

Moore-Love, Karla

From: Stein, Deborah
Sent: Wednesday, May 18, 2016 6:27 PM
To: Elmore-Trummer, Camille; Adamsick, Claire; Bhatt, Pooja; Grumm, Matt; Dunphy, Jamie; Shriver, Katie
Cc: Engstrom, Eric; Anderson, Susan; Zehnder, Joe; Stockton, Marty; Moore-Love, Karla
Subject: Reconsideration of Amendment #S12
Attachments: 17thInsley_memo_5_19_16.doc; AmendmentS12_revisited1.pdf; AmendmentS12revisited2.pdf

Attached is a memo and two maps with a proposal for City Council to consider tomorrow regarding Amendment S12 (otherwise known as SE17th and Insley). I propose that this amendment be revisited tomorrow for the reasons outlined in the brief memo. Please let me know if you have any questions!

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MEMO

DATE: May 18, 2016

TO: Portland City Council

FROM: Deborah Stein, Principal Planner

CC: Susan Anderson, Director; Joe Zehnder, Chief Planner; Eric Engstrom, Principal Planner

SUBJECT: Comprehensive Plan Map Amendment #S12

Last Thursday, Council reaffirmed a decision made the previous day for Comprehensive Plan Map Amendment #S12 (SE 17th and SE Insley). Immediately prior to your original vote on May 11, you asked what the Comprehensive Plan Map designation would be if Council were to reaffirm the Planning and Sustainability Commission's recommendation. I incorrectly replied "R1," when in fact it would be a combination of R1 and R2.5. The next day, staff provided a correction and Council reaffirmed the earlier vote to deny the requested amendment to apply RH.

After talking with staff from your offices following the vote on Thursday, I have learned that some of you voted based on an understanding that a vote consistent with the PSC's recommendation would not render any properties nonconforming. This is not the case: applying R2.5 in the two block area subject to Amendment #S12 would result in four properties being nonconforming, based on what is built today (or in one case, what is currently under permit to be built).

To acknowledge and address this misunderstanding, staff would like to bring this item back before City Council one more time for another vote. Staff proposes that you consider the following revised motion:

1. Deny amendment S12 to change the area to RH;
2. Apply R1 to four properties (shown on the attached map) to avoid these properties being nonconforming;
3. Reaffirm your previous vote to apply R2.5 to all other properties within the two block area bounded by SE Milwaukie; SE Harold; SE Reedway and SE 17th; and
4. Reaffirm your previous vote to apply R1 to the remainder of properties within the area covered by Amendment S12.

I would be happy to answer any questions.



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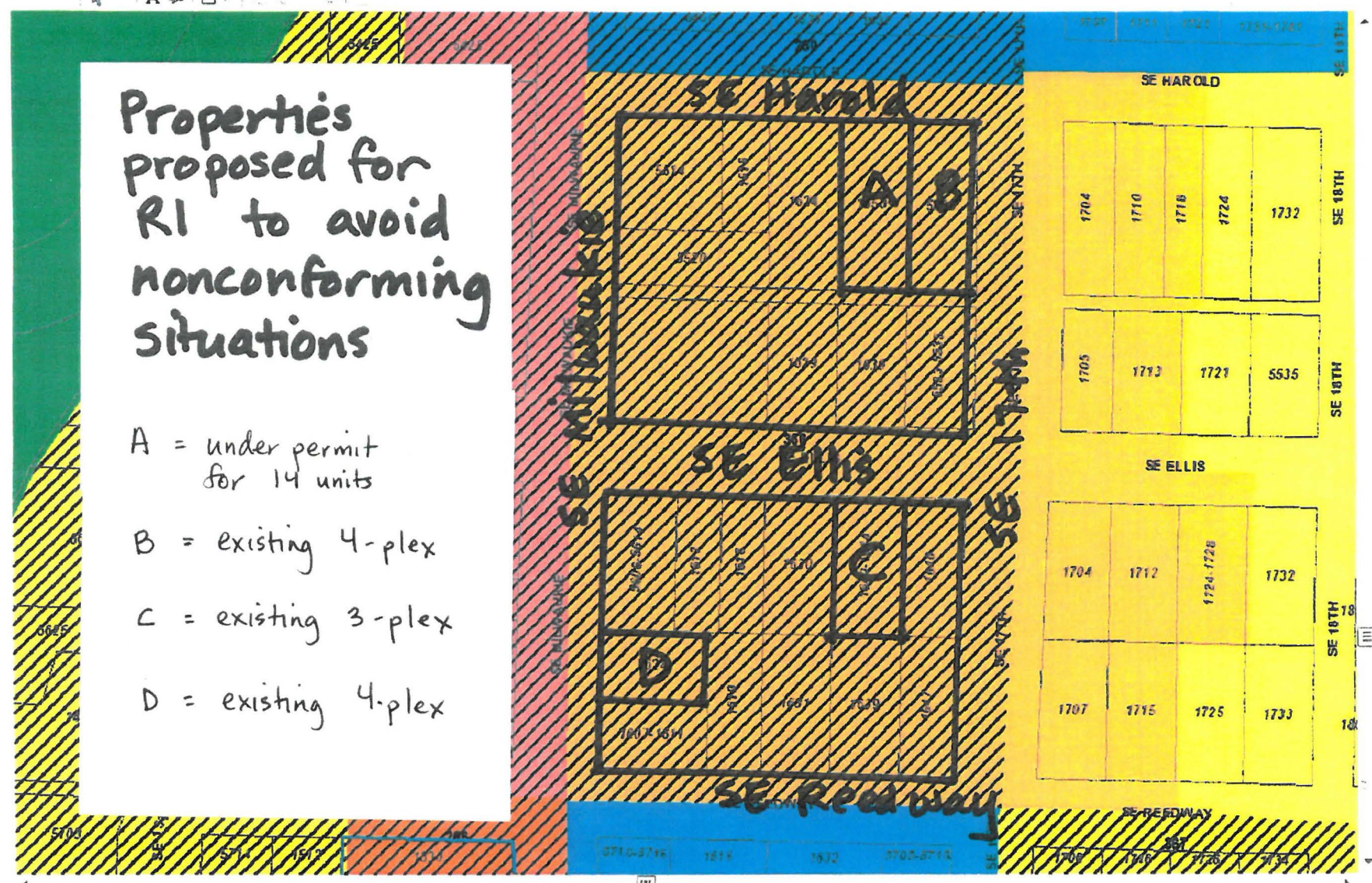
Properties
proposed for
R1 to avoid
nonconforming
situations

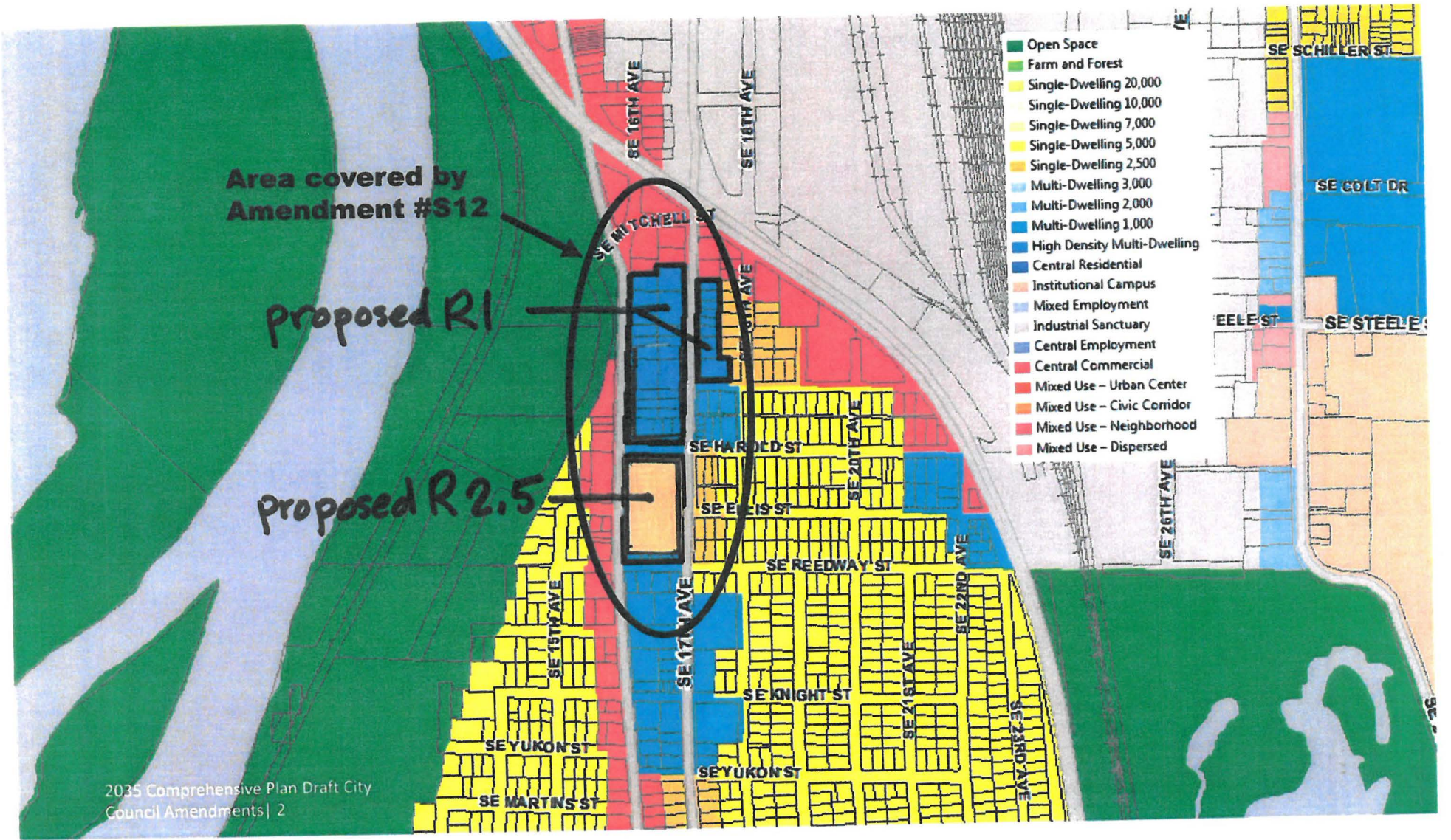
A = under permit
for 14 units

B = existing 4-plex

C = existing 3-plex

D = existing 4-plex





Area covered by Amendment #S12

Proposed R1

Proposed R2.5

- Open Space
- Farm and Forest
- Single-Dwelling 20,000
- Single-Dwelling 10,000
- Single-Dwelling 7,000
- Single-Dwelling 5,000
- Single-Dwelling 2,500
- Multi-Dwelling 3,000
- Multi-Dwelling 2,000
- Multi-Dwelling 1,000
- High Density Multi-Dwelling
- Central Residential
- Institutional Campus
- Mixed Employment
- Industrial Sanctuary
- Central Employment
- Central Commercial
- Mixed Use - Urban Center
- Mixed Use - Civic Corridor
- Mixed Use - Neighborhood
- Mixed Use - Dispersed



Office of Mayor Charlie Hales
City of Portland

April 28, 2016

Memorandum

TO: City Council Commissioners
FROM: Mayor Hales
CC: Susan Anderson, Director, Joe Zehnder, Chief Planner, Eric Engstrom, Principal Planner,
RE: Potential Additional Comp Plan Amendments and Refinements

As staff have reviewed the most recent Comprehensive Plan testimony, several additional changes and refinements have come to our attention. These potential amendments are in addition to those identified in My April 11th memo. I would like these further amendments considered.

1. **Middle housing** (#P45). In response to testimony from Tamara Deridder, staff have suggested a clarifying refinement to the middle housing policy. This amendment is intended to make it clear that no immediate zone changes are being made with this amendment, and the Council is directing staff to conduct a planning process to identify the appropriate places for middle housing, within the parameters specified.

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, ~~where appropriate,~~ and within the Inner Ring around the Central City.

(Co-sponsored by Commissioner Novick)

2. Historic resources definition (NEW). One of the staff-recommended historical resources policy improvements was inadvertently omitted from the amendment report – a refined definition of historic resources, in the glossary. This amendment was identified in my April 11 memo, but the language was incomplete. Below is the corrected definition, which is supported by historic resources staff and the Landmarks Commission:

Historic resource: A structure, place, or object that has a relationship to events or conditions of the human past. Historic resources may be significant for architectural, historical, and cultural reasons. Examples include historic landmarks, conservation landmarks, historic districts, conservation

districts, and structures or objects that are identified as contributing to the historic significance of a district, including resources that are listed in the National Register of Historic places. Rank I, II, and III Structures, places, and objects that are included in historic inventories are ~~potential~~ historic resources.

(Co-sponsored by Commissioner Fritz)

3. **Rossi Farm (#F72).** Change 3839 NE 122nd (1N2E22DD 400) to be entirely Mixed Use - Civic Corridor, and 11800 NE Saver (1N2E22DD 201) to be R3 rather than R7. This change would provide a site that is better suited for grocery store development in the future.

(Co-sponsored by Fish, Fritz)

4. **Metro (NEW).** On April 20th Metro provided testimony requesting adjustment of land use designations on several Metro-owned parcels. In response to that testimony, I would like to propose the following changes:

No.	Parcel	Current Designation	Recommended Designation	Amendment
1	Marine Drive Parcels (1N2E14CB 900, and 1N2E15A 100)	RF	OS	RF
2	Sellwood Riverfront Park (1S1E22A 1000 and 1S1E22DA 100)	RF	OS	RF
3	Mitchel Creek Natural Area (1S2E25A 00102)	R10	OS	R10
4	Fanno Creek Natural Area (1S1E17BC 1000, 1S1E17BC 1100, 1S1E17BC 800, 1S1E17BC 900)	R10	OS	R10

5. **PepsiCo (#M49).** PepsiCo has requested a revision to return their site at 2505 NE Pacific (1N1E36BC 12000) to Mixed Use. This request is based on the policy amendment #P103, which enables a site to have mixed use comp plan designation while retaining employment zoning for the short term. As a result, I am withdrawing amendment #M49.

6. **Mount Hood Community College site in Parkrose (NEW).** It has come to my attention through testimony that MHCC owns property at the SE corner of NE 102nd and Prescott (1N2E22CB 1700 and 1N2E22CB 1800). The property is designated residential, but is adjacent to a MHCC facility across the street, within the City of Maywood Park. I would like to propose designating that property Mixed Use - Dispersed, to facilitate further development of MHCC facilities at that location. Because only a small area extends into the City of Portland, this designation would be more appropriate than the Campus designation.
7. **Google (NEW).** I have been informed of a change that could facilitate Google Fiber installation: A wedge of ODOT property on N. Fargo (1N1E27BA 6800). I propose that this property be designated Mixed Employment.
8. **Boise/Fremont (#M42).** Amendment #M42 had contemplated designating a stretch of N Fremont to Mixed Use, between Vancouver and Mississippi. In light of testimony received in this item, I would like to offer an amendment to scale-back the proposal to change a smaller number of parcels: 705 N FREMONT ST (1N1E27BA 200), 311 W/N IVY ST (1N1E27AB 3100), and the parcels at the corner with N Gantenbein (1N1E27AB 2901, 1N1E27AB 2902)
9. **Correction (#B2).** BPS staff has identified a mistake in the mapping of amendment #B2. The amendments should have been for 412 SE 108th, not 341 SE 109th. The amendment was a change from R2.5 to Mixed Use.
10. **Hayden Island Bridge Clarification.** In the TSP amendment list, I would like to clarify the project description for the Hayden Island Bridge to read as follows: "Design and construct an arterial bridge from Expo Center to East Hayden Island".



