

# Richmond Neighborhood Association

c/o Southeast Uplift  
3534 SE Main ST  
Portland, OR 97214

(503) 232-0010  
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<http://richmondpx.org>



August 9, 2016

To: Comprehensive Plan Update [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
Mayor Charlie Hales, [charlie.hales@portlandoregon.gov](mailto:charlie.hales@portlandoregon.gov)  
Commissioner Nick Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Amanda Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)  
Commissioner Steve Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)

## RE: Comprehensive Plan comments

Dear Mayor Hales and Portland Commissioners:

I am writing on behalf of the Richmond Neighborhood Association (RNA) in support of the mixed-use zones (MUZ) project. I originally wrote and sent this letter back in May 2016, but have been told it was not received. So, I re-submit it here. Please consider this letter alongside the letter recently sent from Matt Otis, as some of our board membership and chairpersons have changed since this letter was written.

I would like to bring the following RNA votes to your attention, as they indicate neighborhood desire for the following:

On Dec 8, 2014, we voted to support United Neighborhoods for Reform's Demo/Development [resolution](#). We also voted to recommend changing Comp Plan designation on the South side of SE Caruthers ST from 35<sup>th</sup> PL to 38<sup>th</sup>, and the West half of block between 38<sup>th</sup> and 39<sup>th</sup> AVE from UCB to R2.5 or R5.

On Feb 9, 2015, we approved a motion to keep Clinton nodes "Mixed Use Neighborhood dispersed," and to "Ask City to have a Design Overlay added for historic streetcar routes, main streets, and major transit and civic corridors and that this be implemented now and not wait for the comprehensive plan adoption in 2017." We also approved a motion to ask the City to "prioritize pattern area standards work now in work plan and budget now and not wait for the Comprehensive Plan adoption in 2017 and that these should include design guidelines work by Division Design Initiative and Boise."

On March 9, 2015, we approved sending a letter to city recommending a 3 story height limit except for existing 4 stories, but leave open option for bonus to 4 or 5 story. We also approved a motion to support the concept of having criteria for upzones, with a request for more information regarding criteria for upzones from CM2 to CM3.

On March 14, 2016, we voted to approve the [DDI Notification Policy](#).

On November 9, 2015, we voted to endorse the [DDI Top Ten Recommendations](#), and we voted to add language to the DDI Top Ten that the RNA does not intend the implementation of these 10 recommendations to reduce existing residential capacity in the neighborhood. We also voted to send a letter to city endorsing DDI top ten, with language about residential capacity reduction.

On November 30, 2015, we approved following to be sent to city:

Study growth scenario alternatives for increasing infill density with fewer development impacts.

Evaluate a more comprehensive “missing middle” neighborhood infill scenario in addition to the Centers and Corridors growth scenario.

Evaluate sustainability impacts of focusing more density on N-S corridors (including environmental, social and economic impacts), and likely reduced shading impacts, as well as the value of maintaining reasonable fair and equitable solar access

Direct staff to come back with a recommendation for how to implement the residential FAR requirement now.

Direct staff to research and return with a recommendation to council for a set of further incentives and programs that support greater innovation, climate resiliency, and sustainability, including:

- A Green Factor program

- Tree preservation

- Incentives for Zero Energy buildings, beneficial projects such as affordable housing, adaptive reuse of older buildings.

Increase notification requirements per DDI recommendations

System Development Charges: Return a portion of SDCS to specific improvements in the neighborhood.

Waiver for beneficial Uses, such as for adaptive reuse of historic-designated properties.

Add Permit requirement to document Development Impacts

Design Review and D-Overlay, add to code:

- Design review for inner east-side street-car era pattern areas.

- Design Overlay for Division

- Consider adding 1-2 additional quadrant specific or “pattern area” design commissions.

Support Policy 5.35 Impact of Regulations on Affordability

Add new policy in Housing Affordability as follows:

“When calculating AMFI for affordable housing qualifications, use 60% MFI figures, and calculate based on the income in the census tract where the housing is built, except that if the MFI figure for that tract is above the metropolitan area average use a figure that is no more than 5% above the average.”

Add the “d” overlay designation to the Comprehensive Plan Map for the section of SE Division from SE 44<sup>th</sup> to SE 51<sup>st</sup>. (The letter added note that “we DO NOT support changing the zoning to Mixed Use Urban Center in order to do so.”)

Changing the Comprehensive Plan Map designation on SE Powell from SE 29<sup>th</sup> to 53<sup>rd</sup> to Mixed Use-Urban Center, and add D overlay.

Separate Motion approved to send a letter of corrections to City Council, if required, regarding the DDI's testimony to City Council and whether it properly reflected the RNA letter's reference to residential capacity versus density.

Best Regards,

---

Cyd Manro, Chair, Richmond Neighborhood Association

10/13/2016

cc: Morgan Tracy, Bureau of Planning and Sustainability [morgan.tracy@portlandoregon.gov](mailto:morgan.tracy@portlandoregon.gov)

**From:** [Zef Wagner](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 11:18:51 PM

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Dear City Council,

I am writing to you to protest the down-zoning of a broad swathe of inner NW Portland. This area is right next to the Pearl District and Downtown, has excellent walking and biking infrastructure and transit service (including streetcar), and some of the best potential for dense, mixed-use development anywhere in the inner neighborhoods. At this time when we are experiencing a housing crisis and affordability crisis, with no end in sight to the population growth, we should be planning for dense development in areas like this that just make sense. I read about a senior housing development that will not be able to move forward because of this zoning proposal. Please stand up to the people who are against change and stand up for the people who desperately need a place to live. Reverse the PSC proposal and retain the current higher-density zoning. Thank you.

Sincerely,

Zef Wagner  
5322 N Denver Ave.  
Portland, OR 97217



**From:** [Zef Wagner](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 11:08:14 PM

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Dear City Council,

I am writing to you today to strongly urge you to make housing more affordable and accessible by eliminating parking minimums in Mixed-Use zoned areas. Portland is growing, and to accommodate that growth and keep affordability, we need more housing supply for people and less space devoted to car storage. Off-street parking is very expensive (tens of thousands of dollars), and that means developers need to build fewer units or target the high-end rental/condo market to make up that cost. Furthermore, mandating parking means that people who either can't afford a car or are doing the right thing by choosing not to own a car are actually paying part of the cost for someone else to store their car! This is unfair, and is not good for our city.

Look to San Francisco for a cautionary tale of what happens when you mandate parking and suppress housing supply through restrictive zoning. The mixed-use areas along centers and corridors have excellent transit options and are more likely to have sidewalks and bike lanes. Many developers will still choose to build some parking, but if they want to target the car-free or car-lite demographic, why should we stop them? Parking minimums are an unnecessary form of top-down, centralized planning, and it has resulted in over-built parking infrastructure and more driving than we would otherwise have (since once someone has a parking space they're more likely to use it). In any case, please stand up for what is right and for adopted city policy and eliminate minimum parking requirements in mixed-use zones.

Sincerely,

Zef Wagner  
5322 N Denver Ave  
Portland, OR 97217

**From:** [Nathaniel Applefield](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 10:19:21 PM

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Portland City Council,

Please trade minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones. Our city needs units!

Thank you!

Nathaniel Applefield  
503-984-0793  
[nathaniel.applefield@gmail.com](mailto:nathaniel.applefield@gmail.com)

**From:** [Travis Parker](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 10:19:12 PM

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E Portland Highway (aka: Lombard/Columbia) (pgs 12 and 13 doc 293)

It is important to note, Columbia Blvd through St. Johns has homes along the route on both the south and north side. The residents on the north have little safe options to access their community in St. Johns. Considering only freight is not fair.

North Willamette River Crossing (pgs 22 and 23 doc 303)

I think it goes without saying: long lines of idling trucks feet from people's front doors is not okay. The St. Johns Bridge is at capacity today. I understand the St. Johns Truck Strategy addresses many issues, but it is not meant to solve capacity concerns.

How can any freight study be completed without considering the locations of the rails and intermodal yards?

Thanks.  
--tj

**From:** [Allen F](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Hales, Mayor](#); [Commissioner Saltzman](#); [Commissioner Fritz](#); [Commissioner Fish](#); [Commissioner Novick](#); [Matt Otis](#)  
**Subject:** 3 errors concerning 10/10/16 vote as stated in Richmond Neighborhood Association's letter testimony on Mixed-Use Zones Project  
**Date:** Thursday, October 13, 2016 10:19:03 PM  
**Attachments:** [Mixed Use correction ltr 10-13-16.pdf](#)  
[RNA Land Use vote 10-10-16.png](#)

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Mayor Hales and Commissioners Fritz, Fish, Novick and Saltzman: I am writing this letter (attached as well) to point out three very significant errors in the letter submitted today (below) by Matt Otis, Richmond Neighborhood Association ("RNA") Land Use and Transportation Committee Chair, concerning the RNA's testimony on Mixed Use Zoning Recommendations. I am pointing out these errors so the record can be corrected as to what the RNA voted on concerning its recommendations on the Mixed Use Zones project at its October 10, 2016 meeting.

I am a Board Member on the RNA; however, I am not writing this letter as a representative of, or spokesperson for the RNA. I am submitting this letter in my individual capacity, as someone who was present at the October 10, 2016 meeting where the RNA voted on these issues and as the person who was assigned to be the official Minutes Taker for the meeting.

**The RNA did NOT vote to "eliminate the use of CE zoning in Richmond and areas bordering Richmond."**

The letter states:

**Minimize or eliminate CE zoning in Richmond**

Richmond is in the heart of the city and the RNA sees our growth creating a greater need toward people-oriented zones of business, housing, and commerce. CE designations do little to improve the livability and walkability of the neighborhoods surrounding them. Therefore, we ask that you eliminate the use of CE zoning in Richmond and areas bordering Richmond. (Emphasis on original).

The letter is in error to state that the RNA is asking the city to "eliminate the use of CE zoning in Richmond and areas bordering Richmond." This was NOT the vote of the RNA. This statement is incorrect in 2 respects.

First, what the RNA *did* vote on was the recommendation to the city to that it "**minimize or eliminate CE zoning in Richmond.**" The RNA's recommendation is to minimize or eliminate the CE zone. Second, its vote is limited to properties inside Richmond. Significantly, the RNA vote was not addressed to properties bordering Richmond, i.e., properties *outside* of Richmond. One property of note that borders Richmond did come up in conversation -- Hawthorne Fred Meyer -- but the Board expressly declined to take a vote to render an opinion or recommendation on that property since it is outside Richmond's boundaries. It should be noted that the caption of the paragraph does accurately state the vote of the RNA.

Attached is the page from Matt's PowerPoint presentation to the Board where he correctly documented in his notes following the meeting what the RNA voted in at October 10 meeting. The Board's motion and vote were guided by the language of this PowerPoint slide. Matt's notes at the bottom of this slide document added in after the meeting state correctly: "Language Passed: Minimize or eliminate CE zoning in Richmond".

**CM2 & CM3: The RNA did NOT vote that is "amenable to CM3 zoning at major nodes within the neighborhood."**

The letter also states:

### **RNA prefers more pedestrian-oriented zones CM2 or CM3**

Creating a vibrant, livable, and walkable community is one of our chief goals. CM2 and CM3 zones allow for such a community to grow and flourish. The MUZ project does a great job of designating CM2 zoning along Hawthorne and Division, which we approve of. We would also be amenable to CM3 zoning at major nodes within the neighborhood.

The last sentence is a significant error: the RNA did NOT vote to recommend there be “CM3 zoning at major nodes within the neighborhood.” **What it *did* vote in was the position and recommendations that: (1) “RNA prefers more pedestrian-oriented zones CM2 or CM3” and (2) that “CM3 [is] preferred on Powell.”** See notes at bottom of attached PowerPoint slide. The letter gives the mistaken impression that the RNA voted to recommend CM3 on SE Division, SE Hawthorne Blvd, or on other streets beside Powell Blvd. The vote and discussion at the meeting recommending CM3 was limited solely to Powell Blvd.

As stated above, the purpose of this letter is simply to ensure there is an accurate record of how the RNA voted on these issues at its recent meeting. Matt, who is new to the RNA Board and to the position of Land Use Chair, did an excellent job in presenting and guiding the discussion on the Mixed Use Zones issues. His enthusiasm, devotion to the neighborhood, and hard work are an asset to the community and the Board. The errors in the letter are most likely due to the rushed process of fellow Board Members inserting edits today into an online draft document in google documents within an extremely short time frame of only few hours.

Sincerely,  
Allen Field

---

**From:** Matt Otis <matt.otis@gmail.com>  
**To:** cputestimony@portlandoregon.gov  
**Cc:** mayorhales@portlandoregon.gov; dan@portlandoregon.gov; amanda@portlandoregon.gov; nick@portlandoregon.gov; novick@portlandoregon.gov; Richmond NA Board <rna-board@googlegroups.com>  
**Sent:** Thursday, October 13, 2016 3:41 PM  
**Subject:** [RNA-board] Comprehensive Plan Update - Mixed-Use Zones Project - Richmond Neighborhood Association

## **Richmond Neighborhood Association**

c/o Southeast Uplift (503) 232-0010  
3534 SE Main ST  
Portland, OR 97214 <http://richmondpx.org>

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October 13, 2016

To: Comprehensive Plan Update [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
Mayor Charlie Hales [mayorhales@portlandoregon.gov](mailto:mayorhales@portlandoregon.gov)  
Commissioner Dan Saltzman [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
Commissioner Amanda Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)  
Commissioner Nick Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)

### **RE: Comprehensive Plan Implementation**

Dear Mayor Charlie Hales and City Commissioners,

I am writing on behalf of the Richmond Neighborhood Association (RNA) in support of the draft proposals for the Mixed-Use Zones (MUZ) Project.

While the RNA agrees with most of the draft recommendations, we would like to see a few adjustments to the plan. We believe these changes can help our neighborhood grow in a positive direction over the next 20 years.

**Minimize or eliminate CE zoning in Richmond**

Richmond is in the heart of the city and the RNA sees our growth creating a greater need toward people-oriented zones of business, housing, and commerce. CE designations do little to improve the livability and walkability of the neighborhoods surrounding them. Therefore, we ask that you eliminate the use of CE zoning in Richmond and areas bordering Richmond.

