and SE 72<sup>nd</sup>. The primary zoning being applied by the Plan amendments on these streets is multi-dwelling RM1 and RM2, which require 10-foot landscaped setbacks along street frontages, which provides for a buffer from busy streets and helps support privacy. In commercial/mixed-use zones, residential units will also be required to be set back from street frontages if the units are built at the same grade as the sidewalk. Also, new development in multi-dwelling and commercial/mixed-use zones along corridors will typically be required to provide street frontage improvements, including street trees, further contributing to a street environment supportive of livability for residents. Therefore, this policy is met.

**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.

123. **Finding:** Consistent with this policy, the LSER Area Plan includes an existing park within the newly-designated Brentwood-Darlington Neighborhood Center. Flavel Park, along with the adjacent Whitman Elementary School, will provide opportunities for community gatherings and activity within this neighborhood center. In addition, the LSER Area Plan expands the boundaries of the Heart of Foster Neighborhood Center to include the Mt. Scott Community Center and the Arleta Triangle Square (at SE 72<sup>nd</sup> and SE Woodstock), which will support the role of this center as a hub of community activity and gathering places. Furthermore, the Plan amendments include expansion of commercial/mixed-use zoning around the Arleta Triangle, which can help activate the area around this public space with commercial services and community activity. Therefore, this policy is met.

**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.

124. **Finding:** City Council interprets the term “protect” here to mean defend or guard against loss, injury, or destruction, and “enhance” means to add to, complement, or improve.

Policy 4.27 provides direction on protecting and enhancing defining places in centers and corridors. Among the distinctive places in the plan area’s centers and corridors are Mt. Scott Community Center and Park and the Arleta Triangle Square, both on SE 72<sup>nd</sup>, and Flavel Park and the adjacent Whitman Elementary School located along SE Flavel near SE 72<sup>nd</sup>. The Plan’s inclusion of the Mt. Scott Community Center and Park and the Arleta Triangle Square into the Heart of Foster Neighborhood Center will reinforce their roles as distinctive hubs for community activity, which will be further reinforced by the Plan’s recommended designation of this area as a Pedestrian District, which designation is accompanied by standards for frequent pedestrian crossings, which will serve to enhance connections to these defining places and activity hubs. Inclusion of Flavel Park and the adjacent Whitman Elementary School into the new Brentwood-Darlington Neighborhood Center will reinforce and enhance the roles of these public places together with the center’s nearby commercial district as distinctive places that support community identity and gatherings. Therefore, this policy is met.

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

125. **Finding:** Historic resources are located throughout the City, including in the LSER Area Plan area. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City’s Historic Resources overlay zone. The LSER Area Plan amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445). Therefore, the LSER Area Plan is consistent with this policy.

**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.

126. **Finding:** Policy 4.29 encourages new development and public places to include design elements and public art. The LSER Area Plan’s designation of the Brentwood-Darlington Neighborhood Center is intended to support its becoming, over time, a hub for services and community activity, and that will contribute to community identity in an area that had lacked a neighborhood business district. Designation as a neighborhood center and expanded commercial/mixed-use zoning will provide opportunities for new development that includes design features that add to the distinct identity of the new center, consistent with this policy. Arleta Triangle Square, which the Plan amendments incorporate into an expanded Heart of Foster Neighborhood Center, currently includes public art to support its role as a community gathering place. The Plan’s amendments, changing zoning adjacent to the Arleta Triangle to allow more nearby businesses and housing, will allow for more activity and people to support its role as a gathering place and setting for public art. Therefore, the LSER Area Plan is consistent with this policy.

## 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.

127. **Finding:** Policies 4.30 through 4.32 provide direction regarding transitions between different types of land uses. The LSER Area Plan includes provisions which address these policies in a number of ways. In the newly-designated Brentwood-Darlington Neighborhood Center, where the largest amount of Zoning Map amendments are focused, zones with the most intense uses and largest allowed building scale are focused in the commercial cores of the center, such as along SE 72<sup>nd</sup> around SE Flavel. The medium-scale multi-dwelling zoning (RM2) is focused around the core area’s commercial/mixed use zoning, while small-scale multi-dwelling zoning (RM1) is applied at the edges of center and further from the commercial areas to provide a transition in scale and activity to low-rise residential areas. Where the Plan includes rezones to multi-dwelling zoning in areas with single-dwelling zoning, the most frequently applied multi-dwelling zone is RM1 to provide

a similar scale to what is allowed in the single-dwelling zones. Both the RM1 and RM2 zones include requirements for landscaped front setbacks, continuing the front yard characteristics of the single-dwelling zoning that predominates in the plan area and softening differences in scale. Allowances for limited amounts of ground-floor commercial uses in these multi-dwelling zones along major corridors limit these uses to corridor frontages and require screening for outdoor seating located adjacent to properties with residential zoning, consistent with these policies. For areas where Plan amendments allow for medium-scale development up to four-stories in height, such as the CM2 and RM2 zones, Zoning Code regulations call for buildings to step down in scale adjacent to properties with single-dwelling zoning, providing a transition to lower-scale zones which is also supported by commercial/mixed-use zone requirements for landscaped setbacks adjacent to properties with residential zoning, allowing for screening vegetation. Furthermore, the Plan's rezoning of properties around the intersection of SE 82<sup>nd</sup> and SE Flavel from EG1 to CM2 will prevent new drive-through uses, limiting impacts on the adjacent residential areas. Also, the Plan retains buffer overlay zoning that currently applies in employment zones adjacent to residential areas, which will continue to provide for buffer transitions between employment and light-industrial uses and adjacent residential areas.

Therefore, the LSER Area Plan supports or is consistent with policies 4.30-4.32.

## 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.

**128. Finding:** The 2035 Comprehensive Plan defines the verb "limit" to mean to minimize or reduce something or the effects of something relative to the current situation or to a potential future situation. The verb "mitigate", which is not defined in the 2035 Comprehensive Plan, means to make less severe. The City Council interprets this policy to apply to non-residential uses, such as those allowed in commercial and employment zones, that can have negative public health impacts on adjacent residential and institutional uses. This policy is primarily implemented through the requirements of Zoning Code Chapter 33.262, which is designed to protect uses from off-site impacts associated with nonresidential uses and by requirements for the Commercial/Mixed Use zones in Chapter 33.130 that require landscaped setbacks and screening adjacent to residential zones. Along the newly-designated SE 52<sup>nd</sup> and SE 72<sup>nd</sup> neighborhood corridors, allowances for limited amounts of ground-floor commercial uses in multi-dwelling zones along these corridors limit these uses to corridor frontages, and require screening for outdoor seating located adjacent to properties with residential zoning. Furthermore, The Plan's zone changes to Open Space for 6.5 acres of BES-owned properties along and near Johnson Creek will allow for additional buffering between fish and wildlife habitat and nearby employment uses, as well as help limit impacts on nearby residential areas. The LSER Area Plan is therefore consistent with the directives of Policy 4.33.

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

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

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

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

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

**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.

129. **Finding:** Policies 4.34-4.40 provide direction regarding transitions between different types of land uses, including auto-oriented uses and the noise and air quality impacts on uses located near freeways, truckways and major traffic streets, as well as lighting impacts and the visual impacts of telecommunications facilities. The LSER Area Plan amendments do not change any of the development standards that regulate these types of activities and impacts, therefore these policies do not apply.

## 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.

130. **Finding:** The City has designated scenic resources in an adopted inventory and protects them through an overlay zone (Chapter 33.480) which addresses landscaping, setbacks, screening, building facades and tree removal. The LSER plan area does not include any designated Scenic Resources recognized by the adopted inventory and does not change this program, therefore this policy does not apply.

## Historic and cultural resources

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

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

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

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

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

**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.

131. **Finding:** The LSER Area Plan area includes two Historic Landmarks and several Significant Resources. Identified historic resources (Historic, Conservation, and National Register Landmarks; Historic, Conservation, and National Register Districts; and Significant Resources) are conserved by the City's Historic Resources overlay zone. The LSER Area Plan amendments do not identify any new or remove any existing historic resources and the amendments do not affect any of the Historic Resource overlay zone regulations (City Code Chapter 33.445). Also, the Plan amendments do not affect archaeological resources. Therefore, the LSER Area Plan is consistent with these policies.

## Public art

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

132. **Finding:** This policy is not applicable, as the LSER Area Plan amendments do not address public art incentives.

## 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 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.

133. **Finding:** Policies 4.60 and 4.61 encourage the adaptive reuse of buildings and promote the space- and energy-efficiency benefits of compact housing. Consistent with these policies, the LSER Area Plan's expansion of multi-dwelling and mixed-use zoning supports the adaptive reuse of existing buildings for more intense uses or commercial activity, and encourages smaller units and more attached units, which results in improved energy efficiency and is consistent with the policy of energy-efficient compact housing. According to studies conducted by the State DEQ, "Reducing home size is among the best tier of options for reducing waste generation in the Oregon housing sector, while simultaneously achieving a large environmental benefit across many categories of impact...Reduction in home size is a significant leverage point for impact reduction [including non-renewable energy use] and may be a more effective measure than achieving minimum levels of 'green certification'" [<https://www.oregon.gov/deq/FilterDocs/ADU-ResBldgLCA-Report.pdf>] Attached housing is also more energy efficient than detached forms of housing. According to the EPA, "fairly substantial differences are seen in detached versus attached homes [approximately 17.5% improved efficiency], but the most striking difference is the variation in energy use between single-family detached homes and multifamily homes [50% improved efficiency], due to the inherent efficiencies from more compact size and shared walls among units." [[www.epa.gov/sites/production/files/2014-03/documents/location\\_efficiency\\_btu.pdf](http://www.epa.gov/sites/production/files/2014-03/documents/location_efficiency_btu.pdf)]. The LSER Area Plan amendments are therefore consistent with the directives of policy 4.60 and 4.61.

The LSER Area Plan does not include any changes to building requirements related to materials, deconstruction, energy efficiency, housing size or any other issues identified in policies 4.62-4.68. These policies do not apply.

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

134. **Finding:** The LSER Area Plan includes amendments and actions that support compact, lower-carbon development and expand multi-modal options in the plan area to reduce the reliance on automobiles and associated carbon emissions. Plan amendments establishing a new mixed-use neighborhood center and expanded commercial/mixed zoning to allow for more neighborhood businesses, together with expanded multi-dwelling zoning in and

around centers and corridors, will allow for more people to live close to services and transit, allowing for more people to walk or bike to local destinations without having to drive. Also, the types of development allowed by the expanded multi-dwelling and commercial/mixed use zoning will allow for compact development that is more energy efficient and has and lower per-unit carbon emissions compared to lower-density development. Furthermore, the Plan's recommended transportation projects, including safety improvements along busy corridors and expansion of the area's system of neighborhood greenways, will improve the ability of residents to access local destinations by walking and biking, reducing reliance on automobile trips. These amendments and actions will help reduce per-capita carbon emissions from buildings and transportation energy use in the area. Therefore, the LSER Area Plan is consistent with Policy 4.69.

**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.

135. **Finding:** The LSER Area Plan does not include any changes related to energy districts, ecodistricts or energy-producing development, as identified in policies 4.70-4.72. These policies do not apply.

## 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.

**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.

136. **Finding:** Policies 4.73 through 4.77 provide direction regarding the interface between development and natural features and functions. The LSER Area Plan's expanded application of multi-dwelling is consistent with these policies in a number of ways. The regulatory provisions in the expanded multi-dwelling zoning include requirements for large sites to include courtyards and other common open spaces, providing more space for trees and other green elements; incentives for preserving large trees by allowing development rights to be transferred to other sites in exchange for tree preservation (this provision does not apply in single-dwelling zones); and limitations on the size of surface parking lots, which will help limit urban heat islands; and provisions for features such as ecoroofs and stormwater planters as part of development. Portions of the plan area with multi-dwelling zoning that are located in the Eastern Neighborhoods Pattern Area will have requirements for deep rear setbacks to keep the middle of blocks greener and support tree preservation and opportunities for habitat.

Policy 4.78 promotes equitable access to nature. The LSER Area Plan supports this policy through transportation project recommendations for expanding the area's network of neighborhood greenways, which include improved pedestrian and bicycle connections to area parks and the Springwater Corridor Trail and Johnson Creek, improving the ability of community members to access the plan area's most significant natural feature. This policy is also supported by the Plan's rezoning of 6.5 acres of land adjacent to or near Johnson Creek to Open Space, which will support habitat restoration and the natural functions of Johnson Creek and expand the amount of natural area in the plan area.

Therefore, the LSER Area Plan is consistent with these policies.

## 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.

137. **Finding:** Policies 4.79 through 4.84 provide direction regarding the interface of development with natural hazards. Consistent with policies 4.79 and 4.80, the LSER Plan focuses the more intense development allowed by the Plan’s Zoning Map amendments away from areas with natural and geological hazards. The LSER Project mapped the following hazard areas, and all zone changes allowing increased development avoided these mapped features:

- 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.

Furthermore, the LSER Area Plan amendments include rezoning 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space. These zone changes will facilitate BES’s work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land, while reducing flood risk to nearby employment and residential properties.

Regarding Policy 4.83, the verb “encourage”, which is defined in the 2035 Comprehensive Plan, means to promote or foster using some combination of voluntary approaches, regulations, or incentives. Urban heat island effects are areas of a city that are significantly warmer than surrounding areas due to lack of trees and vegetation and that have hard surfaces that absorb and radiate heat, such as asphalt paving. The City Council interprets this policy to mean that the City should consider policies, programs and regulations that promote strategies to increase the tree canopy and vegetation; ecoroofs, cool roofs, and alternatives to asphalt for paved surfaces. The regulatory provisions that will apply in areas where the Plan expands multi-dwelling zoning include limitations on the size of surface

parking lots, which will help limit urban heat islands; and requirements for landscaped building setbacks and provisions for features such as ecoroofs and stormwater planters as part of development, which will also help limit urban heat island impacts as well as help manage stormwater. Expanded commercial/mixed use and multi-dwelling zoning along the SE 52nd and SE 72nd corridors will allow for redevelopment that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the area's urban forest and helping to minimize urban heat islands on these corridors.

Therefore, the LSER Area Plan is consistent with these policies.

## 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.

138. **Finding:** Policies 4.85 through 4.88 provide direction regarding the role of development in contributing to access to healthy foods. A major focus of the LSER Area Plan was to expand opportunities for neighborhood businesses, including those providing food, within the plan area to address the lack of local commercial services in the area. The Plan achieves this through expanded commercial/mixed-use zoning in the area's centers and corridors, which will help expand opportunities for neighborhood businesses, including those providing food. The Plan's designation of the Brentwood-Darlington Neighborhood Center and expanded multi-dwelling zoning close to the center's commercial hubs will allow more residents to live close to the center's commercial services, which includes Brentwood-Darlington's only large grocery store, thereby allowing more residents to be close to food sources. The Plan also includes several rezones of small non-conforming corner commercial buildings in residential zones to facilitate their continued commercial uses, including a corner market, which will help support the preservation of small food markets, consistent with these policies. Also, the Plan's designation of SE 52<sup>nd</sup> and SE 72<sup>nd</sup> as neighborhood corridors will allow for limited amounts of ground-floor commercial uses in multi-dwelling zones along these corridors, which could expand opportunities for small corner markets that can help fill in gaps in access to food. Furthermore, the Plan's expansion of multi-dwelling zoning, especially along SE 52<sup>nd</sup>, will allow more residents to live close to the area's community gardens at Brentwood Park and Errol Heights Park. Therefore, LSER Area Plan is consistent with Policies 4.85 through 4.86.

## 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.

139. **Finding:** The City adopted an updated 2045 Housing Needs Analysis (HNA) and 2023 Residential Buildable Lands Inventory (BLI) in December 2023 (Ordinance 191547). The HNA provides information on the future housing need in Portland to 2045 to inform future policy decisions that can influence future housing development, and the BLI identifies the supply of land available to provide this needed housing. The HNA establishes a housing need of 106,571 additional units in Portland by 2045. The BLI estimates that Portland has the capacity for 236,977 additional housing units, which is sufficient capacity to meet the requirements under Statewide Planning Goal 10: Housing and ORS197.296. The LSER Area Plan amendments expand the types, densities, and affordability levels of housing allowed in the plan area by expanding the mapping of multi-dwelling zoning and bringing allowances for a greater diversity of housing types in an area of Portland where single-dwelling zoning is predominant. The additional multi-dwelling zoning provides more options for affordable housing through inclusionary housing regulations and by facilitating compact housing types that are less expensive than single-dwelling houses. The multi-dwelling zone regulations also provide development bonuses to encourage moderate income family housing and barrier-free units. The expanded mapping of multi-dwelling zoning also increases options for people to live in locations close to transit and other services.

**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.

140. **Finding:** City Council defines “equitable access to housing” as a goal to create housing that is accessible and affordable to a wide range of households, including people with disabilities, people of color, low-income households, diverse household types, and older adults. The LSER Area Plan’s Zoning Code and Zoning Map amendments bring regulatory approaches that contribute to equitable access to housing in a range of ways. One way the LSER Area Plan helps achieve this is through a zoning approach that avoids increasing zoning entitlements to locations with existing unregulated low-cost housing and manufactured home parks to avoid adding to redevelopment pressures, as part of a broader effort to support housing stability for the area’s lower-income residents, including people of color. The LSER Area Plan also contributes to housing equity for low-income households by expanding where inclusionary housing regulations apply through expanding mapping of multi-dwelling and mixed-use zoning. The Plan’s expanded mapping of multi-dwelling zoning also supports housing for a diversity of household types through the wide range of housing types allowed in those zones, and through the regulatory incentives they provide for family housing and for visitable or accessible units that expand housing options for people with mobility limitations, including older adults and people with disabilities.



**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.

**141. Finding:** The LSER Area Plan is consistent with this goal as its Zoning Code and Zoning Map provisions through a number of plan approaches:

- Designation of a new Brentwood-Darlington neighborhood center, with expanded commercial/mixed use and multi-dwelling zoning, expanding options for housing and allowing more people to live close to the center’s commercial and community services – including the existing school and park, as well as jobs.
- Expanded commercial/mixed use and multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors and in other corridor locations, which will allow more people to live close to commercial services and transit.
- Recommended transportation safety projects along corridors and along an expanded system of neighborhood greenways, supporting the ability of residents to safely access local services and destinations.
- Recommendations for improved transit service, undertaken in coordination with TriMet, which will provide more frequent and convenient transit access to local, city, and regional destinations.

**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.

**142. Finding:** As Council has found previously, City Council interprets this goal as to encourage the development of regulated affordable housing that provides long-term stability to low-income households. The rising cost of housing is a top concern across the city, as more people are finding it difficult to afford housing — whether they are buying or renting. Citywide, for-sale home listings have become increasingly unaffordable to the general population, with less than one-third of homes affordable to a household earning the (estimated) median income in 2022. The average home price for detached and attached homes increased by 31% between 2018 and 2022, rising from almost \$500,000 to around \$650,000 in 2022. The average home sales price exceeded \$400,000 in all 24 Portland Plan areas in 2022 and a homebuyer looking to purchase a home below \$500,000 could only have found a home in four areas—122nd, Centennial, Lents-Foster, and Gateway. For rental housing, a renter household in 2023 would have needed to make at least \$64,560 per year (around 60% AMI for a four-person household), to afford an average rental apartment in Portland, assuming an affordability threshold of no more than 30 percent of a household’s gross earnings going towards rent. In 2022, the average rent was \$1,614 per unit; for a single householder earning the minimum wage of \$14.75, it would take 80 hours of work a week to afford the average rental. A rental unit would need to be around \$852 a month to be affordable to a minimum wage worker working 40 hours. The primary way the LSER Area Plan amendments support this goal is by expanding where inclusionary housing provisions apply through significant expansion of the mapping of multi-dwelling and

commercial/mixed-use zoning. The Plan's amendments expand the amount of multi-dwelling and commercial/mixed-use zoning, where inclusionary housing requirements apply, by over 93 acres. These Plan amendments expand opportunities for regulated affordable housing, providing housing stability for future low-income residents. The Plan contributes to the preservation of existing affordable housing by a zoning approach that avoids upzones in locations with existing unregulated low-cost apartments and manufactured home parks, in order to avoid adding to redevelopment pressures and contribute to housing stability for residents. The Plan also includes recommendations for community stabilization actions that include identifying opportunity sites for affordable housing and encouraging development by affordable housing providers to increase the amount of regulated affordable housing in the plan area.