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MEMO

DATE: April 27, 2016

TO: Mayor Hales and City Council

FROM: Tyler Bump, Senior Economic Planner
Steve Kountz, Senior Economic Planner
Tom Armstrong, Supervising Planner

CC: Susan Anderson, Director

SUBJECT: Portland and Pattern Area Retail Demand and Sales Analysis

This memo is a follow-up to the retail leakage analysis issues raised in the April 22, 2016 testimony from Eric Hovee on behalf of the Retail Task Force and the International Council of Shopping Centers.

In consideration of the Hovee rebuttal, BPS still does not support amending the EOA analysis with this new retail leakage for two reasons:

1. The retail leakage analysis is not significantly different from what is in the EOA and does not materially change the findings of the EOA - there is a large surplus of neighborhood commercial development capacity in terms of sites sizes and locations throughout the City of Portland.
2. Hovee is misinterpreting the requirements of Goal 9. It requires demonstrating adequate capacity for industrial uses specifically and for the widest range of other employment (non-industrial) uses - not for the widest range of retail, as suggested. The City has done that by analyzing the need for Central City, Campus Institutions and Neighborhood Commercial capacity.

The City does not have to create an even-more complex, detailed analysis that looks at the supply and demand for large-format, auto accommodating, value-oriented retail with drive-throughs. The EOA includes a parcel size analysis for neighborhood commercial uses that shows surplus capacity across a range of parcel sizes across Portland. This level of detail is sufficient to comply with Goal 9.



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Retail Leakage

The April 22 Hovee memo asked BPS staff to provide a comparison of the overall retail sales leakage. Table 1 provides that analysis. Analysis of ESRI Business Analyst Data indicates that there is significantly less total retail leakage occurring in East Portland than identified in the Nielsen data. BPS has identified an 18% retail leakage using the ESRI Business Analyst Data compared to 48% leakage identified by Hovee using the Nielsen data.

Specifically, it is the outer Lents/Pleasant valley sub-market in the Eastern Pattern area represents 57 percent of total leakage in East Portland. This is the area where BPS applied commercial zoning as part of the 122nd Avenue Rezoning Project.

Table 1. Comparison of Retail (all categories) Leakage

	Hovee (Nielsen data)	BPS (ESRI Business Analyst data)
Citywide	9% gap	10% surplus
Eastern	48% gap	18% gap
Western	61% gap	82% gap
Inner	38% gap	38% gap
Central City	223% surplus	308% surplus

Buildable Land Inventory

The April 22 Hovee memo notes a specific concern for neighborhood commercial development capacity in the 3-10 acre parcel size. Table 2 splits the “greater than 3 acres” category into two categories - 3-10 acres and greater than 10 acres. The analysis shows about 45% of the capacity greater than 3 acres is in the 3-10 acre category and there is a reasonable distribution across the pattern areas for both 3-10 acre and greater than 10 acre categories parcel sizes.



Table 2 Neighborhood Commercial Development Capacity by Pattern Area

Pattern Area	Parcel Size			Total	Share
	Less than 3 acres	3-10 acres	More than 10 acres		
Eastern Neighborhoods	230	146	129	505	37%
Inner Neighborhoods	455	69	40	564	41%
Western Neighborhoods	66	31	33	131	10%
Industrial & River	22	24	114	160	12%
	773	270	316		

Conclusion

The retail leakage analysis is only one factor that is considered along with job growth, sector trends, development trends, business focus group insights, small business vitality, and complete neighborhood strategy. The EOA demonstrates that there is a more than adequate land supply to meet future employment growth in the Neighborhood Commercial geography. The EOA is a background document that provides the context for the Comprehensive Plan policy and map decisions to create a hierarchy of centers and corridors that increase access to complete neighborhoods, including access to commercial services and healthy food.



Moore-Love, Karla

From: Engstrom, Eric
Sent: Friday, April 22, 2016 1:02 PM
To: Hales, Charlie; Fish, Nick; Fritz, Amanda; Novick, Steve; Saltzman, Dan; Moore-Love, Karla
Cc: Elmore-Trummer, Camille; Shriver, Katie; Dunphy, Jamie; Grumm, Matt; Adamsick, Claire; Zehnder, Joe; Burns, Al (Planning and Sustainability); Armstrong, Tom; Anderson, Susan; Rees, Linly; Beaumont, Kathryn; King, Lauren; Martin, Kevin
Subject: staff analysis for Comp Plan findings

Commissioners,

Enclosed is an additional staff memo and report that contains technical information that we will cite in the findings that will accompany the 2035 Comp Plan adoption ordinance.

These documents relate to The Buildable Lands Inventory and Growth Scenario modelling, and technical documentation of that. The attachments to the BLI memo have been posted on our ftp site, due to the large file size:

ftp://ftp02.portlandoregon.gov/BPS/Tech_Services/Council_Memos/

If you have questions about this material, let me know in upcoming check-ins. There will be an opportunity to discuss this technical work in conjunction with the June 9th session when you are currently scheduled to adopt findings. Some of this information will be updated again after you finish voting on amendments, to reflect the impact of those amendments.



BLI_GIS_Method... BLI_memo.pdf

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April 21, 2016

Memorandum

TO: Portland City Council
FROM: Al Burns, AICP, Senior City Planner
Bureau of Planning and Sustainability
CC: Eric Engstrom, Principal Planner, Joe Zehnder, Chief Planner, and
Susan Anderson, Director
RE: Revised Needed Buildable Residential Lands Inventory

The purpose of this memo is to describe to City Council an opportunity to adopt a map of “needed” residential buildable land.

Portland has fulfilled its Periodic Review Task 2 obligations under Statewide Planning Goal 10, Housing, and Oregon Administrative Rules, Division 660, Chapter 7, Metropolitan Housing, to adopt an inventory of buildable residential land (BLI). This was accomplished by Council Substitute Ordinance 185657, October 3, 2012, and approved by Order 001850 of the Oregon Land Conservation and Development Commission on May 23, 2014.

Adoption of a revised Inventory of Buildable Residential Lands is included as one action accompanying the Supporting Documents ordinance before you now. This update incorporates up-to-date information on the status of vacant and underutilized parcels – including identification of parcels that are newly-vacant since the adoption of Task 2, as well as identification parcels that were previously identified as vacant in 2014, but have since been developed and thus no longer available as capacity to accommodate future development. These maps and associated capacity estimates also incorporate updated DOGAMI landslide hazard and slope constraint maps. The updated maps are attached.



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Inventory Map of Buildable Residential Lands

Attachment A is a revised residential inventory that meets state requirements. It includes land planned for residential use both with, and without, site constraints. Examples of constraints include environmental overlays, flood and slope hazards, and soil contaminates. A full list of site constraints is Attachment D of this memorandum. Because of the added difficulty and cost of developing constrained sites, the City's Buildable Lands Inventory Model assumed a lower development capacity for these sites. In some cases the calculated capacity was eighty percent or less than a similar unconstrained site.

The Optional Map

The City is permitted, but not required, to adopt a subset of the approved Residential Buildable Lands Inventory as "needed" within the narrow meaning of Oregon Revised Statutes 197.307(3), provided this subset retains a twenty-year supply of buildable land. On housing land identified as needed the city may employ only clear and objective approval standards. These are standards which require no substantial exercise of factual or legal judgment. Unless a subset of the Residential Buildable Lands Inventory Map is identified as "needed," the entire mapped area is assumed to be needed. Since environmentally sensitive and hazardous sites often have unique patterns of areas to avoid, protect, reinforce or remediate it is difficult to impossible to ensure safe housing with only clear and objective standards. The Bureau of Planning and Sustainability recommends that council exercise its option to identify a subset.

The Unconstrained Residential Lands Inventory Map

The Bureau recommends that Council adopt the Attachment C map as the City's map of sufficient "needed" buildable residential land within the meaning of ORS 197.307(3). The previously-approved BLI map containing both constrained land and unconstrained land provides an opportunity for 231,500 new housing units (as stated in the BLI report adopted in October 2012). The revised map (Attachment A), based on the Recommended Comprehensive Plan designations, provides an opportunity for 254,290 new housing units. The optional map describing only relatively unconstrained land (Attachment C) provides an opportunity for 175,173 new housing units¹.

¹ Calculated using the same BLI GIS model described in the original October 2012 BLI.

Since Portland's Metro allocation of regional housing need is about 123,000 additional housing units from 2010-2035², the recommended subset of the residential buildable lands inventory still retains more than adequate capacity to meet the identified twenty-year housing need. In addition, building permit records show that in 2010-June 2015 15,800 new dwellings were built in Portland, leaving a remaining 2015-2035 need of about 107,200 new units.

It is important to note that removing constrained land from the needed inventory does not diminish that land's availability or capacity for residential development. It simply provides the opportunity for Council, or a future council, to adopt criteria requiring the exercise of a suitable amount factual judgment for the approval of residential development on difficult (more constrained) sites.

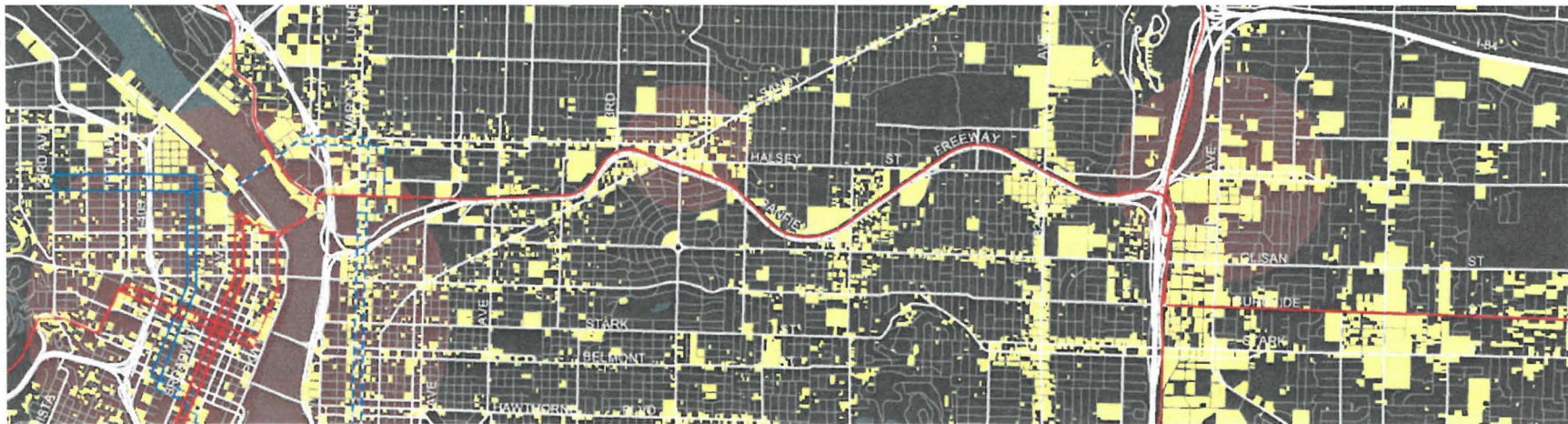
Staff will provide a technical update to these numbers with the findings and substitute ordinance, in late May, to reflect amendments to the Comprehensive Plan Map that council adopts.

List of Attachments:

- A. Revised Inventory Map of Buildable Residential Lands
 - a. Vacant and underutilized lands
 - b. Vacant and underutilized lands by degree of constraint
- B. Maps to revise layers shown on Map HAZ-01 adopted with Ordinance 185657, October 3, 2012.
 - a. *Revised steep slopes map (>25%)*
 - b. DOGAMI Historic Landslide Deposits map
- C. Optional inventory of relatively unconstrained buildable residential lands
 - a. All parcels
 - b. Vacant and underutilized parcels
- D. List of site constraints excluded from Attachment C

² Including the 120,982 allocated to Portland, and the allocations to the portions of unincorporated Multnomah, Washington, and Clackamas counties within Portland's USB (Metro Council Ordinance No. 12-1292A, November 29, 2012).

City of Portland Bureau of Planning & Sustainability
Buildable Lands Inventory and Growth Allocation GIS model



Revised, April 2016



Bureau of Planning and Sustainability

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City of Portland, Oregon
Charlie Hales, Mayor • Susan Anderson, Director



overview

The City of Portland is currently engaged in an effort – the [Comprehensive Plan Update](#) – to plan for the long-term future of our city. In order to discuss the future of Portland, it is important to establish a basic understanding of how the City today compares to the vision of the City for the future. The Bureau of Planning & Sustainability’s Development Capacity Analysis geographic information systems (GIS) model provides information about the amount of existing and proposed housing and employment capacity, and information about how growth may be distributed.

Maximum land use intensities in Portland are controlled in three ways:

1. establishing floor area ratio (FAR) limit and maximum height limits. FAR is the ratio of a building's total square footage to the square footage of the underlying development parcel; or
2. limiting the total number of multi-family residential units; or
3. assigning minimum lot sizes for new single-family residential development.

These limits govern building size and bulk, and – among other objectives – create reasonable certainty for utility and transportation providers regarding the intensities of use for which they must provide infrastructure. FAR and building height limits are the primary limiting factor on development in employment, commercial, and high-density residential areas. In multi-family and single-family residential areas, capacity is based on the allowed number of residential units, rather than maximum building square footages. The specific criteria for determining allowed capacity are described in detail in the Methodology section of this document.

All development capacity and growth allocation analysis is based on the City of Portland’s “Comprehensive Plan Designations” rather than existing zoning. The [Comprehensive Plan Designations](#) reflect the current adopted land use plan for the City of Portland. This plan guides the future growth and development of the city. This analysis provides a means to compare the possible outcomes of the current adopted plans with other alternatives, and quantify possible impacts of new recommended plans.

There are several reasons for conducting this analysis:

- › to quantify the existing development capacity within Portland under the current Comprehensive Plan and zoning regulations;
- › to identify likely redevelopment scenarios and prospective clusters of future development activity by identifying sites that are significantly underutilizing their allowed development capacity;
- › to generate development capacity and possible growth allocation statistics for different areas of the City to highlight the differences in terms of existing and allowed development capacity;
- › to serve as a basis for predicting residential and employment growth under different development scenarios;
- › to help measure the possible impact of recommended land use plans, by predicting where growth may occur, which provides a basis to evaluate impacts – for example, impacts to the transportation system, tree canopy, housing supply, air quality.

Important note: This is a "supply-side" analysis. The model does not predict market demand for new construction. It only identifies lands within the City that could potentially become available for development/redevelopment should market demand exist.

methodology

The Development Capacity Analysis and Growth Allocation geographic information systems (GIS) model consists of 4 basic steps:

1. calculate existing and recommended development and allowed development limits in terms of building square footage, number of multi-family residential units, number of allowed single-family residential lots, and estimated number of jobs;
2. identify development parcels that significantly underutilize their allowed (or proposed) development capacity;
3. apply development constraints to determine remaining, estimated development capacity in terms of building square footage, number of multi-family residential units, number of allowed single-family residential lots, and estimated number of jobs;
4. allocate the expected 20-year housing and employment growth to the available development capacity.

Each of these steps is discussed in detail in the following sections. Refer to the Model Inputs section below for more information on each of the GIS data inputs (development parcels, 3D building model, etc.).

Step 1: Calculate existing development and allowed development limits

The first step in the development capacity model is to calculate existing development and allowed (or proposed) development limits. This allows for a determination of how much of each development parcel's allowed capacity is being used (or not used). **Figure 1** presents an overview of this process, described in detail below.

Existing development

Existing building square footages are determined using the City of Portland's 3D building model. Where building square footage is known (meaning the 3D building GIS dataset building "feature" is attributed with a known square footage), that information is used by the model. Known square footages are usually derived from building permit information, but other sources are used as well (such as information from the building's developer).