**RNA prefers more pedestrian-oriented zones CM2 or CM3**

Creating a vibrant, livable, and walkable community is one of our chief goals. CM2 and CM3 zones allow for such a community to grow and flourish. The MUZ project does a great job of designating CM2 zoning along Hawthorne and Division, which we approve of. We would also be amenable to CM3 zoning at major nodes within the neighborhood.

**Upzone Powell to CM3**

Powell is situated to become one of the prime corridors in Portland. As a major transit corridor, Powell could accommodate a large residential population. The areas surrounding Powell are historically underdeveloped, we see this as a great opportunity to provide much needed housing and jobs in inner Southeast Portland. Given the wide right-of-way, the potential for transit, the underdeveloped nature of Powell, and its proximity to the city core; we recommend upzoning the corridor along Powell to CM3.

**With assessment of impacts—such as solar shading—for adjacent residential properties**

One area we would like to see addressed in the MUZ Project is more assessments of local impacts for larger structures. In particular we would like to see analysis for solar shading and its impact to nearby residential properties. This is a concern for full-height CM2 properties and particularly for CM3 areas. Expecting full sun during the winter solstice for a region so far north would be overreaching. We request those with greater expertise choose an appropriate definition for solar impact limits. The definition should aim to balance resident's solar concerns with the need for height in CM2 and CM3 properties to create abundant housing in Richmond.

Thank you for all your hard work on the MUZ Project.  
And thank you for considering our requests.

Sincerely,  
Matt Otis - Land Use and Transportation Committee Chair - Richmond Neighborhood Association

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To post to this group, send email to [rna-board@googlegroups.com](mailto:rna-board@googlegroups.com).

To view this discussion on the web visit <https://groups.google.com/d/msgid/rna-board/CANU666D%3DcUA84jF2AUJep6Tfzph%3DqBZKh5R0M%3DX6OnNaScgfJw%40mail.gmail.com>.

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Allen Field  
3290 SE Grant  
Portland, Oregon 97214  
503-236-3657

October 13, 2016

Comprehensive Plan Update [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
Mayor Charlie Hales [mayorhales@portlandoregon.gov](mailto:mayorhales@portlandoregon.gov)  
Commissioner Dan Saltzman [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
Commissioner Amanda Fritz [amanda@portlandoregon.gov](mailto:amanda@portlandoregon.gov)  
Commissioner Nick Fish [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Portland City Council  
1221 SW 4th Ave, Room 130  
Portland, OR 97204

Re: Three Significant Errors in Letter from Richmond Neighborhood Land Use and  
Transportation Committee Chair Concerning Mixed Use Zoning  
Recommendations

Mayor Hales and Commissioners:

I am writing this letter to point out three very significant errors in the letter submitted today by Matt Otis, Richmond Neighborhood Association (“RNA”) Land Use and Transportation Committee Chair, concerning the RNA’s testimony on Mixed Use Zoning Recommendations. I am pointing out these errors so the record can be corrected as to what the RNA voted on concerning its recommendations on the Mixed Use Zones project at its October 10, 2016 meeting.

I am a Board Member on the RNA; however, I am not writing this letter as a representative of, or spokesperson for the RNA. I am submitting this letter in my individual capacity, as someone who was present at the October 10, 2016 meeting where the RNA voted on these issues and as the person who was assigned to be the official Minutes Taker for the meeting.

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surrounding them. Therefore, we ask that you eliminate the use of CE zoning in Richmond and areas bordering Richmond. (Emphasis on original).

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Portland City Council  
October 13, 2016  
Page 3

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Sincerely,

A handwritten signature in black ink, appearing to read 'AF', is positioned above the printed name.

Allen Field,

Cc: Matt Otis, RNA Land Use and Transportation Committee Chair  
Marty Stockton, BPS SE District Liaison

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(6 unread) - allen\_fiel... X 2016-10 - RNA - MUZ... X alaska airlines - - Yah... X Book a flight reservati... X 2016-10 - RNA - MUZ... X AOL Mail

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**2016-10 - RNA - MUZ & Inclusionary Housing**

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**2. Mixed-Use Zoning - Recommendations**

The RNA Land Use & Transportation Committee Recommends:

**Minimize or eliminate CE zoning in Richmond.**  
**RNA prefers more pedestrian-oriented zones CM2 or CM3**  
**CM3 preferred on Powell**

Possible Options:

- [Same as above, but] CM2 preferred on Powell
- [Additional] With assessment of impacts -such as solar shading- for adjacent residential properties

Language Passed:  
 Minimize or eliminate CE zoning in Richmond.  
 RNA prefers more pedestrian-oriented zones CM2 or CM3  
 CM3 preferred on Powell  
 With assessment of impacts -such as solar shading- for adjacent residential properties

4:22 PM 10/13/2016

Ask me anything

**From:** [D.Cohen](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 10:01:44 PM

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This is testimony in regard to the draft TSP.

I think an important piece in terms of a North Willamette Crossing is what the draft says re: long-term need. "The St. Johns Bridge currently carries this traffic, but has limitations and WILL NOT BE ADEQUATE IN THE LONG TERM to carry freight and other traffic. The St. Johns Truck Strategy recommends a number of changes to balance freight mobility needs with the vitality of the St. Johns town center. The Truck Strategy provides an interim solution to demand in the corridor and DOES NOT INTEND TO ADDRESS LONG-TERM ACCESS NEEDS TO RIVERGATE AND HWY 30".

As someone who has worked on a PDX transportation plan we should be looking at those long-term needs.

In your modeling it says "very few trucks were diverted to the new bridge". If it is felt that the best interests of the community to re-route the trucks, then we do it and its enforced. No need to cut out an option because the modeling said to - especially because in my experience sometimes PBOT's modeling leaves something to be desired. You also ought to show the "modeling" on which this conclusion was drawn as well as justification for not planning an improvement which would benefit the community just because the freight truckers may not want it.

Thank you .

Donna L Cohen, MEd, MLIS  
Portland, Oregon  
503-737-1425  
citizen@civictinker.net

***Civics for Adults Workshop Series: To Enhance Civic Knowledge and Inspire Political Engagement***  
***Facebook: <https://www.facebook.com/Civics-for-Adults-1490728887922036/>***

**From:** [kristenjc1226@gmail.com](mailto:kristenjc1226@gmail.com)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive plan implementation  
**Date:** Thursday, October 13, 2016 10:01:41 PM

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As a Cathedral Park resident, I plead with you to consider helping ease the traffic issues in our neighborhood. Perhaps it is the proposed bridge that would be only for freight traffic, or simply a study of how to improve flow up to and down from and over the bridge (tolls?). We believe apps like Waze and word on the street is causing commuters to use our one-way roads to get to and from work--people who are not residents of St John's or Linton and are using our residential streets to cross town. A sad symptom is the fact that we cannot use the Forest Park trails after 4pm without waiting in a 20 min line of traffic from Germantown Rd trying to cross the bridge. Something must be done soon!

Sincerely,  
Kristen Caldwell  
7754 N Kellogg St

Sent from my iPhone

**From:** [C.J.Jones](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 9:32:31 PM

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## TESTIMONY ON COMPREHENSIVE PLAN & MIXED USE ZONING

October 13, 2016

Portland City Council  
1221 SW 4th Ave, Room 130  
Portland, OR 97204

Attn: Comprehensive Plan Implementation

Portland City Council members:

I am writing to submit testimony on the Comprehensive Plan Update and the proposed Mixed Use Zoning. I would like to advocate the Council consider the following recommendations for increased density with fewer impacts and greater neighborhood compatibility:

**1. Support for including Design Overlays on Civic Corridors**

Major civic corridors like Powell and others need this design overlay too if they are to become the "Great Streets" they are intended.

**2. Support for Stepbacks and Stepdowns above the Third Floor!!!!**

It is of great concern that the Planning Commission has recommended removal of the stepdown/stepback requirement at the street for smaller zones (CM1 & CM2). We're going taller so we need the stepbacks and stepdowns (especially on narrow streets) to help make better transitions and better compatibility in existing neighborhoods. Hawthorne Boulevard Business Association (HBBA) has recommended these stepbacks above the third floor as has the Division Design Committee. HBBA has stated in past testimony that "it would be disruptive to the ambiance, mass and scale of the District to create a designation that allows more 4 story buildings without a stepback above the 3rd floor." This is an important livability and compatibility issue needed to help new development fit better. It also impacts solar access and shade impacts which can impact daylighting, heating and associated utility costs for the first floor of commercial buildings on the N. Side of narrow E-W streets. Please restore these stepdown requirements to help neighborhood better accept increased density with fewer impacts.

**3. Support for Design Guidelines for Compatibility and Design Commissions per Quadrant.**

We absolutely need to increase our housing capacity. However, as recent evidence has demonstrated, quantity does not always equal quality. It takes thoughtful design that is sensitive to context, neighborhood character and patterns of design that make Portland so special and desirable. To do this effectively we need better area-specific design guidelines, standards and area specific design review boards

**4. Support for HBBA Testimony on Recommendations for Building Size and FAR**

- "...continue a 45' height limit combined with a new 2.5 Floor Area Ratio (FAR) to address concerns about boxy, massive infill on corridors. While we would be more

comfortable with the former C2 limit of three stories or a 45' limit, the introduction of the 2.5 FAR restores balance to the this zoning equation."

**5. Support for Adding Impact Assessments of New Development (DDI Ten 10 Policy Recs #10)**

Solar, privacy, noise, loss of historic resources, traffic, air quality are often significant yet we are lacking the tools we need to properly evaluate and measure the impacts of new development. We need assessments both +/- if we are going to grow denser and maintain livability. This should be a part of permit review but should also be included as a goal in the Comp Plan and standards for higher density buildings. We can't manage effectively what we don't measure.

**6. Support for Incentives & Bonuses for Innovation & Resiliency - (These should be integrated in both the Mixed Use & Other Comp Plan Programmatic Approaches)**

a) Incentives for Reuse/Preservation of Existing Buildings are Needed (ideally tied in with projects that undergo seismic upgrades supported by SDC fee waivers, etc.) This would support resiliency in our existing building stock, incentives upgrades for small business owners, and support preservation of important community character and identity.

b) Incentives or bonuses for Energy efficiency & Building Innovation such as zero energy buildings (i.e. buildings that generate their own energy) - Buildings account for more than 40% of our national energy. Therefore, it is absolutely critical and can have a direct impact on affordability by significantly reducing monthly heating and lighting bills for low income occupants, as well as help meet our long term climate goals.

California has committed to a zero energy building goal for all new residential becoming zero energy by 2020 and all new commercial by 2030. We should be at least as visionary here in Portland if we want to retain our title of a bastion of sustainability. Staff should come back with a recommendation for this to be included in the Mixed Use Zoning Bonuses or a proposal for a short term market incentive (e.g. first 20 zero energy buildings get fee reductions perhaps).

c) Incentives for development in underserved areas (e.g. 82nd, Powell, etc.) that could benefit from increased services new development would bring both through diverse businesses, increased walkability and density for greater transit (via SDC's and other fee waivers or reductions, or other bonuses)

a.

Please support these important issues that impact both our short term and long term community goals for a more livable, resilient and sustainable Portland. Many thanks for the commitment and work you do for our City.

Thank you,

Callie + Andy Jones  
Former Richmond Neighborhood Association Board Member  
2918 SE 43rd Ave, Portland, OR 97206

**From:** [Julie Papke](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Support for truck bridge  
**Date:** Thursday, October 13, 2016 9:01:54 PM

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Hi-

I'd like to add my support for a new bridge to be built for heavy trucks in St Johns to help alleviate heavy truck traffic to and from the terminals, as well as auxiliary trucks cutting around the freemont bridge from Washington to hwy 30.

Thanks!!

Best,

Julie Papke

Sent from my iPhone with phat phingers and an evil auto correct

**From:** [David Wiese](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Re: Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 8:36:13 PM

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Did not see a "reply all" option.

The information that you sent made no mention of including the property addresses which I thought was funny, so I complied with the instructions as put forth in your NOTICE OF PROPOSED ZONING MAP...

Is the location of my property relevant to the comments I made?

If disclosing my address makes my comments carry more weight, then the addresses I was referring to is 60 NE Tillamook to 80 NE Tillamook Street.

If not, please disregard the above information.

Sincerely,

David Wiese  
4330 Pepperwood Avenue  
Long Beach, CA 90808  
562-477-1845

On Thu, Oct 13, 2016 at 3:58 PM, BPS Comprehensive Plan Testimony  
<[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)> wrote:

Dear David,

Please "reply all" with the address(es) in Portland that you're referring to in your testimony below.  
Thank you!

With kind regards,

Marty

Marty Stockton | Southeast District Liaison  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Avenue | Suite 7100 | Portland, OR 97201  
p: [503.823.2041](tel:503.823.2041)  
f: [503.823.5884](tel:503.823.5884)



e: [marty.stockton@portlandoregon.gov](mailto:marty.stockton@portlandoregon.gov)

w: [www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)

To help ensure equal access to City programs, services and activities, the City of Portland will provide translation, reasonably modify policies/procedures and provide auxiliary aids/services/alternative formats to persons with disabilities. For accommodations, translations, complaints, and additional information, contact me, call [503-823-2041](tel:503-823-2041), City TTY [503-823-6868](tel:503-823-6868), or use Oregon Relay Service: 711.

**From:** David Wiese [mailto:[thedavidwiese@gmail.com](mailto:thedavidwiese@gmail.com)]

**Sent:** Thursday, October 13, 2016 3:39 PM

**To:** BPS Comprehensive Plan Testimony <[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)>

**Subject:** Comprehensive Plan Implementation

David Wiese

4330 Pepperwood Ave

Long Beach, CA 90808

I have been hanging onto several parcels for years with the eventual intent to build them out but I liked the buildings and lived in them and just left things alone.

Now you want to cut my potential units to 7 from my current zoning of 9 units.

Leave the Zoning at the current level R2 or change it to R1

The area has already been changed with big buildings throughout the area.

Since when does inner city zoning get less dense?

increase density increase density increase density

Why should the faster owners be rewarded and those of us that want to leave the area as it is (for however long or short) be penalized when they decide to develop their land?

If you care about fair treatment leave the zoning alone.