**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.

143. **Finding:** City Council defines "high-performance housing" to include housing that is developed with a lighter environmental impact (smaller carbon footprint, eco-friendly materials, longevity of construction, reducing waste, recycling). The LSER Area Plan amendments expanding multi-dwelling and mixed-use zoning will allow for more compact, resource-efficient units in the plan area. According to a study published by Oregon DEQ, A Life Cycle Approach to Prioritizing Methods of Preventing Waste from the Residential Construction Sector in the State of Oregon, of 30 different material reduction and reuse practices evaluated, reducing home size and multi-family living achieved the largest greenhouse gas reductions along with significant reductions in other impact categories. Reducing home size by 50 percent results in a projected 36 percent reduction in lifecycle greenhouse gas emissions. Reducing home size is a significant leverage point for environmental impact reduction and may be equivalent to achieving minimum levels of "green" certification. The Plan's expansion of where inclusionary housing applies will allow for people of a wide range of income levels to afford this compact, resource-efficient housing. The Plan's mapping of multi-dwelling and mixed-use zoning along transit corridors will also help contribute to resource efficiency by allowing more residents to live close to transit, minimizing the need to be dependent on cars and allowing for lower-carbon ways of travel.

## 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.

144. **Finding:** The verb "maintain" is defined in the 2035 Comprehensive Plan as to keep what you have, conserve, continue. The City Council defines "sufficient residential development capacity" as having more capacity than the 20-year growth forecast, as required by Statewide Planning Goal 10. Further, the City Council finds that increasing development capacity beyond what is needed is desired to provide capacity over a longer planning horizon; as well as locational and housing type choice. The LSER Area Plan's Zoning Map amendments are estimated to increase the capacity for residential household growth in the Lower Southeast Rising Plan Area by roughly 800 units. This change provides more flexibility

for a greater diversity of housing types and expands opportunity for residential development close to services and transit.

**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).

145. **Finding:** The verb "strive" is defined in the 2035 Comprehensive Plan as to work to achieve over time. The City Council interprets this policy as a performance measure that requires the City to monitor how much residential growth is occurring compared to the rest of the region. The LSER Area Plan's Zoning Map amendments are estimated to increase the capacity for residential household growth in the Lower Southeast Rising Plan Area by roughly 800 units and will contribute to Portland's share of the region's residential growth.

**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.

146. **Finding:** The LSER Area Plan's Zoning Map amendments increase housing capacity in the Lower Southeast Rising Plan Area by an estimated 800 units. The LSER Area Plan amendments increase the production and supply of housing for low- and moderate-income households by expansion of where inclusionary housing provisions apply through expanded mapping of multi-dwelling and mixed-use zoning; and through increased multi-dwelling zoning that provides options for housing types that are less expensive than single-dwelling zoning and that include bonuses for moderate-income family housing.

**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.

147. **Finding:** "Encourage" is defined in the Comprehensive Plan as "promote or foster using some combination of voluntary approaches, regulations, or incentives." Furthermore, the Comprehensive Plan includes a definition of "expand." "Expand" means to "make something that already exists more extensive." The LSER Area Plan amendments promote housing diversity that can help meet the evolving needs of Portland households and expand housing options by extending multi-dwelling and mixed-use zoning in an area of Portland where single-dwelling zoning predominates. The multi-dwelling zoning being expanded in the plan area—the RM1 and RM2 zones—provide for a wide range of housing types, include compact detached and attached houses, plexes, courtyard housing, apartment buildings of a range of types and scales, modular housing, and live-work housing. In combination with these opportunities, multi-dwelling zone bonuses for moderate-income family housing and for barrier-free units encourage a range of housing types for households with a diversity of needs and abilities.

**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.

148. **Finding:** The LSER Area Plan designates a new neighborhood center, the Brentwood Darlington Neighborhood Center, and expands mixed use and multi-dwelling zoning in and around this neighborhood center. The Plan also applies multi-dwelling zoning in and around the existing Heart of Foster Neighborhood Center and the Lents Town Center. The expanded multi-dwelling zoning in and around these centers will allow for a greater diversity of housing options in an area of the City where single-dwelling zoning predominates. The Council interprets “family friendly housing” to include housing units that contain multiple bedrooms and include additional features critical for families, i.e., spaces where family members can gather for meals and other activities, and where children can play and engage in other activities such as homework; and have easy access to outdoor play and recreation space. The multi-dwelling zone bonuses, which will be applicable more broadly in the plan area, include a development bonus for moderate-income three-bedroom units, affordable to households earning no more than 100 percent of area median income, to promote family-sized units as part of the diverse mix of housing in the multi-dwelling zones, including within the plan area’s centers. The Plan’s Economic Analysis Background Report indicates that multi-bedroom townhouses will likely be a common development type in multi-dwelling zones in the foreseeable future. The Plan’s expansion of multi-dwelling zoning will expand opportunities for this family-friendly housing type, as the multi-dwelling zones provide more flexibility for townhouse development than do the single-dwelling zones.

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

149. **Finding:** The multi-dwelling zoning that the LSER Area Plan amendments apply in and around the area’s centers and corridors is RM1 and RM2, which will contribute to expanding options for middle housing, as plexes, townhouses, clustered housing, and small apartment buildings, which are the most commonly built housing types in these low-rise multi-dwelling zones. These zones also provide a transition in scale between the commercial/mixed zones in the core of the centers and the surrounding single-dwelling areas. The properties receiving multi-dwelling zoning designations are located within the boundaries of or within a quarter mile of the plan area’s designated centers, or are located along or close to transit corridors such as SE Woodstock, SE 52<sup>nd</sup>, SE 72<sup>nd</sup>, SE Cesar Chavez, and SE Holgate. In conjunction with the LSER planning project as part of the Forward Together service concept, TriMet has identified some of these corridors for expanded transit service, including frequent service transit on some of the corridors. The expanded multi-dwelling zoning along these corridors facilitates more housing in locations that will allow more residents can live close to transit.

**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.

150. **Finding:** The LSER Area Plan amendments support this policy through expanded multi-dwelling and mixed-use zoning in an area that has predominantly single-dwelling zoning. The multi-dwelling and mixed-use zones allow for a wide variety of housing types that can accommodate a range of households, from studios and one-bedroom units appropriate for small households, to multi-bedroom townhouses suitable for families, to group living arrangements. The expanded multi-dwelling zoning also provides incentives for visitable or physically-accessible units so that more housing can flexibly accommodate residents of a variety of ages and abilities.

**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.

151. **Finding:** Policies 5.8 and 5.9 are addressed and supported by the LSER Area Plan's expanded multi-dwelling zoning, which provides incentives for visitable and physically-accessible units that offer more housing options and remove access barriers for people with disabilities or mobility limitations. Furthermore, the expanded multi-dwelling zoning and its accessibility provisions apply within designated centers and along transit corridors, such as SE 52<sup>nd</sup> Avenue, facilitating physically-accessible housing close to services and transit. This is also promoted by the expanded mixed-use zoning, as multi-level buildings in such zones often include elevators and accessible or adaptable units.

**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.

152. **Finding:** The Comprehensive Plan defines "foster" to mean "encourage or guide the incremental development of something over a long period of time." City Council interprets the phrase "inclusive communities" to mean communities that have a diversity of people in terms of race, ethnicity, gender, sexual orientation, socio-economic status, age, physical abilities, religious beliefs, political beliefs, or other characteristics. The LSER Area Plan amendments encourage and enhance inclusive communities and housing choice for people in protected classes and address disparities by increasing the applicability of requirements and incentives for affordable housing. The LSER Area Plan's expansion of multi-dwelling zoning will foster inclusive communities by adding new options for a range of multi-dwelling and other less-expensive housing types. The expansion of this zoning and mixed-use zoning also expands the availability of inclusionary housing provisions, including requirements that larger projects include affordable units, in areas that had been limited to

single-family houses. This will expand housing options in the plan area for low-income households, who in the Lower Southeast Rising plan area are disproportionately people of color. The Plan also supports inclusive communities by zoning approaches that avoid upzones to locations with existing unregulated low-cost apartments and manufactured home parks, whose residents are disproportionately lower-income and people of color, in order to avoid adding to redevelopment pressures and to support the ability of residents to remain in the community. This approach to affordable housing preservation together with the Plan's expanded application of multi-dwelling zoning and inclusionary housing will help maintain and expand access to relatively affordable housing, especially for historically inequitably-burdened communities of color, underserved and underrepresented communities, and other vulnerable populations.

## Housing access

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

153. **Finding:** The LSER Area Plan amendments remove regulatory barriers to housing choice by applying multi-dwelling zoning in areas that had previously had single-dwelling zoning that allowed only a limited range of housing options. The multi-dwelling zones allows a broad range of housing types and include provisions that address affordability and accessibility, and provide these new housing options in locations close to transit and other services.

**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.

154. **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. For the LSER Area Plan amendments, the Council interprets “involuntary displacement” to occur when a resident is forced to relocate due to factors that are beyond the resident’s control, including but not limited to increased rents and decisions by landlords to redevelop property. Analysis undertaken as part of the LSER project’s Economic Analysis Background Report found that there is minimal risk of displacement associated with the Plan’s amendments due to the high rate of ownership in the area and the strategic and targeted nature of the proposed zone changes, which avoid locations with existing unregulated low-cost housing. The analysis also found that the Plan’s zone changes are not likely to increase redevelopment and residential displacement, as the Plan’s predominant rezoning involves expansion of low-rise multi-dwelling zones (RM1 and RM2), which will not increase the likelihood of redevelopment beyond what is already economically feasible in the existing single-dwelling zones, and will overall create the opportunity for more needed housing by allowing more units on a site when redevelopment does occur. The LSER Area Plan Comprehensive Plan Map and Zoning Map Amendments affect only a small portion of the plan area’s land, just 6.7 percent, leaving the rest of the area’s zoning unchanged. The LSER Area Plan also works to provide for housing stability for low-income households in the long-term and increase the supply of affordable housing by expanding where inclusionary housing regulations apply through broader mapping of multi-dwelling and mixed-use zoning; and addresses residential stability in the near term by avoiding zone changes to locations with existing low-cost apartments and manufactured home parks in order to avoid adding to redevelopment pressures. The Plan also includes recommended actions to support community stability by investing in affordable housing and through community economic development efforts to support small businesses and connect residents to economic opportunity. The City Council finds that these measures are sufficient to mitigate the anticipated impacts to protected classes and low-income households, contribute to housing stability, help preserve communities, and help create permanently affordable housing options for those households that might be displaced due to redevelopment enabled by the LSER Area Plan amendments or associated infrastructure improvements.

**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.

155. **Finding:** The Zoning Code has no provisions for land banking and this policy does not require land banking to be addressed in the Zoning Code. The LSER Area Plan amendments do not change this and do not affect other implementation approaches to land banking. The LSER Area Plan amendments do support the creation of more affordable housing units (with bonus FAR incentives) on sites that are currently held or may be acquired in the future for affordable housing development.

**Policy 5.18. Rebuild communities.** Coordinate plans and investments with programs that enable communities impacted by involuntary displacement to maintain social and cultural connections, and re-establish a stable presence and participation in the impacted neighborhoods.

**156. Finding:** The LSER Area Plan amendments are not anticipated to increase involuntary displacement. Analysis undertaken as part of the LSER project's Economic Analysis Background Report found that there is minimal risk of displacement associated with the Plan's amendments due to the high rate of ownership in the area and the strategic and targeted nature of the proposed zone changes, which avoid locations with existing unregulated low-cost housing. The analysis also found that the Plan's zone changes are not likely to increase redevelopment and residential displacement, as the Plan's predominant rezoning involves expansion of low-rise multi-dwelling zones (RM1 and RM2), which will not increase the likelihood of redevelopment beyond what is already economically feasible in the existing single-dwelling zones, and will overall create the opportunity for more needed housing by allowing more units on a site when redevelopment does occur. The LSER Area Plan also works to provide for housing stability for low-income households in the long-term, and provides more opportunities for displaced residents to return to the area, by increasing the supply of affordable housing through expanding where inclusionary housing regulations apply via broader mapping of multi-dwelling and mixed-use zoning. The Plan also includes recommendations for expanding the role of the Brentwood-Darlington Community Center as a resource for the community, connecting community members and residents who may have been displaced, to community resources and providing opportunities for residents to remain connected to their community in the event that their living situation changes.

**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.

**157. Finding:** The LSER Area Plan's expansion of multi-dwelling and mixed-use zoning allows for a diverse range of housing types, including single-level housing units that can allow older adults to remain in their communities when houses with stairs may no longer accommodate their needs. The expanded multi-dwelling zoning also provides incentives for visitable and physically-accessible units that are intended to offer more options and remove access barriers for people of all ages and abilities. The multi-dwelling and mixed-use zones include inclusionary housing provisions that encourage development of affordable units available to households earning 80% or less of the median family income, which is important for seniors on fixed incomes. The increased range of housing types allowed in the multi-dwelling and mixed-use zones also broadens the diversity of housing options available to older adults as they choose to transition from larger detached houses.

## 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.

**158. Finding:** The eastern portions of the LSER plan area include that area's larger proportions of lower-income households, many of whom live in unregulated low-cost apartments or in manufactured home parks. The Plan prioritizes housing stability for these residents by avoiding upzones to locations with low-cost apartments and manufactured home parks. The LSER Area Plan also works to help meet the housing needs of low-income households



in the long-term and increase the supply of affordable housing by expanding where inclusionary housing regulation requirements for affordable units apply through broader mapping of multi-dwelling and mixed-use zoning. The Plan also includes recommendations for community stabilization actions to support the housing needs of lower-income residents, such as through investments in affordable housing development and consideration of a Tax Increment Finance district for the plan area to fund affordable housing.

**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.

**159.Finding:** The City Council interprets this policy to provide guidance to public investment decisions to improve access to opportunity as part of meeting goals to enhance more neighborhoods to become “complete neighborhoods,” especially in areas with high concentrations of underserved populations and where affordable housing is located. As described in the 2035 Comprehensive Plan (page I-15), complete neighborhoods are places where people have safe and convenient access to the goods and services needed in daily life. The LSER plan area has lower household incomes than the Portland as a whole, as well as higher proportions of communities of color. As summarized in the Plan’s Opportunity Mapping Analysis Report, the LSER Plan Area lacks the commercial services and transportation infrastructure necessary for complete neighborhoods. Most of the plan area lacks complete networks of pedestrian and bicycle infrastructure, with most streets in the Plan’s core focus area lacking sidewalks, and most of the area is not served by frequent service transit. The Plan’s core focus area also lacks a neighborhood business district and has few commercial services, which, in combination with the area’s lack of transportation infrastructure, makes it difficult to access local services. The LSER Area Plan addresses these issues and this policy in a number of ways, including:

- Designation of a new Brentwood-Darlington neighborhood center, with expanded commercial/mixed use and multi-dwelling zoning, expanding options for housing and allowing more people to live close to the center’s commercial and community services – including the existing school and park, as well as jobs. Furthermore, the new neighborhood center is located close to areas with existing affordable housing, including low-cost apartments and manufactured home parks, which will over time allow their residents to be close to more local services.
- Recommended transportation safety projects along corridors and an expanded system of neighborhood greenways, supporting the ability of residents to safely access local services and destinations.
- Recommendations for improved transit service, undertaken in coordination with TriMet, which will provide more frequent and convenient transit access to local, city, and regional destinations.

- The combination of Plan amendments to allow for more commercial services and jobs together with the Plan’s recommended transportation projects will allow for the plan area to become a complete neighborhood in which residents can access the goods and services they need, in compliance with this policy.

**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.

**160. Finding:** The LSER Area Plan amendments expanding multi-dwelling and mixed-use zoning increase opportunities for multi-dwelling and affordable housing options in an area with an extensive system of parks and that includes the Mt. Scott Community Center. The Plan’s designation of the new Brentwood-Darlington Neighborhood Center, with its expanded commercial/mixed use zoning and existing elementary school and park, together with the Plan’s recommended transportation projects, will allow for the area to become a higher-opportunity place with improved access to services and jobs that can be accessed via a range of active transportation options. Expanded multi-dwelling zoning in and around this new neighborhood center, and around other designated centers in the plan area, will support the development of affordable housing close to center services through inclusionary housing requirements and through allowing for additional multifamily housing in an area that is predominantly zoned for single-dwelling development.

**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.

**161. Finding:** The LSER Area Plan helps implement this policy, as it expands options for higher-density housing in the newly-designated Brentwood-Darlington Neighborhood Center and in and around other designated centers by expanding multi-dwelling and mixed-use zoning. These zones also expand opportunities for affordable housing in and around the plan area’s centers through inclusionary housing and other affordable housing provisions; and promote accessibility through a bonus for physically-accessible units and the potential for multi-level buildings with elevators and accessible or adaptable units.

**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.

**162. Finding:** David Douglas School District (DDSD) is the only school district in Portland with an adopted school facility plan. This criterion does not apply as the LSER Area Plan is not located within a school district that has an adopted school facility plan that has been acknowledged by the City of Portland.

## 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.

163. **Finding:** The LSER Area Plan includes housing approaches, related both to the preservation and production of affordable housing, that facilitate projects by affordable housing providers. Affordable housing providers were involved as part of the LSER Area Planning process, in particular the Rose Community Development, whose co-executive director served on the Project Advisory Committee. The Plan's expansion of multi-dwelling zoning was supported by affordable housing providers as a means of expanding opportunities for the production of affordable housing, while the Plan's retention of zoning for manufactured dwelling parks was supported as an approach for preserving this housing as an important low-cost housing resource.

**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.

164. **Finding:** The LSER Area Plan amendments encourage the production of affordable housing that will be affordable to households in the 0 to 80 percent MFI range by expansion of where inclusionary housing provisions – targeted to households earning up to 80 percent of median household income – apply through expanded mapping of multi-dwelling and mixed-use zoning. The Plan's Zoning Map amendments are expected to encourage the production of new regulated affordable housing that will support meeting this target.

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

165. **Finding:** As of August 1, 2016, the City of Portland adopted a one-percent affordable housing construction excise tax to support the production of affordable housing. The LSER Area Plan amendments do not directly affect this program or any other funding program to support the production of affordable housing. The LSER Area Plan amendments do include regulatory mechanisms, such as the expansion of areas with zoning subject to inclusionary housing requirements, to support the production of affordable housing.

**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.

166. **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.

167. **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. The LSER Area Plan amendments encourage the production of permanently-affordable housing through expansion of where inclusionary housing provisions apply, achieved through expanded mapping of multi-dwelling and mixed-use zoning. The expanded mapping of the RM1 and RM2 multi-dwelling zones in the plan area will increase opportunities for both rental and

homeownership housing, as both rental apartments and ownership units are commonly built in these zones, and the multi-dwelling zones' incentives for affordable units apply to both rental and ownership units.

**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.

168. **Finding:** The LSER Area Plan amendments expanding the mapping of multi-dwelling zones, which allow a wide range of compact housing types that are less costly than the single-dwelling housing that predominate within the area's single-dwelling zoned areas.

The LSER Area Plan's expansion of multi-dwelling and mixed-use zoning along transit corridors generally supports reduced household transportation costs because they will allow more people to live close to transit, making transit a more feasible option for more residents, which can reduce reliance on more expensive automobile transportation.

The LSER Area Plan's expansion of multi-dwelling and mixed-use zoning generally supports reduced utility costs by encouraging smaller units and more attached units. According to studies conducted by the State DEQ, "Reducing home size is among the best tier of options for reducing waste generation in the Oregon housing sector, while simultaneously achieving a large environmental benefit across many categories of impact...Reduction in home size is a significant leverage point for impact reduction [including non-renewable energy use] and may be a more effective measure than achieving minimum levels of 'green certification'"

**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.

169. **Finding:** The LSER Area Plan's expansion of multi-dwelling and mixed-use zoning will expand opportunities for a variety of affordable housing types in the plan area, as these zones include inclusionary housing requirements for including affordable units as part of new buildings with 20 or more units, and these zones accommodate a wide variety of housing types that are less expensive than the more limited types of housing allowed in the single-dwelling zones that predominate in the plan area. Furthermore, the Plan's Zoning Map amendments are applied along transit streets such as SE 52<sup>nd</sup> and SE Woodstock, and in and around designated centers, which will expand opportunities for lower-income and other residents to live close to transit providing connections to regional jobs, educational institutions, and training opportunities. The Plan's recommended transportation projects, including expanded pedestrian and bicycle networks, will also create safe connections to local destinations, such as schools and jobs, including those located nearby along the SE 82<sup>nd</sup> Avenue and in the Freeway Land employment district in southern Lents.