If the building square footage is not known, it is estimated using the 3D building model. First, a predominant use is assigned to each building based on the Multnomah County Assessor "property codes". The property codes are consolidated into a small number of general categories – office, institutional, multi-family residential, etc. – and each one of these general categories is assigned an average floor-to-floor height based on standard development practices relating to each use. These assumptions are shown in **Table 1**.

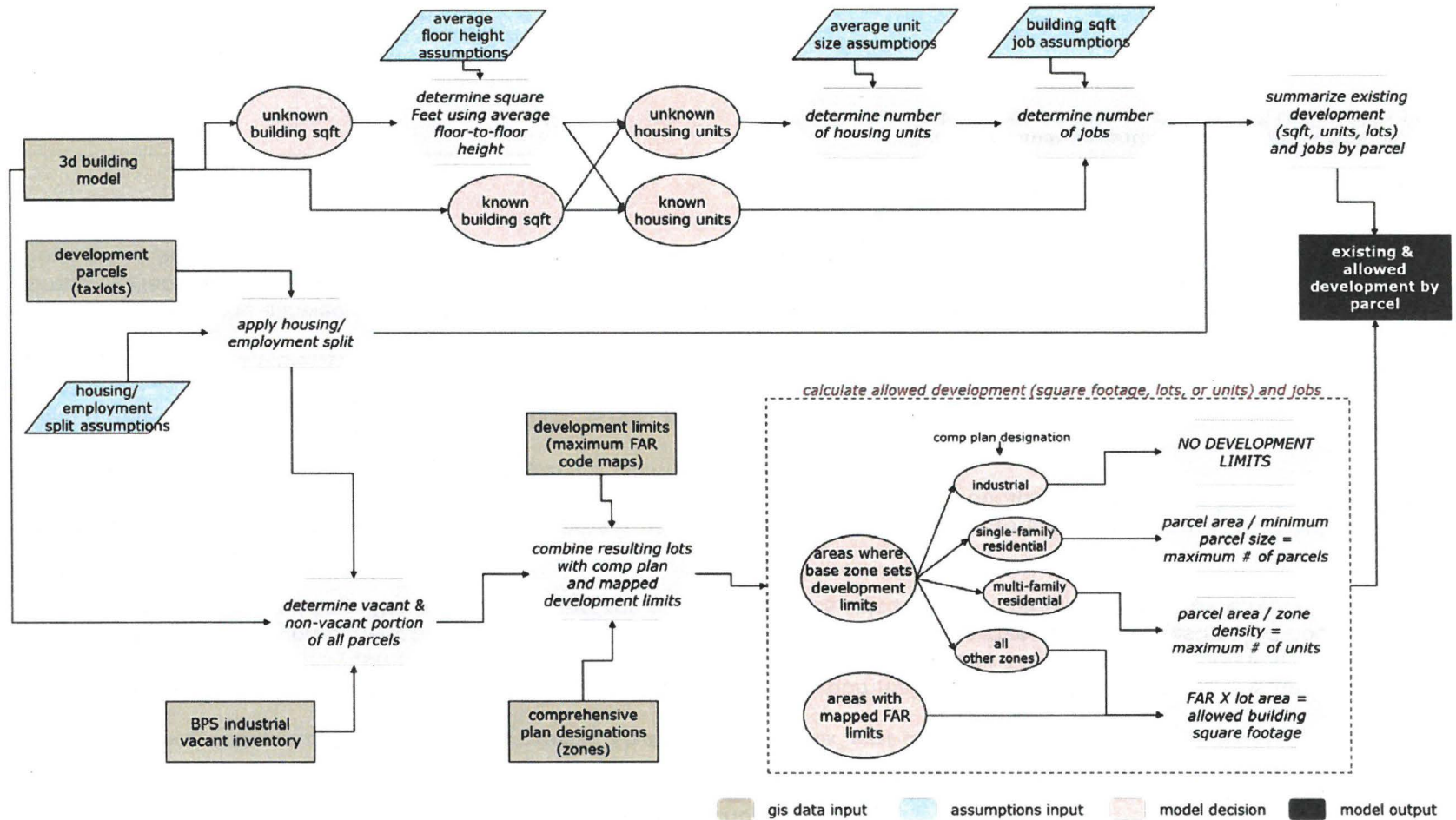


Figure 1. Buildable Lands Inventory GIS model Step #1: Calculate existing and allowed development.

Table 1: Average floor-to-floor height assumptions by predominant building use.

use	average floor-to-floor height
commercial	14'/19'*
industrial	19'
institutional	12'/14'/19'*
multi-family residential	10'
office	14'
single-family residential	10'
<i>all other uses/unknown use</i>	12'

* floor height depends on the specific use. For example, a building with a "big box" retail property code (commercial use) is assigned a height of 19'

Next, the number of stories for each portion of each building – each *polygon* making up the building’s form -- is determined by dividing the height of the polygon by the average floor-to-floor height as determined by the predominant building use. The base area – or *footprint* – of each component polygon is multiplied by the number of stories to arrive at the total estimated floor square footage for that portion of the building. The total square footage of the building is calculated by combining the square footage of all the component polygons.

The total building square footage for each development parcel is then calculated as the total square footage of all buildings on the parcel. Because some parcels contain only a portion of a building's footprint, square footages are weighted based on the percentage of the building footprint within each parcel. **Figure 2** illustrates this process.

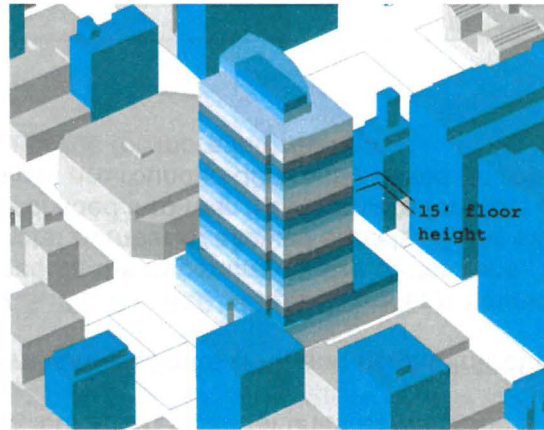
Existing number of multi-family housing units are derived from [City of Portland Buildings GIS Data](#).

Allowed development capacity

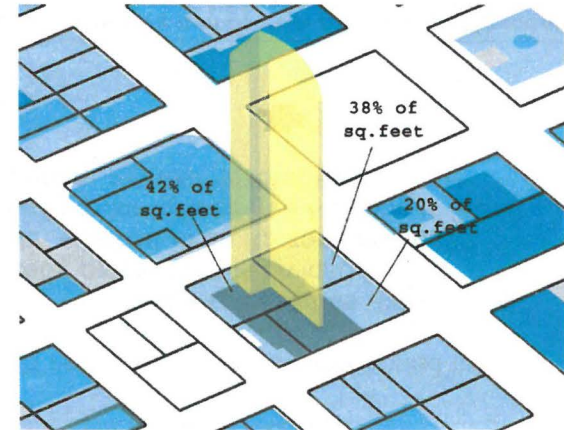
Before calculating the allowed development capacity of each parcel, portions of parcels that have been identified as vacant by the Bureau of Planning & Sustainability (in their industrial/employment lands inventory) are divided into “new” development parcels. This allows these areas to be evaluated separately from the larger lot that they are within.



(a) height of each building polygon is derived from the 3D model



(b) each polygon is divided into floors; each floor's square footage can then be calculated



(c) total square footage of each building polygon is then assigned to a parcel based on the % area in each parcel

Figure 2. Estimating total building development parcel building square footage.

There are two ways the specific development limits are applied to parcels in Portland:

1. specific [Planning and Zoning Code](#) maps that delineate FAR and height limits for particular areas of the City (such as the Central City Plan District); or
2. through development limits related to the parcel's Comprehensive Plan designation and zone (or proposed designation and zone).

If there is no code map showing a development limit for the parcel, then the comprehensive plan or zoning designation determines the limits (**Figure 3**). Note that some designations, like "industrial sanctuary", have no development limits. This model can be run using either the current zoning, or anticipated future zoning based on the current or proposed Comprehensive Plan.

The parcel data is combined with both the code map GIS data and the zoning GIS data (which contains both current zoning and current and possible future comprehensive plan designations). For each parcel, a determination is made as to which of these two apply. Once this is determined, allowed development capacity is calculated as follows:

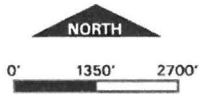
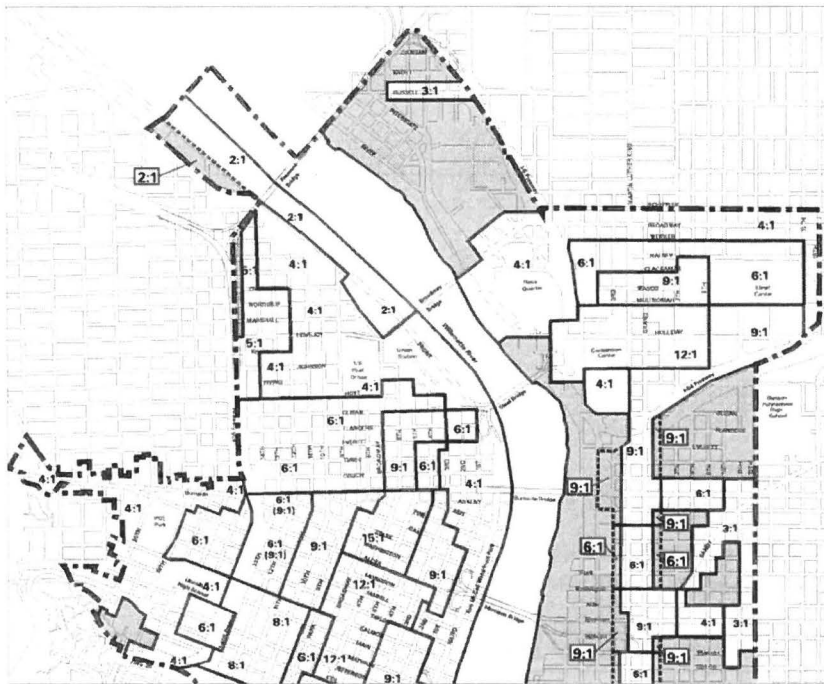
1. areas with mapped FAR limits (per code maps)

Where FAR limits are determined by a code map, the total allowed FAR is calculated by multiplying the lot area by the FAR limit. For example, a 20,000 square foot lot with a FAR limit of 4:1 would have an allowed development capacity of 80,000 square feet. Note that the model only considers "base" FAR. Any additional FAR – *bonus FAR* – that results from having certain amenities (i.e., bike parking) or building features (i.e., ecoroofs) are not currently taken into consideration when determining "underutilized" lots. They are, however, calculated for each lot where the bonus FAR limit is known, so this information is in the output dataset.

2. areas where the base zone sets development limits

Where the development limits are determined by the base zone, development limits can be expressed as not only building square footage, but – in residential zones – as allowed lots and residential units as well. The limits are calculated as follows:

- i. industrial parcels (IS zones): no development limits (FAR and height limitations do not apply to industrially-zoned lots).
- ii. single-family residential parcels (R2.5, R5, R7, R10, R20 & RF zones): development limits are expressed as the allowed number of development parcels based on the minimum lot size of the zone. The total parcel area is divided by the minimum lot size to determine the total number of allowed parcels. If, for example, a parcel in an R5 zone is 20,000 square feet, that parcel could be subdivided into four 5,000 square foot lots (the minimum lot size in a R5 zone is 5,000 square feet.) Note that resulting values are rounded differently based on the maximum number of lots. Refer to the [Single-Dwelling Zones Land Division Guide](#) for more information.



Map 510-2

Floor Area Ratios

(a) FAR limits map from Title 33 zoning code

Table 130-3 Summary of Development Standards in Commercial Zones								
Standard	CN1	CN2	CO1	CO2	CM	CS	CG	CX
Maximum FAR (see 33.130.205)	.75 to 1	.75 to 1	.75 to 1	2 to 1	1 to 1 See 33.130.253	3 to 1	3 to 1	4 to 1
Maximum Height (see 33.130.210)	30 ft.	30 ft.	30 ft.	45 ft.	45 ft.	45 ft.	45 ft.	75 ft.
Min. Building Stbks (see 33.130.215) Street Lot Line or Lot Line Abutting an OS, RX, C, E, or I Zone Lot	0	0	0	0	0	0	0	0
Lot Line Abutting other R Zoned Lot	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4
Garage Entrance Setback (see 33.130.250.E)	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft
Max. Building Stbks (see 33.130.215) Street Lot Line Transit Street or Pedestrian District	None	None	None	None	10 ft. None	10 ft. None	None 10 ft.	None 10 ft.

(b) FAR limits as determined by zone

Figure 3. Examples of 2 different methods of applying development limits to parcels.

- iii. multi-family residential parcels (R1, R2, R3 & IR zones): development limits are expressed as the allowed number of residential units based upon maximum density of the zone. The total parcel area is divided by the maximum density to determine the total number of allowed units. If, for example, a parcel in an R1 zone is 20,000 square feet, that parcel is allowed 20 multi-family units (the minimum zone density in a R1 zone is 1,000 square feet.) Note that resulting values are rounded differently based on the maximum number of units. Refer to the [Multi-Dwelling Zones Land Division Guide](#) for more information.
- iv. all other high-density residential, mixed use commercial, and employment parcels (CG, CS, CX, EX, IR, ME, NC, OC, RH, RX & UC zones): development limits are expressed as the allowed building square footage based on the maximum floor-area ratio (FAR). The total parcel area is multiplied by the maximum FAR to determine the total allowed building square footage. If, for example, a 20,000 square feet parcel has an FAR of 4:1, an 80,000 square foot building is allowed on that lot. Note that only "base" FAR is considered. Maximum FAR of comprehensive plan designations are determined by associating them with existing base zones, or making an assumption about future zoning designations (**Appendix 1**).

The final output of Step 1 of the model is a GIS dataset that contains the existing building square footage and allowed development (total square footage, number of units, or number of parcels) for every parcel within the City of Portland.

Step 2: Identify development parcels that significantly underutilize their allowed development capacity

The second step in the Buildable Lands Inventory model is to identify parcels that are significantly underutilizing their allowed (or proposed) development capacity, which is determined in Step #1 above. **Figure 4** provides an overview of the process, described in detail below.