Do not let some current residents feelings about neighborhood change,  
change the fact that the area is zoned for large buildings and should remain so.

This is an inner city location that should have more housing not less!

This area should change to R1.



**From:** [Josh Baker](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:56:42 PM

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Dear Portland City Council,

I'm proud to call Portland home. Particularly, I've been proud of the city's progressive legacy. Recently though, the City seems to have lost its way - particularly on the environmental and housing front.

**Please trade minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones.** These arbitrary parking requirements suppress housing supply and raise costs.

The arbitrary 30-unit+ threshold for required parking went into effect in much of Portland in 2013. Since 2013, a large number of developments have been built with exactly 30 apartments, just under the threshold for required parking. Why? The 31st apartment brings a mandate for 6 parking spaces. For underground parking, six stalls can cost more than \$300,000 in construction and lost opportunity. Minimum parking requirements have worsened the housing crisis by suppressing housing supply. Additionally, requiring off-street parking is ineffective at solving parking problems because as long as on-street parking is cheaply available, residents to a neighborhood will keep their cars and store them at the curb. Parking requirements can dramatically increase rents, congestion, and reduce housing supply. On-street parking management, such as market-rate permits, will have a greater impact on parking problems without exacerbating the housing crisis further.

Exempting affordable housing units from the calculation of required parking is a good policy, but parking requirements will continue to increase housing costs for middle-class Portlanders. **Portland has a housing shortage, not parking shortage. Parking minimum requirements will produce empty parking spaces at the cost of homes. The bottom line is we need to prioritize housing for people over shelter for cars.** The White House released a report earlier this month to provide policy recommendations to ease housing shortage and improve affordability in cities. According to the report, minimum parking requirements “have a disproportionate impact on housing for low-income households” and “[b]y reducing parking and designing more connected, walkable developments, cities can reduce pollution, traffic congestion and improve economic development.”

In July, City Council agreed to explore other parking management tools and not impose parking minimums in Northwest Portland. Commissioner Nick Fish said at the meeting that when they imposed minimum parking requirements in 2013, it was meant to be a temporary measure. Indeed, in order meet our 2035 mode-share and climate goals, we need to curb excessive parking supply. Removing parking requirements from Mixed Use Zones will not only free neighborhoods for an arbitrary regulatory burden but also be consistent with the City's policies on climate change and transportation.

Thank you,

Joshua Baker  
1425 SW Clay #4  
Portland, OR 97201

**From:** [ellie.harmon](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:47:49 PM

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Hello,

I'm writing to urge you to eliminate minimum parking requirements in mixed use zones.

I live in a building with garage parking that is not even full. I do not own a car, but my rent subsidizes the cost of these spots which were "free" at the time I signed my lease because the apartment company was unable to fill them with paying car owners. When I toured apartments on SE Division, THE LEASING AGENTS suggested that if I had a car it was better to park on the street because that was free but the building was charging for garage space. This is all so absurd! Street parking demands should be managed via a residential permitting system. Parking minimums will not help.

It goes beyond absurd and becomes problematic when we consider parking requirements in tandem with the huge affordable housing crisis we are facing in Portland. Minimum requirements tied to buildings of 30 units or more have suppressed the supply of larger buildings that could house more people. Parking, when it is built, adds extra costs to the development which is passed on to renters, and incentivizes luxury builds which may more easily recoup some of the cost of building homes for cars instead of more people.

As last week's White House housing affordability report stated last week, minimum parking requirements "have a disproportionate impact on housing for low-income households." Moreover, questions of parking are also tied to bigger quality of life issues. Again, from the White House report: "By reducing parking and designing more connected, walkable developments, cities can reduce pollution, traffic congestion and improve economic development." Eliminating parking requirements would be good for housing affordability and is also in line with our city's bigger picture environmental and transportation goals.

Again, please take this opportunity to trade minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones.

Thank you.

Ellie Harmon  
2121 SE Belmont St, Apt 201  
Portland, OR 97214

[ellieharmon.com](http://ellieharmon.com)

.. typed on a tiny virtual keyboard  
.. the usual requests for generosity in reading

**From:** [Tobias Boyd](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation.  
**Date:** Thursday, October 13, 2016 7:44:11 PM

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Thank you for your time. I am writing tonight to urge you to trade minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones. Portland is in desperate need of more housing, especially more affordable housing. Minimum parking requirements drive up prices, and thus are most keenly felt by those who need housing the most (and have fewer vehicles as well). Thank you again,

-Tobias Boyd  
130 NE 72nd Ave  
Portland OR 97213  
503-701-9827

**From:** [Ryan Cox](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Please retain minimum parking requirements.  
**Date:** Thursday, October 13, 2016 7:34:41 PM

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Please retain minimum parking requirements. Inadequate off street parking only leads to more circling drivers and congestion.

On street parking is needed for visitors, ride sharing, deliveries, service vehicles and emergency vehicles. Cars will be with us for the next few decades, our climate, geography and limited public transit guarantee it.

**From:** [Han Solo](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 7:18:40 PM

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## **Support Entrepreneurs by Supporting House-to-Commercial Conversions**

I would like to address my strong support for the rule in the current zoning code update that exempts minimum parking requirements in small mixed-use lots less than 7500 sq. ft. in area. This exemption will provide many benefits for Portland and its residents by encouraging entrepreneurs to preserve and update historical homes through converting them to storefronts.

While easily overlooked, house-to-storefront conversions are an important component in many of Portland's most successful and historical business districts. Examples of these include NW 23rd, SE 13th (Sellwood), Mississippi, Hawthorne, and Division Street districts. This pattern is particularly obvious at the corner of NW 23rd and NW Kearney where approximately half of all the storefronts on the nearby blocks occupy converted houses and are essential element of NW 23rd's unique historical and pedestrian-friendly atmosphere.

In addition to historical preservation, another major benefit for encouraging house-to-storefront conversion is to increase entrepreneurship and innovation. Many of Portland's most iconic and pioneering restaurants were started in converted houses. Pok Pok on Division, Teote on SE 13th, Por Que No on Mississippi, and Cha Cha Cha and The Bible Club in Sellwood, are just a few examples of such iconic businesses. In each of these cases, the result has been a community-embraced business that has either played a vital role in the early revitalization of a previously underinvested urban street or, otherwise, added a unique business to an established business district which was in danger of becoming monotonous as a result of the higher rents in newer, blander developments.

Based on these examples, it is safe to say that house-to-storefront conversions have been a critical component in Portland's success as a city. As such, any zoning laws ought not to discourage or prevent these types of conversions from happening, either intentionally or unintentionally, across the mixed-use zones in the city.

One regulation, in particular, that discourages or outright prevents these conversions are minimum parking requirements for commercial uses on small mixed-use lots. These requirements result in the need to pave the greenery for an added benefit of nothing more than a few additional parking spaces in most cases. Furthermore, the addition of these small parking lots destroys the pedestrian-friendly feel that commercial districts with converted houses can provide; and -- worst-of-all -- they may prevent entrepreneurs from creating the much needed outdoor spaces in commercial storefronts that Portlanders love so much.

Pok Pok is an example of the kind of outdoor space that has been created by turning a house's former front yard into a year-round, semi-outdoor seating area. Pok Pok's creative use of this space has become a major tourist attraction for Portland. Pok Pok's transformation from single-family house to internationally renowned restaurant is described in the following excerpt from the foodie, web blog FoodForThoughtMiami.com: "Pok Pok started as a rotisserie grill take-out business in the driveway of a house, and over time expanded, in somewhat haphazard fashion, into an actual restaurant. "

Unfortunately, entrepreneurs who wish to replicate the Pok Pok model will likely discover that lots like the one Pok Pok occupies today are rare, expensive, and coveted by much larger developers because they are located on streets serviced by frequent transit. As a result, they will seek out less expensive areas which retain some of Division Street's pedestrian-friendly characteristics, but lack its immediate adjacency to frequent transit.

The 52nd Ave in the Brentwood-Darlington, the 72nd Ave area of Mt. Scott, and the Woodstock Blvd area of Lents (just East of 82nd) are all examples of several, reasonably affordable, pedestrian and bicyclist friendly business districts that fit this description. However, if this exemption were not passed into law, entrepreneurs would not be able to grow in the same 'haphazard fashion' as Pok Pok did as a byproduct of continually needing to add parking and having to pave over outdoor spaces as they expand.

The fact that all of these zones are pedestrian and bike friendly, while not being directly adjacent to frequent transit, is important to recognize because, when it comes to how people choose to access commercial storefronts, transit may not be as relevant of a factor as pedestrian friendliness and bikability. This is evidenced by Metro in the report *'You are here: A snapshot of how the Portland region gets around'*. In this report, Metro shows that people travel in very different ways when commuting to work versus performing other activities. In particular, this report shows that, when 'all trips' are considered in comparison to just commuting, 'driving alone' drops substantially as a means of transportation whereas walking increases over 300% and transit use drops by 33%.

This above Metro obtained result strongly implies that walkability, and not frequent transit access, should be the primary motivator for exempting parking in smaller commercial storefront areas.

Last but not least, city planners should also consider that not all entrepreneurs will be deterred by the requirement to add parking to small house conversions -- only those who wish to create aesthetically pleasing spaces like restaurateurs, small quirky shop owners, and coffee and tea purveyors would be affected. On the other hand, those who wish to establish potshops would,



in all likelihood, be completely undeterred by the need to '*pave over paradise and put up a parking lot*'.

It is for these reasons I believe the city should pass the 7500 sq. ft lot exemption across all mixed-use zones into law. Doing so will increase the supply of potential house conversions and allow entrepreneurs to take on early risks in lesser known areas which, otherwise, would be overlooked by larger developers for decades. In addition, it will also promote the creation of distinctive storefronts that increase walkability and reduce car usage in areas which are pedestrian friendly even when those areas do not have immediate frequent transit proximity.

Huiwen Cheng

7006 SE 52nd Ave.

Brentwood-Darlington

**From:** [Richard Lishner](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive plan implementation  
**Date:** Thursday, October 13, 2016 6:54:10 PM

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To Whom it may concern:

I would like to strongly oppose the new proposals that allow bonuses to developers up to 60' on arterials and allow 4-story buildings without side or front setbacks. These violate the grand bargains that were part of the entire muzpak process. The height limit on Division should be 3-stories with an additional story available as bonuses for affordability, materials, or other considerations. These proposals are a total concession to developers who do not need any concessions in the present market. Any thought that these proposals will lead to any affordability are illusions - the market will never build affordable housing unless forced to by zoning now allowed by Salem. These proposals ignore the overwhelming desires of the people of Portland, and the obvious design failures of the last few years on Division.

Richard Lishner, Architect and Neighbor  
2545 SE Division  
Portland, OR 97202

**From:** [Cornucopia](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 6:49:31 PM

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I would like to let you know that I support eliminating parking minimums and instead turning our vast oversupply of parking into low-income housing which is desperately needed.

People > cars

Richard  
50 SW 68th Ave  
Portland, Or 97225

**From:** [marijane.white](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 6:17:49 PM

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Hello,

I am writing to express my support for trading minimum parking requirements for more affordable housing by eliminating minimum parking requirements in Mixed-Use Zones. There are many good reasons to eliminate minimums, but for me the most important reason is that it increases the cost of housing and reduces the supply. Portland needs more housing and especially more affordable housing. Sheltering people should be a higher priority than sheltering cars.

Thank you,  
Marijane White  
7005 SE Main St  
Portland, OR 97215

**From:** [Ken Hittle](#)  
**To:** [Council Clerk – Testimony](#); [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Hales, Mayor](#); [Commissioner Fritz](#); [Commissioner Fish](#); [Commissioner Novick](#); [City Auditor Griffin-Valade](#); [Commissioner Saltzman](#); [Anderson, Susan](#); [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)  
**Subject:** Planning for Multnomah Village  
**Date:** Thursday, October 13, 2016 5:55:37 PM

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Portland City Council  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

c/o Council Clerk

**Re: Planning for Multnomah Village**

Multnomah Village is an area of Portland with major historical design significant that needs to be protected. The current scale of this business district is appropriate for its narrow main street, making it an inviting place for people to shop and eat out in unique locally-owned businesses.

With the exception of one 3-story building, the Village consists of one-story and two-story buildings, many of which are the original buildings from the earliest days. The Village is covered by a Design District Overlay under the current Comprehensive Plan and this D Overlay states that new development must be consistent with the scale and character of the existing businesses, but the current zoning code does not provide this protection.

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan proposes to change Commercial Storefront properties in Multnomah Village to either Commercial Mixed Zones 1 (CM1) or 2 (CM2). The CM2 designation would allow out-of-scale buildings of up to 4-stories to be built in this historic area.

We are requesting that the City Council change the designation of all properties in the business district of Multnomah Village that are covered by the current D overlay to CM1. The new CM1 designation is a better fit for the historic Village because it will limit building heights in this area to 35 feet, the approximate height of three-story buildings.

We are also requesting that building heights for lots that are bounded by two streets be measured from the lower street. This will prevent the construction of additional stories that could result if heights are measured from the higher street on these steep lots.

Lastly, we are requesting that a Plan District be implemented as part of the Comprehensive Plan for the Multnomah Village Business District to further protect the scale and character of this special place that has major design significance in the City of Portland.

Please add this to the record.

Thank you,

Sharon Downey and Ken Hittle

2757 SW Moss ST, Portland OR 97219

**From:** [yubet](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Minimum Parking requirements  
**Date:** Thursday, October 13, 2016 5:51:17 PM

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I dont think you need to keep making builders include parking. As a city we need less cars. We need to encourage other kinds of transportation. I live at 39th and se Yamhill. It would be greatvto have a high rise of micro apts. here for young folks with less money. They walk and take our #15 bus. thanks

Yvette Uber

LIVE LONG AND PROSPER.

**From:** [Steve Gatt](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Minimum parking requirements  
**Date:** Thursday, October 13, 2016 5:50:29 PM

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Commissioners,

My wife and I have lived in Portland for more than 7 years now. We truly enjoy many aspects of life in Portland but finding available on-street parking, close to home (owners not renters), is not one of them. I would strongly encourage Council to maintain the current minimum parking requirements. With additional density comes additional cars, they have to park somewhere. Continuing to have available off-street parking mandated as part of new development is a vital key to maintaining civility and livability within Portland.