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

170. **Finding:** The LSER Area Plan amendments are consistent with this policy by allowing a greater diversity of housing types in and around the plan area's designated centers,

including the newly-designated Brentwood-Darlington Neighborhood Center. The Zoning Map amendments include expanded multi-dwelling zoning (RM1 and RM2), which will allow a broader range of housing types, such as attached houses, townhouses, apartment buildings, and clustered housing, compared to the single-dwelling zoning that predominates in the area. Development in the multi-dwelling zones can be rentals in a variety of housing types and configurations, or can be ownership housing, such as condominiums or fee-simple ownership housing, such as attached houses on individual lots. Housing type and tenure diversity is also promoted by multi-dwelling zone bonuses for projects that include three-bedroom units affordable to moderate income households.

**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.

171. **Finding:** This policy is only relevant to the Central City, which is not part of the LSER Area Plan project. This policy does not apply.

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

172. **Finding:** This policy does not apply because it concerns affordable housing funding sources and mechanisms, which are not addressed by zoning code regulations that are the focus of the LSER Area Plan amendments.

**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.

173. **Finding:** The LSER Area Plan amendments are consistent with this policy as the amendments expand the use of inclusionary housing tools in conjunction with the production of market-rate housing, through increasing where inclusionary housing provisions apply with the expanded mapping of multi-dwelling and mixed-use zoning in the plan area.

**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.

174. **Finding:** The LSER Area Plan amendments do not include new regulations that could affect development of affordable housing. The Plan amendments use existing regulations that apply in the multi-dwelling and mixed-use zones that are being expanded in the plan area. The Plan's Economic Analysis Background Report assessed the economic feasibility of the zone changes and determined that the types of development allowed in the multi-dwelling and mixed-use zones that are being expanded in the plan area would be economically feasible, including wood-frame apartment buildings and townhouses, which are relatively inexpensive construction types that lend themselves to affordable housing development. The Plan amendments do not include new regulations or expansion of the Design overlay zone, in part to avoid adding complexity and costs to the development of affordable housing. The LSER Area Plan amendments, including rezoning from single-dwelling to

multi-dwelling zoning, will allow for more economically-diverse residential areas in the plan area due to the greater diversity of housing allowed. The LSER Area Plan's expansion of where inclusionary housing provision apply, through expanded mapping of multi-dwelling and mixed-use zoning, will also promote economically-diverse housing and residential areas, as these provisions allow for a mix of market-rate housing in combination with affordable units.

**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.

175. **Finding:** The LSER plan area includes several existing mobile home parks that are zoned RMP (Residential Manufactured Dwelling Park). The Plan amendments intentionally avoided changes to the zoning of these mobile home parks in order avoid adding to redevelopment pressure and to support the continuation of this housing as an important low/moderate income housing option.

**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.

176. **Finding:** The LSER Area Plan amendments are consistent with this policy as the expanded mapping of multi-dwelling and mixed-use zoning will allow for increased opportunities for the development of moderate-income housing close transit. The Plan's Zoning Map amendments are applied along transit streets such as SE 52nd and SE Woodstock, and in and around designated centers, which will expand opportunities for moderate-income and other residents to live close to transit that provides connections to regional jobs, educational institutions, and training opportunities. The Plan's recommended transportation projects, including expanded pedestrian and bicycle networks, will also create safe connections to nearby employment areas, including those located nearby along the SE 82nd Avenue and in the Freeway Land employment district in southern Lents. The Plan's expanded multi-dwelling and mixed-use zoning will allow for development of a wide range of housing types that are less expensive than the limited range of housing types allowed in the single-dwelling zones predominant in the area, and the greater numbers of units allowed in the new zoning will allow for more moderate-income households to live close to transit. The expanded applicability of inclusionary housing provisions, in conjunction with the broader mapping of the multi-dwelling and mixed-use zoning, also promotes housing affordable to moderate-income households by providing options for inclusionary housing requirements to be met through units affordable to households earning up to 80 percent of median household income, and through a multi-dwelling zone bonus for moderate income family housing, affordable to households earning up to 100 percent of median household income.

**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.

177. **Finding:** The LSER Area Plan’s expansion of multi-dwelling zoning will allow for a greater range of small single-family houses, including various configurations of compact attached houses and small-lot detached houses. The multi-dwelling zones provide more regulatory allowances for various combinations of clusters of small attached houses and small-lot detached houses compared to the single-dwelling zones that predominate in the area. The expanded multi-dwelling zoning also supports the preservation of existing houses by providing flexibility for internal conversions and for the addition of accessory dwelling units and other unit types to existing housing.

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

178. **Finding:** The LSER Area Plan’s expansion of multi-dwelling and mixed-use zoning increase density and provide for affordable housing density bonuses that could be utilized by a major employer to provide employer-assisted affordable housing.

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

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

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

179. **Finding:** Council finds that Policies 5.41 through 5.43 all aim to support opportunities for homeownership for all Portlanders, including historically under-served and under-represented Portlanders. The LSER Area Plan amendments remove regulatory barriers to a variety of housing types and tenures through the expanded mapping of multi-dwelling and mixed-use zoning, which allow for a wide variety of housing and ownership arrangements, including condominiums, cooperatives, fee-simple lots, community land trust models, and other ownership arrangements. Furthermore, the LSER Area Plan’s expansion of multi-dwelling zoning supports homeownership opportunities through expanded availability of the deeper housing affordability bonus, which provides development incentives for projects that provide ownership housing affordable to households earning no more than 80 percent of area median income. Another development bonus, for moderate-income three-bedroom units affordable to households earning no more than 100 percent of area median income will also facilitate the development of ownership housing in the multi-dwelling zones.

**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.

180. **Finding:** Council finds that Policies 5.44 through 5.45 address how the City engages with Metro and other jurisdictions in the Portland region on housing issues. The LSER Area Plan amendments are one strategy to encourage higher-density housing by providing for a wider range of housing types that can help maintain lower-cost market-rate housing in Portland that will help the City meet its housing needs and serve as an example for other jurisdictions in the region.

## Homelessness

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

181. **Finding:** The LSER Area Plan’s expansion of multi-dwelling and mixed-use zoning allow a greater range of housing arrangements within the housing continuum than is the case in the single-dwelling zones that predominate in the area. The multi-dwelling and mixed-use zones allow for a broader range of transitional housing types, including a variety of shelter arrangements, that are limited to conditional uses or in conjunction with institutional uses in the single-dwelling zones. The expanded multi-dwelling and mixed-use zoning also has greater allowances for Group Living housing, including arrangements that include supportive services, allowances for which are much more limited in the single-dwelling zones. The LSER Area Plan amendments therefore are consistent with this policy in expanding zoning that provides for more flexibility for transitional housing, Group Living, supportive services, and other housing arrangements.

## 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.

182. **Finding:** The LSER Area Plan regulatory amendments primarily involve amendments to the Comprehensive Plan Map and Zoning Map and do not impact regulations related to the health and safety of residents. The Plan’s expansion of multi-dwelling and mixed-use zoning along transit corridors, together with the Plan’s recommended transportation projects – including corridor safety projects and an expanded system of neighborhood greenways, is consistent with this policy by allowing for more housing to be built that supports active living by being in locations that allow more residents to be able to walk to access transit



and to be able to safely walk and bicycle to local destinations, including the area's schools and parks.

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

183. **Finding:** The LSER Area Plan amendments primarily involve amendments to the Comprehensive Plan Map and Zoning Map and do not regulate interior building materials or construction. The Plan amendments neither regulate such features nor create barriers to maintaining or creating housing free of hazardous materials.

**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.

184. **Finding:** The LSER Area Plan amendments primarily involve amendments to the Comprehensive Plan Map and Zoning Map and do not change regulations related to housing quality. The Plan amendments neither regulate such features nor create barriers to creating housing that provides high indoor air quality, access to sunlight and outdoor spaces, and is protected from excessive noise, pests, and hazardous environmental conditions. The Plan's expanded multi-dwelling and mixed-use zoning will be subject to existing requirements for outdoor spaces to be provided for residents.

**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.

185. **Finding:** The LSER Area Plan's expansion of multi-dwelling and mixed-use zoning encourages smaller units and more attached units, which results in improved energy efficiency and is consistent with the policy of creating high-performance housing. According to studies conducted by the State DEQ, "Reducing home size is among the best tier of options for reducing waste generation in the Oregon housing sector, while simultaneously achieving a large environmental benefit across many categories of impact...Reduction in home size is a significant leverage point for impact reduction [including non-renewable energy use] and may be a more effective measure than achieving minimum levels of 'green certification'" [<https://www.oregon.gov/deq/FilterDocs/ADU-ResBldgLCA-Report.pdf>] Attached housing is also more energy efficient than detached forms of housing. According to the EPA, "fairly substantial differences are seen in detached versus attached homes [approximately 17.5% improved efficiency], but the most striking difference is the variation in energy use between single-family detached homes and multifamily homes [50% improved efficiency], due to the inherent efficiencies from more compact size and shared walls among units." [[www.epa.gov/sites/production/files/2014-03/documents/location\\_efficiency\\_btu.pdf](http://www.epa.gov/sites/production/files/2014-03/documents/location_efficiency_btu.pdf)]

**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.

**186. Finding:** The LSER Area Plan amendments primarily involve amendments to the Comprehensive Plan Map and Zoning Map and do not change regulations related to the design of housing. The Plan amendments neither regulate such features nor create barriers to creating housing with features supportive of healthy eating and active living. The Plan's expanded multi-dwelling and mixed-use zoning will be subject to existing requirements for outdoor spaces or amenities to be provided for residents.

**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.

**187. Finding:** The LSER Area Plan amendments are consistent with this policy by expanding multi-dwelling zoning in residential areas, which brings with it increased requirements for pedestrian pathways and bicycle parking as part of development, and also includes regulations for pedestrian connectivity as part of development on large sites. The LSER Area Plan's recommended transportation projects, such as an expanded system of neighborhood greenways, is also consistent with this policy by supporting the creation of safe pedestrian and bicycle connections through the plan area's residential areas, connecting residents to schools, parks, and other local destination.

**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.

**188. Finding:** The LSER Area Plan amendments primarily involve amendments to the Comprehensive Plan Map and Zoning Map and do not change regulations related to the design of housing or sites. The Plan amendments neither regulate such features nor create barriers to creating housing with features supportive of social interaction. The Plan's expanded multi-dwelling and mixed-use zoning will be subject to existing regulations that require outdoor spaces, such as courtyards, that can support social interaction, and that provide options for indoor spaces, such as community rooms, as part of housing development, which can help reduce social isolation for residents during times of the year when outdoor activity is limited.

**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.

**189. Finding:** The LSER Area Plan amendments do not alter regulations establishing tenant protections including required relocation assistance when properties are sold and/or redeveloped (PCC 30.01.085). The Plan's approach to Zoning Map amendments supports tenant stability by avoiding zone changes to locations with existing unregulated low-cost apartments and manufactured home parks in order to avoid adding to redevelopment pressures.

## 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.

190. **Finding:** The City Council interprets this goal to apply to the city as whole and not to individual businesses or sectors of business. The City Council interprets this goal to mean that Portland has a strong economy with employment opportunities for a diverse population. The City Council finds that an important factor in a diverse economy is to provide access to job opportunities across a wide range of wage scales, especially middle wage jobs. The LSER Area Plan amendments apply only to the Brentwood-Darlington neighborhood and parts of adjacent neighborhoods and will have a minimal impact on the city's overall economy. However, the LSER Area Plan amendments are consistent with this goal as they include Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area, providing and estimated increase in employment capacity of 120 additional jobs.

**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.

191. **Finding:** The LSER Area Plan amendments are consistent with this goal as they include Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area, which will contribute to maintaining an adequate supply of land for employment in Portland. The growth analysis undertaken for the LSER Area Plan estimates that the proposed amendments increase employment capacity by an additional 120 jobs. The Plans recommended transportation projects will improve access to the plan area's commercial and employment districts once implemented. In addition, the Plan's rezoning of 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space will facilitate BES's work in undertaking floodplain restoration on the properties to help reduce flooding that has impacted industrial land in the area, and contribute to their viability as employment land.

**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.

192. **Finding:** The LSER Area Plan amendments are consistent with this goal in a number of ways. The LSER Area Plan's Zoning Map amendments, together with the designation of the Brentwood-Darlington Neighborhood Center, support the development of a new neighborhood business district by expanding commercial/mixed-use zoning in this new center, in an area that otherwise had no substantial neighborhood business district. The new neighborhood center and its expanded commercial/mixed use zoning will provide new opportunities for businesses to be established in the area and allow for more commercial services for the area's residents. The Plan also expands commercial/mixed-use zonings in and around smaller commercial hubs along the area's transit corridors, supporting opportunities for additional businesses and commercial services in these locations. The Plan's expansion of multi-dwelling zoning around these commercial areas and around the area's designated mixed-use centers will also allow for larger numbers of residents to live close to the commercial services of these areas, providing some of the customer base that can support the viability of businesses. The Plan's application of the Centers Main Street Overlay to the core existing commercial hubs of the Brentwood-Darlington Neighborhood Center includes requirements for ground-floor active uses to support the continuity of commercial activity in key locations.

## 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.

**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.

193. **Finding:** Policies 6.1 through 6.12 provide direction regarding economic and employment growth. For the most part, these policies are citywide and programmatic economic development directives that are not applicable to the limited amount of LSER Area Plan Zoning Map amendments specific to the plan area’s commercial and employment areas. However, City Council determines that the LSER Area Plan amendments are consistent with these policies as they support local commercial and employment opportunities in the LSER plan area through Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area, expand employment capacity by an estimated 120 jobs, and designate a new Brentwood-Darlington Neighborhood Center, which will support economic vitality and employment opportunities in an area with many lower-income households and people of color. Economic resilience, called for in Policy 6.1, is also supported by LSER Area Plan amendments that rezone 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space, which will facilitate BES’s work in undertaking floodplain restoration in the area to help reduce flooding that has impacted nearby industrial land, and will contribute to their viability and resilience as employment land.

**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.

194. **Finding:** The LSER Area Plan amendments are consistent with this policy as they include Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area and expand employment capacity by an estimated 120 jobs, which will support economic vitality and employment opportunities in the area and contribute to maintaining an adequate supply of land for employment in Portland.

**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 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.

195. **Finding:** Policies 6.14 through 6.16 provide direction regarding development sites and regulations in employment areas. For the most part, these policies are citywide and program-specific economic development directives that are not the subject of the LSER Area Plan’s land use map amendments. The LSER Area Plan does not introduce new types of regulatory requirements and does not expand discretionary land use reviews, in keeping with policy guidance in Policy 6.16.b regarding promoting regulatory certainty.

**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.

196. **Finding:** Policies 6.17 through 6.19 provide direction regarding citywide land supply and corporate headquarters in employment areas. Although the LSER Area Plan amendments only address land supply in a small area of the city, they are consistent with this policy as they include Comprehensive Plan Map and Zoning Map amendments that increase the amount of commercial/mixed-use zoning in the plan area and expand employment capacity by an estimated 120 jobs, which will contribute to maintaining an adequate supply of land for employment in Portland.

## Traded sector competitiveness

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

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

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

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

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

**Policy 6.25. 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.

197. **Finding:** City Council interprets that Policies 6.20-6.26 address traded sector businesses at the city and regionwide scale. The LSER Area Plan amendments address only land uses in the LSER plan area and do not impact the business climate at the citywide or regional scales. Therefore, City Council determines that the LSER Area Plan amendments do not adversely impact the city and regional business climate and Policies 6.20-6.26 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.

198. **Finding:** Policy 6.27 provides direction regarding the need for middle- and higher-wage employment opportunities, especially for under-served and under-represented communities. The LSER Area Plan includes considerable amounts of employment and industrial land near Johnson Creek, including on land that has been subject to periodic flooding. LSER Area Plan amendments include rezoning two properties (four acres) owned by BES east of SE 82<sup>nd</sup> to Open Space to support their use as part of BES's West Lents Floodplain Restoration Project to reduce flooding in the area's nearby industrial and employment lands. These rezones are consistent with these policies by contributing to reducing flooding and thereby supporting the viability of the area's employment lands, including for middle wage jobs that are located in close proximity to historically underserved communities living in the area.

**Policy 6.28. East Portland job growth.** Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.

199. **Finding:** The LSER plan area includes portions of the Lents Neighborhood east of SE 82<sup>nd</sup> Avenue that are located within East Portland. The LSER Area Plan includes amendments that support this policy by applying commercial/mixed use zoning in the area around SE 82<sup>nd</sup> and SE Flavel, which will support the ability of this area's small retail and service businesses to grow and expand, which has been limited by existing zoning. Also, the LSER Area Plan amendments includes rezoning two properties (four acres) owned by BES east of SE 82<sup>nd</sup> to Open Space to support their use as part of BES's West Lents Floodplain Restoration Project to reduce flooding in the area's nearby industrial and employment lands. These rezones are consistent with this policy by contributing to reducing flooding and thereby supporting the viability of the area's employment lands, including as a 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.

200. **Finding:** Policies 6.29 through and 6.31 provide direction regarding equity-related approaches to expanding access to economic opportunity, reducing disparities, and aligning responses to a range of issues such as housing stability and access to services. These policies concern programmatic approaches that are not the subject of the LSER Area Plan's land use map amendments. The LSER Area Plan includes recommendations for future



community stabilization actions that are consistent with this policy, including recommendations for workforce development approaches to connect lower-income/BIPOC/immigrant community members to living wage jobs, and other approaches to connect lower-income residents to economic opportunity and small business support.

**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.

201. **Finding:** The LSER Area Plan amendments do not address urban renewal plans. This policy does 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.

202. **Finding:** Policies 6.33 through 6.35 provide direction regarding economic development in the Central City. The LSER Area Plan amendments have no impact on the Central City or Marquam Hill employment zones. 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.

**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.

203. **Finding:** City Council interprets that Policies 6.36 through 6.55 provide direction regarding industrial and employment districts. For the most part, the LSER Area Plan amendments do not change Comprehensive Plan designations affecting lands in industrial or employment districts, except for the two instances described below, which are located in areas identified as Dispersed Employment in the Economic Development chapter of the Comprehensive Plan. The Plan amendments include changing the land use designations of a three-acre, BES-owned property located just north of SE Harney and east of SE 83<sup>rd</sup> from Industrial Sanctuary Comprehensive Plan Map designation (IG2 zoning) to Open Space Comprehensive Plan Map and Zoning Map designation. This property (known as the Harney property) has been owned by BES since 2005 and will be included as part of BES's West Lents Floodplain Restoration Project to reduce flooding in the area, including nearby industrial and employment lands. This property is heavily forested and vegetated, is subject to environmental overlay zoning, and records indicate it has not had an industrial use for at

least 28 years. A portion of this property is in the mapped 100-year floodplain and the National Wetlands Inventory classifies most of the property as Freshwater Forested/Shrub Wetland. BES modeling shows the property being substantially inundated during 25-year and 100-year flood events, with modeling for the latter estimating inundation of 3-4 feet depth. As part of the West Lents Floodplain Restoration Project, the rezoning of the Harney property to Open Space will support floodplain management, which will help reduce flooding on nearby employment lands. City Council determines that the rezoning of this property to Open Space will on balance support the policies of the Comprehensive Plan and is supportive of policies to protect land for employment uses by helping to reduce flood risks to nearby employment lands.

The second change the LSER Amendments makes to industrial or employment designation is changing the designation of a small number of properties, totaling 4.4 acres, clustered at the intersection of SE Flavel and SE 82<sup>nd</sup>, from Mixed Employment (EG1 zoning) to Mixed Use – Civic Corridor (CM2 zoning). Existing uses on these properties are primarily retail sales and service, which are limited in the EG1 zone, and also some residential (currently non-conforming uses) and a community service use. The area was zoned commercial until 1996, when it was rezoned to the current employment zoning. These properties are primarily small in size, limiting their ability to be used for light industrial and other employment uses. These properties are located within the new Brentwood-Darlington Neighborhood Center and the rezoning of these properties to commercial/mixed use will support the continuation and growth of the existing retail sales and service uses, and expand the ability of this area to provide commercial services to nearby residents in an area that has been historically underserved. Growth analysis of the Zoning Map changes indicate that expanding commercial/mixed zoning in the area that includes the SE Flavel and SE 82<sup>nd</sup> will expand employment capacity in the area. The majority (49 acres) of the Dispersed Employment land along SE 82<sup>nd</sup> will retain employment and industrial zoning. City Council determines that on balance the rezoning of these properties will support the policies of the Comprehensive Plan, expanding opportunities for commercial services and jobs, while on the whole having little impact on Portland's industrial and employment land.