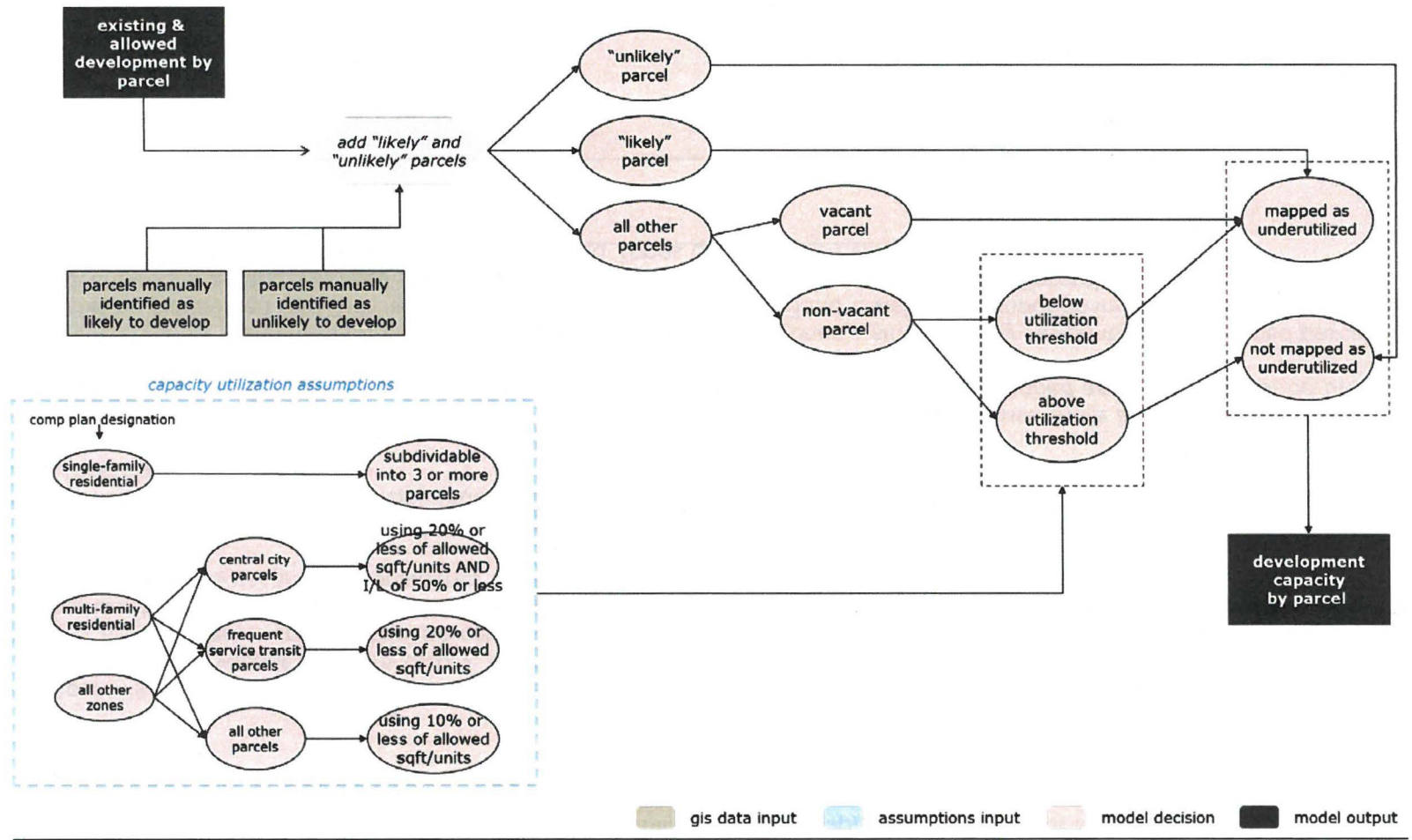


Figure 4. Buildable Lands Inventory GIS model Step #2: Identify underutilized parcels.

Parcels are evaluated as follows:

1. "Likely" & "Unlikely" parcels

The initial outputs of the Buildable Lands Inventory GIS model were reviewed thoroughly by Bureau of Planning & Sustainability staff. Based on staff knowledge, parcels that were known to have high development or redevelopment potential and were not identified by the model as underutilized were "manually" flagged as underutilized and included in subsequent model outputs. These "likely" parcels are all mapped as underutilized regardless of the existing or allowed development capacity.

Parcels that were not identified as constrained in Step 2 of the model, but that are known to have a very low likelihood for development or redevelopment, were manually flagged as "unlikely" to develop, and therefore not included in the final map of underutilized parcels.

2. All other parcels

All vacant parcels are mapped as underutilized, regardless of the allowed development capacity. Parcels are identified as vacant by Metro, in their regional vacant lands inventory, or the Bureau of Planning & Sustainability in their industrial/employment lands inventory. In addition, any non-industrial parcels where less 5% or less of the site area is developed AND where the Multnomah County Assessor has recorded the current land use as "vacant" are included in the vacant category. Portions of a parcel larger than ½ acre that are mapped as vacant are considered a separate parcel and are treated as such in all 3 steps of the DCA model.

Non-vacant parcels are individually identified as "significantly underutilized" if they are below the capacity utilization threshold defined for their comprehensive plan designation. The following assumptions determine whether a parcel is above or below this utilization threshold:

- i. industrial parcels (IS zones): industrially-zoned parcels can not be evaluated because there are no FAR or other similar limits on allowed development. As a result, *only vacant industrial properties are mapped as significantly underutilized.*
- ii. single-family residential parcels (R2.5, R5, R7, R10, R20 & RF zones): single-family residential (SFR)-zoned parcels that can be subdivided into 3 or more parcels – calculated using the land division assumptions in Step #1 of the DCA model – are mapped as underutilized. Note that the number of allowed parcels is rounded differently based on the maximum number of parcels. Refer to the [Single-Dwelling Zones Land Division Guide](#) for more information.

iii. multi-family residential parcels (R1, R2, R3 & IR zones):

- a. parcels within the Central City: mapped as underutilized if they are using less than 20% of their allowed multi-family units AND the parcel's improvement-to-land value ratio is 50% or less. Existing units are derived from City of Portland building data. Improvement-to-land ratios are calculated using Multnomah County Assessor real market land and improvement (building) values for the current tax year.

For example, a 20,000 square foot R1 parcel that currently has 2 existing units, an improvement value of \$50,000 and a land value of \$200,000. The percentage of capacity used by this parcel is calculated as:

$$\frac{\text{number of existing units}}{\text{parcel area} \div \text{zone density}} = \frac{2}{20,000 \div 1,000} = \frac{2}{20} = 10\%$$

Note that the number of allowed units is rounded differently based on the maximum number of units. Refer to the [Multi-Dwelling Zones Land Division Guide](#) for more information.

The improvement-to-land ratio of this parcel is calculated as follows:

$$\frac{\text{improvement value}}{\text{land value}} = \frac{\$50,000}{\$200,000} = 25\%$$

In this Central City parcel example, the parcel is mapped as underutilized because the percentage of capacity used is less than 20% AND the improvement-to-land ratio is less than 50%.

- b. parcels outside the Central City but within 500' of a "frequent service" transit line: mapped as underutilized if they are using less than 20% of their allowed multi-family units (regardless of the improvement-to-land ratio). Improvement and land values are not as accurate or consistently recorded outside Portland's Central City, so they are not used in other parts of the City at this time. [Frequent service transit lines](#) are defined as bus and light rail lines that run every 15 minutes or better during weekday peak hours.

- c. all other parcels: mapped as underutilized if they are using less than 10% of their allowed multi-family units (regardless of the improvement-to-land ratio).
- iv. all other high-density residential, mixed use commercial, and employment parcels (CG, CS, CX, EX, IR, ME, NC, OC, RH, RX & UC zones):
 - a. parcels within the Central City: mapped as underutilized if they are using less than 20% of their allowed floor-area ratio (FAR) building square footage AND the parcel's improvement-to-land ratio is 50% or less. Improvement-to-land ratios are calculated using Multnomah County Assessor real market land and improvement (building) values for the current tax year.

For example, a 20,000 square foot parcel that currently contains a 10,000 square foot building has a FAR of 5:1, an improvement value of \$50,000 and a land value of \$200,000. The percentage of capacity used by this parcel is calculated as:

$$\frac{\text{existing building square footage}}{\text{parcel area} \times \text{FAR}} = \frac{10,000}{20,000 \times 5} = \frac{10,000}{100,000} = 10\%$$

The improvement-to-land ratio of this parcel is 25%, calculated per the multi-family example above. This Central City parcel is mapped as underutilized because the percentage of capacity used is less than 20% AND the improvement-to-land ratio is less than 50%.

Note that all calculations are based on base floor-area ratios and do not include additional square footages that might be allowed because of development and building features that qualify for FAR bonuses (residential development, bike lockers, etc.)

- b. parcels outside the Central City but within 500' of a "frequent service" transit line: mapped as underutilized if they are using less than 20% of their allowed FAR building square footage (regardless of the improvement-to-land ratio). Improvement and land values are not as accurate or consistently recorded outside Portland's Central City, so they are not used in other parts of the City at this time. [Frequent service transit lines](#) are defined as bus and light rail lines that run every 15 minutes or better during weekday peak hours.

- c. all other parcels: mapped as underutilized if they are using less than 10% of their allowed FAR building square footage (regardless of the improvement-to-land ratio).

Step 3: Apply development constraints

The third step in the Buildable Lands Inventory model is to apply development constraints to allowed development capacity. **Figure 5** summarizes the process of identifying constrained properties. The specific types of constraints are described in detail in **Appendix 2** (and described in more detail in **Appendix C of the Buildable Lands Inventory Summary Report**, adopted by City Council in October 2012).

Constraints are incorporated into the model as a two separate GIS featureclasses, one for constraints that apply to an entire parcel (i.e., slope, brownfields, historic resources), and one for partial lot constraints (i.e., protection overlays, wetlands, flood hazards). Constraint data and/or maps are available upon request.

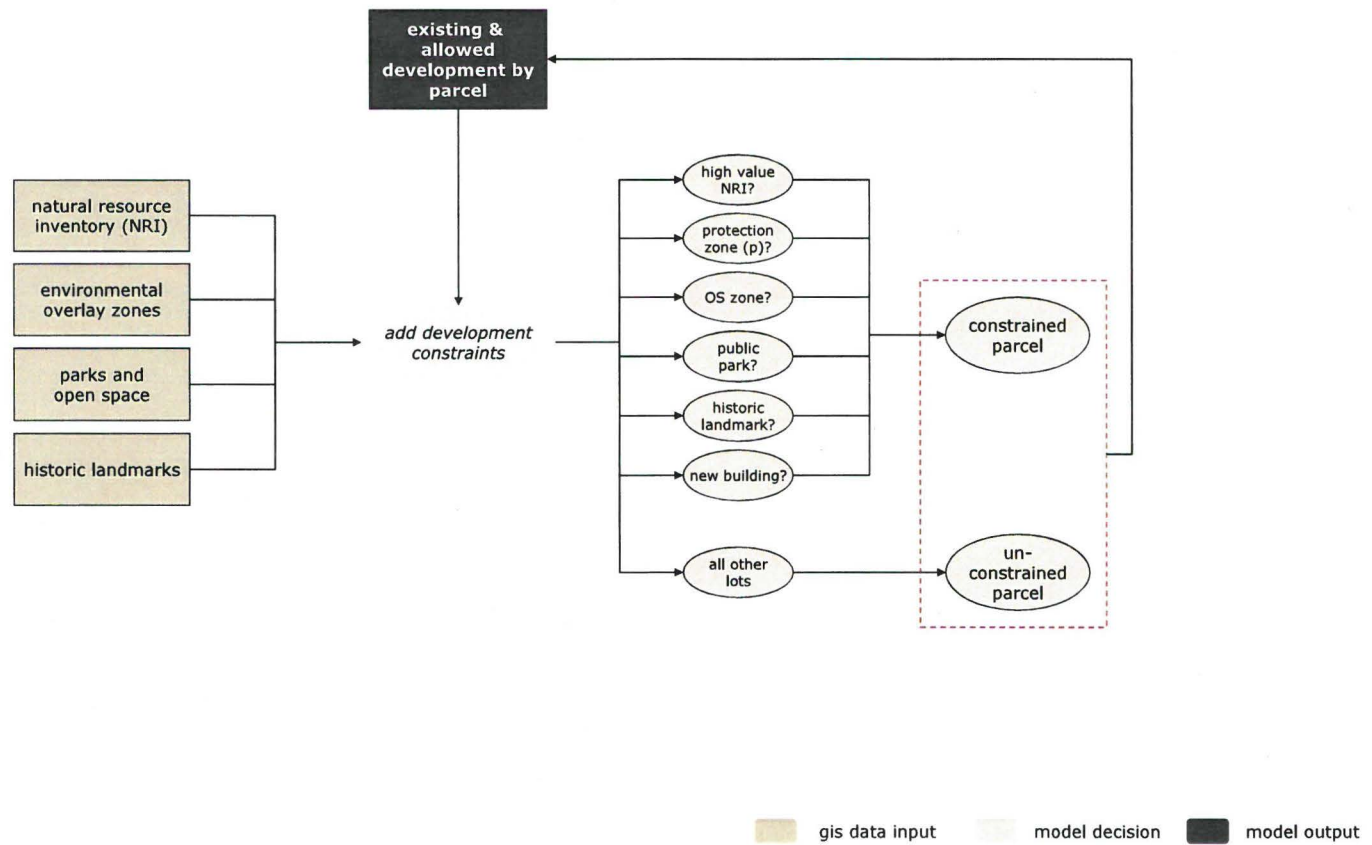


Figure 5. Buildable Lands Inventory GIS model Step #2: Identify constrained properties.

Step 4: Housing and employment allocation

The final step in the Buildable Lands Inventory model is to generalize the constrained development capacity to a 250X250' grid covering the Portland urban service boundary area and iteratively allocate Metro's forecasted growth for the City as a whole to the individual grid cells. Currently the model is allocating forecasted growth from 2010 to 2035, less actual development built between 2010 and 2015, and new jobs added between 2010 and 2012. **Figure 6** illustrates this process.

The allocation model determines each grid cells "attraction index" using past development activity in the grid cell, and available capacity in the cell (relative weight of each factor in the index calculation is determined per the "Lookback" assumptions in **Appendix 1**). The index value for each cell is calculated by comparing the number of SFR and MFR units constructed in the cell in the past five years to all units constructed in the City, and the net housing and jobs capacity in the cell compared to the net capacity in the entire City. So for each cell, the single-family residential (SFR) attraction index would be calculated as:

$$\text{Attraction Index} = \left(\frac{\text{SFR units added to grid cell in the last 5 years}}{\text{SFR units added to the Portland USB in the last 5 years}} \times 80\% \right) + \left(\frac{\text{SFR lot capacity of the cell}}{\text{SFR lot capacity in the USB}} \times 20\% \right)$$

The index is then iteratively recalculated, based on the "proposed growth scenario" allocation area assumptions in **Appendix 1** (Tables 6 and 7). Allocation areas are defined modeling geographies that correspond to the Urban design Framework place types used in the recommended Comprehensive Plan (The Central City, Regional centers, Town centers, Civic Corridors, Neighborhood centers, etc.). These allocation areas are a tools that enables the model to respond to specific policy objectives, such as goals to accommodate a certain percentage of growth to the Central City, or various Mixed Use areas. For each allocation area, a specified percentage of units and jobs is allocated to that area. The allocation index is recalculated to distribute 100% of that allocation. The allocation areas were adjusted to represent different growth scenarios. A default scenario was also run that allocated growth based entirely on the attraction index, without the allocation area screen.

For example, the SFR allocation to a particular grid cell in an allocation area would be calculated as:

$$\text{Allocation area SFR allocation} \times \left(\text{Grid cell SFR attraction index} \times \left(\frac{\text{Total SFR attraction index for the Portland USB}}{\text{Total SFR attraction index for all grid cells in the allocation area}} \right) \right)$$

If the allocation exceeds the capacity of a cell, the surplus is then reallocated to cells with remaining capacity by adjusting the allocation index based on the total of the cells with remaining capacity (using an equation similar to the one above), and then the

surplus is redistributed. The process continues until all housing units and jobs have been allocated. If a specific allocation area “fills up” to capacity, excess is re-allocated to other geographies.

The development capacity GIS model is composed of several individual Python scripts. The model itself runs in ESRI’s ArcGIS (Version 10.3). The model is not static – as the inputs to the model change, the model results can be updated, thus allowing the model to incorporate changes in zoning regulations, assumptions, etc., thus making the capacity analysis easy to update and maintain over time.