Thank you.  
Steve Gatt  
1515 SE 22nd Ave  
Apt 7  
Portland, OR 97214

**From:** [Eli Spevak](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Hales, Mayor](#); [Commissioner Fish](#); [Commissioner Novick](#); [Saltzman, Dan](#); [Commissioner Fritz](#)  
**Subject:** Comprehensive Plan Implementation comments  
**Date:** Thursday, October 13, 2016 5:40:24 PM

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Mayor Hales and Commissioners,

Although I serve on the Planning and Sustainability Commission, this letter comes from me individually - with suggestions for your consideration pertaining to the Comprehensive Plan Implementation package before you right now.

**Zoning at major transit intersections:**

The intersections of Caesar Chavez with Hawthorne Blvd and Powell Blvd are the prime corners for transit and commercial services in all of Southeast Portland and represent some of the best-served transit locations outside of the Central City. Yet a number of properties within a block of the Hawthorne crossing are still zoned R5 (despite city council's comprehensive plan designation of these lots for MU-UC). And proposed zoning at the Powell intersection falls in the mid-range of this same comp plan designation despite the opportunity for more intense development at that location, where there's current surface parking and fairly auto-oriented retail.

*Caesar Chavez and Hawthorne:* The PSC has recommended re-zoning 11 lots to CM2 to match the new comp plan designation. There are four lots on SE 38<sup>th</sup> south of Hawthorne (1524, 1534, 1604 SE 38<sup>th</sup>), and there are 7 lots on both sides of SE Cesar Chavez south of Hawthorne (1523, 1535, 1605, 1613 Chavez, a converted house at 1621-27 Chavez, another house at 3829 SE Market, and a house with two units at 1600-1604 SE Chavez). I urge you to follow this recommendation.

Some property owners have expressed concern that tall buildings will be next to their homes. But, this same configuration applies for 1 ½ miles along the south side of Hawthorne, and for a mile along Division. All of these residential parcels are being zoned R-2.5, (which I also support) with a 35' height limit, so the adjacent 45' height limit (55 with bonus) of the CM-2 zone is not too great a difference. The CM-2 will, in addition, be required to step back above the third floor (above 35') at the side or rear, to 25' from any residential lot line. This will minimize impacts on adjacent houses, which could soon be rowhouses.

Applying this zone now will allow for more housing as well as commercial to be built in this high-opportunity location, with two grocery stores, excellent transit, and all the shops along Hawthorne. This will mean more housing in Richmond, helping curb rising housing costs. Putting the zoning in place now removes the need for expensive zone changes and reduces the chances that lower-density development will be built at this location; development likely to be in place for 50-100 years into the future.

*Caesar Chavez and Powell:* In part because re-zoning of property at this intersection might be reviewed more holistically as part of a broader BRT project, the PSC recommended a middle-of-the-road CM2 zone designation. However, this is *already* an extremely well served intersection, whether BRT happens or not. Furthermore, abutting lots are large enough to accommodate the scale of CM3 development and existing development is low value compared



with what could be built there. It would be a shame for this to be developed at the CM2 density at such a prime location, so I encourage you to go beyond the PSC recommendation to zone properties at this intersection CM3.

### **Alphabet District FAR:**

After I and the PSC supported staff's recommendation for a compromise that split the Alphabet District FAR designations roughly in half (denser at the south end, less dense at the north end), I've learned that this downzoning of the north end of the district jeopardizes the feasibility of a proposed affordable senior housing development. This is not something I (and I believe other commissioners) were aware of when we made that decision. Although it's impossible to know how or if this information would have impacted the PSC's ultimate recommendation, I personally request that the City Council revise the zoning on this district so that this much-needed affordable housing development can proceed.

### **Parking Minimums:**

The Comprehensive Plan Implementation package is appropriate and well timed to remove parking minimums in the mixed use zones. I urge you to do so!

As you know, the original impetus for modifying our zoning code to waive parking minimums near transit a little over a decade ago was climate change. That motivation for action has become more important, not less, over the ensuing years. A couple years ago, I testified in support of retaining the waiver of parking minimums for properties well served by transit. At the time, I noted the likelihood that developers would build just under the threshold to avoid the parking minimum - even on sites that could (and should, by virtue of their location!) house more people. Unfortunately, parking minimums were re-established. And that scenario has come to pass, with some projects coming in at 29 units that could have been built with more. Since then, our housing crisis has only gotten worse. And looking ahead, some other proposed changes to mixed use zoning regulations, such as step-downs to neighborhood homes and minimum green open space requirements for residential units (both of which I support, BTW), will tend to *further increase* the cost of housing at these prime locations. This is a good time to drop parking minimums once and for all!

Even without minimums, most developers will continue to build some level of off-street parking spaces, as evidenced by recent construction in NW Portland where zoning doesn't dictate minimum numbers of spaces yet developers often build it anyway. And waiving parking minimums without negatively impacting neighbors is more feasible today, now that Portland is taking steps beyond the central city to manage on-street parking and establish (and require, in many cases) TDM programs. Finally, I'll note that it's important to think of new development in the broader context of past development practices. It's true that many people still need cars for daily life activities - and places to store them safely. But we should also remember that most homes and apartments built since WWII have included *ample* off-street parking spaces. So people needing space for cars have many choices. We need to *also* provide opportunities for people who can't afford, don't want, or don't need a private space for an automobile.

Thank you so much for your consideration and your time.

Sincerely,  
- Eli Spevak

Eli Spevak  
4757 NE Going St.  
Portland, OR 97218  
(503) 422-2607

Campus Institutional Zoning Project

October 13, 2016

Mayor Hales and City Councilors:

**Our recommendation: REMOVE THE LEGACY GOOD SAMARITAN FACILITY FROM THE CIZP**

Thank you for the opportunity to respond to the *Campus Institutional Zoning Project Early Implementation of the 2035 Comprehensive Plan Proposed Draft – November 2015*. The Northwest District Association, through its executive planning committee, offers the following comments based on review of the multiple drafts, membership on the advisory committee, meetings with BPS staff, and multiple work sessions with Legacy Good Samaritan. The hard work of the NWDA Planning Committee to coordinate this initial response with Good Samaritan and link it to the *Comprehensive Plan*, the *Employment Zoning Project*, the *Mixed Use Zoning Project*, and the *Transportation System Plan* reflects our commitment to working with the City and our business community on plans that affect the livability of Northwest Portland.

Our work on the CIZP has led us to conclude that the best response to the challenge of planning for service growth at Legacy Good Samaritan is not include it in the CIZP. The CIZP, as currently drafted, does not reflect the unique nature of the Good Samaritan campus as it functions in the NW neighborhood. The CZIP does not work for Good Samaritan because it presumes that all institutions can be treated in the zoning code in a similar fashion. We don't find this to be the case with Good Samaritan.

Good Samaritan currently operates under a conditional use master plan within the regulatory guidelines of the City of Portland's *Northwest District Plan* and a good neighbor agreement with the NWDA. This regulatory construct works well for the neighborhood, the institution and the city and is based on decades of work between all stakeholders. It allows for considerable growth at Good Samaritan that helps the city meet its economic development goals, as outlined in the *Economic Opportunity Analysis*.

As drafted, the CIZP ignores the unique characteristics of Legacy Good Samaritan, its integration into the neighborhood, its unique grid development pattern that provides for multiple access and throughways, and its building's sizes and locations that respond to the grid and the surrounding built environment. By not acknowledging these fundamental characteristics the CIZP will fail to serve the NW community and Legacy Good Samaritan as they continue to grow and evolve together.

The NW District Planning Committee remains committed to further discussion with BPS staff, in cooperation with Legacy Good Samaritan, to find solutions for service and employment growth at Good Samaritan. As stated, we find that the CIZP fails to provide a solution that embraces the distinctive features of Northwest and Good Samaritan. Our sense is that NW and Legacy Good Samaritan would be better served through amending the NW District Plan by creating a sub-district within that plan specific to Legacy Good Samaritan.

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Bill Welch

The subdistrict would incorporate elements of the existing Master Plan, the NW District Plan and the draft CIZP.

We look forward to continuing to work with Legacy Good Samaritan, BPS staff, the PSC and City Council on opportunities to address our concerns while meeting the policy goal for accommodating growth on major campus institutions.

Sincerely,

Greg Theisen

Co-chair, NWDA Planning Committee



## Hawthorne Boulevard Business Association

October 13, 2016

Re: Portland Comprehensive Plan Early Implementation

### HBBA 2016-17 Board Members

#### Officers

Greg Moon, President  
*Western Seminary*

Bruce Chaser, V-Pres.  
*Well Adjusted*

Liz Potter, Secretary  
*New Seasons*

Roger Jones, Treasurer  
*Aetna Brokerage*

#### Past President

Hilda Stevens  
*Bazi Bierbrasserie*

#### Directors:

Miranda Levin  
*Memento*

Gregg Harris  
*Roosevelt's Terrarium*

Marina Martinez  
*Hawthorne Ghost Tour*

David Rappaport  
*Hawthorne Cutlery*

Don Mack  
*Multi-Pure Dealer*

Jay Ihrke  
*Belmont Eco-Laundry*

Ryan Malen  
*Fred Meyer*

#### HBBA Mission

The Hawthorne Boulevard Business Association promotes, supports and celebrates the prosperity and livability of our District.

#### HBBA Vision

conserves the uniqueness of our past and embraces the possibilities of the future.

P.O. Box 15271

Ptld, OR 97293

(503) 775-7633

[www.hawthornepdx.com](http://www.hawthornepdx.com)

To: Portland City Council

CC: Marty Stockton, Barry Manning, Nathan Howard

Mayor Hales & Commissioners:

*At a regular meeting of the HBBA Board of Directors duly called on October 12, 2016 to discuss the City of Portland's Comprehensive Plan Early Implementation, the following testimony was moved, seconded and carried unanimously:*

The Hawthorne Boulevard Business Association (HBBA) exists to promote the general business welfare of its members and generally all businesses bordering Hawthorne Boulevard from SE 12<sup>th</sup> avenue to SE 60<sup>th</sup> Avenue. Testimony here focuses on the Mixed Use Zones Project (MUZ). This is a follow-up to our previous testimony submitted March 12<sup>th</sup>, 2015 (attached).

The Hawthorne commercial district hosts an amazing variety of uses that attract customers from near and far, from an eclectic array of small retail to a diverse collection of restaurants. Just as important, Hawthorne hosts those bricks and mortar businesses - grocery stores and banks - that support walkable, 20 minute neighborhoods. In short, the Hawthorne District is already very much a "mixed-use" model.

In going forward, it is imperative we maintain that healthy balance of mixed uses. While the MUZ Project understandably focused on housing, it is concerning that the overall balance of factors contributing to the success of our streetcar era commercial corridors may have been overlooked. Our positions stated below seek to promote growth along Hawthorne while retaining the essential characteristics of identity, context, place, and balance that is so central to our success.

#### **Base Height and Floor to Area Ratio (FAR) Limits: (33.130.205 & 33.130.210.B.1)**

The proposed "Base" Height and FAR limits for zones CM1, CM2, CM3 should instead be designated the "Standard" limit.

The new CM2 zone does well at replacing the predominant CS zone along Hawthorne Blvd. in continuing a 45' height limit combined with a new **2.5 Floor to Area Ratio (FAR)** to address concerns about boxy, massive infill on corridors. While we would be more comfortable with the former C2 limit of three stories or a 45' height limit, the introduction of the 2.5 FAR restores balance to this zoning equation.

**“Development Bonuses - Incentive to provide public benefits” (Section 33.130.212)**

We recommend that Section 33.130.212 be completely removed. The proposed MUZ Development Bonuses completely destroy the benefits of the new FAR and existing height limits.

HBBA fully supports efforts to address the lack of affordable housing. The current Development Bonuses under 33.120.212 were devised before passage of SB1533 (Inclusionary Zoning) when massive density incentives were one of the few tools available to encourage more affordable housing.

However, SB1533 authorizes several new tools to mandate and/or incentivize affordable housing that do not require bonus heights or density and these need to be analyzed before bonuses are approved.

Even before SB1533, there were serious concerns about the efficacy and potential for abuse of the “public benefit” clause of Section 33.130.212. Gina Tynan of the Bureau of Development Services raised concerns in Nov. 13, 2015 testimony, “FAR Bonus certification authority is unclear.... Will measurable public benefits outweigh the costs?” Because of the “aggressive schedule” of the MUZ project, BDS indicated “bonus incentives” have not been “sufficiently evaluated, tested, or modeled.”

As it is, when reviewing the density incentives offered by other cities one finds **Portland’s MUZ project is offering bonuses that are 2-3 times the norm.**

Consider Figure 1, an example of density bonuses offered by Evanston, Illinois as part of their recently amended inclusionary zoning program. While the Evanston program only requires 10% of units to be affordable (20% if any public funding is involved) the required target is defined as 50-60% Median Family Income (MFI), compared to 80% MFI for MUZ. Bonus densities range from 5-20% depending on category.

(D) *Bonuses:* Density, height, and FAR (floor area ratio) requirements provided in Title 6 are hereby amended for covered developments that provide on-site affordable units, the development is entitled to the following bonuses:

Development Bonus	In TOD Area	Outside TOD Area
Density	20% bonus	10% bonus
Height	10% bonus	5% bonus
FAR	10% bonus	5% bonus

Figure 1:  
Evanston



**Sacramento, California** requires a minimum 25% density bonus as part of their program. However, their income targets are also lower covering a range from 50-80% MFI. Figure 2 exhibits the basic requirement

**Section 17.190.030. Standard Inclusionary Housing Component**

A. Number and Affordability of Inclusionary Units. In Development Projects in New Growth Areas, the Inclusionary Housing Component shall consist of Inclusionary Units developed for, offered to, and leased or sold to Very Low and Low Income Households as follows: ten percent (10%) of the Dwelling Units shall be Affordable to Very Low Income Households and five percent (5%) of the Dwelling Units shall be Affordable to Low Income Households.

Figure 2:  
Sacramento

By comparison, the “public benefit” proposed by Portland’s MUZ are astonishingly generous. **The FAR bonuses for CM1 and CM2 range from 60-67%**, while the height bonus is 22%, all to create a relatively small number of affordable units at 80% MFI. See Figure 3.