## 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.

204. **Finding:** Policies 6.56 through 6.61 provide direction regarding campus institutions. The LSER Area Plan area does not include a campus institution land use designation. These policies do not apply.

## Neighborhood business districts

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

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

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

**Policy 6.65. 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.

**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.

205. **Finding:** Policies 6.62 through 6.73 provide direction regarding neighborhood business districts, including commercial areas located within centers. The LSER Area Plan amendments, including its Comprehensive Plan Map and Zoning Map amendments and

designation of the new Brentwood-Darlington Neighborhood Center, are consistent with these policies in a number of ways. The Plan's expansion of commercial/mixed-use zoning in the new neighborhood center supports the establishment of a neighborhood business district in the plan's core area, which has historically lacked a neighborhood business district; and, together with expanded commercial/mixed use zoning at smaller commercial hubs, supports the growth of a variety of business districts and opportunities for small businesses, consistent with policies 6.62, 6.63 and 6.64. Opportunities for small businesses is also supported by the Plan's designation of portions of SE 52<sup>nd</sup> and SE 72<sup>nd</sup> as neighborhood corridors, which will allow for small ground-floor commercial uses in multi-dwelling zones along these corridors, which will also allow for the expansion of existing home-based businesses along these corridors. The Plan's amendments expanding commercial/mixed use zoning in smaller commercial hubs and zoning that will allow for small commercial uses in multi-dwelling zones along corridors is also consistent with policies 6.66 and 6.67, in that these amendments will allow for smaller commercial areas that can expand local access to commercial services in areas between designated centers, including as part of development in multi-dwelling zones. The Plan's expanded commercial zoning in the new neighborhood center, including the commercial hub at SE 82<sup>nd</sup> and SE Flavel, expands opportunities for retail and other commercial services in historically underserved parts of the Brentwood Darlington and southern Lents neighborhoods, consistent with Policy 6.67. The Plan's expansion of commercial/mixed-use zoning in the new Brentwood-Darlington Neighborhood Center is also consistent with Policy 6.73 and its sub-policies, as this will allow for a broader range of neighborhood commercial services so that residents can meet more of their daily needs locally and allow for an estimated 116 additional jobs, while the Plan's application of the Centers Main Street Overlay to the center's core commercial areas at the intersections of SE Flavel with SE 72<sup>nd</sup> and at SE 82<sup>nd</sup> will ensure that development at these key locations include ground-floor active uses to support their functions as commercial hubs.

## Chapter 7: Environmental and Watershed Health

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

206. **Finding:** The City's adopted Climate Action Plan (CAP) identifies objectives and actions for reducing carbon emissions and one of the objectives is to reduce emissions related to transportation. Several actions related to reducing emissions (including actions 4O and 4Q) call for reducing emissions by focusing on "concentrating growth and density in areas with access to transit services, bike and pedestrian infrastructure...to reduce transportation fuel use. Such development patterns have helped reduce total gasoline sales in Multnomah County by 29 percent per person below 1990." (Climate Action Plan, City of Portland, Oregon and Multnomah County, pg. 77, June 30, 2015.

The LSER Area Plan amendments support carbon emission reductions, consistent with Goal 7.A and the Climate Action Plan, by supporting the development of compact housing within centers and along transit corridors, which helps provide services nearer to where residents live and options beyond the automobile. The Plan's recommended transportation projects will also support access to transit and multi modal options.

**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.

207. **Finding:** The LSER Area Plan includes amendments that are consistent with this goal, specifically Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by the Portland Bureau of Environmental Services (BES). These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land. These zone changes contribution to improving the ecosystem functions of Johnson Creek also support economic prosperity, as they involve floodplain management that will help reduce flooding that impacts nearby industrial land. Their contribution to increasing open space and habitat restoration also improves the surrounding community's access to nature.

BES acquired these properties because of their value as natural infrastructure due to their proximity to Johnson Creek as well as their value as floodplain and riparian buffer areas. Johnson Creek is an important component of the stormwater conveyance system in this area of southeast Portland. Runoff from development and streets flows overland or through pipes into Johnson Creek, which acts as the natural stormwater conveyance in this area. Due to the area's flat topography, there are ongoing flooding issues in the areas where these properties are located. BES invests in floodplain restoration to reduce the impacts of frequent flooding on community members, their properties, and the streets they use. Management and restoration of these properties as natural areas helps preserve important floodplain areas, helping to reduce impacts of flooding.



The vegetated riparian buffers along Johnson Creek provide important ecological and stormwater functions to the watershed and surrounding neighborhoods, which the zone changes to Open Space will support. Riparian areas absorb, intercept, and store stormwater, thus helping to reduce downstream flooding; facilitate chemical cycling, which contributes to water quality improvements; trap and transport sediments; alter or absorb pollutants; provide essential habitat for plants and animals; and strongly influence the health of downstream waterbodies. BES has a regulatory obligation on behalf of the City to protect the water quality of Johnson Creek, which includes preventing pollutants in stormwater from entering the creek. Management and restoration of these properties as natural areas, facilitated by the Plan's mapping amendments, helps support these responsibilities and regulatory obligations.

**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.

**208.Finding:** The 2035 Comprehensive Plan describes resilience as "reducing the vulnerability of our neighborhoods, businesses, and built and natural infrastructure to withstand challenges – environmental, economic and social – that may result from major hazardous events."

The LSER Area Plan contributes to resilience in the context of climate change and natural hazards in a number of ways, including:

- The LSER Area Plan amendments include rezoning 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.
- The Plan supports neighborhood resilience by proposing a new neighborhood center with expanded commercial/mixed use zoning and adjacent multi-dwelling zoning, which over time will allow more residents the opportunity to live within walking distance of commercial services without having to be dependent on cars to access services, allowing for reduced carbon emissions and a reduced impact on climate and natural systems.
- The Plan's recommendations for transportation safety projects that prioritize pedestrian, bicycle and transit access, including corridor and neighborhood greenway improvements, will facilitate the ability of residents to access services and community destinations by walking, biking, or transit, supporting reduced carbon emissions with reduced impacts on climate and natural systems.
- The Plan includes recommendations to support an expanded role for the Brentwood-Darlington Community Center in serving as a resilience center for the community during emergencies and extreme-weather events, functioning as a warming/cooling center, temporary shelter, with resilient energy sources to provide charging stations for mobile phones and other needs.
- The Plan's expansion of commercial/mixed use and multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors will facilitate new development that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the

area's urban forest and helping to minimize urban heat islands on these corridors. Also, the majority of the Plan's zone changes from single-dwelling zoning is to the RM1 multi-dwelling zone, which has a similar maximum lot coverage to the R5 and R2.5 single-dwelling zones, thereby providing similar opportunities for tree plantings. Some of the Plan's expanded multi-dwelling zoning is in the Eastern Neighborhoods Pattern Area, where requirements for deep rear setbacks apply in order to continue existing patterns of backyards and opportunities for trees and other green elements, which will help reduce urban heat island impacts.

**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.

209. **Finding:** The City of Portland has a robust and diverse system of parks, recreation areas, and open spaces. The City's Parks 2020 Vision documents the City's long-term plan to provide a wide variety of high-quality park and recreation services and opportunities for all residents. The LSER Area Plan furthers this vision to connect Portlanders to nature and to open spaces. The Plan's recommended transportation projects include an expanded network of neighborhood greenways that will facilitate the ability of residents to safely walk, bike and roll to the area's system of parks, schools, natural areas, and the Springwater Corridor.

Also supporting this goal, the LSER Area Plan amendments include rezoning 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land, as well as serve to protect water quality and add to the area's system of natural areas. Rezoned properties near Johnson Creek and SE 45th will be incorporated into the Johnson Creek Oxbow Restoration Project and will complement the recent improvements at Errol Heights Park. Restoration efforts will reconnect Johnson Creek and Errol Creek with their natural floodplains to improve water quality, reduce flood risk in the surrounding neighborhood, and provide habitat for ESA-listed salmon, birds, and other wildlife. This area and the restoration project are located at the edge of a census tract that has high proportions of residents who are people of color, have less than a 4-year degree, and have lower adjusted household incomes (per the BPS Economic Vulnerability Assessment), so these improvements will contribute to more equitable access to nature and management of natural hazards.

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

210. **Finding:** The LSER Area Plan supports this goal by amendments that expand Open Space zoning along and near Johnson Creek, which will increase opportunities for area residents to be close to nature and participate in volunteer restoration opportunities. The Plan helps achieve this through amendments that rezone 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space. These zone changes will facilitate BES's

work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.

## 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.

**211. Finding:** The LSER Area Plan includes amendments that support this policy through Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by the Portland Bureau of Environmental Services (BES). These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.

The vegetated riparian buffers along Johnson Creek provide important ecological and stormwater functions to the watershed and surrounding neighborhoods, which the zone changes to Open Space will support. Riparian areas absorb, intercept, and store stormwater, thus helping to reduce downstream flooding; facilitate chemical cycling, which contributes to water quality improvements; trap and transport sediments; alter or absorb pollutants; provide essential habitat for plants and animals; and strongly influence the health of downstream waterbodies. BES has a regulatory obligation on behalf of the City to protect the water quality of Johnson Creek, which includes preventing pollutants in stormwater from entering the creek. Management and restoration of these properties as natural areas, facilitated by the Plan's mapping amendments, helps support these responsibilities and regulatory obligations.

**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.

**212. Finding:** The LSER Area Plan supports this policy through rezoning 6.5 acres of land that are along or close to Johnson Creek and owned by BES to Open Space, which will support work to reduce flooding and improve water quality in an area with historically disadvantaged communities living in areas that have been periodically subject to flooding. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land, as well as serve to protect water quality and add to the area's system of natural areas. Rezoned properties near Johnson Creek and SE 45th will be incorporated into the Johnson Creek Oxbow Restoration Project and will complement the recent improvements at Errol Heights Park. Restoration efforts will reconnect Johnson Creek and Errol Creek with their natural floodplains to improve water quality, reduce flood risk in the surrounding neighborhood, and provide habitat for ESA-listed salmon, birds, and other

wildlife. This area and the restoration project are located at the edge of a census tract that has high proportions of residents who are people of color, have less than a 4-year degree, and have lower adjusted household incomes (per the BPS Economic Vulnerability Assessment).

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

213. **Finding:** The Comprehensive Plan defines ecosystem services as, “The contribution of ecosystem conditions and processes to human well-being including the production of goods and processes that control variability, support life, health, and safety, enrich cultural life, and preserve options. Examples include pollination of trees and plants, climate regulation, flood mitigation, stormwater management, clean air and water, recreational opportunities, and satisfaction of aesthetic and spiritual needs.”

The LSER Area Plan amendments are consistent with this policy because, as shown in the findings for the Chapter 7 Goals and policies above, the amendments include expansions of Open Space zoning along Johnson Creek that will support floodplain and habitat restoration, mitigating flooding and water quality impacts, and expand the ability of area residents to benefit from access to nature.

**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.

214. **Finding:** The LSER Area Plan amendments are consistent with this policy and sub-policies because, as shown in in the findings for the Chapter 7 Goals and policies above, the amendments include land use mapping amendments that will allow for housing to be located close to transit and commercial services, which, together with the Plan’s recommended transportation projects, will facilitate active transportation options that can limit carbon emissions and improve neighborhood resilience. The Plan also contributes to resilience through expansions of Open Space zoning along Johnson Creek that will support floodplain and habitat restoration, mitigating flooding and water quality impacts, and supporting improved resilience to climate-exacerbated flooding.

One of the key strategies to reduce carbon emissions is to reduce emissions related to transportation by reducing reliance on the automobile by encouraging housing near multi-modal transportation alternatives, such as transit service and bikeways. The Plan amendments support this by expanding multi-dwelling zoning in centers and along transit corridors, and this housing would also be served by the Plan’s recommended bicycle and pedestrian connections. According to studies conducted by Oregon DEQ, “Reducing home size is among the best tier of options for reducing waste generation in the Oregon housing sector, while simultaneously achieving a large environmental benefit across many categories

of impact...Reduction in home size is a significant leverage point for impact reduction [including non-renewable energy use] and may be a more effective measure than achieving minimum levels of 'green certification'". The LSER Area Plan amendments will expand the range of housing types, especially smaller units, that are allowed in these areas, which will further contribute to reducing Portland's carbon emissions.

**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.

215. **Finding:** The LSER Area Plan amendments are consistent with this policy because, as shown in the findings for the Chapter 7 Goals and policies above, the amendments have the potential to protect air quality. The amendments include land use mapping amendments that will allow for housing to be located close to transit and commercial services, which, together with the Plan's recommended transportation projects that support travel by walking, biking, transit, will facilitate active transportation options that can limit carbon emissions and air quality impacts. The Plan's expansion of multi-dwelling and commercial/mixed use zoning along corridors will facilitate new development that will be required to include street trees, helping to bring shade that can mitigate urban heat island impacts along streets that currently have few street trees.

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

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

216. **Finding:** Policies 7.6 and 7.7 provide direction regarding hydrology and water quality. The LSER Area Plan includes amendments that support this policy through Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and watershed hydrology of Johnson Creek and adjacent land.

Johnson Creek is an important component of the stormwater conveyance system in this area of southeast Portland. Runoff from development and streets flows overland or through pipes into Johnson Creek, which acts as the natural stormwater conveyance in this area. Due to the area's flat topography, there are ongoing flooding issues in the areas where these properties are located. BES invests in floodplain restoration to reduce the impacts of frequent flooding on community members, their properties, and the streets

they use. Management and restoration of these properties as natural areas helps preserve important floodplain areas, helping to reduce impacts of flooding.

The vegetated riparian buffers along Johnson Creek provide important ecological and stormwater functions to the watershed and surrounding neighborhoods, which the zone changes to Open Space will support. Riparian areas absorb, intercept, and store stormwater, thus helping to reduce downstream flooding; facilitate chemical cycling, which contributes to water quality improvements; trap and transport sediments; alter or absorb pollutants; provide essential habitat for plants and animals; and strongly influence the health of downstream waterbodies. BES has a regulatory obligation on behalf of the City to protect the water quality of Johnson Creek, which includes preventing pollutants in stormwater from entering the creek. Management and restoration of these properties as natural areas, facilitated by the Plan's mapping amendments, helps support these responsibilities and regulatory obligations and is consistent with these policies.

**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.

217. **Finding:** Policies 7.8 through 7.10 provide direction regarding biodiversity and habitat. The LSER Area Plan amendments do not change the environmental zones. Other City programs for flood management, erosion, and sediment control (i.e., City Title 10 Erosion Control, and the balanced cut and fill requirements of City Title 24) protect resources and functional values that have been identified by the City as providing benefits to the public, including in areas with underserved and underrepresented communities. The LSER Area Plan includes amendments that support this policy through Comprehensive Plan Map and Zoning Map

amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will facilitate BES's work in undertaking floodplain and habitat restoration on the properties and the surrounding area. Rezoned properties near Johnson Creek and SE 45th will be incorporated into the Johnson Creek Oxbow Restoration Project and will complement the recent improvements at Errol Heights Park. The rezoned properties will be part of restoration efforts that will reconnect Johnson Creek and Errol Creek with their natural floodplains to improve water quality, reduce flood risk in the surrounding neighborhood, and provide habitat for ESA-listed salmon, birds, and other wildlife, consistent with these policies.

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

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

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

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

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

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

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

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

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

218. **Finding:** The LSER Area Plan amendments support tree preservation through rezones of 6.5 acres land near Johnson Creek to Open Space, which will support preservation of existing trees as well as plantings of new trees as part of planned habitat restoration. The expanded tree canopy and floodplain restoration that these rezones will facilitate will benefit residents in nearby areas who have been historically underserved, as nearby areas have lower-incomes and higher proportions of communities of color than Portland as a whole. The Plan's expansion of commercial/mixed use and multi-dwelling zoning along the SE 52nd and SE 72nd corridors will facilitate new development that will trigger requirements for wider sidewalks and street trees, which the area currently lacks, contributing to the area's urban forest and helping to minimize urban heat islands on these corridors. The Plan's expanded multi-dwelling zoning will also bring broader applicability of regulatory provisions that allow development rights to be transferred to other sites in exchange for

preservation of existing large trees, bringing an additional tool to support tree preservation to more properties in the plan area.

**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.

219. **Finding:** Policies 7.12 and 7.13 provide direction regarding invasive species and soil quality. The LSER Area Plan amendments do not affect programs and investments related to these policies.

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

220. **Finding:** The LSER Area Plan amendments do not directly address risks from these hazards associated with development because City programs for flood management, and erosion and sediment control (Title 10 Erosion Control and the balanced cut and fill requirements of City Title 24), are unchanged by these amendments. Indirectly, the LSER Area Plan amendments applying Open Space zoning to 6.5 acres of BES-owned properties will support this policy, as the rezoned properties will be used for floodplain restoration and floodplain management that will reduce flood risk for existing and new development in nearby employment and residential areas.

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

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

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

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

221. **Finding:** Policies 7.15 through 7.18 provide direction regarding non-regulatory approaches to improving environmental quality. Because the LSER Area Plan amendments primarily affect the Comprehensive Plan Map and Zoning Map and do not affect non-regulatory implementation approaches, these policies do not apply.



## Planning for natural resource protection

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

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

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

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

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

**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.

**222. Finding:** Policies 7.19 through 7.22 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 No. 185657, amended by Ordinance No. 190834) 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 overlay 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 (including the Environmental overlay zones, the River Natural overlay zone, the River Environmental overlay zone, and the Pleasant Valley Natural Resource overlay zone). In

much of the city, the environmental overlay zones were recently updated to reflect more accurate information about the location and characteristics of significant natural resources. The LSER Area Plan amendments do not change these zones or regulations. The LSER Area Plan amendments do include zone changes to 6.5 acres of BES-owned land adjacent or near Johnson Creek, an identified resource on the Natural Resources Inventory. As described in the findings to Goal 7.B, these zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties (most of which are located within environmental overlay zones) to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and adjacent land.

## 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:

1. On the site of the resource subject to impact with the same kind of resource; if that is not possible, then
2. Off-site with the same kind of resource; if that is not possible, then
3. On-site with a different kind of resource; if that is not possible, then
4. 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.

**223. Findings:** Policies 7.23 through 7.26 provide direction regarding the protection of significant natural resources in development situations. The City's recently updated environmental overlay zones (including the Environmental overlay zones, the River Natural overlay zone, the River Environmental overlay zone, and the Pleasant Valley Natural Resource overlay zone) are the regulations that control development in order to protect, or ensure mitigation for, the resources and functional values while allowing environmentally

sensitive urban development. The LSER Area Plan amendments do not change any of 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.

224. **Finding:** Policies 7.27 through 7.29 provide direction regarding aggregate resources. The LSER Area Plan 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.

225. **Finding:** Policies 7.30 through 7.32 provide direction regarding habitat and river-related uses in the Columbia River Watershed. The LSER Area Plan 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. The findings earlier in this chapter that apply to all of Portland's watersheds are incorporated by reference.

## Willamette River Watershed

**Policy 7.33. Fish habitat.** Provide adequate intervals of ecologically-functional shallow-water habitat for native fish along the entire length of the Willamette River within the city, and at the confluences of its tributaries.

**Policy 7.34. Stream connectivity.** Improve stream connectivity between the Willamette River and its tributaries.

**Policy 7.35. River bank conditions.** Preserve existing river bank habitat and encourage the rehabilitation of river bank sections that have been significantly altered due to development with more fish and wildlife friendly riverbank conditions.

**Policy 7.36. 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.

226. **Finding:** Policies 7.33 through 7.42 provide direction regarding habitat and river-related uses in the Willamette River Watershed. The LSER Area Plan amendments do not affect the Environmental, Greenway, or River overlay zones that apply in this area, or other regulations or programs related to habitat or watershed health. The findings earlier in this chapter that apply to all of Portland's watersheds are incorporated by reference.