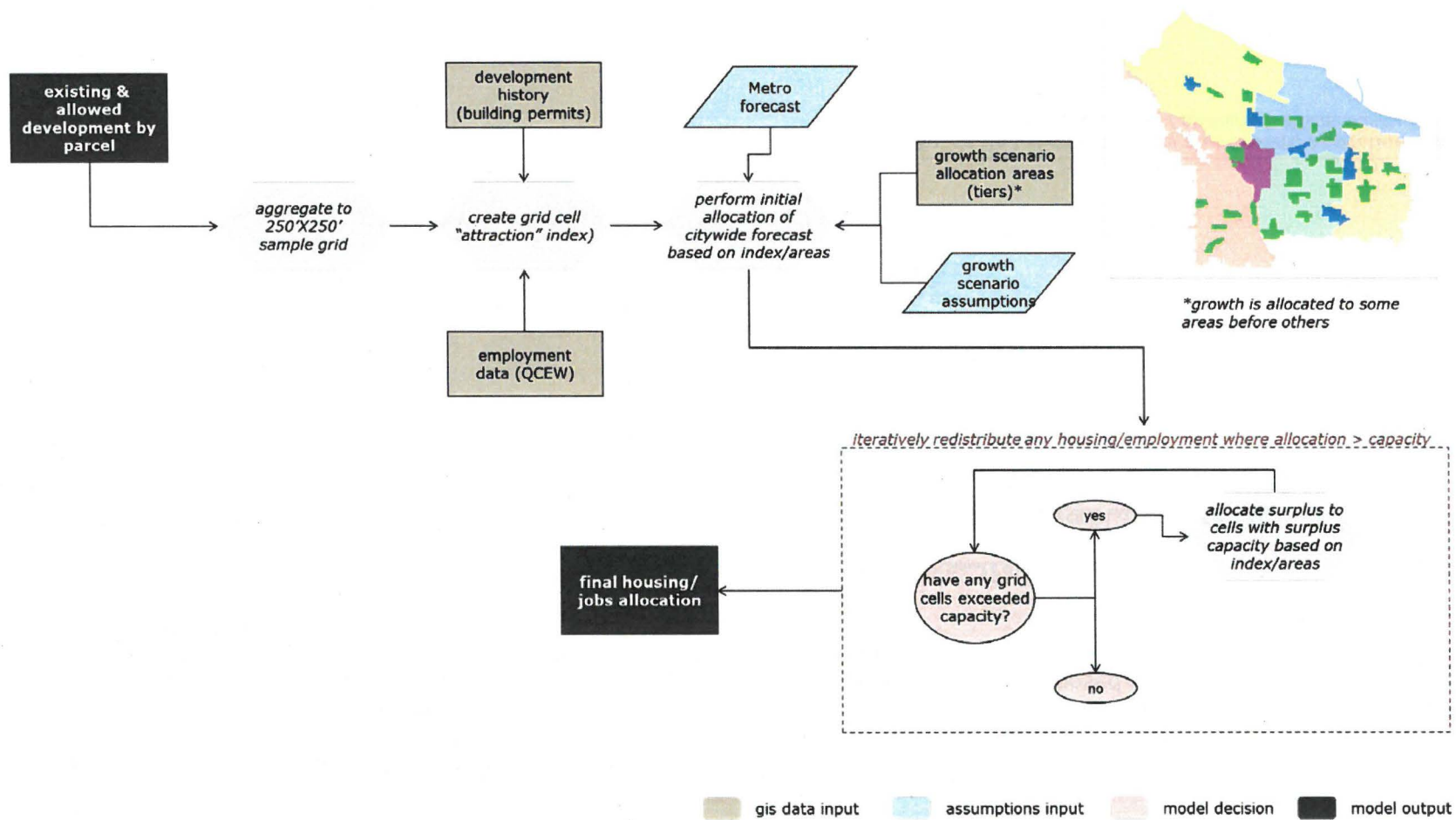


Figure 6. Buildable Lands Inventory GIS model Step #4: Allocate Housing and Jobs Forecast.

model results

BLI Model Development Capacity Parcels

A GIS featureclass containing all parcels identified as underutilized by the BLI GIS model. Contains parcel-by-parcel information about existing SFR/MFR housing and jobs, and allowed housing and job capacity. Development constraint information is also tracked for each parcel, and allowed capacities are adjusted based on these constraints.

Download: http://gis.pdx.opendata.arcgis.com/datasets/266a4e0651e245399caf09eb06691272_90

Metadata: <https://www.portlandmaps.com/metadata/index.cfm?&brief=0&action=DisplayLayer&LayerID=52965>

BLI Model Housing/Employment Allocation Grid

Allocation of Metro 2035 forecast for the City of Portland to a 250'X250' grid covering the City of Portland area. Forecast is allocated to cells based on development trends, employment densities, and underlying development capacity per the GIS-based buildable lands inventory (BLI) allocation and capacity models. Growth is allocated based on the current proposed comprehensive plan land use designations and a proposed ("preferred") growth scenario that resulted from the Bureau of Planning and Sustainability's (BPS) 2012 Growth Scenario Analysis.

Download: http://gis.pdx.opendata.arcgis.com/datasets/596a1c1dcca249c289c7bfe237ab876a_88

Metadata: <https://www.portlandmaps.com/metadata/index.cfm?&brief=0&action=DisplayLayer&LayerID=53973>

All other model inputs, Python scripts, and supporting documentation are available upon request.

project contacts

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Appendix 1: BLI Model Assumptions

Table 1: Comprehensive Plan and Capacity Assumptions

COMP_ZONE	TYPE	GEN_ZONE	GEN_ZONE_CC	REG_ZONE	FAR	FAR_UTIL	FAR_UTILCC	HEIGHT	ZONE_SIZE	RESSPLIT	RESSPLITCC	MFR_SPLIT	RETSPLITCC	AVG_UNIT	AVG_UNITCC	MIN_LOT	MIN_LOTCC	NOTES
CE	Zone	Commercial	Commercial	MUR9	2.5:1	1	0.90	45	0	0.25	0.40	1.00	0.06	1,000	1,000	1,500	10,000	
CG	Zone	Commercial	Commercial	MUR9	3:1	1	0.90	45	0	0.25	0.40	1.00	0.06	1,000	1,033	1,500	10,000	
C11	Zone	Institutional	Institutional	MUR10	4:1	1	1.23	65	0	0.10	0.00	1.00	0.00	1,000	1,000	1,500	10,000	
C12	Zone	Institutional	Institutional	MUR10	4:1	1	1.23	65	0	0.10	0.00	1.00	0.00	1,000	1,000	1,500	10,000	
CM1	Zone	Commercial	Commercial	MUR8	1.5:1	1	0.90	35	0	0.30	0.40	1.00	0.06	1,000	1,000	1,500	10,000	
CM2	Zone	Commercial	Commercial	MUR9	2.5:1	1	0.90	45	0	0.75	0.40	1.00	0.06	1,000	1,000	1,500	10,000	
CM3	Zone	Commercial	Commercial	MUR10	3:1	1	0.90	65	0	0.75	0.63	1.00	0.08	1,000	1,000	1,500	10,000	
CX	Comp Plan/Zone	Commercial	Commercial	MUR10	4:1	1	0.90	75	0	0.55	0.40	1.00	0.06	1,000	1,033	1,500	10,000	
EG1	Zone	General Employment	Mixed Employment	IND/IL	3:1	0.65	1.23	45	0	0.00	0.63	0.00	0.08	1,000	1,196	1,500	10,000	
EG2	Zone	General Employment	Mixed Employment	IND/IL	3:1	0.4	1.23	0	0	0.00	0.63	0.00	0.08	1,000	1,196	1,500	10,000	
EX	Comp Plan/Zone	Central Employment	Mixed Employment	MUR10	3:1	1	1.23	65	0	0.75	0.63	1.00	0.08	1,000	1,196	1,500	10,000	
IC	Comp Plan	Institutional	Institutional	MUR10	4:1	1	1.23	65	0	0.10	0.00	1.00	0.00	1,000	1,000	1,500	10,000	
IG1	Zone	Industrial	Industrial	IL	NA	0	0.00	0	0	0.00	0.00	0.00	0.00	1,000	1,000	1,500	10,000	
IG2	Zone	Industrial	Industrial	IL	NA	0	0.00	0	0	0.00	0.00	0.00	0.00	1,000	1,000	1,500	10,000	
IH	Zone	Industrial	Industrial	IL	NA	0	0.00	0	0	0.00	0.00	0.00	0.00	1,000	1,000	1,500	10,000	
IR	Comp Plan	Multi-Family Residential	Residential	MUR7	2:1	1	0.87	100	0	0.05	0.78	1.00	0.05	1,000	821	1,500	10,000	
IS	Comp Plan	Industrial	Industrial	IL	NA	0	0.00	0	0	0.00	0.00	0.00	0.00	1,000	1,000	1,500	10,000	
ME	Comp Plan	General Employment	Mixed Employment	IND/IL	1:1	1	1.23	45	0	0.00	0.63	0.00	0.08	1,000	1,196	1,500	10,000	
MU-C	Comp Plan	Commercial	Commercial	MUR9	3:1	1	0.90	45	0	0.50	0.66	0.95	0.34	1,000	1,000	1,500	10,000	
MU-D	Comp Plan	Commercial	Commercial	MUR8	.75:1	1	0.90	30	0	0.20	0.25	0.75	1.00	1,000	1,000	1,500	10,000	
MU-N	Comp Plan	Commercial	Commercial	MUR9	2.5:1	1	0.90	45	0	0.25	0.25	0.80	0.75	1,000	1,000	1,500	10,000	
MU-U	Comp Plan	Commercial	Commercial	MUR10	4:1	1	0.90	65	0	0.75	0.75	0.99	0.25	1,000	1,000	1,500	10,000	
NC	Comp Plan	Commercial	Commercial	MUR8	.75:1	1	0.90	30	0	0.30	0.40	1.00	0.06	1,000	1,033	1,500	10,000	
OC	Comp Plan	Commercial	Commercial	MUR9	1:1	1	0.90	45	0	0.00	0.40	0.00	0.06	1,000	1,033	1,500	10,000	
OS	Comp Plan/Zone	Open Space	Open Space	POS	NA	0	0.00	0	0	0.00	0.00	0.00	0.00	1,000	1,000	1,500	10,000	
R1	Comp Plan/Zone	Multi-Family Residential	Residential	MFR6	NA	1	0.87	45	1,000	1.00	0.78	0.67	0.05	1,000	821	1,500	10,000	
R10	Comp Plan/Zone	Single-Family Residential	Residential	SFR3	NA	0	0.00	30	10,000	1.00	1.00	0.00	0.00	1,000	1,000	1,500	10,000	
R2	Comp Plan/Zone	Multi-Family Residential	Residential	MFR2	NA	1	0.87	40	2,000	1.00	0.78	0.67	0.05	1,000	821	1,500	10,000	
R2.5	Comp Plan/Zone	Single-Family Residential	Residential	SFR14	NA	0	0.00	35	2,500	1.00	1.00	0.00	0.00	1,000	1,000	1,500	10,000	
R20	Comp Plan/Zone	Single-Family Residential	Residential	SFR2	NA	0	0.00	30	20,000	1.00	1.00	0.00	0.00	1,000	1,000	1,500	10,000	
R3	Comp Plan/Zone	Multi-Family Residential	Residential	MFR1	NA	0	0.00	35	3,000	1.00	1.00	0.67	0.00	1,000	1,000	1,500	10,000	
R5	Comp Plan/Zone	Single-Family Residential	Residential	SFR7	NA	0	0.00	30	5,000	1.00	1.00	0.00	0.00	1,000	1,000	1,500	10,000	
R7	Comp Plan/Zone	Single-Family Residential	Residential	SFR5	NA	0	0.00	30	7,000	1.00	1.00	0.00	0.00	1,000	1,000	1,500	10,000	
RF	Comp Plan/Zone	Single-Family Residential	Residential	SFR1	NA	0	0.00	30	86,920	1.00	1.00	0.00	0.00	1,000	1,000	1,500	10,000	
RH	Comp Plan/Zone	Multi-Family Residential	Residential	MUR9	2:1	1	0.87	100	0	1.00	0.78	1.00	0.05	1,000	821	1,500	10,000	
RX	Comp Plan/Zone	Multi-Family Residential	Residential	MUR10	4:1	1	0.87	100	0	1.00	0.78	1.00	0.05	1,000	821	1,500	10,000	
UC	Comp Plan	Commercial	Commercial	MUR9	3:1	1	0.90	45	0	0.75	0.40	1.00	0.06	1,000	1,033	1,500	10,000	
WHI	Comp Plan	Industrial	Industrial	IL	NA	0	0.00	0	0	0.00	0.00	0.00	0.00	1,000	1,000	1,500	1,500	

Table 2: Institutional Campus Capacity Assumptions

Name	Campus_ID	MP_SQFT	MP_FAR	MP_Jobs	Notes
Concordia University	1	81,762	0.1041	275	
Kaiser Medical Center	4	233,758	0.3211	478	
Legacy Emmanuel Hospital	2	272,004	0.1336	1,894	
Legacy Good Samaritan Hospital	3	442,419	0.7158	1,083	
Lewis & Clark College	5	908,162	0.1378	613	
Multnomah University	6	104,943	0.1014	187	
OHSU-Marquam Hill Hospitals	17	1,861,846	0.4197	6,318	
OHSU-South Waterfront Campus	18	508,115	3.9940	4,000	Deduct from Institutions, Add to Central City job total
PCC-Cascade	7	102,913	0.3211	381	
PCC-Southeast	8	54,833	0.3211	203	
PCC-Sylvania	9	347,634	0.3211	1,287	
Portland Adventist Hospital	10	0	0.0000	1,124	Deduct from Gateway/Neighborhood Commercial jobs
Portland State University	16	0	0.0000	2,139	Deduct from Central City jobs
Providence Portland Hospital	11	580,000	0.9318	3,430	
Reed College	12	263,674	0.0563	678	
University Of Portland	13	545,601	0.0937	506	
University of Western States	15	31,560	0.0351	147	
Warner Pacific College	14	185,217	0.2738	186	

Table 3: Development Constraint Assumptions

Category	Field	EOA_Category	Description	Partial_Lots	Model_Update	Rate_Housing	Rate_Employ_CC	Rate_Employ_Ind	Rate_Employ_Com	Rate_Employ_Inst
Brownfields	conECSI	Brownfields	DEQ, Environmental Cleanup Sites I (ECSI)	No	Yes	0.85	0.90	0.60	0.60	0.55
Brownfields	conLUST	Brownfields	DEQ, Underground Storage Tank Cleanup Sites (UST)	No	Yes	0.85	0.90	0.60	0.60	0.55
Cultural Resources	conHist	Low	Historic and Conservation districts	No	No	0.85	0.85	0.85	0.85	0.85
Cultural Resources	conHistLdm	Historic	Historic and Conservation Landmarks	No	Yes	0.55	0.55	0.55	0.55	0.55
Cultural Resources	conNataM	Low	Parcels requiring archaeological scan or consultation with Native American tribal governments	No	No	1.00	0.85	0.85	0.85	0.85
Environmental Overlay Zones	conCovrly	Environmental	Environmental Conservation Zones	Yes	Yes	1.00	0.75	0.50	0.35	0.35
Environmental Overlay Zones	conPovrly	Full	Environmental Protection Zones	Yes	Yes	0.00	0.00	0.00	0.00	0.00
Flight Limitations	conAirHgt	None	Approach and departure cones	No	No	0.85	1.00	1.00	1.00	1.00
Flight Limitations	conHeliprt	None	Heliport Landing (impacts several buildings near Portland Heliport)	No	No	0.85	1.00	1.00	1.00	1.00
Flight Limitations	conNoise	None	Noise contours (areas above LDN 65 and 68 noise contours)	No	No	0.85	1.00	1.00	1.00	1.00
Greenway	conGW	Greenway	All land with g/r/n overlays; land within 1 overlay where 10% or more of the parcel is within 125' of OHW	No	No	0.55	0.75	0.50	0.55	0.55
Hazards	conFld100	Environmental	FEMA 100-Year Floodplain Map	Yes	Yes	0.85	0.75	0.50	0.35	0.35
Hazards	conFldway	Full	FEMA Floodway Map	Yes	Yes	0.00	0.00	0.00	0.00	0.00
Hazards	conLSHA	None	Parcels within 50' of a mapped landslide hazard area	No	No	0.85	1.00	1.00	1.00	1.00
Hazards	conSLDO	None	Parcels within 50' of a mapped historic landslide (most recent SLIDO database)	No	No	0.85	1.00	1.00	1.00	1.00
Hazards	conSlp25	Environmental	Parcels where 25% or more of the parcel has a slope of greater than 25%	No	No	0.85	0.75	0.50	0.35	0.35
Infrastructure	conSewer	Infrastructure	Infrastructure Constrained Areas: Sewer	No	No	0.85	0.75	0.75	0.75	0.75
Infrastructure	conStorm	Infrastructure	Stormwater System	No	No	0.85	0.75	0.75	0.75	0.75
Infrastructure	conWater	Infrastructure	Water System	No	No	0.85	0.75	0.75	0.75	0.75
Natural Resources	conWetland	Environmental	Wetlands	Yes	Yes	0.55	0.75	0.50	0.35	0.35
Public Ownership	conInstit	None	Institutional Campuses	No	No	0.00	1.00	1.00	1.00	1.00
Public Ownership	conPrvCom	Full	Private Common Open Space	No	No	0.00	0.00	0.00	0.00	0.00
Public Ownership	conPubOwn	None	Publicly owned or controlled lots that do not provide for residential uses	No	Yes	0.20	1.00	1.00	1.00	1.00
Scenic Areas	conView	Low	Views	No	No	0.85	0.85	0.85	0.85	0.85
Transporation	conTranCap	Infrastructure	2008 Volume to Capacity Ratios	No	No	0.85	0.75	0.75	0.75	0.75
Transporation	conTranInt	Infrastructure	ODOT Highway Interchanges	No	No	0.85	0.75	0.75	0.75	0.75
Transporation	conTranSub	Infrastructure	Substandard and Unimproved Streets	No	No	0.85	0.75	0.75	0.75	0.75