The best approach at this point would be to restate “Base” Height and FAR as “Standard” and remove “public benefit” bonus incentives from the MUZ project.

	CM1	CM2	
Base Height Limit (stories)	35' (3)	45' (4)	
Base FAR	1.5:1	2.5:1	
Maximum Height Limit with Bonus (stories)	35' (3)	55' (5)*	22% bonus
Maximum FAR with Bonus	2.5:1	4:1	60% bonus

Figure 3:  
Portland MUZ

For future bonus programs, we believe a 20% cumulative cap on FAR bonuses should be the norm, recognizing that FAR is a central tool in creating manageable and contextual urban fabric. For CM2, this would mean a Maximum FAR including bonuses of 3:1.

**Good idea: Low-rise Storefront Commercial Proposal (33.415 & Zoning Map)**

Streetcar era low-rise storefront commercial urban fabric is an invaluable, irreplaceable asset. These historic stretches represent integral manifestations of our neighborhoods’ sense of place and identity. Further, many of these vintage streetscapes have become important economically as visitor attractions regionally, nationally, and even internationally.

**We encourage Council to restore the original proposals to zone specific sections of Hawthorne as CM1 that the Portland Sustainability Commission (PSC) has removed.**



However, it is important for City of Portland to implement measures that recognize the contribution – economic and cultural – that property owners of these special low rise buildings make to the local community as a whole. Owners of historically important properties should be provided with transferable density benefits, tax abatements, and other support. As the BDS noted, “Historic resources are City jewels that contribute to the collective sense of place, not just for a specific neighborhood’s enjoyment.”

### **Ground Floor Commercial Space: 33.415.200**

HBBA supports requirements for ground floor active space; however as proposed they are inadequate. For 33.415.200 it is suggested that at least 50% of the ground floor area to be in active uses in the Centers Main Street Overlay Area, and require at least 25% of all other CM 1 and CM2 zoned properties to be ground floor active use. We should also require mitigation for lost commercial space due to demolition and new construction within these zones.

Given that Mixed Use Zoning is largely applied to business districts, it is imperative to develop and increase the capacity of ground floor active uses that have been traditionally accommodated in commercial street front infrastructure. Such uses include businesses and institutions which operate using between 2,500 and 15,000 square feet.

Further new Commercial Space is correctly defined as “Active Space” - meaning they represent an invaluable asset in urban fabric whereas previously these might have been housed in separate (non mixed-use) structures.

In areas slightly outside intense commercial cores, active ground floor spaces are necessary to host functions like nurseries, pre-schools, personal services (e.g. counseling), etc. These services are vital to healthy neighborhoods.

Recent mixed-used buildings have been stingy in allocating ground floor space to commercial or active uses. Traditional ground floor commercial units often facilitate larger spaces in the 5000-10,000 square foot range. On Hawthorne Boulevard, think **Powells, Red Light, Gold Door**, or even the relatively new spaces of **Dosha** and **American Apparel** – primarily housed in warehouse style storefront spaces. The newly expanded **Powells** on Hawthorne will approach 15,000 Sq. Ft.; something impossible in almost any mixed-used project built recently.

At the same time, more attention needs to be focused on the potential loss of professional office space in our corridors (e.g. 21 professionals already displaced at SE Hawthorne/26th and 25 more potentially displaced at SE Hawthorne/45th.). These professional services are vital to walkable neighborhoods.

### **33.266.110 Minimum Required Parking Spaces (on transit corridors)**

Perhaps the greatest conflict point between added residential capacity and small businesses operating on streetcar era corridors are the multiple demands on critical



curbside parking.

HBBA businesses rely on and support improving all the forms of transit that contribute to our vitality. We support more frequent bus service, curbside bike parking corrals, improved pedestrian access and safety, while accommodating and welcoming visitors from well outside our district who arrive by vehicle.

To that end, a base minimum of .5 parking spaces per residential unit for mixed use projects is recommended under 30 units, with a base minimum of .7 parking spaces per unit for all other projects. We note the new Goat Blocks project (in the EX zone), using stack parking, will achieve this .7 minimum.

It is recognized that including parking is an expense. However, within narrow corridors the most cost effective time to create new parking to accommodate new growth is as a component of new mixed-use construction. It becomes exponentially expensive and difficult after the fact.

However, there are certain parcels on a historic corridor like Hawthorne Blvd. - because of their size and location on street corners - that are more conducive to including generous amounts of subterranean parking than others, such as narrow lots wedged mid-block. An active program of parking management and sharing while continuing to add supply may be the optimum approach.

Finally, in terms of contributing to housing costs, it would be preferred to forgive a portion of minimum parking requirements in guarantee or as an incentive for dedicated below market housing instead of assuming these savings will be automatically passed on to tenant.

### **Conclusion**

Portland is blessed by an amazing array of vibrant, historic close-in neighborhoods that abut the HBBA district. The introduction of new density into Mixed Use Zones needs to be done with a deft touch that recognizes the considerable potential downsides as well as upsides that new investment and development brings.

A more conservative FAR combined with rigorous ground floor active space requirements, plus maintaining sufficient parking capabilities for corridors like Hawthorne, while improving all forms of transit, is the key to future livability and viability.



Attachment:  
Previous  
testimony

**HBBA 2015-16  
Board Members**

**Officers**

Cassie Ridgway,  
Interim President  
*Altar*

Miranda Levin, V. Pres.  
*Memento*

Liz Potter, Secretary  
*New Seasons Market*

Greg Moon, Treasurer  
*Western Seminary*

**Directors:**

*Matt Galli*  
*Fred Meyer - Hawthorne*

Roger Jones  
*Aetna Brokerage*

Bruce Chaser  
*Well Adjusted, LLC*

Shelly Arnold  
*Rivermark Community Credit  
Union*

Hilda Stevens  
*BAZI*

Gabrielle Mercedes Bolivar  
*Mainspring Portland  
(formerly FISH)*

**HBBA Mission**

to promote the general business welfare of the businesses and all members of this Association and generally of all businesses bordering SE Hawthorne Boulevard from SE 12th Avenue to SE 60th Avenue and, HBBA promotes, develops and preserves Hawthorne Boulevard through community involvement, as a desirable place to work, shop and live.

**Hawthorne Boulevard Business Association**  
P.O. Box 15271  
Portland, OR 97293-1271  
(503) 775-7633

[www.hawthornepdx.com](http://www.hawthornepdx.com)

EIN: 93-0886868

March 12, 2015

To: Bureau of Planning & Sustainability

From: Hawthorne Boulevard Business Association (HBBA)

Re: 2035 Comprehensive Plan Proposed Draft – July 2014  
Portland Mixed Use Zones Project document – 2/25/2015  
Slide #1, page 29

The HBBA Board of Directors voted on March 11, 2015 to respond to the 2035 Comprehensive Plan Proposed Draft specifically regarding **building height** and the lack of proposed step back within the rules for the 80' Right of Way streets (i.e. Powell and Sandy).

This classic Streetcar Era District does not fit the Civic Corridor definition (Policy 3.38) and finds "mid-rise" development of 4 to 6 stories disrespects the neighborhood character of the Boulevard which is already constrained to the point that bicycles are forced to transit the area by way of SE Salmon and SE Lincoln/Harrison. Hawthorne most clearly aligns with Neighborhood Corridor (Policy 3.42).

Recommendation: Define Hawthorne Boulevard as a Neighborhood Corridor.

We propose it would be preferable to place 70' ROW streets in the 60' ROW (ie Belmont, Division) arena. Hawthorne and other 70' streets are generally more traditional Main Streets with narrower sidewalks and a traditional feel to them. We believe it would be disruptive to the ambience, mass and scale of the District to create a designation that allows more 4 story buildings without a step back above the 3<sup>rd</sup> floor.

Recommendation: Change the ROW footage to < 75' in order to include Hawthorne Boulevard with the 60' ROW designation.

We also encourage requiring a step back after the 3<sup>rd</sup> floor to better integrate into the residential areas to the north or south in order to not overpower the existing fabric between the commercial and the residential community.

Portland City Council  
1221 SW 4th Ave, Room 130  
Portland, OR 97204  
Attn: Comprehensive Plan Early Implementation Testimony

Thursday, October 13, 2016

Mayor Hales  
Commissioners

I'm Wayne Rask, a fractional owner and the Principal Broker representing properties at **10010 & 10060 SE Ankeny St.**

The holding is 2.08 acres and is Project #17 on the Portland Brownfield Funded Project List. The ownership recently completed a two-year process of environmental assessment and negotiation leading to DEQ's approval of a Remedial Action Plan to render the site suitable for "Urban Residential" development. Meeting this higher standard results in a higher cost for remediation.

I object to the proposed rezoning of these lots from the current EX zone to a reconfigured EG1 zone. Among the drastic ramifications of this change are:

- Household Living will no longer be a permitted use – This contradicts the ownership's vision and motivation for purchasing the property and undertaking the remediation because of their intention to devote part of the site, which fronts Ankeny Street, to much needed Affordable Housing.
- Maximum Allowable height under EG1 will be reduced from 120' to 45' - Ownership's vision for the portion of the site fronting Pine Street is a reduced size "New York Building" of perhaps 5 Stories. An industrial flex building to accommodate small-space users; incubator and start-ups including loft office. If you manufacture it, assemble it, fix it, design it, or market it, then we want you here and we will help you find financing for it.
- Maximum FAR will be reduced from 6:1 to 3:1 - Ownership is faced with hundreds of thousands of cleanup related dollars. To justify the expense, it must be distributed over a much greater amount of finished floor area than the amount proposed.
- Maximum site coverage is reduced from 100% to 85%

We are requesting our property and other neighboring properties retain their current EX zoning in consideration to its proximity to the Burnside and 102<sup>nd</sup> MAX station, and its prominence in the *Opportunity Gateway Concept Plan*, retain their current FAR, Height and Uses.

There is a plan for new streets in Gateway, one of which might cut through our lots. This too would be a horrific extra burden to this property owner given the potential of forfeiting a substantial portion of our land. The argument for more streets was in conjunction with grander live-work environment that the PDC and other agencies would have helped to bring about. If this ambition goes away, then so should the argument for the street.

Again, we request to retain the EXd zoning for our property and neighboring properties.

Wayne Rask  
Fractional owner and Principal Broker  
wayne@raskgrp.com

3560 SW Troy St.  
Portland, OR 97219

Allen Field  
3290 SE Grant  
Portland, Oregon 97214  
503-236-3657

October 13, 2016

**Sent via email: [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)**

Portland City Council  
1221 SW 4th Ave, Room 130  
Portland, OR 97204

Re: Testimony on omprehensive Plan Implementation

Portland City Council members:

I am writing to submit testimony on the Comprehensive Plan Update and the proposed Mixed Use Zoning.

**1. Support for including Design Overlays on Civic Corridors**

Major civic corridors like Powell and others need this design overlay too if they are to become the "Great Streets" they are intended.

**2. Support for Stepbacks and Stepdowns above the Third Floor**

It is of great concern that the Planning Commission has recommended removal of the stepdown/stepback requirement at the street for smaller zones (CM1 & CM2). We're going taller so we need the stepbacks and stepdowns (especially on narrow streets) to help make better transitions and better compatibility in existing neighborhoods. Hawthorne Boulevard Business Association (HBBA) has recommended these stepbacks above the third floor as has the Division Design Committee. HBBA has stated in past testimony that "it would be disruptive to the ambiance, mass and scale of the District to create a designation that allows more 4 story buildings without a stepback above the 3rd floor." This is an important livability and compatibility issue needed to help new development fit better. It also impacts solar access and shade impacts which can impact daylighting, heating and associated utility costs for the first floor of commercial buildings on the N. Side of narrow E-W streets. Please restore these stepdown requirements to help neighborhood better accept increased density with fewer impacts.

**3. Support for Design Guidelines for Compatibility and Design Commissions per Quadrant.**

Housing capacity is at issue now. As recent evidence has demonstrated, quantity does not always equal quality. It takes thoughtful design that is sensitive to context, neighborhood character and patterns of design that make Portland so special and desirable. To do this

effectively we need better area-specific design guidelines, standards and area specific design review boards

4. **Support for HBBA Testimony on Recommendations for Building Size and FAR**  
- "...continue a 45' height limit combined with a new 2.5 Floor Area Ratio (FAR) to address concerns about boxy, massive infill on corridors. While we would be more comfortable with the former C2 limit of three stories or a 45' limit, the introduction of the 2.5 FAR restores balance to the this zoning equation."
  
5. **Support for Adding Impact Assessments of New Development (DDI Ten 10 Policy Recs #10)**  
Solar, privacy, noise, loss of historic resources, traffic, air quality are often significant yet we are lacking the tools we need to properly evaluate and measure the impacts of new development. We need assessments both +/- if we are going to grow denser and maintain livability. This should be a part of permit review but should also be included as a goal in the Comp Plan and standards for higher density buildings. We can't manage effectively what we don't measure.
  
6. **Support for Incentives & Bonuses for Innovation & Resiliency** - (These should be integrated in both the Mixed Use & Other Comp Plan Programmatic Approaches)
  - a) Incentives for Reuse/Preservation of Existing Buildings are Needed (ideally tied in with projects that undergo seismic upgrades supported by SDC fee waivers, etc.)  
This would support resiliency in our existing building stock, incentives upgrades for small business owners, and support preservation of important community character and identity.
  
  - b) Incentives or bonuses for Energy efficiency & Building Innovation such as zero energy buildings (i.e. buildings that generate their own energy) - Buildings account for more than 40% of our national energy. Therefore, it is absolutely critical and can have a direct impact on affordability by significantly reducing monthly heating and lighting bills for low income occupants, as well as help meet our long term climate goals. California has committed to a zero energy building goal for all new residential becoming zero energy by 2020 and all new commercial by 2030. We should be at least as visionary here in Portland if we want to retain our title of a bastion of sustainability. Staff should come back with a recommendation for this to be included in the Mixed Use Zoning Bonuses or a proposal for a short term market incentive (e.g. first 20 zero energy buildings get fee reductions perhaps).