## 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.

**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.

227. **Finding:** Policies 7.43 through 7.49 provide direction regarding the environment and watershed health in the Columbia Slough Watershed. The LSER Area Plan amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. The findings earlier in this chapter that apply to all of Portland's watersheds are incorporated by reference.

## 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.

228. **Finding:** Policies 7.50 through 7.52 provide direction regarding habitat and river-related uses in the Fanno and Tryon Creek Watersheds. The LSER Area Plan amendments do not affect the environmental zones that apply in this area, or other regulations or programs related to habitat or watershed health. The findings earlier in this chapter that apply to all of Portland's watersheds are incorporated by reference.

## 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 recreation in East Portland.

**229.Finding:** Policies 7.53 through 7.57 provide direction regarding the environment and watershed health in the Johnson Creek Watershed. The majority of the LSER plan area is located within the Johnson Creek Watershed. The LSER Area Plan includes amendments that are consistent with these policies, specifically Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and its watershed.

BES acquired these properties because of their value as natural infrastructure due to their proximity to Johnson Creek as well as their value as floodplain and riparian buffer areas. Johnson Creek is an important component of the stormwater conveyance system in this area of southeast Portland. Runoff from development and streets flows overland or through pipes into Johnson Creek, which acts as the natural stormwater conveyance in this area. Due to the area's flat topography, there are ongoing flooding issues in the areas where these properties are located. BES invests in floodplain restoration to reduce the impacts of frequent flooding on community members, their properties, and the streets they use. Management and restoration of these properties as natural areas helps preserve important floodplain areas, helping to reduce impacts of flooding.

The vegetated riparian buffers along Johnson Creek provide important ecological and stormwater functions to the watershed and surrounding neighborhoods, which the zone changes to Open Space will support. Riparian areas absorb, intercept, and store stormwater, thus helping to reduce downstream flooding; facilitate chemical cycling, which contributes to water quality improvements; trap and transport sediments; alter or absorb pollutants; provide essential habitat for plants and animals; and strongly influence the health of downstream waterbodies. BES has a regulatory obligation on behalf of the City to protect the water quality of Johnson Creek, which includes preventing pollutants in stormwater from entering the creek. Management and restoration of these properties as natural areas, facilitated by the Plan's mapping amendments, helps support these responsibilities and regulatory obligations.

In addition to expanded Open Space zoning around Johnson Creek, the Plan also includes recommended transportation projects, including an expanded network of neighborhood

greenways, that will improve pedestrian and bicycle connections to the Springwater Corridor Trail. Therefore, the Plan supports these policies.

## 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.

230. **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 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.

Some of these goals are not applicable because they guide public agencies that provide public facilities on how those facilities should be provided. The policy-specific findings below address the applicable goals. Transportation facilities are addressed under Chapter 9 (Transportation), below. The findings for Statewide Planning Goals 11 and 12 also address public facilities and are incorporated by reference.

The LSER Area Plan amendments affect the amount of development anticipated in the plan area. A growth analysis undertaken for the plan area based on the Plan's expanded multi-dwelling and commercial/mixed-use zoning estimated that the zone changes will result in approximately 76 additional housing units and 31 additional jobs in the plan area by 2045. The total zoned capacity resulting from the zone changes is estimated to increase housing capacity by 800 units, with employment capacity increased by 120 jobs, although only a portion of this increase is expected to be built by 2045. The infrastructure bureaus provided assessments of the adequacy of infrastructure to accommodate the additional housing units and jobs by 2045 associated with the LSER Area Plan zone changes, summarized below.

#### Sanitary Sewer and Stormwater

The Bureau of Environmental Services (BES) assessed sanitary sewer service and stormwater facilities in the plan area and determined that existing infrastructure was generally adequate to accommodate the additional housing and jobs associated with the LSER zone changes.

#### Water

The Water Bureau assessed the increase in water demand that would result from the LSER zone changes and existing infrastructure conditions and concluded that no water system modifications are needed to meet water demands for any of the proposed zoning modifications.

#### Transportation

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.

## 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.

**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.

231. **Finding:** The City Council interprets policies 8.1 through 8.5 to provide direction on the provision of public facilities and services and the process of urbanization. The LSER Area Plan amendments do not urbanize any rural land. and do not change the City’s planning service delivery.

## 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.

232. **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 services within the City of Portland’s Urban Services Boundary. The LSER Area Plan amendments do not include amendments to public service coordination agreements. The LSER project coordinated with TriMet on the LSER Area Plan’s recommended transit concept, which informed development of TriMet’s Forward Together service concept. The Portland Bureau of Transportation (PBOT) was a partner in the LSER Plan to ensure that the Plan’s land use and transportation proposals were closely coordinated. The LSER project also coordinated with other infrastructure bureaus on the Plan’s land use proposals, including the Oregon Department of Transportation and internally with City bureaus, including BES, Parks and Recreation, the Water Bureau, Urban Forestry, and Prosper Portland.

## 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.

233. **Finding:** The City Council interprets Policies 8.11 through 8.19 to provide direction on extending public services and orderly urbanization, especially for unincorporated land outside of the city limits. The LSER Area Plan amendments do not involve any land outside the city limits, nor does the LSER Area Plan change any existing City policies related to service extensions, nor does the LSER Area Plan propose any service extensions outside city limits. City Council determines that 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.

**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.

234. **Finding:** The City Council interprets policies 8.20 through 8.26 to provide direction on investment priorities for public facilities. The LSER Area Plan includes recommendations for transportation projects to support recommended land use changes and address existing transportation infrastructure deficiencies.

The Plan is consistent with policy 8.21 because it considers existing systems and recommends transportation projects designed to serve locations where the LSER Area Plan amendments bring increased commercial/mixed-use and multi-dwelling zoning and that are intended to become places for growth and increased activity, such as the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> neighborhood corridors, SE Woodstock, and the newly designated Brentwood-Darlington Neighborhood Center.

Policy 8.22.b provides guidance for “places that lack basic public facilities or services and also have significant growth potential”, instructing the City to “invest to enhance neighborhoods, fill gaps, maintain affordability, and accommodate growth.” The LSER plan

area is such a place because it lacks many basic urban amenities such as sidewalks and complete bicycle networks, and includes centers and corridors that are intended to accommodate growth. The Plan's recommended transportation projects are also consistent with this policy because they will address deficiencies in the plan area's pedestrian and bicycle infrastructure through safety improvements on major corridors, such as adding pedestrian crossings and filling in sidewalk gaps, and through expansion of the area's system of neighborhood greenways in order to create a continuous and safer system of pedestrian and bicycle connections in an area where such infrastructure is incomplete. The plan also strives to maintain affordability by using zoning approaches to preserve existing affordable apartments and manufactured home parks by avoiding rezoning that could add to redevelopment pressures, and recommends actions to support community stabilization and the creation of additional affordable housing.

## 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.

235. **Finding:** The City Council interprets policies 8.27 through 8.30 to provide direction on the funding of public facilities and services within the City of Portland's Urban Services Boundary. The LSER Area Plan does not make changes to the way infrastructure costs are managed. However, the Plan's identification of priority "Tier 1" transportation projects is consistent with Policy 8.27 in that this prioritization responds to funding limitations and prioritizes transportation projects necessary to serve locations intended for growth and activity, such as transit corridors and mixed-use centers, or that fill in major gaps in the area's bicycle and pedestrian systems. The City Council interprets policies 8.28 through 8.30 to provide direction on the funding of public facilities. The LSER Area Plan is adopting land use changes and a set of planning-level recommendations for supportive transportation projects. The funding and design process for transportation projects occurs later. Therefore, these policies are not applicable.

## 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.

236. **Finding:** Policy 8.31 addresses the Guiding Principles as they relate to public facilities. General findings about the Guiding Principles are found earlier in this report. With regard to public facilities, the LSER Area Plan recommendations advance these principles because:

- **Economic Prosperity:** The recommended transportation projects support a low-carbon economy and access to neighborhood businesses by including corridor and neighborhood greenway projects that will facilitate access by walking, biking, or transit to commercial areas. In conjunction with the Plan's expanded commercial/mixed-use zoning, this improved access will also help support the viability of area business.
- **Human Health:** The recommended public facilities include improvements to active transportation infrastructure, such as an expanded system of neighborhood greenways, which supports active lifestyles and access to local parks and open spaces.
- **Environmental Health:** The recommended public facilities include circulation improvements which will improve access to transit and access to local destinations by walking and biking, which will facilitate alternatives to driving and provide air quality benefits. The Plan's rezoning of land near Johnson Creek will facilitate BES's work on floodplain and stormwater management and habitat restoration in the area, supporting the environmental health of Johnson Creek and its floodplain.
- **Equity:** The recommended public facilities were designed to address long-standing inequitable access to safe transportation infrastructure in the area, which has higher portions of lower-income households and communities of color than the rest of

Portland, especially in eastern portions of the plan area, and has had deficient infrastructure. Specifically, the recommended transportation projects will improve the ability of all area residents to safely access local and area destinations by walking, bicycling, and transit.

- **Resilience:** The recommended public facilities support resilient communities by including transportation projects that will improve local access to commercial and community services, facilitating the area becoming a complete neighborhood where residents can access services they need on a daily basis. Also supporting resilience, the Plan's rezoning of land near Johnson Creek will facilitate BES's work on floodplain and stormwater management in the area, helping to reduce flood risk.

Policies 8.32 and 8.33 address community engagement and community benefits for "large" infrastructure projects. The City Council interprets "large" to mean projects at the upper end of the scale of projects in the City's public facilities plan (the CSP and the TSP project lists). Planned CSP and TSP project costs range from \$500,000 to almost \$3 billion (the Columbia River Bridge). Most are under \$10 million. There are only a few larger than \$50 million. This includes major transit facilities, major street reconstructions, and large bridges. Considering that range, it is reasonable that "large" means projects that will cost tens of millions of dollars, or more. The project recommendations in the LSER Area Plan are for smaller facilities, primarily local transportation safety improvements such as localized pedestrian safety interventions. These policies are not applicable.

The City Council interprets policies 8.34 through 8.38 to provide direction on the design of public facilities. The LSER Area Plan is adopting land use changes and a set of planning-level recommendations for supportive public facility investments. The design process occurs later. Therefore, these policies are not applicable.

## 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 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.

237. **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 LSER Area Plan furthers Policy 8.39 because it includes transportation project recommendations for expanding the area’s network of neighborhood greenways to improve pedestrian and bicycle connectivity within the plan area, and addresses equity by expanding this system into areas with historically disadvantaged communities that had in the past not benefited from a complete network of such facilities.

The LSER Area Plan furthers Policy 8.40 because it includes recommendations for transportation projects for corridors such as SE 52<sup>nd</sup>, SE 72<sup>nd</sup>, and SE Woodstock, that will improve these streets’ multi-modal functions and support their Transportation System Plan designations as important neighborhood connections for pedestrians, bicycles, transit, and traffic. The Plan’s identification of corridor transportation projects is also coordinated with these street’s intended land use functions as locations for commercial and community services and multi-dwelling housing.

The City Council interprets policies 8.41 through 8.52 to provide direction on the design, programming, and management of public facilities. The LSER Area Plan is adopting land use changes and a set of planning-level recommendations for supportive public facility investments. The design process and programming and management decisions occur later. Therefore, these policies are not applicable.

## 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.

238. **Finding:** The City Council interprets policies 8.53 through 8.60 to apply to designated trails. While designated trail alignments are located within the LSER plan area, the Plan amendments do not amend the designated trail alignments. 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 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.

239. **Finding:** The City Council interprets policies 8.61 through 8.67 to apply to the provision of sanitary sewer facilities. BES does not anticipate the growth associated with the LSER Area Plan Comprehensive Plan Map and Zoning Map amendments will cause significant problems for either property owners or the system. BES staff analyzed the growth associated with the LSER Area Plan amendments and determined that the area's sanitary sewer system will be able to serve future growth associated with the proposed zone changes.

## 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.

**240.Finding:** The City Council interprets policies 8.68 through 8.75 to apply to the provision of stormwater facilities. BES assessed the area’s existing stormwater system and determined that the system will be able to accommodate the growth associated with the LSER Area Plan amendments. Most of the stormwater south of Duke Street, where the majority of the Plan’s Zoning Map amendments are located, is actively ‘injected’ into the ground through sumps or drywells (also formally called underground injection controls, or UICs for short). In the southern hillside, some stormwater is conveyed by pipes into Johnson Creek. In much of the plan area, the soils have good infiltration, which makes the area well suited for using UICs to manage stormwater. A large portion of the UICs provide groundwater recharge that feeds Errol Creek, Flavel Wetland, and Johnson Creek, making them important to the groundwater hydrology of the area.

The LSER Area Plan includes Comprehensive Plan Map and Zoning Map amendments that are consistent with these policies. Plan amendments rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will facilitate BES’s work in undertaking floodplain restoration on the properties to help manage flooding and stormwater and provide habitat, and will contribute to broader efforts to restore the floodplain, hydrology, habitat, and natural system functions of Johnson Creek and adjacent land, 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.

**241.Finding:** The City Council interprets policies 8.76 through 8.80 to apply to the management of floodplains. The LSER plan area include parts of Johnson Creek and its floodplain. BES is actively engaged in efforts to prevent the impacts of flooding on private property and public infrastructure, protect water quality, and enhance habitat, especially for ESA-listed salmonids. In the southwest corner of the plan area (around the intersection of Johnson Creek Blvd, SE 45th Avenue and Harney Drive) BES is designing the Johnson Creek Oxbow Restoration Project, which will include elements to improve water quality from the 45th and 52nd Avenue storm mains and create high flow refugia off the main channel of the creek. This restoration work, along with previous projects, parks, and natural areas, not only serves the stormwater management needs of the area, it also provides access to nature for nearby residents. The work will also enhance conditions for fish and other aquatic species, by improving fish passage, access to cold water sources, off-channel floodplain refugia, floodplain functionality, and wetland habitat.

BES is designing the West Lents Floodplain Restoration Project in the southeast corner of the plan area where Johnson Creek crosses SE 82nd Avenue. This project will reduce flood risks to nearby industrial properties, multifamily housing, a manufactured home park, and single-dwelling residential development in an economically vulnerable community. LSER Area Plan amendments rezoning 6.5 acres of BES-owned land near Johnson to Open Space will facilitate BES floodplain and stormwater management work for both the West Lents Floodplain Restoration Project and the Johnson Creek Oxbow Restoration Project, consistent with these policies.

## 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.

**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.

242. **Finding:** The City Council interprets policies 8.81 through 8.91 to apply to the provision of water service. The Water Bureau (PWB) conducted analysis of water pipe sizes and fire flow requirements as part of their review of growth associated with the LSER Area Plan Zoning Map amendments. PWB determined that no water system modifications are needed to meet water demands for any of the Zoning Map amendments. Future development could require existing mains to be upsized depending on water service sizes needed for new customers.

## 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-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.

243. **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 LSER Area Plan amendments do not change current parks and recreation programs or change the supply of parks or impact the use of park land. These policies do not apply.

## 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.

244. **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.

245. **Finding:** The City Council interprets this policy to address the provision of waste management services. The LSER Area Plan amendments do not impact the City's waste management services. This policy does 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.

246. **Finding:** David Douglas School District (DDSD) is the only school district in Portland with an adopted school facility plan. None of the LSER plan area is within the enrollment boundary of the David Douglas School District, which covers much of East Portland east of the plan area. The overall expectation for growth in East Portland is grounded in regional housing demand forecasts made by Metro, and those demand forecasts have not been altered by the LSER Area Plan amendments.



**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.

**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 institutions to support community and recreational use of their facilities.

247. **Finding:** The City Council interprets policies 8.114 through 8.122 to address the provision of school facilities and not development on private land. 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.

248. **Finding:** The City Council interprets policies 8.123 and 8.124 to address the citywide provision of technology and communication services. These policies do not apply.

## Energy infrastructure

**Policy 8.125. Energy efficiency.** Promote efficient and sustainable production and use of energy resources by residents and businesses, including low-carbon renewable energy sources, district energy systems, and distributed generation, through land use plans, zoning, and other legislative land use decisions.

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

249. **Finding:** The LSER Area Plan 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. These policies do 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.

250. **Finding:** Goal 9.A concerns safety. The LSER Area Plan promotes this goal by including recommendations for a number of pedestrian and bike safety improvements in the plan area. The Plan's recommended transportation projects include a range of projects along

corridors and an expanded system of neighborhood greenways that focus on enhancing safety for a variety of modes, particularly walking and bicycling.

Goal 9.B speaks to how the performance of the transportation system is measured and is operationalized by the System Management policies of this chapter.

Goal 9.C speaks to placemaking. The findings for Policies 9.11 through 9.13 discuss this.

Goal 9.D relates to promoting more sustainable transportation modes and reducing the impact of automobile travel. The findings in response to Policy 9.5 address this.

Goal 9.E addresses the distribution of transportation options, investments, and benefits. The LSER Area Plan responds to this goal by providing recommendations to improve outcomes in the plan area geography, which is an area that has many gaps in urban infrastructure and is home a larger proportion of community of color and lower-income people than Portland as a whole. In the case of the LSER Area Plan, community engagement included focused outreach to immigrant communities and residents of apartment complexes and manufactured home parks to ensure that their needs were incorporated into the Plan's recommendations. This is described in the equity and engagement sections of the Plan (LSER Area Plan, pages 33-37).

Goal 9.F encourages consideration of health outcomes. The LSER Area Plan included a Health Assessment Background Report, which used health outcomes to help guide the plan, and includes several actions that further positive public health outcomes (LSER Area Plan, page 32).

Goal 9.G addresses prosperity. The LSER Area Plan furthers this goal by expanding commercial/mixed-use zoning to allow for more neighborhood businesses and jobs in the plan area, in combination with the Plan's recommended transportation projects, which will improve transit and multimodal access to the area's neighborhood business districts, employment areas, and educational institutions, thereby helping to expand residents' access to economic opportunity and the viability of these areas.

Goal 9.H concerns cost effectiveness of capital and operating investments and asset management. The LSER Area Plan responds to this goal by developing tiered approach to prioritizing infrastructure recommendations so that projects can be phased in as financial resources allow.

Goal 9.I concerns the Portland Airport and is therefore not applicable.

## 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.

251. **Finding:** Policies 9.1 through 9.4 provide direction regarding transportation system classifications and the Transportation System Plan (TSP). The LSER Area Plan is consistent with these policies because it includes a complementary comprehensive growth concept and transportation/circulation concept (see LSER Area Plan pages 48 through 52). Street functions and design categories are described in the plan and are clearly related to the abutting land uses. The Plan's Comprehensive Plan Map and Zoning Map amendments focus commercial/mixed use and multi-dwelling land use designations along streets along corridors that are also a focus for the Plan's recommended transportation projects and that are a focus for multi-modal improvements, which furthers the linkage between street function and land use (see LSER Area Plan Part 2). Finally, the LSER Area Plan includes recommendations to modify TSP street classifications within the plan area to better align with the LSER Area Plan land use changes and the circulation concept, including assigning a pedestrian district classification to the newly-designated Brentwood-Darlington Neighborhood Center consistent with Policy 9.2.b (see LSER Area Plan pages 156 – 169).

**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.

252. **Finding:** The LSER Area Plan includes several elements that generally work to reduce vehicle miles travelled (VMT) and support low-carbon transportation modes (biking and walking).

- The LSER Area Plan increases residential densities within walking distance of the area's designated mixed-use centers, which increases the potential customer base for a wider

range of commercial services to exist in these centers. This enables people to make shorter bike and pedestrian trips to meet more of their daily needs. The LSER Area Plan also supports transit ridership because the expanded commercial/mixed use and multi-dwelling zoning is focused along transit corridors and in and around centers served by transit, allowing for more residents to live close to transit. This is further supported by recommended transit service improvements, undertaken in coordination with TriMet's Forward Together service concept, that will expand frequent-service transit through the core of the LSER plan area and improve transit connections to local and citywide destinations.

- The LSER Area Plan recommends corridor improvements and an expanded neighborhood greenway system that will facilitate access by walking and bicycling to local destinations, supporting alternatives to driving trips. These recommendations are described in Part 2 of the LSER Area Plan.