Table 4: Allocation Attraction Index Assumptions

Alloc_Type	Lookback	Capacity	Notes
Housing	80%	20%	Lookback based on permit history (5-year, or full history)
Employment	80%	20%	Lookback based on number of existing employees (QCEW data)

Table 5: SFR, MFR and Jobs Allocation

Alloc_Type	Allocation	Notes
MFR Units	81,653	96,059 (2010 to 2035 forecast) less 2,043 ADUs less 12,363 New MFR Units (through 6/1/15)
SFR Units	22,098	25,535 (2010 to 2035 forecast) less 3,437 New SFR Units (through 6/1/15)
ADU Units	2,045	3,000 (2010 to 2035 forecast) less 955 New ADUs (through 6/1/15); ADU units assigned to SFR zones through separate model
Jobs	117,015	141,640 (2010 to 2035 forecast) less 24,625 new jobs (through 2013, per QCEW data)

Table 6: Proposed Growth Scenario Housing Allocation Assumptions

Alloc_Area	SFR_Cap_Util	MFR_Cap_Util	MFR_Alloc	Notes
Central City Plan District	100%	110%	38.00%	
Gateway	100%	80%	4.00%	
Town Center - Urban Ring	100%	90%	27.00%	
Civic Corridors	100%	80%	16.00%	
Neighborhood Centers - Corridors	100%	70%	12.00%	
Other	100%	70%	3.00%	

Table 7: Proposed Growth Scenario Employment Allocation Assumptions

Alloc_Area	Employ_Cap_Util	Employ_Alloc	Notes
Central City Plan District	100%	23.92%	Includes PSU and OHSU South Waterfront institutional allocation
Central City Industrial	100%	6.83%	
Industrial	100%	21.78%	
Institutional	100%	18.13%	
Gateway	100%	3.09%	Includes Adventist Hospital Institutional allocation
Neighborhood Commercial	100%	20.34%	
Residential	100%	5.30%	
WHI	100%	0.60%	750 jobs from Industrial allocation

Table 9: Housing Type Descriptions

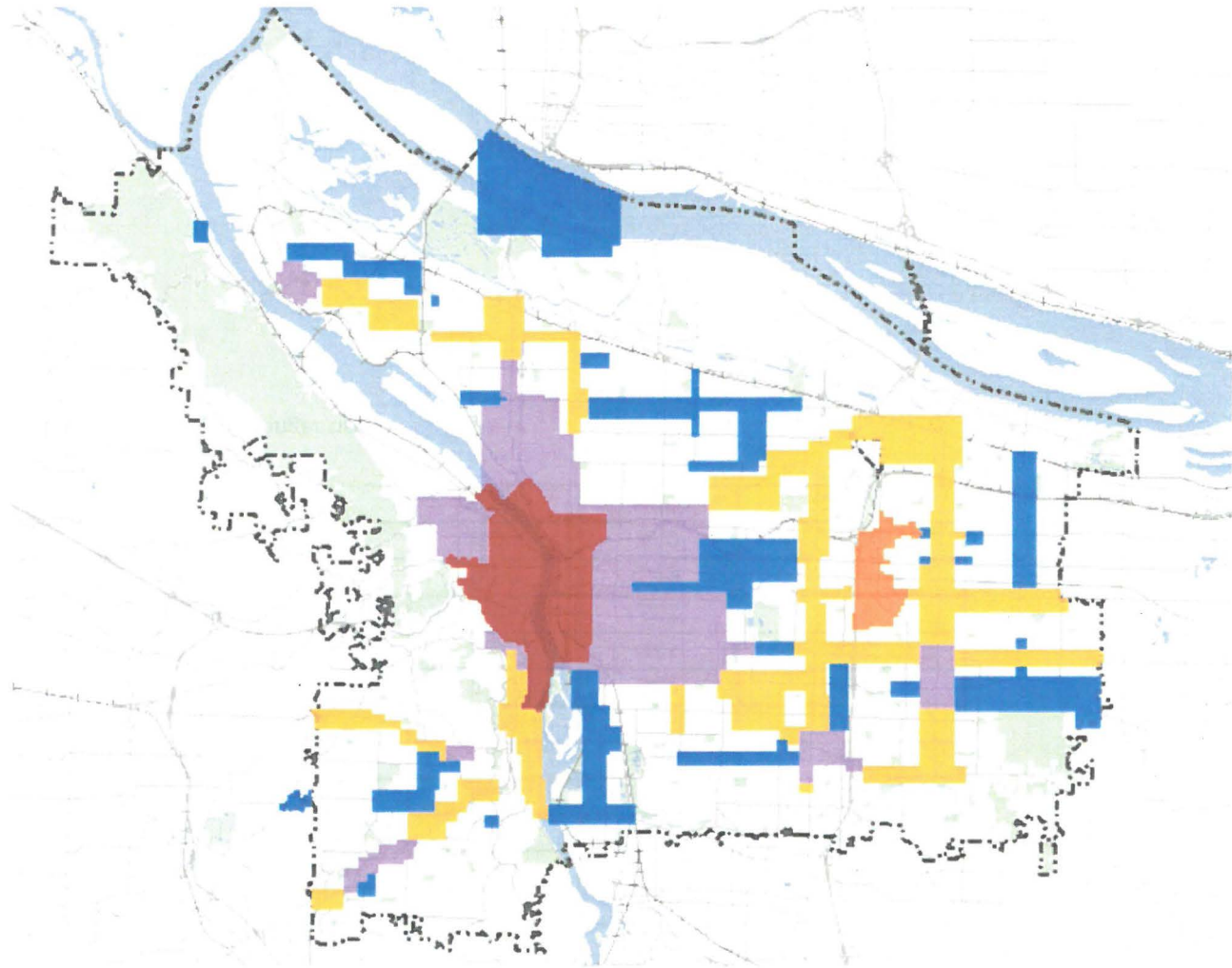
Code	Housing_Type	Unit_Type
A	SFR Houses	SFR
B	Narrow Lot Houses	SFR
C	Attached Houses Medium Density	SFR
D	Attached Houses High Density	SFR
E	Plexes	MFR
F	Corridor Apartments	MFR
G	SRO Housing	MFR
H	Neighborhood Mixed Use	MFR
I	Mid-Rise Mixed Use Small Units	MFR
J	Mid-Rise Mixed Use Large Units	MFR
K	High-Rise Tower	MFR

Table 10: Employment Capacity Assumptions

Geog_Spec	Market_FAR	BldgSF_Job	QCEW_Estimate
CENTRAL CITY COMMERCIAL	0.00	398	790
CENTRAL CITY INDUSTRIAL	0.00	491	637
COLUMBIA EAST	0.00	660	1,109
COLUMBIA HARBOR	0.00	755	1,572
HARBOR AND AIRPORT DISTRICTS	0.00	755	1,572
DISPERSED EMPLOYMENT	0.00	490	804
DISPERSED INDUSTRIAL	0.00	490	804
HARBOR ACCESS LANDS	0.00	1,250	2,012
HARBOR ACCESS SUBAREA	0.00	1,250	2,012
INSTITUTIONAL	0.00	462	436
NEIGHBORHOOD COMMERCIAL	0.52	445	825
REGIONAL CENTER	0.95	503	819
TOWN CENTER	0.54	519	698
Outside Employment Areas	0.00	450	N/A
WHI	0.00	1,250	2,012

* old geography name, no longer used

Sample Allocation Area Map (Residential, Preferred 2035 Comprehensive Plan Scenario)



Appendix 2: Constraint Descriptions

Bureau of Planning and Sustainability Buildable Lands Inventory Model
BLI Development Constraints

constraint description	GIS attribute name	mapping methodology	applies to partial or full taxlots?	last update	Capacity Utilization Rate				
					Residential	Employment (Central City)	Employment (Industrial)	Employment (Commercial)	Employment (Institutional)
Brownfields									
DEQ environmental cleanup sites (ECSI)	conECSI	lot contains an ECSI site	full	12/16/2014	85%	90%	60%	60%	55%
DEQ underground storage tank cleanup sites (LUST)	conLUST	lot contains an LUST site	full	12/16/2014	85%	90%	60%	60%	55%
Cultural Resources									
historic and conservation districts	conHist	lot is within a historic or conservation district	full	2/25/2014	85%	85%	85%	85%	85%
historic and conservation landmarks	conHistLdm	lot contains a historic or conservation landmark	full	2/25/2014	55%	55%	55%	55%	55%
areas requiring archaeological scan or consultation with tribes	conNatAm	lot with an identified cultural resource area	full	2/25/2014	100%	85%	85%	85%	85%
Environmental Overlay Zones									
conservation zones	conCovrly	lot or portion of a lot within mapped environmental conservation overlay zone	partial	12/16/2014	100%	75%	50%	35%	35%
protection zones	conPovrly	lot or portion of a lot within mapped environmental protection overlay zone	partial	12/16/2014	0%	0%	0%	0%	0%
Flight Limitations									
approach and departure cones	conAirHgt	overlay zone height limits near the airport landing and takeoff cone	full	1/1/2009	85%	100%	100%	100%	100%
heliport landing	conHelprt	identified heliports	full	1/1/2009	85%	100%	100%	100%	100%
airport noise	conNoise	areas above day/night average sound level (LDN) of 65 per mapped noise contours	full	7/1/2012	85%	100%	100%	100%	100%
Greenway									
greenway	conGW	lots within mapped greenway overlay zones ("g", "r", and "n" overlays); lots within the "l" overlay where 10% or more of the lot area is within 125' of ordinary high water	full	7/1/2012	55%	75%	50%	55%	55%
Hazards									
DOGAMI regulatory landslide hazard area	conSHA	lots within 50' of a mapped landslide hazard area	full	2/25/2014	85%	100%	100%	100%	100%
DOGMAI digital landslide deposits database	conSUDO	lots within 50' of a mapped historic landslide deposit	full	12/16/2014	85%	100%	100%	100%	100%
FEMA 100 year floodplain map	conFid100	lot or portion of a lot within the mapped 100-year floodplain (special flood hazard area)	partial	12/16/2014	85%	75%	50%	35%	35%
FEMA floodway map	conFidway	lot or portion of a lot within the mapped floodway	partial	12/16/2014	0%	0%	0%	0%	0%
slopes over 25%	conSlp25	lots where 25% or more of the lot has a slope greater than or equal to 25% (as derived from LIDAR elevation models)	full	2/25/2014	85%	75%	50%	35%	35%
Infrastructure									
sewer system constraints	conSewer	lots identified as not able to connect to the public sewer system that are not parks, open space, or other publicly-owned land [source: Bureau of Environmental Services]	full	1/1/2014	85%	75%	75%	75%	75%
stormwater system constraints	conStorm	lots more than 50' from a mapped stormwater pipe or culvert, combined sewer pipe, underground injection control (sump), or stream/river/drainageway, AND meet one of the following conditions: 1 are less than 10' to seasonal high groundwater [source: Bureau of Environmental Services] 2 are identified as not suitable for infiltration based on soil and slope [source: Bureau of Environmental Services] 3 in a mapped wellhead protection area	full	1/1/2014	85%	75%	75%	75%	75%
water system constraints	conWater	lots are constrained if they meet one or more of the following conditions: 1 greater than 50' from a water main and not within the Rockwood or Palantine Hill water districts 2 less than 50' from a 2" water distribution main AND not within 50' of a distribution main larger than 2"; 3 in a wildland interface area AND not within the Linton, Rocky Butte pump, Mt. Scott, Lexington, Clatsop pump, Willalatin, Greenleaf, Penridge and Calvary service areas	full	1/1/2014	85%	75%	75%	75%	75%
Natural Resources									
wetlands	conWetland	lots or portions of a lot within a mapped wetland	partial	updates when model is run	55%	75%	50%	35%	35%
Public Ownership									
institutional campuses	conInstit	lots within a mapped institutional campus	full	2/25/2014	0%	100%	100%	100%	100%
private common open space	conPvtCom	lots identified as common open space; based on Metro Outdoor Recreation & Conservation Area (ORCA) "Home Owners Association" sites, as well as manual adding known private open space taxlots	full	9/17/2015	0%	0%	0%	0%	0%
publicly-owned lots that do not provide for residential uses	conPubOwn	publicly-owned lots not owned by the Housing Authority of Portland	full	12/16/2014	20%	100%	100%	100%	100%
Scenic Areas									
scenic views	conView	lots with a mapped view corridor with a height restriction in the Scenic Resources Protection Plan	full	1/1/2009	85%	85%	85%	85%	85%