- c) Incentives for development in underserved areas (e.g. 82nd, Powell, etc.) that could benefit from increased services new development would bring both through diverse businesses, increased walkability and density for greater transit (via SDC's and other fee waivers or reductions, or other bonuses).
7. I oppose the proposed change from R to CM2 for the properties on the block between SE Hawthorne Blvd and Market St., and between SE 38<sup>th</sup> and Cesar Chavez Blvd. This proposed change was never presented to the Richmond Neighborhood Association nor did the community have an opportunity to express its views on this proposed change to the RNA.

Allowing this zoning change will allow the encroachment of CM zoning into a residential neighborhood that has no precedent in SE neighborhoods.

I urge you to retain the R zoning and, at most, adopt the recommendation of BPS which recommended these R5 properties to be rezoned to R2.5 on 38<sup>th</sup> and to R1 on Chavez.

Please support these important issues that impact both our short term and long term community goals for a more livable, resilient and sustainable Portland.

Thank you,



Allen Field,  
3290 SE Grant St.  
Portland, OR 97214

**From:** [Luke Norman](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 5:06:43 PM

---

City Council,

I'm writing today to express my support for increased affordable housing in Portland through an elimination of minimum parking requirements in Mixed-Use Zones.

As you may be aware, the evidence that parking requirements increase the cost of housing has grown to the extent that the White House has recommended removing parking requirements as they disproportionately impact low-income residents. As City Council has extended the Housing Emergency, it is the perfect time to ensure that we remove barriers to increasing affordable housing in Portland.

With the recent [news](#) that the Streetcar gains a rider for every new housing unit built, this is the time to remove parking requirements that our city doesn't need. I encourage you to plan for a city where housing is affordable and driving is optional.

Warm regards,

Luke Norman



**From:** [Stephen Judkins](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** Comprehensive plan implementation  
**Date:** Thursday, October 13, 2016 5:04:56 PM

---

I believe that the next comprehensive plan should have as few minimum parking requirements as possible. At the very least, we should trade requirements for more affordable housing. Parking requirements are shown to significantly affect the cost of new housing and are a partial cause of our current housing crisis.

Thanks,  
Stephen Judkins  
416 N Beech  
Portland, OR 97227

**From:** [James Peterson](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [jim.rue@state.or.us](mailto:jim.rue@state.or.us); [Hales, Mayor](#); [Commissioner Fritz](#); [Commissioner Fish](#); [Commissioner Novick](#); [Commissioner Saltzman](#); [mnachair@gmail.com](mailto:mnachair@gmail.com)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 4:58:46 PM  
**Attachments:** [Comp 10.13.16.docx](#)

---

October 13, 2016

Council Clerk , [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

RE: Comprehensive Plan Implementation

All provisions of the City of Portland Zoning Code Title 33 and the 2035 Comprehensive Plan zone definitions need to be made consistent with the adopted 2035 Comprehensive Plan Policies in Chapter 10.

Please add these to the record.  
Thank you,

James F Peterson  
Multnomah  
Land Use Chair  
2502 SW Multnomah Blvd  
Portland, OR 97219

DLCD  
Director Jim Rue, [jim.rue@state.or.us](mailto:jim.rue@state.or.us)

Portland City Council  
Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)

Sent from [Outlook](#)

October 13, 2016

Council Clerk , [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

RE: Comprehensive Plan Implementation

All provisions of the City of Portland Zoning Code Title 33 and the 2035 Comprehensive Plan zone definitions need to be made consistent with the adopted 2035 Comprehensive Plan Policies in Chapter 10.

Please add these to the record.

Thank you,

James F Peterson  
Multnomah  
Land Use Chair  
2502 SW Multnomah Blvd  
Portland, OR 97219

DLCD  
Director Jim Rue, [jim.rue@state.or.us](mailto:jim.rue@state.or.us)

Portland City Council  
Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)

**From:** [Council Clerk – Testimony](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** FW: PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219  
**Date:** Thursday, October 13, 2016 4:52:35 PM  
**Attachments:** [7008 SW CAPITOL HILL RD PORTLAND 97219.png](#)  
[image00001.png](#)

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<!--[if lte mso 15 || CheckWebRef]-->

Parsons, Susan has shared a OneDrive file with you. To view it, click the link below.

 [7008 SW CAPITOL HILL RD PORTLAND 97219.png](#)

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<!--[endif]-->

Susan Parsons  
Assistant Council Clerk  
City of Portland  
[susan.parsons@portlandoregon.gov](mailto:susan.parsons@portlandoregon.gov)  
503.823.4085

---

**From:** izzat dweik [mailto:izzatd@hotmail.com]  
**Sent:** Thursday, October 13, 2016 4:19 PM  
**To:** Council Clerk – Testimony <CCTestimony@portlandoregon.gov>  
**Cc:** Frederiksen, Joan <Joan.Frederiksen@portlandoregon.gov>  
**Subject:** Fw: PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219

---

**From:** izzat dweik <[izzatd@hotmail.com](mailto:izzatd@hotmail.com)>  
**Sent:** Thursday, October 13, 2016 4:16 PM  
**To:** [susan.parsons@portlandoregon.gov](mailto:susan.parsons@portlandoregon.gov)  
**Cc:** [cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
**Subject:** Re: PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219

Sorry i need to include the Map

---

**From:** izzat dweik <[izzatd@hotmail.com](mailto:izzatd@hotmail.com)>  
**Sent:** Thursday, October 13, 2016 4:04 PM  
**To:** [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
**Subject:** PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219

MR. MAYOR , CITY COMMISSIONERS ,

My name is issac Dweik I reside and own the property located at 7008 sw capitol hill rd

Portland 97219 , Unfortunately I missed the dead line which was adopted in June for the comprehensive changes in zoning . I am asking for my property zoning to be changed or considered as soon as possible from R7 TO R1 or at least R2

1- My property is zoned R7 and the south adjacent to my property is and has been zoned R2 For over 40 years .

2- The property Adjust to me from the east and north of me have been adopted to be changed to R1 And R2 .

3- The capitol hill rd is on the west side of my property .

4- That leaves my property which currently R 7 surrounded by R1& R2 zoning .

5- Should you I hope rezone it or consider rezoning it in the near future THAT will have min um impact on schools roads and other services .

6- That area and neighborhood has a real low density .

7- With the currant housing crises and with all projection that it will even get worse every year it really makes perfect sense for it to be rezoned to R1

8- This property is within close proximity to the Jews temple and since it is one of the commandments in the Jews faith is to WALK to the temple That area and neighborhood is absolutely in dire need for more affordable homes .

PLEASE CHANGE OR CONSIDER FOR THIS PROPERTY TO BE REZONED TO R1

Thank you all for taking the time to read my testimony and please consider the change .

Issac Dweik

**From:** [Council Clerk – Testimony](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** FW: PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219  
**Date:** Thursday, October 13, 2016 4:52:13 PM  
**Attachments:** [7008 SW CAPITOL HILL RD PORTLAND 97219.png](#)  
[image00001.png](#)

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<!--[if lte mso 15 || CheckWebRef]-->

Parsons, Susan has shared a OneDrive file with you. To view it, click the link below.

 [7008 SW CAPITOL HILL RD PORTLAND 97219.png](#)

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<!--[endif]-->

Susan Parsons  
Assistant Council Clerk  
City of Portland  
[susan.parsons@portlandoregon.gov](mailto:susan.parsons@portlandoregon.gov)  
503.823.4085

---

**From:** izzat dweik [mailto:izzatd@hotmail.com]  
**Sent:** Thursday, October 13, 2016 4:15 PM  
**To:** susan.parsons@portlandoregon.g  
**Cc:** Council Clerk – Testimony <CCTestimony@portlandoregon.gov>  
**Subject:** Re: PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219

Sorry i need to include the Map

---

**From:** izzat dweik <[izzatd@hotmail.com](mailto:izzatd@hotmail.com)>  
**Sent:** Thursday, October 13, 2016 4:04 PM  
**To:** [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
**Subject:** PROPERTY LOCATED AT 7008 SW CAPITOL HILL RD , PORTLAND 97219

MR. MAYOR , CITY COMMISSIONERS ,

My name is issac Dweik I reside and own the property located at 7008 sw capitol hill rd Portland 97219 , Unfortunately I missed the dead line which was adopted in June for the comprehensive changes in zoning . I am asking for my property zoning to be changed or considered as soon as possible from R7 TO R1 or at least R2

1- My property is zoned R7 and the south adjacent to my property is and has been zoned R2 For over 40 years .

2- The property Adjust to me from the east and north of me have been adopted to be changed to R1 And R2 .

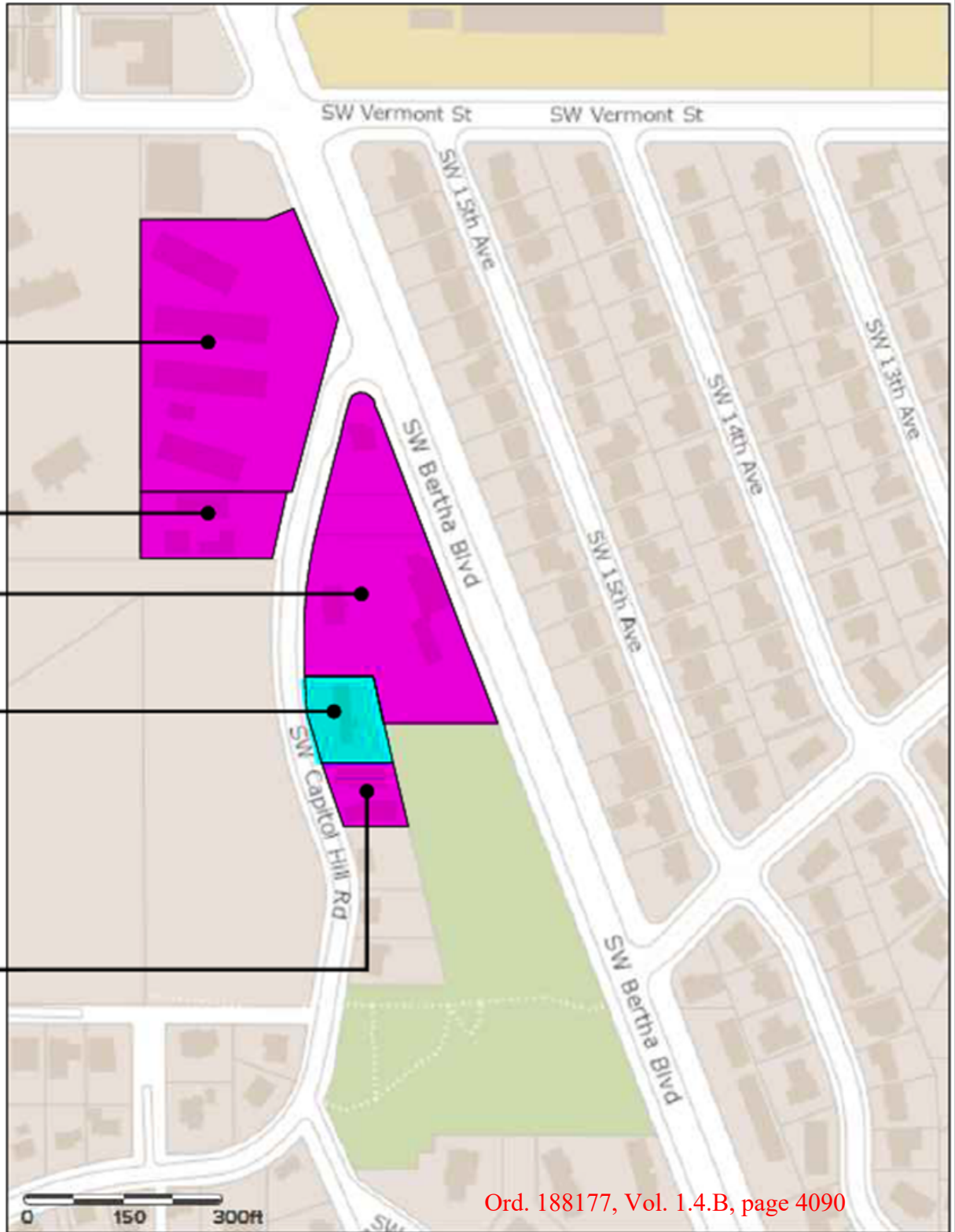
**R7 EXISTING**  
**R1 PROPOSED**  
7008 SW CAPITOL HILL ROAD

R1

R2

R1 & R2

R2



STEWART  
1200  
BEA  
(003)  
(071)  
page 6  
DWEIK PROPERTY  
PRO  
NUM  
DRAWN  
DESIGN  
SHEET  
ZONING  
SHEET

3- The capitol hill rd is on the west side of my property .

4- That leaves my property which currently R 7 surrounded by R1& R2 zoning .

5- Should you I hope rezone it or consider rezoning it in the near future THAT will have minimum impact on schools roads and other services .

6- That area and neighborhood has a real low density .

7- With the current housing crises and with all projection that it will even get worse every year it really makes perfect sense for it to be rezoned to R1

8- This property is within close proximity to the Jews temple and since it is one of the commandments in the Jews faith is to WALK to the temple That area and neighborhood is absolutely in dire need for more affordable homes .

PLEASE CHANGE OR CONSIDER FOR THIS PROPERTY TO BE REZONED TO R1

Thank you all for taking the time to read my testimony and please consider the change .

Issac Dweik



**From:** [Carol McCarthy](#)  
**To:** [Council Clerk – Testimony](#); [BPS Comprehensive Plan Testimony](#)  
**Cc:** [City Auditor Griffin-Valade](#); [ted@tedwheeler.org](mailto:ted@tedwheeler.org)  
**Subject:** Public Testimony regarding the Recommended Draft of the Community Involvement Program  
**Date:** Thursday, October 13, 2016 4:50:52 PM  
**Attachments:** [2016-10-13\\_CIP-Citizens.pdf](#)  
[2016-10-13\\_CIP-GeographicDiversity.pdf](#)  
[2016-10-13\\_CIP-List\\_of\\_Communities.pdf](#)  
[2016-10-13\\_CIP-ONI.pdf](#)

---

Please add the attached positions adopted by the Multnomah Neighborhood Association to the record on the Recommended Draft of the Community Involvement Program.