**Policy 9.6. Transportation strategy for people movement.** Implement a prioritization of modes for people movement by making transportation system decisions per the following ordered list:

1. Walking
2. Bicycling
3. Transit
4. Fleets of electric, fully automated, multiple passenger vehicles
5. Other shared vehicles
6. Low or no occupancy vehicles, fossil-fueled non-transit vehicles

When implementing this prioritization ensure that:

- The needs and safety of each group of users are considered, and changes do not make existing conditions worse for the most vulnerable users higher on the ordered list.
- 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

253. **Finding:** These policies concern the way that the transportation system is managed and operated, and how space within the right of way is managed. To the extent that they provide direction on land use planning or development of new public facilities plans, they speak to prioritizing vulnerable road users. The LSER Area Plan is consistent with this direction because it includes transportation project recommendations to improve pedestrian and bicycle connectivity and safety in the plan area, as well as transit access, consistent with the mode prioritization in Policy 9.6.

Policy 9.7 supplements Policies 9.30 through 9.36 below, related to freight movement. Those findings apply to this policy and are incorporated by reference.

Consistent with Policy 9.8, the LSER transportation project recommendations focus on low-cost transportation modes – walking, biking, and transit; and work to address the significant gaps in sidewalks, safe crossings, bicycle facilities and transit service in the plan area. Improving deficiencies in transportation facilities in the plan area also addresses disparities and equity, as the area has higher-portions of lower-income households and communities of color than Portland as a whole, especially in the plan’s eastern areas around SE 82nd, where there are a number of manufactured home parks and low-cost apartment complexes. The Plan’s recommended transportation projects include corridor safety improvements, such as enhanced pedestrian crossings and filling gaps in sidewalks, which will contribute to safe access for people of all ages and abilities, consistent with Policy 9.9.

The LSER Area Plan is consistent with Policy 9.10 because it establishes a geographically-specific transportation plan for the LSER plan area, which is responsive to the characteristics of the neighborhood pattern areas found in the plan area.

## 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.

254. **Finding:** The LSER Area Plan focuses on coordinated land use amendments and transportation recommendations to help implement the City's Urban Design Framework, especially as it applies to the framework's designated centers and corridors within the plan area. Policies 9.11 and 9.12 emphasize linkages between land use and transportation plans, and the connection between street function and abutting land uses. The LSER Area Plan is consistent with these policies because it includes a complementary comprehensive growth concept and transportation/circulation concept (see LSER Area Plan pages 47 to 54). Recommended transportation projects, street functions and design categories are described in the LSER Area Plan and are clearly related to the abutting land uses.

The Plan's recommended transportation projects and TSP designations also support these policies in that these projects and designations are designed to support the role of centers as places that prioritize access by walking, biking, rolling, and transit; and includes recommendations for an expanded system of neighborhood greenways connecting residents to the area's centers and other local destinations. The Plan includes recommendations for designating the new neighborhood center as a pedestrian district in the TSP, as well as expanding the Heart of Foster center and pedestrian district to include the Mt. Scott Community Center and Arleta Triangle to prioritize these areas for pedestrian access and community activity.

Furthermore, the roles of the plan area's designated corridors as places for growth and multimodal transportation is also supported by the Plan's recommended transportation projects, which include improvements to support the multimodal functions and safety of designated corridors, such as through improved pedestrian crossings, enhanced bike lanes, and sidewalk infill, while continuing to support vehicle access and the freight needs of corridor businesses.

**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.

255. **Finding:** The LSER Area Plan is consistent with this policy because it includes a complementary comprehensive growth concept and transportation/circulation concept (see LSER Area Plan pages 47 to 54). Recommended transportation projects, street functions and design categories are described in the plan and are clearly related to the abutting land uses. The LSER Area Plan includes recommendations to modify TSP street classifications within the plan area to better align with recommended land use changes, and includes recommendations for applying a TSP pedestrian district classification for the newly-designated Brentwood-Darlington Neighborhood Center to support its intended land use function as a place with concentrations of local services and pedestrian activity. Consistent with this policy, the Plan includes recommended changes to TSP street design classifications



for SE 52nd and SE 72nd corresponding to the Plan's designation of these as neighborhood corridors on the Comprehensive Plan Urban Design Framework (LSER Area Plan pages 156 through 169).

## 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 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.

256. **Finding:** Consistent with these policies, the LSER Area Plan includes recommended TSP street design classification changes that will guide the design of future street improvements to support the functions of some locations as the setting for neighborhood businesses, community activity, and concentrations of housing. This includes recommendations for applying the TSP street design classification of Neighborhood Corridors for SE 52<sup>nd</sup> and SE 72<sup>nd</sup>, corresponding to the Plan's expansion of commercial/mixed-use and multi-dwelling zoning along these corridors; and application of Neighborhood Main Street or Civic Corridor along portions of SE 72<sup>nd</sup> and SE 82<sup>nd</sup> that are intended to be the setting for neighborhood business districts and is applying commercial/mixed use zoning (LSER Area Plan pages 156 through 169).

Policies 9.15 and 9.16 relate to repurposing street space when appropriate to serve community purposes or integrate natural features. The LSER Area Plan's transportation recommendations are planning-level recommendations and do not include the design details of street improvements, as the design process for street improvements occurs later in the implementation process. However, the Plan's recommendations for neighborhood greenways and local street improvements provide flexibility for future street improvements to accommodate community activity and natural features, and the Plan's transportation section highlights opportunities PBOT's Portland in the Streets program provides for community members to initiate, design, and implement local street improvements.

## 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.

257. **Finding:** The LSER Area Plan helps make walking a more attractive mode for short trips by recommending a range of pedestrian access improvements, in conjunction with land use amendments to allow for more neighborhood businesses and services within walking distance of plan area residents. Consistent with these policies, the Plan's recommended transportation projects include a focus on improving safety for pedestrians and bicycles along busy corridors and an expanded system of neighborhood greenways facilitating pedestrian and bicycle access to the area's centers, schools, parks, and natural areas. Recommended transportation improvements also support the role of the plan area's centers as places that prioritize pedestrian access, as well as access by bicycles and transit users. The Plan includes recommendations for designating the newly-designated Brentwood-Darlington Neighborhood Center as a pedestrian district in the TSP, as well as expanding the Heart of Foster center and pedestrian district to include the Mt. Scott Community Center and Arleta Triangle to prioritize these areas for pedestrian access and community activity. Therefore, the LSER Area Plan is consistent with these policies.

**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.

258. **Finding:** The LSER Area Plan helps create conditions that make bicycling more attractive than driving by recommending a range of improvements to the area's network of bicycle infrastructure, in conjunction with land use amendments to allow for more neighborhood businesses and services within walking distance or a short bicycle ride for plan area residents. Consistent with these policies, the Plan's recommended transportation projects include recommendations for enhanced bicycle facilities along busy corridors and an expanded system of neighborhood greenways that will facilitate bicycle access to the area's centers, schools, parks, and natural areas. Therefore, the LSER Area Plan is consistent with these policies.

**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 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.

259. **Finding:** Policies 9.22 through 9.27 address transit. The LSER project coordinated with TriMet on the LSER Area Plan's recommended transit concept, which focused on improving transit access through the plan area, and which informed development of TriMet's Forward Together service concept. Consistent with these policies, the Plan includes recommendations for improved transit service, most of which recommendations have been incorporated into TriMet's Forward Together plan, which will provide more frequent and convenient transit service along the area's corridors and provide improved connections between centers in the plan area and beyond. This includes new continuous and frequent transit service along the SE Woodstock corridor that will connect the Woodstock Neighborhood Center and the Lents Town Center. Another LSER Area Plan transit system recommendation, also incorporated into TriMet's Forward Together plan, is new transit service along the SE 72<sup>nd</sup> neighborhood corridor that will provide connections between the newly-designated Brentwood-Darlington Neighborhood Center to the Mt. Scott Community Center, which is a key hub for community activity and recreation. The LSER Area Plan also supports transit ridership through zone changes expanding higher-density zoning along transit corridors and in designated centers, which will allow for more housing and residents to live close to transit. Therefore, the LSER Area Plan is consistent with these policies.

**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.

260. **Finding:** This policy addresses intercity transportation. The LSER Area Plan does not impact this subject. This policy is not applicable.

**Policy 9.29. Regional trafficways and transitways.** Maintain capacity of regional transitways and existing regional trafficways to accommodate through-traffic.

261. **Finding:** This policy addresses regional traffic. Interstate 205, located just to the east of the LSER plan area, is a regional transitway and a regional trafficway. As described in the findings for Statewide Planning Goal 12, traffic modelling analysis was completed and the results show that growth associated with the LSER Area Plan zone changes will have no discernable impact on the area's transportation facilities, including Interstate 205, and will not impact the ability of Interstate 205 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.

262. **Finding:** Policies 9.30 through 9.36 direct the City to develop, maintain, and enhance a multimodal freight transportation system. The LSER Area Plan does not overlap with the

Portland Harbor geography and does not have any freight rail service. Within or adjacent to the plan area, Interstate 205, SE 82<sup>nd</sup>, SE Foster and SE Woodstock have functional classifications for freight movement. As described in the findings for Statewide Planning Goal 12, traffic modelling analysis was completed and the results show that growth associated with the LSER Area Plan zone changes will have no discernable impact on the area's transportation facilities, including the area's designated truck streets, and will not impact the ability of freight to access the plan area's business districts. Therefore, the LSER Area Plan is consistent with these policies.

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

263. **Finding:** Policy 9.37 concerns a Central City Heliport which is not in the LSER Area Plan geography. This policy is not applicable.

**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.

264. **Finding:** Policies 9.38 and 9.39 address automobile transportation. As described in findings for the Statewide Planning Goal 12, traffic modelling analysis was completed, and the results show that the LSER Area Plan is maintaining acceptable levels of mobility within the plan district area and will have no discernable impact on the area's transportation facilities. In addition, the LSER Area Plan includes several elements that generally work to reduce vehicle miles travelled (VMT):

- The LSER Area Plan amendments increase residential densities within walking distance of the area's mixed-use centers and corridors, which will allow more people to live close to services and to be able make shorter bike and pedestrian trips to meet more of their daily needs. The LSER Area Plan also supports transit ridership because the Plan's increases to residential densities are focused around transit corridors; and by the Plan's recommended transit service improvements, developed in coordination with TriMet's Forward Together plan, which will increase frequent service transit through the plan area and provide better connections to the area's centers, employment areas, and other local and citywide destinations. These changes will increase the utility of transit and help reduce the need for vehicle trips.
- The LSER Area Plan helps make walking and bicycling more attractive modes for short trips by recommending a range of transportation improvements focused on active transportation, in conjunction with land use amendments to allow for more neighborhood businesses and services within walking distance of plan area residents. The Plan's recommended transportation projects include a focus on improving safety for pedestrians and bicycles along busy corridors and an expanded system of

neighborhood greenways facilitating pedestrian and bicycle access to the area's centers, schools, parks, and natural areas. Recommended transportation improvements also support the role of the plan area's centers as places that prioritize pedestrian access, as well as access by bicycles and transit users. These recommended improvements will help enable residents to access to local destinations without having to be dependent on driving.

Therefore, the LSER Area Plan is consistent with these policies.

**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.

**265. Finding:** This policy directs the City to maintain accessible network of emergency response routes. This network is identified through street functional classifications in the Transportation System Plan. No changes to that network are being made with the LSER Area Plan. The LSER Area Plan includes a recommendation to add several bike and pedestrian circulation and street improvement projects to the TSP. Emergency vehicle access can be considered in project design. Therefore, the LSER Area Plan is consistent with this policy.

## 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.

**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.

266. **Finding:** Policies 9.41 through 9.44 provide policy direction related to Portland International Airport and are not relevant to the geography of the LSER Area Plan. 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.

267. **Finding:** Policies 9.45 and 9.46 address operations of the public street system and not planning and development. These policies do not apply.

**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 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 or 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.

268. **Finding:** The LSER Area Plan is consistent with this policy because the Plan's recommended transportation improvements, particularly the Plan's expanded network of neighborhood greenways, address the area's historic lack of complete pedestrian and bicycle infrastructure and will contribute to creating an interconnected transportation system to provide multimodal access to the area's centers and other local destinations. Therefore, the LSER Area Plan is consistent with this policy.

**Policy 9.48 Technology.** Encourage the use of emerging vehicle and parking technology to improve real-time management of the transportation network and to manage and allocate parking supply and demand.

**Policy 9.49 Performance measures.** Establish multimodal performance measures and measures of system completeness to evaluate and monitor the adequacy of transportation services based on performance measures in goals 9.A. through 9.I. Use these measures to evaluate overall system performance, inform corridor and area-specific plans and investments, identify project and program needs, evaluate and prioritize investments, and regulate development, institutional campus growth, zone changes, Comprehensive Plan Map amendments, and conditional uses.

**9.49.a.** Eliminate deaths and serious injuries for all who share Portland streets by 2025.

**9.49.b.** Maintain or decrease the number of peak period non-freight motor vehicle trips, system-wide and within each mobility corridor to reduce or manage congestion.

**9.49.c.** By 2035, reduce the number of miles Portlanders travel by car to 11 miles per day or less, on average.

**9.49.d.** Establish mode split targets in 2040 Growth Concept areas within the City, consistent with Metro's targets for these areas.

**9.49.e.** By 2035, increase the mode share of daily non-drive alone trips to 70 percent citywide, and to the following in the five pattern areas:



Pattern Area	2035 daily target mode share
Central City	85%
Inner Neighborhoods	70%
Western Neighborhoods	65%
Eastern Neighborhoods	65%
Industrial and River	55%

**9.49.f.** By 2035, 70 percent of commuters walk, bike, take transit, carpool, or work from home at approximately the following rates:

Mode	Mode Share
Walk	7.5%
Bicycle	25%
Transit	25%
Carpool	10%
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.i.** 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.

<b>Table 9-2: Oregon Metro Interim Deficiency Thresholds and Operating Standards</b>			
Location	Standards		
	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.

**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).

269. **Finding:** Policies 9.48 through 9.51 address the management of the City's transportation system in relation to certain performance measures incorporated into state, regional and local transportation plans. Conformance with these standards and OAR 660-0012-0060 was discussed above in findings responding to State Planning Goal 12, and are incorporated here by reference.

## 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.

270. **Finding:** Policies 9.52 through 9.54 provide direction regarding transportation demand management. The LSER Area Plan is consistent with these policies as the existing zoning code Chapter 33.266 applies transportation demand management requirements to multi-dwelling and mixed-use zones in locations close to frequent transit in projects with buildings with 10 or more units. This includes parts of the LSER Area Plan geography where zone changes to multi-dwelling or commercial/mixed use zones are being made.

## Parking management

**Policy 9.55. Parking management.** Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district vitality, vehicle miles traveled (VMT) reduction, and air quality. Implement strategies that reduce demand for new parking and private vehicle ownership, and that help maintain optimal parking occupancy and availability.

**Policy 9.56. Curb Zone.** Recognize that the Curb Zone is a public space, a physical and spatial asset that has value and cost. Evaluate whether, when, and where parking is the highest and best use of this public space in support of broad City policy goals and local land use context.

Establish thresholds to utilize parking management and pricing tools in areas with high parking demand to ensure adequate on-street parking supply during peak periods.

**Policy 9.57. On-street parking.** Manage parking and loading demand, supply, and operations in the public right of way to achieve mode share objectives, and to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand.

**Policy 9.58. Off-street parking.** Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.

**Policy 9.59. Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space.

**Policy 9.60. Cost and price.** Recognize the high public and private cost of parking by encouraging prices that reflect the cost of providing parking and balance demand and supply. Discourage employee and resident parking subsidies.

271. **Finding:** Policies 9.55 through 9.60 address parking. The City's existing parking regulations implement these policies by including maximum parking ratios, by not requiring off-street parking with most new development, by permitting and encouraging shared parking arrangements. The LSER Area Plan's transportation recommendations also help reduce the need for private vehicles and associated off-street parking spaces through transportation projects that make alternatives to car travel more feasible and attractive, such as recommended pedestrian and bicycle infrastructure improvements, as well as recommended transit improvements that have been incorporated into TriMet's Forward Together plan, which includes plans for two new frequent service transit lines through the plan area.

The Transportation Planning Rule points to the designation of residential on-street parking districts as a tool that local governments can use to reduce reliance on automobile trips (660-012-0045). Portland has had an Area Parking Permit Program in effect since 1981. In recent years, this program has expanded to include 17 zones with neighborhoods and businesses collaborating with PBOT to create the rules for their zone. Per City Council ordinance, the Area Parking Permit Program can impose a surcharge on parking permits. The money raised from the surcharge can then be used to fund Transportation Demand Management strategies that reduce automobile trips. This includes a Transportation Wallet program where participants can receive significantly reduced transit, bike share, and other mobility passes in exchange for forgoing an on-street parking permit. PBOT will continue to seek opportunities to work with neighborhoods to expand the Area Parking Permit Program to address areas where traffic and parking congestion are increasing. The LSER Area Plan area will be eligible to use these tools, as a more urban land use pattern emerges over time.

**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.

272. **Finding:** The existing zoning code contains bicycle parking requirements to implement this policy, which were updated in 2020 through a separate ordinance. These existing requirements will apply to the LSER Area Plan area.

## Finance, programs, and coordination

**Policy 9.62. Coordination.** Coordinate with state and federal agencies, local and regional governments, special districts, other City bureaus, and providers of transportation services when planning for, developing, and funding transportation facilities and services.

**Policy 9.63. New development impacts.** Prevent, reduce, and mitigate the impacts of new development and redevelopment on the transportation system. Utilize strategies including transportation and parking demand management, transportation system analysis, and system and local impact mitigation improvements and fees.

**Policy 9.64. Education and encouragement.** Create, maintain, and coordinate educational and encouragement programs that support multimodal transportation and that emphasize safety for all modes of transportation. Ensure that these programs are accessible to historically underserved 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.

273. **Finding:** Policies 9.62 through 9.67 primarily address the funding and management of the City's transportation system and not planning and development actions, and do not apply. The LSER Area Plan is consistent with Policy 9.62 because ODOT, TriMet, City bureaus, and educational districts participated in the LSER project's advisory group. Policy 9.63 addresses development impacts. The findings in response to Statewide Planning Goal 12 address this and are incorporated here by reference.

## 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 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.

274. **Finding:** Policies 9.68 and 9.69 address the management and regulation of automated vehicles in the right of way. There is no aspect of the LSER Area Plan that relates to this topic, therefore these policies are not applicable.

# 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.

275. **Finding:** The LSER Area Plan amendments revise the Comprehensive Plan and map, Zoning Map, and Zoning Code to effectively implement the provisions of the LSER Area Plan. The LSER Area Plan amendments are consistent with the policies in the 2035 Comprehensive Plan, as described in the findings throughout this report.

## 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.

276. **Finding:** The LSER Area Plan amendments apply land use designations to all land within the LSER Area Plan study area. In certain portions of the LSER Area Plan area, land use designations are updated to implement the plan objectives and advance the goals and policies of the 2035 Comprehensive Plan, as described in the findings throughout this report. Specific land use changes are proposed to advance the Comprehensive Plan Urban Design Framework and centers policies, by supporting and focusing urban levels of development in areas designated as centers and corridors.

## 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.

277. **Finding:** The LSER Area Plan amendments apply base zones to all properties within the town center area. Generally, the base zone applied is the zone that most closely corresponds to the land use designation. In one location within the plan area, a higher-density land use designation is applied, but an existing, less intense base zone is retained due to short-term obstacles to achieving the long-range land use.

### 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.

**10.3.d.** An amendment to a base zone consistent with the land use designation must be approved when it is found that current public services can support the uses allowed by the zone, or that public services can be made capable by the time the development is complete. The adequacy of services is based on the proposed use and development. If a specific use and development proposal is not submitted, services must be able to support the range of uses and development allowed by the zone. For the purposes of this requirement, services include water supply, sanitary sewage disposal, stormwater management, transportation, school district capacity (where a school facility plan exists), and police and fire protection.

**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.

278. **Finding:** The LSER Area Plan amendments apply base zones legislatively. The zones applied are corresponding zones, or zones that are allowed per Figure 10.1 of the Comprehensive Plan. As indicated in Finding for Policy 10.2, an existing allowed but non-corresponding zone is retained in one area where current constraints do not support the level of development associated with the corresponding zone.

**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:

- 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.

279. **Finding:** The only LSER Area Plan amendments to the Zoning Code are changes to the Civic and Neighborhood Corridors maps in Chapters 33.120 and 33.130. These Zoning Code map amendments bring consistency with the Plan's amendments to the Comprehensive Plan's Urban Design Framework, specifically the designation of two additional neighborhood corridors, to implement the Plan's Land Use Growth Concept.