Bureau of Planning and Sustainability Buildable Lands Inventory Model
BLI Development Constraints

constraint description	GIS attribute name	mapping methodology	applies to partial or full taxlots?	last update	Capacity Utilization Rate				
					Residential	Employment (Central City)	Employment (Industrial)	Employment (Commercial)	Employment (Institutional)
Transportation									
traffic volume exceeds capacity	conTranCap	lots outside the Central City that do not have a Mixed Use (MU) comp plan designation and: 1 are within areas mapped as Conditional Use Master Plan (CUMP) areas ¹ ; or 2 have a proposed SFR comp plan designation (R2.5, R5, R7, R10, R20, RF), or; 3 have an Institutional Campus (IC) comp plan designation; or 4 lots with proposed multifamily, employment or industrial proposed comp plan designations where the proposed comp plan designation will not match proposed zoning. ²	full	3/6/2015	85%	75%	75%	75%	75%
<p>...AND where one or more of the following conditions is met:</p> <p>1 lot or portion of the lot is less than 1/8 mile from an over capacity facility³ for streets (excluding highways and highway interchanges) <u>inside</u> neighborhoods that meet connectivity standards⁴;</p> <p>2 lot or portion of the lot less than 1/4 mile from an over capacity facility³ for streets (excluding highways and highway interchanges) <u>outside</u> neighborhoods that meet connectivity standards⁴.</p>									
ODOT highway interchanges	conTranInt	lots outside the Central City that do not have a Mixed Use (MU) comp plan designation and: 1 are within areas mapped as Conditional Use Master Plan (CUMP) areas ¹ ; or 2 have a proposed SFR comp plan designation (R2.5, R5, R7, R10, R20, RF), or; 3 have an Institutional Campus (IC) comp plan designation; or 4 lots with proposed multifamily, employment or industrial proposed comp plan designations where the proposed comp plan designation will not match proposed zoning. ²	full	3/6/2015	85%	75%	75%	75%	75%
<p>... AND:</p> <p>Where the lot is less than 1/2 mile from a I84, I5, I405, I205, or Hwy 26 over-capacity interchange (ramp connecting to a local street)⁵</p>									
substandard and unimproved Streets	conTranSub	lots are constrained if they meet one or more of the following conditions: 1 within 50' of a incomplete or substandard street or right-of-way. Substandard street data is derived from street center line attributes from PBOT dataset pavement_pms_pdx. Attributes for Paved without Curbs, Unpaved and Impassable Streets are derived from Fields [SurfaceType] and [Curbs]. 2 within 50' of a master plan street (Streetplan dataset) with a determined alignment; 3 within 50' of a street face that lacks a sidewalk (excluding OS, IS, and EG comp plan designations) [using pbot sidewalk data]	full	12/16/2014	85%	75%	75%	75%	75%

¹ Conditional Use Master Plan (CUMP) areas are identified as all Land Use Review cases (per the BDS Land Use Review GIS data) with the following case types per the "CASE_NAME_FULL" attribute: "IM", "CUMS", "MS" and "IR". Sample query: CASE_NAME_FULL LIKE '%M%'

² Used the BPS District Liaison proposed tentative zoning. Also assumed proposed comp plan designations and proposed zoning will match in proposed employment and industrial designations, excluding proposed golf course "IS" designations (proposed change record ID # 294, 297 & 298). Identified using the following query: NOT NEWDESIG IN ('MU1', 'MU2', 'MU3', 'MU4') AND (NEWDESIG IN ('R2.5', 'R5', 'R7', 'R10', 'R20', 'RF') OR NEWDESIG = 'IC' OR (NEWDESIG IN ('CX', 'EX', 'R1', 'R2', 'R3', 'RH', 'RX') AND NEWDESIG <=> NEWZONE) OR (RECID IN (294,297,298))), where NEWDESIG is the proposed designation, NEWZONE is the proposed zone, and RECID is the unique ID of the proposed change from the BPS comp plan proposal database.

³ Over capacity streets are identified as any local (non-ODOT) street modeled at 90% capacity or above. Source is PBOT transportation model outputs V/C attribute. Sample query: V/C >= 90

⁴ Neighborhoods that meet street connectivity standards: NPMS, NECN (except Eliot), CNN (except Cully), SUEL, Brentwood Darlington, Mt Scott-Arleta, Foster-Powell, Downtown, Old Town/Chinatown, Northwest District, Pearl, South Portland, South Burlingame, Goose Hollow, Lloyd District

⁵ Over capacity interchanges are identified as any ODOT freeway/highway interchanges (ramps connecting to local streets) modeled at 85% capacity or above. Source is PBOT transportation model outputs V/C attribute. Sample query: V/C >= 85

Moore-Love, Karla

From: Engstrom, Eric
Sent: Thursday, April 21, 2016 10:27 AM
To: Hales, Charlie; Fish, Nick; Fritz, Amanda; Novick, Steve; Saltzman, Dan; Moore-Love, Karla
Cc: Elmore-Trummer, Camille; Shriver, Katie; Dunphy, Jamie; Grumm, Matt; Adamsick, Claire; Zehnder, Joe; Burns, Al (Planning and Sustainability); Armstrong, Tom; Anderson, Susan; Rees, Linly; Beaumont, Kathryn; King, Lauren
Subject: staff memo

Commissioners,

Enclosed is a staff rebuttal to Comp Plan testimony related to commercial/retail land supply in the Employment Opportunities Analysis (EOA). This is a response to possible EOA amendments suggested by the Retail Task Force.



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Eric Engstrom, AICP
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Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

MEMO

DATE: April 19, 2016

TO: Mayor Hales and City Council

FROM: Tyler Bump, Senior Economic Planner
Steve Kountz, Senior Economic Planner
Tom Armstrong, Supervising Planner

CC: Susan Anderson, Director

SUBJECT: Portland and Pattern Area Retail Demand and Sales Analysis

BPS staff does not think there is a need to amend the Economic Opportunities Analysis (EOA) to address retail capacity issues raised in the April 14, 2016 testimony from Mark Whitlow and Eric Hovee on behalf of the Retail Task Force and the International Council of Shopping Centers. BPS does support amending or adding policies to the Comprehensive Plan to further support retail development, especially grocery stores, in neighborhood business districts as part of the complete neighborhoods strategy.

Retail Leakage

BPS staff conducted further analysis to evaluate the land use implications for retail leakage as identified in Eric Hovee's "Retail Performance by Pattern Area Draft 1-14-16". BPS staff found some discrepancies in the scale of leakage by pattern area between the Nielsen data source used by Hovee and ESRI Business Analyst data, which was also used in the EOA. This difference may be attributed to modelling methodology differences between these two third-party data sources. It should also be noted, that this type of analysis is based on the number of stores located within a given geography, but because there is no sales tax there is a lack of complete and accurate data for retail activity by sector and geography.

One of the key claims in the Hovee memo is that Portland as a whole is "under retailled" with a 9% leakage of retail sales - that is that Portlanders spend 9% of their disposal income outside the city on retail goods. The implication in testimony provided to City Council is that this leakage is due to the lack of retail land available, especially for larger, big box formats.

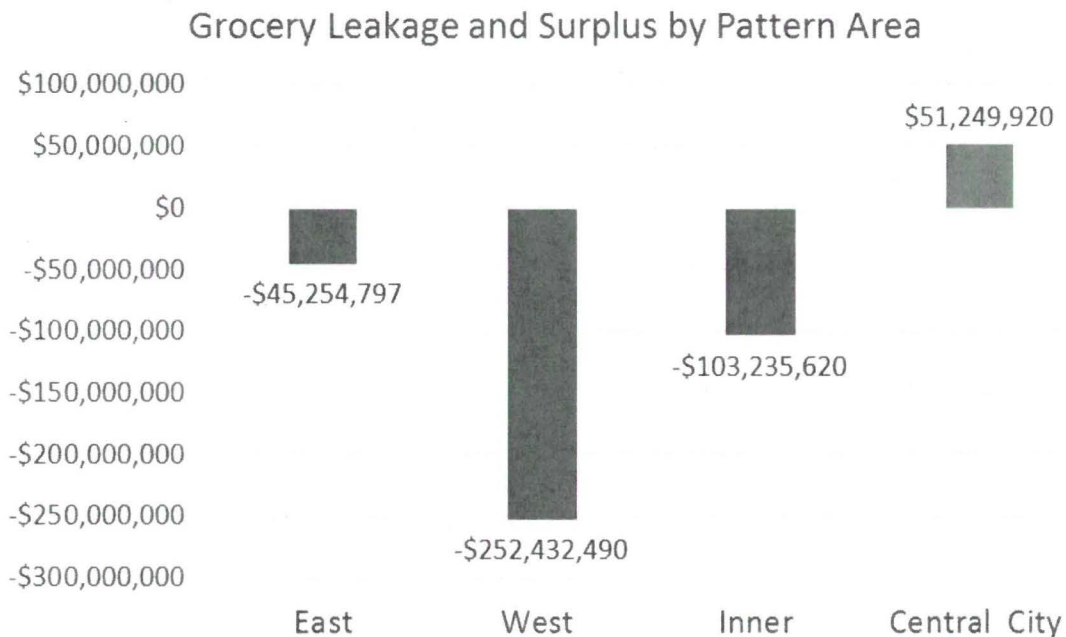


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Specifically, the testimony indicates that there is a shortage of grocery stores, especially in East Portland.

Additional analysis of ESRI data conducted by BPS staff suggests that citywide there is actually a 10% surplus of retail sales beyond estimated demand for Portland households. BPS staff agrees that there is citywide grocery leakage, which is also identified in the EOA, though analysis using ESRI Business Analyst suggest that citywide grocery leakage is 18% compared to 24% grocery leakage identified in the Hovee memo. Variation in findings of grocery leakage also exist for pattern area geographies. The majority of grocery leakage in the City of Portland, 89 percent of total grocery leakage, can be attributed to the Western Neighborhood pattern area where there are both land use constraints and topography constraints that significantly impact land supply. As noted in the Hovee “Retail Performance by Pattern Area” memo, the majority of daily needs purchases for this pattern area are made in cities adjacent to Portland such as Beaverton, Tigard and Lake Oswego or at grocers located in Northwest Portland and the Central City.



Source: BPS analysis of ESRI Business Analyst Data- March 2016



Table 1. Comparison of Grocery Store Leakage

	Hovee (Nielsen data)	BPS (ESRI Business Analyst data)
Citywide	24% gap	18% gap
East	39% gap	16% gap
West	66% gap	77% gap
Inner	15% gap	12% gap
Central City	19% surplus	44% surplus

ESRI Business Analyst data indicates that the Eastern pattern area had much less leakage occurring than is identified in the Nielsen data provided by Hovee, which estimated total retail sales leakage of 48% and grocery leakage of 39%. The ESRI data identified a much smaller leakage estimate for both total retail sales (18%) and grocery sales (16%). Additionally, a closer analysis found there are two key sub-areas where grocery leakage is occurring in the Eastern pattern area, the Sumner-Parkrose area and the outer Lents-Pleasant Valley Area. In addition to the Grocery Outlet store that is currently under construction at NE 107th/Sandy Boulevard (which is not accounted for in the retail sales data), BPS staff has been working with community organizations in the Parkrose area to refine zoning proposals in the Mixed Use Zones Project to encourage more daily needs retail users on the north side of Sandy Boulevard through the wider designation of CE zoning. The 122nd Avenue Rezone Project (2012) also applied a variety of commercial zones along 122nd Avenue near Foster Road to encourage retail activity that will help nearby residents meet their daily needs. It should also be noted that a large number of residents in the Eastern pattern area meet their grocery shopping needs at culturally specific markets and stores throughout East Portland. These small culturally specific markets are vibrant businesses of which are often undervalued in traditional economic modelling but are crucial to supporting immigrant and refugee communities in East Portland.

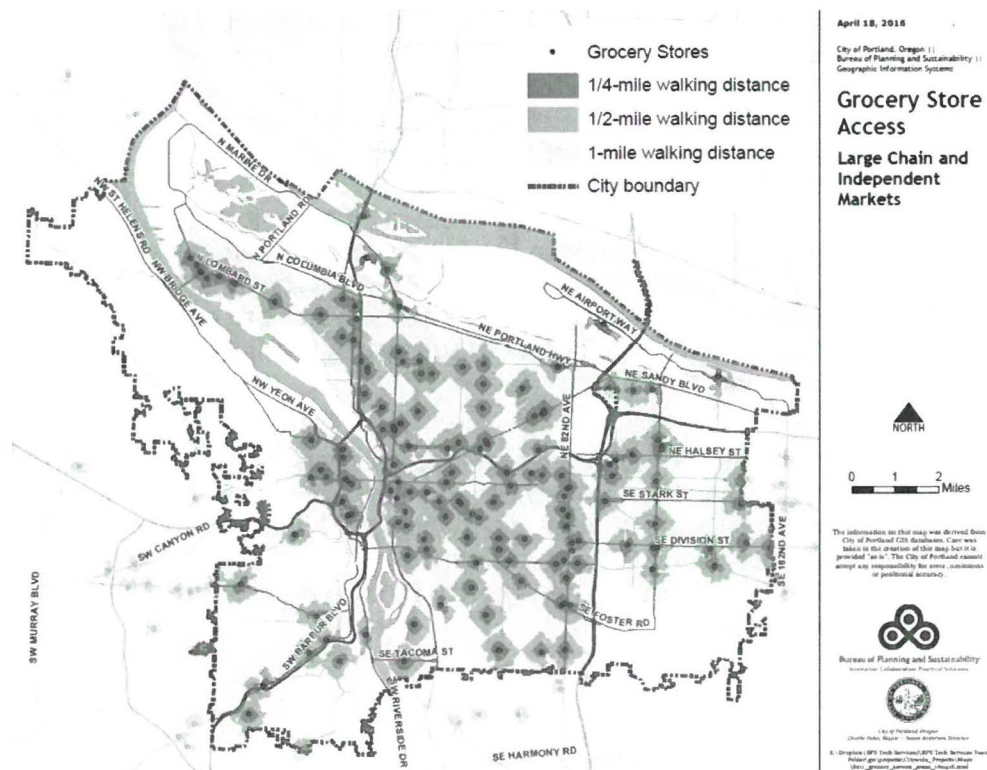
Also, Hovee’s findings of a higher vacancy rate and lower rents in East Portland are an indicator of retail space availability. Something other than zoning/land development capacity is at work - a combination of insufficient demographic demand and business support. The City of Portland strategy is not to zone even more land for commercial retail development, but rather to support business growth through programs like PDC’s Neighborhood Prosperity Initiative.

The high amount of retail and grocery leakage that occurs in the Western Neighborhoods pattern area can be attributed to a number of factors. The built form and residential density levels vary significantly across the Western pattern area from the south to north which impacts access to commercial services. Retail demand analysis for this large of a geography identifies a significant amount of demand based on higher income levels of households while



these neighborhoods have significant land use and topography constraints that limit the market response from large format retailers. Much of the leakage in the Western pattern area is going to Inner Pattern Area stores such as the Northwest Portland Fred Meyer, Whole Foods, New Seasons, and Food Front Co-Op as well as large format retailers on the west side of Portland near Raleigh Hills and Cedar Hills shopping centers that include Fred Meyer, New Seasons, Winco Foods, and a variety of culturally specific grocery stores including Uwajimaya, Bazaar Market, Asian Food Center, G Mart and Salsa Market. The recent closure of the Walmart Neighborhood Market in Raleigh Hills is demonstrative of the large supply of west side grocers that serve finite demand of a larger market area in and around the Southwest Hills.¹

The 2008 retail leakage analysis in Section 1 of the EOA found that, “Generally, Portland is adequately retailed.” In the 2008 analysis using ESRI Business Analyst data, there was an identified citywide retail surplus of 14%. An update of citywide retail analysis conducted for this memo found that a retail surplus of 10% exists as of March 2016. Additionally, recent analysis of access to grocery stores in the City of Portland indicates that access throughout the city is reasonably well distributed with the exception of Parkrose where challenges exist to compete with the existing Costco on NE 138th Avenue, near SE 122nd Avenue and Foster Road where land use changes were made to accommodate a variety of neighborhood serving retail as part of the 122nd Avenue Rezoning Project (2012), and parts of the Southwest and Northwest hills where land use and topography constraints limit commercial activity.



¹ <http://pamplinmedia.com/bvt/15-news/289089-166241-walmart-to-close-raleigh-hills-store-268-others>



Previous testimony by Whitlow (December 31, 2015) also references a 2011 PDC study by Leland Consulting Group as further evidence of a “lack of available sites” for grocery stores in East Portland. BPS does not find the 2011 PDC/Leland study to be compelling for a 20-year EOA because it was a short-term market study of what was currently available on the market at that time and limited to what buildings were available for lease and what vacant land was for sale. The Leland Consulting Group report that was conducted for the Portland Development Commission did not consider redevelopment of underutilized, lower-value sites, which is the primary source of developable land supply in the Neighborhood Commercial geographies identified in the Buildable Land Inventory, which is the basis for the land supply analysis in the EOA Section 2/3. The EOA Section 2/3 found that there was sufficient developable and redevelopable land for a variety of site sizes as referenced below in the research that was conducted by E.D. Hovee and Company and the Bureau of Planning and Sustainability.