Thank you,  
Carol McCarthy

Chair - Multnomah Neighborhood Association  
email: [MNAChair@gmail.com](mailto:MNAChair@gmail.com)

October 13, 2016

Portland City Council  
Council Clerk  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

**Re: CIP Should Be Assigned to ONI**

The Multnomah Neighborhood Association (MNA) requests that the Community Involvement Committee of the August 2016 Recommended Draft of the Community Involvement Program (CIP) be revised to assign the Community Involvement Committee (CIC) to the Office of Neighborhood Involvement (ONI) and that the members of the CIC be appointed by ONI.

The recommended CIP assigns the CIC to the Bureau of Planning and Sustainability (BPS). The MNA is concerned that this will allow BPS to have too much influence over land use issues where they have plans that are at odds with positions adopted by the neighborhood associations. In addition, ONI has an established track record of supporting community involvement. The City should allocate any funding for improving community involvement to ONI to guarantee some degree of autonomy from BPS for the CIC.

Please add this to the record.



Carol McCarthy  
MNA Chair

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Mayor-Elect Ted Wheeler, [ted@tedwheeler.org](mailto:ted@tedwheeler.org)

October 13, 2016

Portland City Council Clerk  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

## Re: CIP Should Maintain List of Communities

The Multnomah Neighborhood Association is concerned that the August 2016 Recommended Draft of the Community Involvement Program allows the City to determine what is a “community” without public transparency. The definition of community as “*A group of people with a shared sense of identity or belonging*” is so broad that without further definition, the public cannot understand which groups of people with “shared identity or belonging” have standing in the CIP as “communities”.

Basic questions are left unanswered:

- Who is a member of a given group of people with a “shared sense of identity or belonging”?
- What “sense of identity or belonging” is shared by the group of people?
- What is the name of the group?
- How does the group make decisions or adopt positions?
- Who speaks for the group?

The CIP needs to be more transparent in defining “community” because it appears to be the basis for the CIP.

The Multnomah Neighborhood Association is requesting that, at a minimum, the CIP:

- Maintain a list of communities that have standing in the CIP as “communities”;
- Provide procedures used to add and remove communities from the list;
- Clarify how membership in a community is determined, so that an individual may unambiguously determine whether or not they belong to a given community and whether they belong to more than one community; and
- Report on an annual basis the funding that communities on the list receive from the City.

The MNA raised these concerns during the 2035 Comprehensive Plan hearings and we still consider them to be serious concerns. The current draft CIP will allow the City to arbitrarily select groups of people for identity as communities and also to select organizations to represent these communities without transparency and without vetting these selection processes with the public.

Please add this to the record.



Carol McCarthy  
MNA Chair

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Mayor-Elect Ted Wheeler, [ted@tedwheeler.org](mailto:ted@tedwheeler.org)

October 13, 2016

Portland City Council  
Council Clerk  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

### **Re: CIC Should Represent Geographic Diversity**

The Multnomah Neighborhood Association is concerned that the Community Involvement Committee of the August 2016 Recommended Draft of the Community Involvement Program will not guarantee representation of Portland's diverse geographic areas.

State Goal 1 in Oregon's Statewide Planning Goals & Guidelines, OAR 660-015-000(1), requires geographic representation in the CIC: *"As a component, the program for citizen involvement shall include an officially recognized committee for citizen involvement (CCI) broadly representative of geographic areas and interests related to land use and land-use decisions."*

We are requesting that the bolded phrase shown below be added to the last sentence of the third paragraph on page 15, so that the composition of the Community Involvement Committee is consistent with the requirement for geographic diversity in State Goal 1:

*The committee's composition should represent the racial, cultural, and socioeconomic diversity of the people of Portland, **as well as be broadly representative of Portland's geographic areas and interests related to land use and land-use decisions.***

Please add this to the record.



Carol McCarthy  
MNA Chair

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Mayor-Elect Ted Wheeler, [ted@tedwheeler.org](mailto:ted@tedwheeler.org)

October 13, 2016

Portland City Council  
Council Clerk  
[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)  
[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)  
1221 SW Fourth Avenue, Room 130  
Portland, Oregon 97204

## Re: The Role of Citizens in the CIP

The Multnomah Neighborhood Association (MNA) is concerned that the August 2016 Recommended Draft of the Community Involvement Program (CIP) only includes the word “citizen” to justify why it is not using the word “citizen” in the CIP:

*The word “citizen” is not used because it can suggest that legal citizenship is a prerequisite for civic involvement, which is not the case. The choice to replace “citizen” with “community” is intended to open the doors and welcome engagement with everyone. The choice to use “community” rather than “public” is intended to reflect a less formal approach to involvement.*

The word “citizen” also suggests thousands of years of history that resulted in the US Constitution and Bill of Rights, and eventually in the 14<sup>th</sup> and 19<sup>th</sup> amendments to the US Constitution, as well as the 1924 Indian Citizenship Act. The MNA is concerned that the authors of the 2035 Comprehensive Plan and the CIP have, albeit with good intentions, have actually harmed the citizens of Portland.

**By introducing “community” as an alternative to “citizen”, the City may inadvertently be providing the opportunity for special interest groups, such as lobbyists, to have standing in the CIP.**

State Goal 1 in Oregon’s Statewide Planning Goals & Guidelines, OAR 660-015-000(1) clearly states that citizen involvement is required in comprehensive planning and this must be guaranteed. If the City also wishes to involve Portland’s non-citizen residents, then this might be better accomplished by replacing the word “community” with “citizens and non-citizen Portland residents” in the CIP. If by “everyone” the City wishes to include people other than citizens and non-citizen residents, then these should also be explicitly mentioned.

Involvement is profoundly important to the citizens of Portland, who are the majority of Portland’s residents, and the CIP should reflect this by approaching involvement formally and explicitly.

Please add this to the record.



Carol McCarthy  
MNA Chair

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Mayor-Elect Ted Wheeler, [ted@tedwheeler.org](mailto:ted@tedwheeler.org)

**From:** [Ashley Schumacher](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** St Johns resident with feedback  
**Date:** Thursday, October 13, 2016 4:49:09 PM

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Our little neck of the woods is getting choked by non-local traffic. Both commuters moving between Vancouver/NE Portland and Hillsboro/Beaverton and increased truck traffic are seriously decreasing the quality of our air and our lives.

I would be all for some type of solutions that gets non-local traffic out of our town core. A North Willamette crossing - if only for freight traffic - would be a start. Please consider this as part of the comprehensive plan.

Thank you,  
Ashley Schumacher  
971-269-7130

**From:** [Debbie Thomas](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Debbie Thomas](#)  
**Subject:** Comprehensive Plan Implementation  
**Date:** Thursday, October 13, 2016 4:41:00 PM

---

Debbie Thomas Geffrard

Testimony

Ordered verbally slightly different - see asterisks

I will summarize - I am here primarily to focus on the FAR modifications. There are 9 C zones - 5 are "upgraded", 1 stays the same and then 3 are "down graded".

The city is talking all about the density needs - mainly in housing but also in commercial and services.

We talk about new codes and requirements for unreinforced masonry buildings.

We talk about bonus FAR - to encourage certain kinds of development.

The zoning changes proposed suggest changes that would lower density in many areas that we as tax payers have spent many years at improving and put many many resources into the infrastructure and amenities in those areas.

\*

In your proposed modifications - CS CX and CG are the only ones that the FAR is penalized or lowered. The others have been increased. I hope that is an oversight that will be recognized and changed and not adopted.

\*My comments are not "spot" property accommodations (as someone suggested) - this goes all over the city and affects many

many property owners. Northwest - northeast - St. John's (where they desperately need density) You are suggesting devaluation of properties and lessening the use of our city's infrastructure that everyone pays for.

Specifically regarding the CS to CM 2 -

My first question is why ?

It penalizes owners that haven't done a recent development. Not to mention that I believe it will create less design diversity since everyone will most likely create boxes that maximize what they can do.

Going from CS to CM 2 - reduces FAR - far more than it appears - 3:1 versus 2.5:1 - however it's really much more than that because you have limited the bonuses - so it could be a huge reduction for some properties and or planned developments. I'm not sure a lot of people actually realize that part has been slipped in.

And do you realize that in some cases - if the property is deemed uneconomical to reinforce - with this change - and under the new proposal - you might not even be able recreate what is there now.

This makes no sense me, goes completely against our coveted Urban Growth Boundary and I am in strong opposition to this and several other elements such as CN2 going to CM1 and limiting retail sales services and office.

What is the city thinking - inclusionary zoning requirements - gross sales taxes on corporations that we desperately need to create jobs in our market. Along with this suggestion - Portland is going backwards. We need our elected officials to focus on legislation that will encourage methodical growth and the influx



of more businesses - not discouraging both.

My other objections to the proposed changes have pretty much already been voiced.

Someone mentioned transferring FAR - well from what I've seen is that costs a lot of money and changes economic dynamics of new developments.

Thank you.

Debbie Thomas  
Debbie Thomas Real Estate  
[402 NW 13th Avenue](#)  
[Portland, OR 97209](#)  
P [503.226.2141](#)  
F [503.226.0283](#)  
M 503.720.6335  
[deb@debbiethomas.com](mailto:deb@debbiethomas.com)

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Sent from my iPhone

**From:** [Hollenbeck Glenda](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Mark Whitlow \(mwhitlow@perkinscoie.com\)](#); [Hipp Stephanie](#); [Levy Harlan](#); [Shammas David](#); [Darnell Tim](#); [Vogel, Stephanie \(Perkins Coie\)](#); [Murphy Zach](#)  
**Subject:** RE: Portland Mixed Use Zone Project  
**Date:** Thursday, October 13, 2016 4:38:44 PM  
**Attachments:** [1. 12109 NE Glisan St.pdf](#)  
[2. 5613 SE 82nd Ave.pdf](#)  
[3. 10050 SW Barbur Blvd.pdf](#)  
[4. 8149 SE Stark St.pdf](#)  
[5. 9100 SE Powell Blvd..pdf](#)  
[Letter 10-13-16 -Portland Mixed Use Zoning.pdf](#)

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**Please see the letter submitted by McDonald's Corporation along with 5 accompanying attachments.**

**Glenda Hollenbeck | Regional Property Manager | Pacific Northwest Regions  
US Restaurant Development | McDonald's USA | 15738 NW Graf St., Portland OR 97229  
(p) 503 867-3427 (e-fax) 503 296-2241 glenda.hollenbeck@us.mcd.com**

---

**From:** Planning and Sustainability Commission [mailto:[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)]  
**Sent:** Thursday, October 13, 2016 4:31 PM  
**To:** Hollenbeck Glenda <[Glenda.Hollenbeck@us.mcd.com](mailto:Glenda.Hollenbeck@us.mcd.com)>; Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Cc:** Mark Whitlow ([mwhitlow@perkinscoie.com](mailto:mwhitlow@perkinscoie.com)) <[mwhitlow@perkinscoie.com](mailto:mwhitlow@perkinscoie.com)>; Hipp Stephanie <[Stephanie.Hipp@us.mcd.com](mailto:Stephanie.Hipp@us.mcd.com)>; Levy Harlan <[Harlan.Levy@us.mcd.com](mailto:Harlan.Levy@us.mcd.com)>; Shammas David <[David.Shammas@us.mcd.com](mailto:David.Shammas@us.mcd.com)>; Darnell Tim <[Tim.Darnell@us.mcd.com](mailto:Tim.Darnell@us.mcd.com)>; Vogel, Stephanie (Perkins Coie) <[SVogel@perkinscoie.com](mailto:SVogel@perkinscoie.com)>; Murphy Zach <[Zach.Murphy@us.mcd.com](mailto:Zach.Murphy@us.mcd.com)>  
**Subject:** RE: Portland Mixed Use Zone Project

Hi Glenda,

At this point, your comments should be sent to City Council for their consideration on the Task 5 Implementation Package, as the PSC has already forwarded their recommendation to Council.

Please email [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov) with these comments to ensure they are entered into the record.

Thank you,  
julie

Julie Ocken  
City of Portland  
Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201  
503-823-6041  
[www.portlandoregon.gov/bps](http://www.portlandoregon.gov/bps)

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To help ensure equal access to City programs, services and activities, the City of Portland will provide transportation, reasonably modify policies/procedures and provide auxiliary aids/services/alternative formats to persons with disabilities. For accommodations, translations, complaints and additional information, contact me, City TTY 503-823-6868, or use Oregon Relay Service: 711.  
-----

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**From:** Hollenbeck Glenda [<mailto:Glenda.Hollenbeck@us.mcd.com>]  
**Sent:** Thursday, October 13, 2016 4:16 PM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Cc:** Mark Whitlow ([mwhitlow@perkinscoie.com](mailto:mwhitlow@perkinscoie.com)) <[mwhitlow@perkinscoie.com](mailto:mwhitlow@perkinscoie.com)>; Hipp Stephanie <[Stephanie.Hipp@us.mcd.com](mailto:Stephanie.Hipp@us.mcd.com)>; Levy Harlan <[Harlan.Levy@us.mcd.com](mailto:Harlan.Levy@us.mcd.com)>; Shammass David <[David.Shammass@us.mcd.com](mailto:David.Shammass@us.mcd.com)>; Darnell Tim <[Tim.Darnell@us.mcd.com](mailto:Tim.Darnell@us.mcd.com)>; Vogel, Stephanie (Perkins Coie) <[SVogel@perkinscoie.com](mailto:SVogel@perkinscoie.com)>; Murphy Zach <[Zach.Murphy@us.mcd.com](mailto:Zach.Murphy@us.mcd.com)>  
**Subject:** Portland Mixed Use Zone Project

**Please see the letter submitted by McDonald's Corporation along with 5 accompanying attachments.**

**Glenda Hollenbeck | Regional Property Manager | Pacific Northwest Regions  
US Restaurant Development | McDonald's USA | 15738 NW Graf St., Portland OR 97229  
(p) 503 867-3427 (e-fax) 503 296-2241 [glenda.hollenbeck@us.mcd.com](mailto:glenda.hollenbeck@us.mcd.com)**

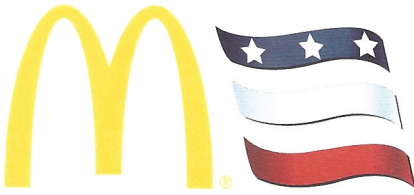
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McDonald's USA, LLC  
 12131 - 113th Avenue NE, #103  
 Kirkland, WA 98034

October 13, 2016

Mayor Charles Hales  
 Portland City Council  
 City of Portland  
 1900 SW Fourth Avenue #7100  
 Portland, OR 97201

Re: Portland Mixed Use Zones Project

Dear Mayor Hales and Members of the City Council:

I am the Pacific Northwest Regional Property Manager for McDonald's Corporation ("McDonald's"). McDonald's owns or holds ground leases on several properties in the City of Portland that are proposed to be rezoned, or subjected to limitations east of 80th Avenue, under the City's Mixed Use Zones Project. This letter respectfully supplements my prior letter of May 9, 2016 to the Portland Planning and Sustainability Commission ("PSC") regarding the above. This letter requests that these sites are zoned Commercial Employment ("CE") and not subjected to the Centers Main Street Overlay ("CMSO") zone during this rezoning process, or to the PSC's recommendation that drive-throughs be banned east of 80th Avenue. We also recommend that the CE zone be revised to better acknowledge the need for auto-accommodating development.