# Part IV. Area-Specific Plans

As required by PCC 33.810.050.B and 2035 Comprehensive Plan Policy 1.19, the following area-specific plans provide additional policy direction that is relevant within the policy framework provided by the overall Comprehensive Plan. The following plans were analyzed for policies related to the LSER Area Plan amendments:

- Outer Southeast Community Plan (Ordinance 169763, effective 1996)
- Brentwood-Darlington Neighborhood Plan (Ordinance 165071, effective 1992)

**280. Finding:** The City Council has identified the following area-specific plan policies to be relevant to the LSER Area Plan amendments. City Council finds that the LSER Area Plan amendments affect only small portions of other area plans not included in these findings, and that compliance with the 2035 Comprehensive Plan supersedes any goals and policies in those area plans.

## Outer Southeast Community Plan

(Ordinance 169763, effective 1996)

### Economic Development Policy

Improve the vitality of outer southeast business districts and employment centers. Ensure that they grow to serve the needs of outer southeast residents, attract customers from throughout the region, and generate family wage jobs for residents.

**Objective 1.** Foster the revitalization of older business districts including Foster Road, 82nd Avenue, and the former downtowns of Lents and Montavilla.

**Objective 2.** Promote the reuse and redevelopment of vacant, underused, or dilapidated commercial sites on arterials along both sides of I-205.

**Objective 3.** Create up to 6,000 new jobs in the outer southeast area by encouraging development of commercial and industrial areas.

- a. Increase the range of uses allowed in portions of commercial strips that are likely to redevelop. This would include more light industrial uses with fewer restrictions on size.
- b. Maintain a supply of land on which uses can locate.
- c. Provide certainty for medical and education institutions, encouraging them to grow and foster related businesses nearby.
- d. Encourage the development of a regional center in the area from the Gateway Shopping Center to the Portland Adventist Medical Center.
- e. Encourage the development of the Lents Town Center at the I-205/Foster Road interchange.

**Objective 4.** Promote the retention and growth of existing businesses to increase the number of jobs they provide.

**281. Finding:** This policy addresses business districts and employment centers in the Outer Southeast Community Plan area, which includes the LSER plan area. Consistent with this policy, the LSER Area Plan amendments expand commercial/mixed-use zoning in the plan

area to enable the creation of a new neighborhood business district in the newly-designated Brentwood-Darlington Neighborhood Center and expands such zoning in smaller commercial hubs to support the vitality and growth of the area's neighborhood business districts to help meet the needs of the area's residents.

The Plan's amendments are also consistent with this policy by increasing employment capacity in the plan area by an estimated 120 jobs, which will support economic vitality and employment opportunities in the area. Furthermore, the Plan's rezones of BES-owned land near Johnson Creek to Open Space for the purposes of floodplain and habitat restoration will help reduce flood risk in nearby employment lands, supporting the viability and resilience of these employment areas. Also, consistent with Objective 4, the Plan's rezoning of properties around the intersection of SE Flavel and SE 82<sup>nd</sup> to commercial/mixed use will support the continuation and growth of the existing small businesses in this area, some of which are subject to limitations on their size or can be replaced by more auto-oriented uses under current employment zoning.

Therefore, the LSER Area Plan amendments are consistent with this policy.

## Transportation Policy

Ensure that streets in outer southeast form a network that provide for efficient travel throughout the community and to other parts of Portland and the region. Reduce congestion and pollution caused by the automobile by creating land use patterns that support transit, bike, and pedestrian travel.

**Objective 1.** Reduce the amount of automobile driving done by area residents by making it more convenient to use public transit.

- a. Increase housing densities within one-quarter mile of transit streets.
- b. Encourage a mix of multifamily housing and shopping opportunities in areas with good transit service.

**Objective 2.** Support better mass transit service by creating opportunities to develop higher density housing on or near streets with public-transit service or planned public transit service. Ensure that this housing blends in with that of surrounding residential areas.

**Objective 3.** Ensure that outer southeast residents have adequate public transportation to job sites.

**Objective 4.** Pursue and plan for high-capacity transit on I-205, with a Lents station.

**Objective 5.** Increase housing densities where streets cross I-205 to support development of a future high capacity transit facility such as a light-rail line or express bus service.

**Objective 6.** Keep through-traffic on freeways and arterials and off local streets.

**Objective 7.** Create through streets at frequent intervals.

**Objective 8.** Seek ways of providing connections for limited auto access and for full pedestrian and bike access when practical difficulties prevent full street improvements.

**Objective 9.** Ensure adequate truck access to industrial sites so that raw materials can be delivered and products shipped. However, keep truck traffic out of residential areas when possible.

282. **Finding.** This policy addresses transportation and land use patterns that are supportive of transit, bike, and pedestrian travel in the Outer Southeast Community Plan area. Consistent with this policy, the LSER Area Plan includes several elements that work to support travel by transit, biking, and walking, including:

- The LSER Area Plan increases residential densities within walking distance of the area's designated mixed-use centers, which increases the potential customer base for a wider range of commercial services to exist in these centers. This enables people to make shorter bike and pedestrian trips to meet more of their daily needs. The LSER Area Plan also supports transit ridership because the expanded commercial/mixed use and multi-dwelling zoning is focused along transit corridors and in and around centers served by transit, allowing for more residents to live close to transit. This is further supported by recommended transit service improvements, undertaken in coordination with TriMet's Forward Together service concept, that will expand frequent-service transit through the core of the LSER plan area and improve transit connections to local and citywide destinations.
- The LSER Area Plan recommends corridor improvements and an expanded neighborhood greenway system that will facilitate access by walking and bicycling to local destinations, supporting alternatives to driving trips. The Plan also includes recommendations for improvements to reduce cut-through traffic and calm traffic on local streets, consistent with objectives 6 and 8. These recommendations are described in Part 2 of the LSER Area Plan.
- Related to truck access, traffic modelling analysis was completed and the results show that growth associated with the LSER Area Plan zone changes will have no discernable impact on the area's transportation facilities, including the area's designated truck streets, and will not impact the ability of freight to access the plan area's industrial sites of business districts.

Therefore, the LSER Area Plan is consistent with this policy.

## Housing Policy

Provide a variety of housing choices for outer southeast community residents of all income levels by maintaining the existing sound housing stock and promoting new housing development.

**Objective 1.** Construct 14,000 new housing units in the Outer Southeast Community Plan area by 2015.

**Objective 2.** Stimulate production of new housing units by both private and nonprofit housing producers to accommodate expected population growth.

**Objective 3.** Increase opportunity for building more single-family housing in outer southeast neighborhoods.

**Objective 4.** Promote construction of attached housing designed to be owner-occupied to accommodate smaller households.

**Objective 5.** Increase opportunities for multifamily housing in areas convenient to shopping and transit.

**Objective 6.** Encourage property owners to maintain and improve their homes so that established neighborhoods remain stable and attractive.

**Objective 7.** Preserve and increase the supply of housing affordable to households below the median income.

- a. Rehabilitate at least 100 housing units a year owned or rented by those with limited incomes.
- b. Support community development corporations and other nonprofit housing providers.
- c. Preserve existing mobile home parks.

**Finding:** This policy addresses housing diversity, housing preservation, and expanding housing supply in the Outer Southeast Community Plan area. Consistent with this policy, the LSER Area Plan amendments expanding multi-dwelling and commercial/mixed-use zoning will increase the supply of a variety of housing types at a range of affordability levels. The LSER Area Plan's Zoning Map amendments are estimated to increase the capacity for residential household growth in the Lower Southeast Rising Plan Area by roughly 800 units. The zoning amendments provide more flexibility for a greater diversity of housing types and focus zoning for multifamily housing close to services and transit.

The LSER Area Plan amendments promote a diverse range of housing types affordable at a range of household income levels by extending multi-dwelling and mixed-use zoning in an area of Portland where single-dwelling zoning predominates. The multi-dwelling zoning being expanded in the plan area—the RM1 and RM2 zones—provide for a wide range of housing types, include attached houses, clusters of compact detached houses, plexes, courtyard housing, apartment buildings of a range of types and scales, modular housing, and live-work housing. In combination with these opportunities, multi-dwelling zone bonuses for moderate-income family housing and for barrier-free units encourage a range of housing types for households with a diversity of needs and abilities. Both ownership and rental housing is commonly built in the RM1 and RM2 multi-dwelling zones, including as attached and detached houses, which will contribute to expansion of both ownership and rental housing options in the plan area.

The LSER Area Plan amendments support the creation of new affordable housing by expanding where inclusionary housing provisions apply through expansion of the mapping of multi-dwelling and commercial/mixed-use zoning. The Plan's amendments expand the amount of multi-dwelling and commercial/mixed-use zoning, where inclusionary housing requirements apply, by over 93 acres. These Plan amendments expand opportunities for regulated affordable housing, providing housing stability for future low-income residents. The Plan contributes to the preservation of existing affordable housing by a zoning approach that avoids upzones in locations with existing unregulated low-cost apartments and manufactured home parks, in order to avoid adding to redevelopment pressures and contribute to housing stability for residents. The Plan also includes recommendations for community stabilization actions that include

identifying opportunity sites for affordable housing and encouraging development by affordable housing providers to increase the amount of regulated affordable housing in the plan area.

Therefore, the LSER Area Plan is consistent with this policy.

## Open Space and Environment Policy

Provide parks and open spaces to meet projected recreational needs of outer southeast residents. Create a sense of connection with the natural environment. Protect natural resources by reducing the impact of development on them.

**Objective 1.** Acquire new parks and open spaces and build new community centers to meet the recreational needs of current and future residents.

**Objective 2.** Reinforce Johnson Creek, the Boring Lava Hills, and Kelly Butte as significant natural and scenic resources.

**Objective 3.** Improve access to sites for recreational and open space opportunities, especially in the riparian areas of the Johnson Creek corridor.

**Objective 4.** Establish network of bicycle and pedestrian connections between outer southeast's parks, open spaces, and the Springwater Corridor.

**Objective 5.** Ensure convenient and safe access from residential areas to neighborhood parks.

**Objective 6.** Protect and enhance the Springwater Corridor as a recreational trail.

**Objective 7.** Protect and improve water quality within the Johnson Creek Basin.

- Improve flood plain management.
- Encourage responsible flood plain development.

**Objective 8.** Maintain Johnson Creek and all related waterways in as natural condition as possible.

**Objective 9.** Improve the appearance and livability of outer southeast neighborhoods.

283. **Finding:** This policy addresses parks, open space, and natural areas in the Outer Southeast Community Plan area. The majority of the LSER plan area is located within the Johnson Creek Watershed. The LSER Area Plan includes amendments are consistent with this policy, especially objectives related to Johnson Creek and access to parks and opens spaces. The Plan's amendments include Comprehensive Plan Map and Zoning Map amendments that rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and provide habitat, and will contribute to broader efforts to restore the floodplain and habitat functions of Johnson Creek and its watershed.

BES acquired these properties because of their value as natural infrastructure due to their proximity to Johnson Creek as well as their value as floodplain and riparian buffer areas. Johnson Creek is an important component of the stormwater conveyance system in this area of southeast Portland. Runoff from development and streets flows overland or through pipes into Johnson Creek, which acts as the natural stormwater conveyance in this area. Due

to the area's flat topography, there are ongoing flooding issues in the areas where these properties are located. BES invests in floodplain restoration to reduce the impacts of frequent flooding on community members, their properties, and the streets they use. Management and restoration of these properties as natural areas helps preserve important floodplain areas, helping to reduce impacts of flooding.

The vegetated riparian buffers along Johnson Creek provide important ecological and stormwater functions to the watershed and surrounding neighborhoods, which the zone changes to Open Space will support. Riparian areas absorb, intercept, and store stormwater, thus helping to reduce downstream flooding; facilitate chemical cycling, which contributes to water quality improvements; trap and transport sediments; alter or absorb pollutants; provide essential habitat for plants and animals; and strongly influence the health of downstream waterbodies. BES has a regulatory obligation on behalf of the City to protect the water quality of Johnson Creek, which includes preventing pollutants in stormwater from entering the creek. Management and restoration of these properties as natural areas, facilitated by the Plan's mapping amendments, helps support these responsibilities and regulatory obligations.

In addition to expanded Open Space zoning around Johnson Creek, the Plan also includes recommended transportation projects, including an expanded network of neighborhood greenways, that will improve pedestrian and bicycle connections to Johnson Creek, the Springwater Corridor Trail, and the plan area's other parks and open spaces.

Therefore, the LSER Area Plan is consistent with this policy.

## Urban Design Policy

Foster a sense of place and identity for the Outer Southeast Community Plan area by reinforcing existing character-giving elements and encouraging the emergence of new ones as envisioned in the Vision Plan.

**Objective 1.** Establish a high profile "regional center" in the area from Gateway to the Portland Adventist Medical Center with an infrastructure that is supportive of high-intensity development for living, working, and recreating.

**Objective 2.** Establish a "town center" at Lents. Promote mixed-use development with a streetscape that provides pedestrian amenities. Reinforce the existing pedestrian district at Lents.

**Objective 3.** Encourage Eastport Plaza, Gateway Shopping Center, Mall 205, and the commercial nodes at 122nd and Stark and 122nd and Division to establish focal points and village squares within their boundaries.

**Objective 4.** Promote "main street" development on portions of Foster Road, Glisan Street, and Woodstock Boulevard, on Division and Stark Streets, and 82nd and 122nd Avenues. Locate buildings with entrances off the sidewalk. Encourage sidewalk cafes, display windows, benches, street trees, awnings, small scale signs that are directed to the pedestrians, and on-street parking. (See Vision Plan Map)



**Objective 5.** Protect the natural and scenic resources of Johnson Creek, Powell and Kelly Buttes, and Mt. Scott. Reinforce the Springwater Corridor. These features serve as important edges in the Outer Southeast Community Plan area.

**Objective 6.** Embrace urban design proposals as put forth in each Outer Southeast Community Neighborhood Plan.

**Objective 7.** Promote a street network which reinforces the unique character of each subarea (See Subarea Introduction).

**284. Finding.** This policy addresses urban design in the Outer Southeast Community Plan area. Consistent with Objective 4 of this policy, LSER amendments expanding commercial/mixed-use zoning along area corridors, such as on SE 82<sup>nd</sup> around Flavel, and along portions of SE 72<sup>nd</sup> and SE 52<sup>nd</sup>, will support the creation of main street commercial areas with design features supportive of pedestrian activity, such as ground-floor windows, street-oriented entrances, street trees, and uses such as retail, restaurants, cafes, and other neighborhood businesses. Furthermore, the Plan's application of the Centers Main Street Plan Overlay Zone (m-overlay) to the core commercial areas at SE Flavel and SE 72<sup>nd</sup> and at SE 82<sup>nd</sup> will bring regulatory design standards that further support a pedestrian-oriented street environment, such as ground-floor active uses, larger amounts of ground-floor windows, and limitations on front parking lots. Plan amendments also provide zoning that increases housing opportunities at the western edge of the Lents Town Center, which will allow more people to live close to the town center, and support its businesses the viability of the town center, consistent with Objective 2 of this policy.

Consistent with Objective 5 of this policy, Plan amendments rezone 6.5 acres of land to Open Space that are along or close to Johnson Creek that are owned by BES. These zone changes will facilitate BES's work in undertaking habitat and floodplain restoration on the properties to help manage flooding and provide habitat, while also supporting the scenic and natural resources of Johnson Creek and the Springwater Corridor.

Also consistent with this policy, the Plan's transportation recommendations will expand the plan area's network of neighborhood greenways, utilizing and enhancing the role of the area's street network in providing pedestrian and bicycle connections to the area's parks, schools, open spaces, businesses and other local destinations; reinforcing the role of these street connections as part of the design, spatial organization, and character of the plan area.

Therefore, the LSER Area Plan is consistent with this policy.

## Public Safety Policy

Apply CPTED principles to both public and private development projects. Encourage land use arrangements and street patterns that provide more eyes on the street. Encourage site layouts and building designs that encourage proprietary attitudes and natural surveillance over shared and public spaces.

**Objective 1.** Promote a mix of development and uses at focal points and attractions that provide round-the-clock surveillance.

**Objective 2.** Encourage building designs that restrict access to areas vulnerable to crime such as building entrances, sidewalks, parking lots, and loading and delivery areas. The following are examples of how to carry out this idea.

- a. Provide opportunities for retail uses on the ground floor perimeter of the building adjacent to public areas. Encourage sidewalk cafes and coffee shops with windows overlooking sidewalks and parking lots.
- b. Locate windows in building walls that abut such public areas as sidewalks, plaza, parks, and parking lots.
- c. Situate windows so that building users can easily watch over sidewalks, parking, and entrances. This will also make it easier to watch activities inside and facilitate police patrol.
- d. Locate and design entrances so that they can be watched from both the street and from inside the building.
- e. Control access to loading and delivery areas, unless these areas can be easily watched from either inside the building, the street, or both.
- f. Situate areas intended for exterior activities, displays, products and produce so that they can be easily watched from inside the building and from the street.
- g. Illuminate walkways so that they can be easily seen from both the street and inside the building.

**Objective 3.** Encourage development of new detached and attached residences with porches, balconies, and windows that overlook the street. Set the garage back from the front of the building.

**Objective 4.** Keep the Springwater Corridor visible from surrounding commercial, industrial, and residential areas to increase the safety of those using the trail. Discourage landscaping such as continuous rows of conifers that would block the view of the corridor.

**Objective 5.** Encourage the construction of streets that connect in undeveloped or underdeveloped parts of the plan area to facilitate the movement of police and fire emergency vehicles throughout the area.

**Objective 6.** Promote connections that provide for pedestrians, bicycles, and motorized vehicles. Avoid pedestrian-only connections in order to enhance surveillance over sidewalks.

**Finding.** This policy addresses public safety in the Outer Southeast Community Plan area, with a focus on CPTED (Crime Prevention Through Environmental Design) principles. Consistent with this policy, the LSER Area Plan amendments expand commercial/mixed-use zoning at key locations, such as in the newly-designated Brentwood-Darlington Neighborhood Center, smaller commercial hubs along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors, and around the Arleta Triangle. The increased development this zoning will allow for, including the additional activity generated by commercial uses, and associated design standards for features such as ground-floor windows and street-oriented doors and window, will bring additional opportunities for informal surveillance, consistent with this policy. Furthermore, the Plan's expanded multi-dwelling zoning will be accompanied by multi-dwelling zone development standards for design features that support informal surveillance, such as street-oriented doors and windows and limitations on front garages. Also, the Plan's

expansion of multi-dwelling zoning along the SE 52<sup>nd</sup> and SE 72<sup>nd</sup> corridors provides allowances for ground-floor commercial uses fronting onto corridor sidewalks, further supporting passive surveillance of streets and sidewalks and facilitating “eyes on the street” along the area’s major corridors. The additional development opportunities provided by the Plan’s amendments can also increase opportunities for creating new street connections, consistent with Objective 6.

Therefore, the LSER Area Plan is consistent with this policy.

### Subarea Policy I – Traditional Urban Neighborhoods

Preserve the fabric of these traditional residential neighborhoods and streetcar era commercial districts. Promote construction of new housing on or near transit streets and "Main Street" development on portions of Foster Road, Stark, and Glisan Streets. Encourage infill development.

**Objective 1.** Encourage "Main Street" development on Foster Road between Holgate and 72nd Avenues, Stark Street between 78th and 82nd Avenues, and Glisan Street between 68th and 80th.

**Objective 2.** Provide opportunities for businesses to expand by extending the depth of business zoning along Foster Road.

**Objective 3.** Create opportunities for new multifamily housing along streets with transit service.

**Objective 4.** Encourage compatible infill at densities which support transit on vacant lots in established residential areas.

285. **Finding.** This policy addresses traditional neighborhoods in the Outer Southeast Community Plan area. The LSER plan area is located within the traditional neighborhoods geography as shown in the Outer Southeast Community Plan. Consistent with this policy, the LSER Area Plan expands multi-dwelling zoning and opportunities for new multifamily housing along the area’s transit streets, such as SE Woodstock, SE 52<sup>nd</sup>, and SE 72<sup>nd</sup>. The Plan’s amendments also encourage main street type development along the area’s corridors by expanding commercial/mixed-use zoning along portions of SE 52<sup>nd</sup>, SE 72<sup>nd</sup>, and SE 82nd, which will require development to include features typical of main street development, such as ground-floor windows, street-oriented entrances, street trees; and allow uses typical of main street commercial districts such as retail, restaurants, cafes, and other neighborhood businesses. Also consistent with this policy, Plan amendments address compatibility with existing residential scale in that the majority of the multi-dwelling zone expansion is to RM1 zoning, which is intended to be compatible with lower-density residential areas and provides for a similar scale of development to single-dwelling residential zones and requires features such as front setbacks and yards that are similar to the single-dwelling zones that predominate in the area. Therefore, this policy is met.