Table 2. Comparison of Buildable Land Inventory Demand and Supply by Site Size

EOA Geography	Buildable Land Inventory by Parcel Size (acres)	
	< 3 Acres	> 3 Acres
Neighborhood Commercial Demand	515	176
Neighborhood Commercial Supply	761	543
Neighborhood Commercial Surplus	246	367

BPS analysis of the BLI development capacity in the Neighborhood Commercial geography shows an adequate distribution across the pattern areas for both small and large parcel sizes. As discussed above the Western Neighborhood pattern area has the most constrained land supply, but it is in-line with its proportional share (17%) of the population. (Note: Industrial & River pattern area is included because it include the retail development on Hayden Island as well as Cascade Station).

Table 3 Neighborhood Commercial Development Capacity by Pattern Area

Pattern Area	Parcel Size		Total	Share
	Less than 3 acres	More than 3 acres		
Eastern Neighborhoods	230	275	505	37%
Inner Neighborhoods	455	110	564	41%
Western Neighborhoods	66	64	131	10%
Industrial & River	22	138	160	12%
	773	587		



Conclusion

BPS staff disagrees with the Hovee/Whitlow position that “Portland experiences significant sales leakage.” The 2016 BPS analysis is consistent with the 2008 data in the Section 1 of EOA. Therefore, no amendment to that portion of the document is necessary.

BPS staff disagrees with the Hovee/Whitlow position that the land supply is inadequate for store types that require larger sites. The land supply analysis in the EOA finds an overall 216% surplus of developable land in Neighborhood Commercial geographies relative to 20-year demand. The BLI shows that there is ample supply of Neighborhood Commercial land in all size categories, including for 2-5 acre sites. Additionally, some of the mixed use commercial map changes in the Comprehensive Plan have been made to address areas that are underserved by neighborhood serving retail and services as part of creating complete neighborhoods.

The EOA includes retail leakage analysis within a broad review of neighborhood commercial land considerations, including job growth, sector trends, development trends, business focus group insights, small business vitality, complete neighborhoods, and adequate land supply. The EOA analysis particularly explores new market opportunities and new policy directions, including expanding transit oriented development, an urban form hierarchy of centers and corridors, neighborhood revitalization, and healthy food access.

Finally, BPS staff does not think it is necessary to include an additional statement in Section 4 of the EOA to emphasize the need to serve unmet neighborhood commercial needs. Section 4 already acknowledges that only 64% of Portlanders live in complete neighborhoods, and that only 60% live within a half-mile of a grocery store and that there is a need for additional commercial capacity in underserved neighborhoods, but this challenge is more than a land use development capacity issue, it requires other actions, in terms of incentives and investments, to support additional retail development in underserved neighborhoods.





CITY OF
PORTLAND, OREGON

Amanda Fritz, Commissioner
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Portland, Oregon 97204
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amanda@portlandoregon.gov

April 13, 2016

To: City Council
From: Commissioner Fritz
CC: Joe Zehnder, Chief Planner; Eric Engstrom, Principal Planner; Susan Anderson, Director

RE: Potential Additional Comp. Plan Amendments and Refinements – REVISED MEMO

Since publication of the Comprehensive Plan Amendment Report on March 18th, I have identified minor amendments to be included for discussion at upcoming Comprehensive Plan hearings on April 14th and 20th, 2016.

1. Chapter 2, P.GP 2-5

Amend Goal 2.F: Accessible and effective participation. I support the following language proposed by the Public Involvement Advisory Council in coordination with the Anti-Displacement PDX coalition, to address both physical and cultural accessibility in community involvement processes.

Goal 2F: Accessible and effective participation

City planning and investment decision-making processes are designed to be culturally accessible and effective, and responsive to the needs of all communities and cultures. 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-specifierresponsive, and robust community involvement.

Co-sponsored by Mayor Hales

2. Errata: the following policy change proposal was included in my original list of amendments submitted to the Bureau of Planning and Sustainability prior to March 18.

Chapter 2, P. GP 2-11

Add a policy emphasizing the need for the City to budget sufficient resources for the Community Involvement Program:

"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.

3. **Chapter 9, Policy 9.57 - 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. Provide adequate but not excessive off-street parking where needed, consistent with the preceding practices.

Co-sponsored by Commissioner Novick

4. **Chapter 9, Page GP9-6, Goal 9.A: Safety**
The City achieves the standard of zero traffic-related fatalities and serious injuries. Transportation safety impacts the livability of a city and the comfort and security of those using City streets. This is achieved through comprehensive efforts to improve transportation safety through equity, engineering, education, enforcement and evaluation will be used to eliminate traffic-related fatalities and serious injuries from Portland's transportation system.

Co-sponsored by Commissioner Novick



CITY OF
PORTLAND, OREGON
OFFICE OF PUBLIC SAFETY

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April 12, 2016

Memorandum

TO: Mayor Hales and City Commissioners
FROM: Commissioner Novick
CC: Joe Zehnder, Chief Planner; Eric Engstrom, Principal Planner; Susan Anderson,
Director
RE: Potential additional Comprehensive Plan Amendment

Two potential additional amendments to the Comprehensive Plan have come to my attention since publication of the Comprehensive Plan Amendment Report on March 18. I would like these further amendments to be considered.

1. This map amendment would re-designate properties located in NW Portland in the area bounded by:
 - NW 29th Ave. on the east
 - NW Nicolai St. on the north
 - The half block south of NW Roosevelt St. on the south
 - The half block to the west of NW 31st Ave on the west

The parcels are currently designated Mixed Employment. This amendment proposes re-designating the parcels Central Employment / EX. The properties included in this area are R307721, R307722, R307724, R307726, R307727, R307729, R307730, R307739, R307740, R307741, R307744, and part of R307719. These parcels are adjacent to and nearby the parcels addressed by Amendment #M47.

In addition, this amendment proposes refining Amendment #M47. Amendment #M47 changes the designation on R307720 and part of R30719 from Mixed Employment to Multi-Dwelling 2,000. This amendment would change the designation to Multi-Dwelling 1,000 instead of Multi-Dwelling 2,000.

Cosponsor: Mayor Hales, Commissioner Saltzman

2. This map amendment proposes applying the changes proposed by the Mayor in the first amendment discussed in his April 11, 2016, memo to the area between SE 26th Ave. and SE 30th Ave. and between SE Stark St. and SE Belmont St., excluding the area north of Belmont proposed for Mixed Use. Currently, much of this area is proposed for a designation that will allow a mix of R1 and R2 zoning.

Cosponsors: Commissioner Fritz



Commissioner Nick Fish
City of Portland

April 12, 2016

Memorandum

TO: City Council Commissioners
FROM: Commissioner Fish
CC: Joe Zehnder, Chief Planner, Eric Engstrom, Principal Planner, Susan Anderson, Director

RE: Potential Additional Comp. Plan Amendments and Refinements

Since publication of the Comprehensive Plan Amendment Report on March 18th, the Bureau of Environmental Services (BES) has identified several of the properties on the *Residential and Open Space Zoning Map Update* that they would request an alternative zoning designation.

In 2014, BES worked with BPS and PP&R to identify water quality facilities and natural areas to recommend for a Comp Plan map zone change to Open Space (OS). Of the final BPS recommendations, BES has identified ten properties they would prefer an amended zoning designation.

I would like these further amendments considered.

Address	Tax Lot	Map ID	Description	Explanation
No address	R100110	547	Retain existing R7 base zone	Erroneously proposed for OS designation. In BES' Wastewater portfolio
No address	R130273		Change base zone from R5 to OS	Acquired to preserve and enhance water quality and natural resource functions
No address	R193262		Change base zone from R5 to OS	Acquired to preserve and enhance water quality and natural resource functions
6714 SE 142 nd	R130272		Change base zone from R10 to OS	Acquired to preserve and enhance water quality and natural resource functions

7215 SE Barbara Welch Road	R193275	233	Change base zone from R10 to OS	Acquired to preserve and enhance water quality and natural resource functions
14841 SE Barbara Welch Lane	R337096	233	Change base zone from R10 to OS	Acquired to preserve and enhance water quality and natural resource functions
No address	R335436		Change base zone from IH, EG2 to OS	Acquired to preserve and enhance water quality and natural resource functions
No address	R336975		Change base zone from R10 to OS	Acquired to preserve and enhance water quality and natural resource functions



Commissioner Nick Fish
City of Portland

April 12, 2016

Memorandum

TO: City Council Commissioners
FROM: Commissioner Fish
CC: Joe Zehnder, Chief Planner, Eric Engstrom, Principal Planner, Susan Anderson, Director

RE: Potential Additional Comp. Plan Amendment

Since publication of the Comprehensive Plan Amendment Report on March 18th, residents in the Richmond neighborhood contacted my office and requested a change to the *Residential and Open Space Zoning Map Update*.

The neighbors have requested the properties on SE Caruthers between SE 35th PI to SE 38th Ave be changed from the current proposal of "Mixed Use – Urban Center" to "R2.5" to reflect the desire that this neighborhood remain residential. The underlying zoning map already designates these properties as "R2.5". Additionally, the properties directly north of this block are zoned "R2.5" in the Comp Plan.

I would like these further amendments considered.



Office of Mayor Charlie Hales
City of Portland

April 11, 2016

Memorandum

TO: City Council Commissioners
FROM: Mayor Hales
CC: Joe Zehnder, Chief Planner, Eric Engstrom, Principal Planner, Susan Anderson, Director
RE: Potential Additional Comp. Plan Amendments and Refinements

Since publication of the Comprehensive Plan Amendment Report on March 18th, several possible additional changes and refinements have come to our attention. I would like these further amendments considered.

1. **Buckman (#S21).** This map amendment applies to an area in Buckman that has a mix of small lot detached homes, duplexes, triplexes, and apartment buildings. Staff has proposed changing the area R2.5 while amendment #S21 would keep the area R5.

While the amendment may be seen as a way to prevent single family demolitions, the risk of this with R2.5 is overstated. Of the 140 dwellings in the area, 36 are single family homes, but only 6 of those are on that would be dividable in R2.5. Also, R2.5 is the most appropriate zone for the way the area is developed. The average density of the area is 25 units/acre. This exceeds the maximum density allowed under R2. Of the 60 lots in the area 33 are less than 2,500 square feet.

If Council wishes to retain R5 zoning, staff recommends the following approach. City Council should direct staff to use create an overlay or plan district to accomplish the following:

- a. Prevent the remaining 5,000 square foot lots in the area to be divided. This would be consistent with the R5 Zone standards.

AND

- b. Allow bonus density up to R1 levels if:
 - i. A building more than 75 years old has not been demolished on the site in the past 10 years. For example, the R1 density could be achieved through internal conversions, or additional ADUs).
 - ii. Development that involved demolition of buildings less than 75 years old or is happening on vacant lots or parking lots could be allowed via Design Review.

(Co-sponsored by Commissioner Fritz, Novick)

2. **Carbon Emissions Policy** (Refinement of #P43). BPS staff have suggestion a minor refinement to the New Policy to go after 4.63. **(Co-sponsored by Commissioner Novick)**

New Policy after 4.63. Reduce carbon emissions. Encourage a development pattern that minimizes carbon emissions from building and transportation energy use.

3. **Air Quality Policy** (NEW). Request from Tamara DeRidder for more emphasis on air quality in the plan. Staff suggests two additions – one related to vehicular emissions and one related to use of State DEQ data in making land use decisions. **(Co-sponsored by Commissioner Saltzman, Novick, and Fish)**

“Policy 4.36 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. Advocate for state legislation to accelerate replacement of older diesel engines.”

“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. Coordinate with the Oregon Department of Environmental Quality to incorporate up-to-date air quality information and best practices into planning and investment decisions.”

4. **Interim Congestion Standards** (NEW). This addition to Policy 9.49 adds reference to the new Interim Mobility Standards. These are regional standards that Metro requires for evaluating congestion. These standards have been used to evaluate investments and policies in the new Comprehensive Plan.

The proposed amendment makes clear that these standards have been used for evaluating the plan’s compliance with state and regional transportation requirements. Appending these standards to Chapter 9 Transportation Element of the Comprehensive Plan avoids any legal confusion about what standards were used to evaluate the plan, and subsequent amendments.

“Policy 9.49 Regional congestion management. Coordinate with Metro to establish new regional multimodal mobility standards that prioritize transit, freight, and system completeness.

- i. 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.*
- ii. In the interim, use the deficiency thresholds and operating standards of the Regional Mobility Policy, in Figure 9-4.”*

Figure 9-4. Interim Deficiency Thresholds and Operating Standards

Location	Standards		
	Mid-Day One-Hour Peak*	PM 2-Hour Peak*	
		1 st Hour	2 nd Hour
Central City, Gateway, Town Centers, Neighborhood Centers, Station Areas	.99	1.1	.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	.99	1.1	.99
Other Principal Arterial Routes	.90	.99	.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.

(Co-Sponsored by Commissioner Fish)

5. **350pdx Changes (NEW).** Members of the 350pdx organization have suggested a few small policy refinements to Policies 6.6 and 6.39c.

“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 the production of renewable energy, energy efficiency projects, waste reduction, production of more durable goods, and recycling.”

“Policy 6.39.c. Prime Industrial Land Retention. Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area while ensuring environmental resources and public health are also protected.”

(Co-sponsored by Commissioner Fritz)

6. **Corresponding and Allowed Zones for Each Land Use Designation** (Figure 10-1). This addition to a table in Chapter 10 corrects a situation in St Johns where EG2 zoning is being used on as an interim in a Mixed Use Comp Plan designation. Specifically, this change adds EG2 to the list of “allowed” interim zones for Urban Centers in Figure 10-1. This means EG2 MAY occur in a Mixed Use designate area but additional EG2 zoning cannot be added. Only the “corresponding” zones in Figure 10-1 may be used for zone changes. **(Co-sponsored by Commissioner Fish)**
7. **NE 60th Avenue** (#M45 and M71). In consultation with Rose City Park Neighborhood, staff has developed some refinement to the zoning pattern along NE 60th (Map to be provided).
8. **Euclid Heights (NEW).** Rose City Park Neighborhood has requested down-designation from R2.5 to R5 for a small area near where 47th Avenue crosses the Banfield Freeway. The area is not adjacent to the MAX station or other frequent transit, but is adjacent to the Hollywood Town Center.

9. SE Henry Street (#B110) Opposition to up-zoning of property at 5401 SE Henry Street due to public safety issue (i.e., dead end street, lack of turnaround). This amendment would change all of the R2.5 on SE Henry to R5, between SE 52nd and the end of the street at 5601 Duke. **(Co-sponsored by Commissioner Saltzman, Novick)**

10. Rossi Farms (#F72) The Rossi family is asking for Mixed Use – Civic Corridor on the west side of 122nd Ave as opposed to the proposed R3 (the property at 3839 NE 122ND AVE, 1N2E22DD 400). **(Co-sponsored by Commissioner Fish, Fritz)**

11. Inclusionary Housing (Policy 5.34) Add “Work to remove regulatory barriers that prevent the use of such tools.” **(Co-sponsored by Commissioner Fritz, and Commissioner Fish)**

12. Historic resource: A structure, place, or object that has a relationship to events or conditions of the human past. Historic resources may be significant for architectural, historical, and cultural reasons. Examples include historic landmarks, conservation landmarks, historic districts, conservation districts, and structures or objects that are identified as contributing to the historic significance of a district, including resources that are listed in the National Register of Historic places. **(Co-sponsored by Commissioner Fritz)**