## Brentwood-Darlington Neighborhood Plan

(Ordinance 165071, effective 1992)

### Policy 1: Neighborhood Identity

Strengthen the identity of Brentwood-Darlington and enhance its desirability as a place to live and work.

**Objective 1.** Increase the number and variety of social and cultural events and activities in the neighborhood and publicize them.

**Objective 2.** Support programs and policies which will promote, retain and manage Brentwood-Darlington's historic and natural resources.

**Objective 3.** Market Brentwood-Darlington as a business location and as a place to live and work.

286. **Finding.** Consistent with this policy, the LSER Area Plan amendments contribute to strengthening the identify of Brentwood-Darlington. The Plan's designation of the Brentwood-Darlington Neighborhood Center and zoning to support the creation of a main street commercial district along SE 72<sup>nd</sup> will allow for this center to become a hub of services and activity for the Brentwood-Darlington Neighborhood, reinforcing the role of existing community anchors in this new center, such as Whitman Elementary School and Flavel Park, and adding to the neighborhood's distinct identity. The Plan's expansion of commercial/mixed-use zoning around smaller existing neighborhood commercial hubs, such as along SE 52<sup>nd</sup> and zoning providing expanded housing options close to these commercial areas and to community services, together with the Plan's recommended transportation projects to make it easier for people to walk and bicycle to neighborhood destinations, will support Brentwood-Darlington's desirability as a place to work and live, consistent with this policy. Therefore, this policy is met.

### Policy 2: Livability and Safety

Foster a diverse, stable and safe community

**Objective 1.** Make the neighborhood a place where people of all races. ethnic groups and religions can live without fear of prejudice.

**Objective 2.** Improve the physical environment of the neighborhood.

**Objective 3.** Reduce crime in the neighborhood by expanding and participating in crime prevention programs and neighborhood association efforts.

**Objective 4.** Improve the neighborhood's pedestrian environment and create a pedestrian system.

**Objective 5.** Establish and promote medical facilities and social services which serve the local community in a cost-efficient manner.

**Objective 6.** Ensure that quality levels of fire protection and emergency medical services are maintained and make fire prevention and life safety a neighborhood priority.

287. **Finding:** The LSER Area Plan’s amendments are consistent with this policy in a number of ways. One way the LSER Area Plan helps support a diverse community is through a zoning approach that avoids increasing zoning entitlements to locations with existing unregulated low-cost housing and manufactured home parks to avoid adding to redevelopment pressures, as part of a broader effort to support housing stability for the area’s lower-income residents, including people of color. The LSER Area Plan also contributes to opportunities for low-income households to live in the area by expanding where inclusionary housing regulations apply through expanding mapping of multi-dwelling and mixed-use zoning. The Plan’s expanded mapping of multi-dwelling zoning also supports housing for a diversity of household types through the wide range of housing types allowed in those zones, and through the regulatory incentives they provide for moderate-income family housing and for visitable or accessible units that expand housing options for people with mobility limitations, including older adults and people with disabilities. Consistent with Objective 4, the Plan’s recommended transportation projects include a focus on improving the area’s pedestrian environment through projects to improve safety along busy corridors, and through an expanded system of neighborhood greenways providing safe pedestrian and bicycle connections to the area’s schools, parks, businesses, natural areas, and other local destinations. Related to Objective 5, the Plan’s expansion of commercial/mixed use zoning will provide more opportunities to locate medical facilities and social services in the area. Therefore, the LSER Area Plan is consistent with this policy.

### **Policy 3: Education, Recreation and Culture**

Promote educational, recreational and cultural opportunities and make Brentwood-Darlington citizens aware of them.

**Objective 1.** Develop parks on publicly-owned land and support development of other recreational and cultural opportunities.

**Objective 2.** Promote development of a multipurpose community center.

**Objective 3.** Provide an atmosphere of academic excellence, open lines of communication and a safe environment in neighborhood schools and encourage parent involvement and home environments that support learning.

**Objective 4.** Support and promote safe, high-quality and affordable childcare that is accessible to Brentwood-Darlington residents.

288. **Finding.** The LSER Area Plan is supportive of this policy, particularly Objective 1, by expanding publicly-owned open space through rezoning BES-owned land near Johnson Creek to Open Space, to be used for habitat restoration and to expand natural area around the creek. The Plan’s transportation recommendations expanding the area’s system of neighborhood greenways also support this policy by improving pedestrian and bicycle access to the area’s schools, parks, natural areas, and to the nearby Mt. Scott Community Center and the many recreational opportunities it provides. The Plan also includes recommended future actions to support an expanded role for the Brentwood-Darlington Community Center as a hub for the community. Therefore, the LSER Area Plan is consistent with this policy.

#### **Policy 4: Housing**

Preserve and improve existing housing while providing opportunities for new housing for people of all ages and income levels.

**Objective 1.** Maintain and improve owner-occupied and rental housing.

**Objective 2.** Promote new housing development on vacant properties.

**Objective 3.** Support multifamily development only where services are available and adequate.

**Objective 4.** Support nonprofit efforts to rehabilitate and/or build housing in Brentwood-Darlington.

**Finding.** The LSER Area Plan amendments are consistent with this policy in a number of ways. The Plan contributes to the preservation of existing affordable housing by a zoning approach that avoids upzones in locations with existing unregulated low-cost apartments and manufactured home parks, in order to avoid adding to redevelopment pressures and contribute to housing stability for residents. The Plan also includes recommendations for community stabilization actions that include identifying opportunity sites for affordable housing and encouraging development by affordable housing providers to increase the amount of regulated affordable housing in the plan area. The Plan also addresses the stability and continuation of existing housing by limiting zone changes to the area's centers and corridors, leaving the majority of the area's zoning (71%) in single-dwelling zones. Analysis undertaken as part of the LSER project's Economic Analysis Background Report found that the majority of development allowed by the Plan's zone changes will likely take place on vacant properties, and will not increase the rate of redevelopment of existing residential properties beyond what is taking place with existing single-dwelling zoning. The Plan's expansion of multi-dwelling and commercial/mixed-use zoning will also increase the supply of a variety of housing types at a range of affordability levels, and will expand incentives and requirements for providing affordable housing units, as well as the availability of development incentives for moderate-income family housing and barrier-free housing accessible to people of a range of ages and abilities.

Consistent with Objective 3, the Plan's expansion of multi-dwelling zoning is focused in and around mixed-use centers and along transit corridors, so that residents can live close to commercial services and transit. Related to adequacy of City infrastructure to support the zone changes, a growth analysis undertaken for the plan area based on the Plan's expanded multi-dwelling and commercial/mixed-use zoning estimated that the zone changes will result in approximately 76 additional housing units and 31 additional jobs in the plan area by 2045. City infrastructure bureaus provided assessments of the adequacy of infrastructure to accommodate the additional housing units and jobs by 2045 associated with the LSER Area Plan zone changes, summarized below.

##### Sanitary Sewer and Stormwater

The Bureau of Environmental Services (BES) assessed sanitary sewer service and stormwater facilities in the plan area and determined that existing infrastructure was generally adequate to accommodate the additional housing and jobs associated with the LSER zone changes.

### Water

The Water Bureau assessed the increase in water demand that would result from the LSER zone changes and existing infrastructure conditions and concluded that no water system modifications are needed to meet water demands for any of the proposed zoning modifications.

### Transportation

As described in findings for the Statewide Planning Goal 12, PBOT staff undertook a traffic modelling analysis for the growth associated with the zone changes, and the results show that the LSER Area Plan is maintaining acceptable levels of mobility within the plan area and that the uses associated with the zoning map changes will have no discernable impact on the area's transportation facilities, which are capable of accommodating the small number of additional vehicle trips associated with the zone changes.

Therefore, the LSER Area Plan is consistent with this policy.

### **Policy 5: Land Use**

Maintain and improve the predominantly residential character of Brentwood-Darlington while promoting compatibility among the residential, commercial and industrial land uses of the neighborhood.

**Objective 1.** Preserve the predominantly single-family areas of the neighborhood while allowing multifamily, commercial and industrial zoning at appropriate locations.

**Objective 2.** Create effective buffers, such as setbacks and landscaping between commercial or industrial and residential uses.

289. **Finding:** The LSER Area Plan is consistent with this policy as its Comprehensive Plan Map and Zoning Map amendments direct most growth to the area's designated centers and corridors, including the newly-designated Brentwood-Darlington Neighborhood Center. The Brentwood-Darlington Neighborhood Plan Concept Map, which accompanies Policy 5, identifies the SE 72nd and Flavel area as a "Mixed-Use Activity Center," which the new neighborhood center will help implement. Outside these areas, the Plan supports the continuation of the scale and characteristics of most of the area's lower-density neighborhoods, with 71% of plan area zoning remaining single-dwelling. Also, the majority of rezones from single-dwelling zoning is to the small-scale RM1 multi-dwelling zone, which is intended to be compatible with single-dwelling areas and limits development scale to be similar to that of single-dwelling zones (for example, the majority of rezones from single-dwelling zoning involves changes from R2.5 to RM1 zoning, both of which zones limit building height to 35 feet). Also consistent with this policy, the Plan amendments retain the Buffer Overlay Zone that applies between employment and residential areas, which requires setbacks and landscaping and limits exterior activities to limit impacts to residential areas. Also, the expanded commercial/mixed-use zoning will require setbacks with screening vegetation adjacent to residential zones, as well as step-downs in building scale adjacent to lower-density residential zones. Therefore, the LSER Area Plan is consistent with this policy.

### **Policy 6: Business and Industry**

Support the retention and expansion of existing businesses and encourage new commercial uses when compatible with the surrounding neighborhood.

**Objective 1.** Rehabilitate and upgrade existing commercial development in commercially zoned areas. These areas are: SE 52nd and SE Flavel, SE 72<sup>nd</sup> Avenue and SE Flavel Street, SE 82<sup>nd</sup> Avenue and SE Flavel Street, SE 82<sup>nd</sup> Avenue, and certain areas along SE 52nd Avenue.

**Objective 2.** Attract businesses that enhance the neighborhood and provide needed goods and services to local residents.

**Objective 3.** Support existing and new businesses as a way to increase employment opportunities in the neighborhood.

**Objective 4.** Encourage new industrial uses that are compatible with the neighborhood and retain low-impact industrial uses.

**Objective 5.** Maintain open channels of communication between neighborhood residents and businesses.

**290.Finding:** Consistent with this policy, the LSER Area Plan amendments expand commercial/mixed-use zoning in the plan area, including within the newly-designated Brentwood-Darlington Neighborhood Center and in smaller commercial hubs. These zoning changes will support the ability of existing business to expand, as well as provide opportunities for new business. The locations of the expanded commercial zoning are in the areas identified in Objective 1, including portions of SE 52<sup>nd</sup> and SE 72<sup>nd</sup>, and along SE 82<sup>nd</sup> near SE Flavel. The zone changes on SE 82<sup>nd</sup> involve a change from employment (EG1) to commercial/mixed-use (CM2), in a location where the existing uses are mostly retail and service businesses. The Plan's rezoning of properties in this location to commercial/mixed use will support the continuation and growth of the existing small businesses in this area, some of which are subject to limitations on their size or can be replaced by more auto-oriented uses under current employment zoning. Furthermore, the Plan's application of multi-dwelling zoning along portions of the SE 72<sup>nd</sup> corridor, currently zoned single-dwelling, will allow for small ground-floor commercial uses, which will allow for the existing home-based businesses along this corridor to expand and accommodate more customers, while limitations on the size of commercial spaces and limits on exterior activity will support compatibility with nearby residential areas. Compatibility with residential areas is also supported by the building height limits of the CM1 and CM2 commercial/mixed use zones that are being applied in the area, which allow three- to four-story buildings that are only a small increment taller than the three-story buildings allowed in the area's predominant residential zones. Compatibility is also supported by these zones' requirements for landscaped setbacks, screening, and building height step-downs adjacent to residential zones.

The Plan's amendments are also consistent with this policy by increasing employment capacity in the plan area by an estimated 120 jobs, which will support economic vitality and employment opportunities in the area. Also, the Plan's Community Stabilization section includes recommended actions for community-based economic development approaches to



support the retention and expansion of existing small businesses, and support new businesses.

Therefore, the LSER Area Plan amendments are consistent with this policy.

### **Policy 7: Traffic and Transportation**

Support a system of streets that is efficient, safe and affordable while minimizing the impact of traffic on residential areas and business operations.

**Objective 1.** Provide affordable street improvements at levels appropriate to their function and in coordination with other public improvements.

**Objective 2.** Ensure the safe functioning of all streets in the neighborhood.

**Objective 3.** Minimize the impact of through traffic (traffic that originates outside the neighborhood or adjacent neighborhoods) on local residential and neighborhood collector streets.

**Objective 4.** Improve and maintain transit service and increase transit use.

**Objective 5.** Encourage bicycling and walking for everyday and recreational trips.

**Objective 6.** Improve streets in the vicinity of Harney Park so that Phase 2 of the park can be completed.

**291. Finding:** The LSER Area Plan includes several elements that support this policy, including:

- The LSER Area Plan includes a broad range of recommended transportation projects to improve the safety and function of the neighborhood's streets and transportation system. These include recommends safety improvements along the neighborhood's major corridors, including enhanced crossings and sidewalk infill; and an expanded neighborhood greenway system that will facilitate access by walking and bicycling to local destinations. The streets identified for improvement as neighborhood greenways include streets providing access to Harney Park, consistent with Objective 6, as well as streets providing connections to other neighborhood parks.
- The Plan also includes recommendations for improvements to reduce cut-through traffic and calm traffic on local streets, consistent with Objective 3. These and the other transportation recommendations are described in Part 2 of the LSER Area Plan.
- The Plan also includes recommended transit service improvements, undertaken in coordination with TriMet's Forward Together service concept, that will expand frequent-service transit through the Brentwood-Darlington neighborhood and improve transit connections to local and citywide destinations, consistent with Objective 4.

Therefore, the LSER Area Plan is consistent with this policy.

# Part V. Comprehensive Plan and Zoning Code Text Amendment Criteria

## 33.810.050 Approval Criteria [Comprehensive Plan Map Amendments]

**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.

292. **Finding:** The LSER Area Plan Land Use Growth Concept has been refined and translated into both a Comprehensive Plan Map and a Zoning Map. The changes to the Comprehensive Plan and Zoning maps proposed includes areas where:

- The Zoning Map and the Comprehensive Plan Map designations are both proposed to change
- The Zoning Map designation will stay the same but the Comprehensive Plan Map designation is proposed to change to a higher designation.

Upon the effective date of the LSER Area Plan, both the citywide 2035 Comprehensive Plan Map and the Zoning Map will be updated and modified to integrate the newly adopted land use designations for the LSER plan area.

See LSER Area Plan Part 1 for simplified and annotated maps of what map designations are proposed to change within the town center boundary area.

The City Council interprets that this criterion requires the LSER Area Plan amendments to show consistency on balance. The City Council has applied all applicable policies and the findings in this exhibit demonstrate how the LSER Area Plan amendments to the 2035 Comprehensive Plan Map are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, the Statewide Planning Goals, and relevant area plans.

## 33.835.040 Approval Criteria [Goal, Policy, and Regulation Amendments]

**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.

293. **Finding:** The LSER Area Plan amendments do not include any amendments to the text of the zoning code. The only LSER Area Plan amendments to the zoning code are changes to the Civic and Neighborhood Corridors maps in Chapters 33.120 and 33.130 of the zoning code. These zoning code map amendments bring consistency with the Plan’s amendments to the Comprehensive Plan’s Urban Design Framework, specifically the designation of two

additional neighborhood corridors to implement the Plan's Land Use Growth Concept. Furthermore, the findings in this exhibit demonstrate how the LSER Area Plan amendments are consistent with the 2035 Comprehensive Plan, the Urban Growth Management Functional Plan, and the Statewide Planning Goals. Therefore, the LSER Area Plan zoning code amendments are consistent with this policy.

### 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.

294. **Finding.** The LSER Area Plan Land Use Growth Concept has been refined and translated into both a Comprehensive Plan Map and a Zoning Map. The changes to the Comprehensive Plan and Zoning maps proposed includes areas where:

- The Zoning Map and the Comprehensive Plan Map designations are both proposed to change
- The Zoning Map designation will stay the same but the Comprehensive Plan Map designation is proposed to change to a higher designation.

Upon the effective date of the LSER Area Plan, both the citywide 2035 Comprehensive Plan Map and the Zoning Map will be updated and modified to integrate the newly adopted land use designations for the LSER plan area.

See LSER Area Plan Part 1, pages 48-62, for simplified and annotated maps of what map designations are proposed to change within the plan area.

All LSER Area Plan Zoning Map amendments reflect and align with amendments to the 2035 Comprehensive Plan Map and are therefore consistent with that 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.

295. **Finding.** The LSER Area Plan amendments expand the areas mapped for mixed use and multi dwelling zoning. Based on the proposed zoning map amendments, a growth analysis undertaken for the plan area estimated that the zone changes will result in approximately 76 additional housing units and 31 additional jobs in the plan area by 2045. The infrastructure bureaus provided assessments regarding existing infrastructure and determined that there are adequate services for all the LSER Area Plan’s map amendments, summarized below.

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.

#### Water

The Water Bureau assessed the increase in water demand that would result from the LSER zone changes and existing infrastructure conditions and concluded existing infrastructure is capable of supporting the uses allowed by zoning map amendments and that no water system modifications are needed to meet water demands for any of the proposed zoning map amendments.

#### Police and Fire Protection

The Police and Fire Bureaus have not established any specific or quantifiable levels of service for new development.

As noted in the findings above, the LSER Area Plan amendments are consistent with Statewide Planning Goal 11 (Public Facilities and Services) and the applicable 2035 Comprehensive Plan policies in Chapter 8 (Public Facilities and Services) and the findings in response to those goals and policies are incorporated by reference. Therefore, the public services for water supply, and capacity, and police and fire protection are capable of supporting the proposed changes to zoning in the LSER plan area.

- 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.

#### 296. **Finding.** Sanitary Sewer and Stormwater

The Bureau of Environmental Services (BES) assessed sanitary sewer service and stormwater facilities in the plan area and determined that existing infrastructure was generally adequate to accommodate the additional housing and jobs associated with the LSER zoning map changes.

- 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.

297. **Finding.** As described in findings for the Statewide Planning Goal 12, traffic modelling analysis was completed, and the results show that the LSER Area Plan is maintaining acceptable levels of mobility within the plan area and that the uses associated with the zoning map changes will have no discernable impact on the area's transportation facilities.

- 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.

298. **Finding.** This criterion does not apply as the LSER Area Plan is not located within a school district that has an adopted school facility plan that has been acknowledged by the City of Portland. Nonetheless, it is appropriate to note that Portland Public Schools (PPS) reviewed the LSER Area Plan Comprehensive Plan amendments and did not have concerns about the overall enrollment capacity changes that would be associated with them in the plan area.

3. Services to a site that is requesting rezoning to IR Institutional Residential, will be considered adequate if the development proposed is mitigated through an approved impact mitigation plan or conditional use master plan for the institution.

299. **Finding.** The LSER Area Plan does not change any site to IR. This subsection does not apply.

**C. When the requested zone is IR, Institutional Residential.** In addition to the criteria listed in subsections A. and B. of this Section, a site being rezoned to IR, Institutional Residential must be under the control of an institution that is a participant in an approved impact mitigation plan or conditional use master plan that includes the site. A site will be considered under an institution's control when it is owned by the institution or when the institution holds a lease for use of the site that covers the next 20 years or more.

**D. When the requested zone change is CI1 or CI2.** When the requested zone change is CI1 or CI2, a Transportation Impact Review is required as part of the zoning map amendment.

300. **Finding.** For subsections C. and D., the LSER Area Plan does not change any site to IR, CI1, or CI2. These subsections do not apply.

**E. Location.** The site must be within the City's boundary of incorporation. See Section 33.855.080.

301. **Finding.** All sites being rezoned by the LSER Area Plan are located within the City's boundary of incorporation.