Our primary concern with the City's proposed re-zonings on our sites is that they will expressly or effectively prohibit drive-through uses. McDonald's business model has depended on drive-through and drive-up business since its earliest days, and few of its locations can be considered solely sit-down restaurants. On average, a McDonald's restaurant achieves 72% of its gross sales through its drive-through window. This obviously means that preserving existing drive-throughs is a paramount concern for us. It is similarly important that we have the ability to expand, remodel, and reconstruct our existing restaurants.

The City proposes to rezone four of our locations as mixed-use zones and apply the Centers Main Street Overlay ("CMSO"), and to ban new drive-throughs east of 80th Avenue, even if in the CE zone, as is our 9100 SE Powell store. These are summarized in the table below:

Exhibit Number	Restaurant Location	Existing Base Zone	Existing Overlay Zone	Existing Plan District	Proposed Base Zone	Proposed Overlay Zone	Plan District Changes
1.	12109 NE Glisan St.	CS	(d)	N/A	CM2	CMSO, (d)	N/A
2.	5613 SE 82nd Ave.	EX	(d)	N/A	CM3	CMSO, (d)*	N/A
3.	10050 SW Barbur Blvd.	CG	N/A	N/A	CM2	CMSO, (d)	N/A



4.	8149 SE Stark St.	CG-CS	N/A	N/A	CM2	CMSO	N/A
5.	9100 SE Powell	CG	N/A	N/A	CE	*	N/A

\*Drive-throughs prohibited east of 80th Avenue.

Once this new zoning is in effect, the very linchpin of these stores' success—their drive-through windows—will be unlawful. This will present very real problems when McDonald's operators seek to remodel their restaurants. For example, depending on the remodel plan, the City may require the drive-through to be removed.

Of the proposed zones, only CE without the CMSO will allow drive-throughs. Applying this zone at these locations is appropriate because they are outside of the Central City and already committed to auto-accommodating development, consistent with the following statement in the Proposed Draft of the mixed-use zones: “[The CE zone] is generally not appropriate in designated centers, except on a site that is currently developed in an auto-oriented manner and urban scale development is not economically feasible.” In our experience, areas such as these are slow to redevelop and we do not anticipate them doing so in the foreseeable future.

Although we understand the City's goal of making existing neighborhoods more walkable, the prohibition on drive-throughs will not do that; only changed market conditions and increased residential density will substantially change the character of outer-Portland neighborhoods. Drive-throughs are not inconsistent with walkability. Most McDonald's drive-through trips are “pass-by” trips, meaning that McDonald's restaurants have a relatively low traffic impact. To the extent that curb cuts and vehicle queuing are a concern, such issues can be addressed through site design of new and remodeled stores.

McDonald's is committed to operating and improving these restaurants. The proposed zoning, and in particular the CMSO, will make this substantially more difficult. Moreover, the policy of prohibiting drive-throughs will make life harder for those who rely on the convenience of drive-throughs, such as the elderly, disabled, and those with a number of small children, for whom sit-down restaurant dining is difficult or inconvenient.

Finally, even if our stores are zoned CE, we are concerned that the existing CE zone is not truly auto-accommodating, as currently defined in Portland Zoning Code:

"Auto-Accommodating Development. Development which is designed with an emphasis on customers who use autos to travel to the site, rather than those which have an emphasis on pedestrian customers. This type of development usually has more than the minimum required number of parking spaces. The main entrance is oriented to the parking area. In many cases, the building will have parking between the street and the building. Other typical characteristics are blank walls along much of the facade, more than one driveway, and a low percentage of the site covered by buildings."

Please consider a reduction of the pedestrian and transit oriented development standards in the new CE zone, to make it more auto-accommodating to better implement the existing "auto-accommodating" definition. For example, the City should consider allowing vehicle circulation areas in front setbacks and allowing dense landscaping in lieu of the 25-foot setback proposed to be required between drive-through uses and adjacent residential zones.

We sincerely appreciate the Commission's consideration of our request.

Best regards,

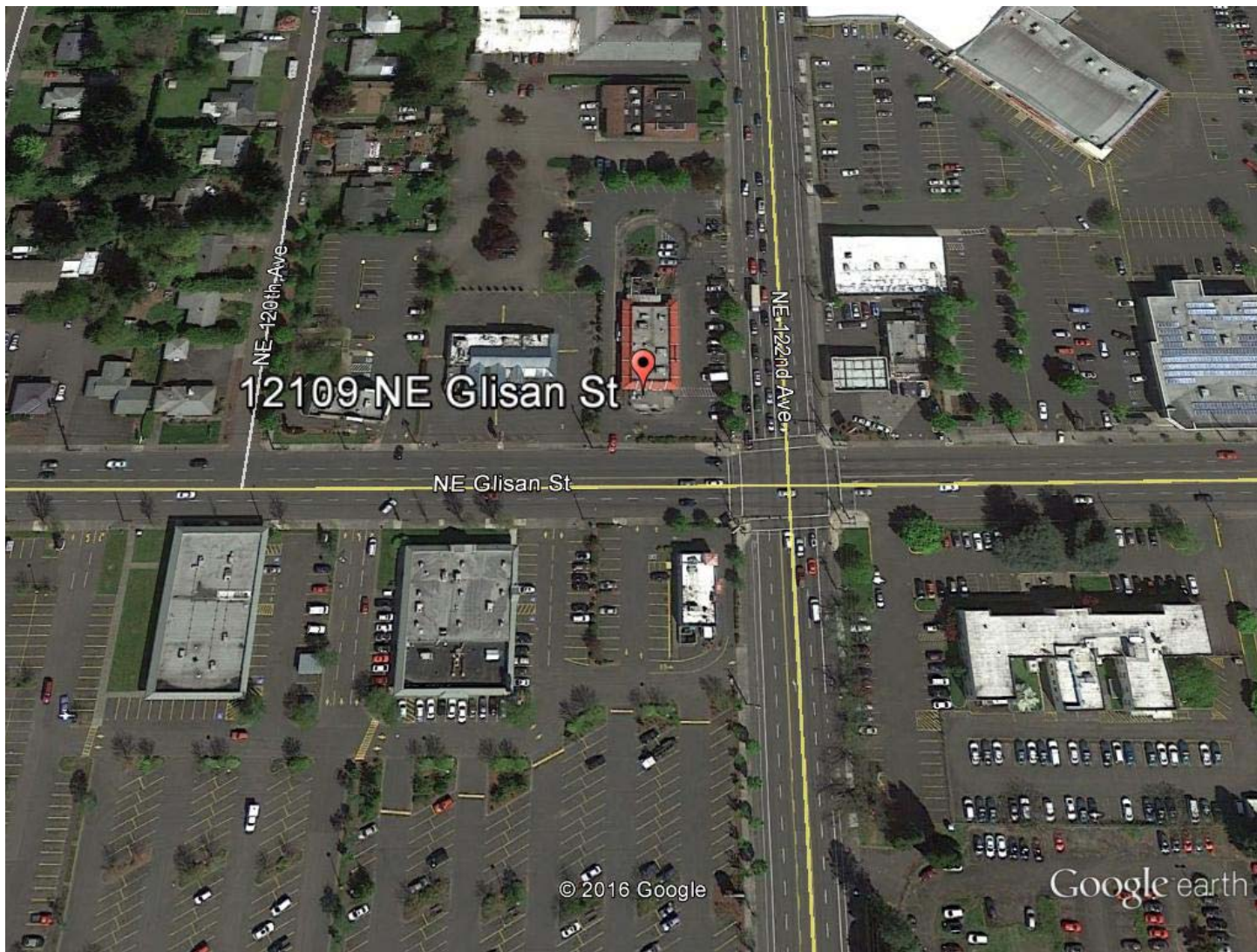
*Glenda Hollenbeck*

Glenda Hollenbeck

Enclosures

cc: Ms. Stephanie Hipp  
Mr. Harlan Levy  
Mr. Mark Whitlow

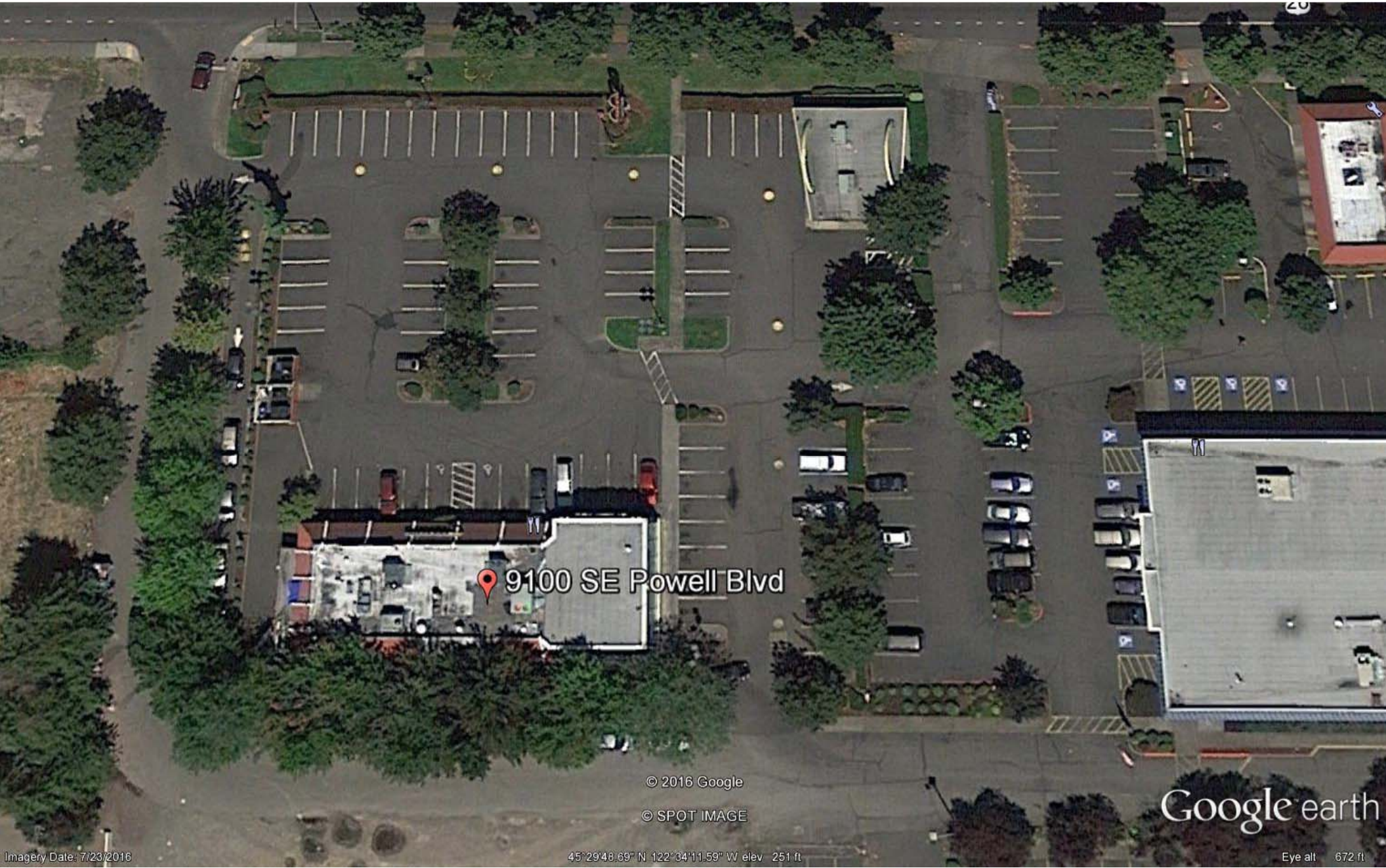




Google earth







9100 SE Powell Blvd

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45°29'48.69" N 122°34'11.59" W elev 251 ft

Google earth

Eye alt 672 ft





Google earth

feet  
meters







Google earth







Google earth



Comprehensive Plan Implementation Testimony  
Portland City Council, c/o Council Clerk  
1221 SW Fourth Ave., Room 130  
Portland OR, 97204

Honorable Mayor and City Commissioners:

October 11, 2016

The Brooklyn Action Corps (BAC) is submitting the following testimony on anticipated zoning to comply with the 2035 Comprehensive Plan for the Brooklyn Neighborhood.

- (1) Retain current R2.5 zoning for two residences at 1126 SE Reynolds and 1138 SE Reynolds (Proposed Change # 257).
- (2) As an alternative, only CM1 should be allowed, not CE.

We justify these requests below:

Brooklyn is a small neighborhood surrounded by major transportation arteries (SE McLoughlin, SE Powell, and Brooklyn Yards Intermodal). Brooklyn has a high percentage of rental properties (>60%), relative to the surrounding neighborhoods of Sellwood/Moreland, Hosford Abernathy and Creston-Kenilworth. In addition, the MAX Orange Line has brought about the conversion of three Brooklyn homes to a commercial self storage facility on SE 17th. We are protective of the residential nature of our shrinking neighborhood.

While we support the proposed up-zoning of the properties along SE Milwaukie from SE Center to SE Holgate (Proposed Change # 1559) from R1 to CM1 as an appropriate change, the BAC is concerned with further encroachment of commercial property into existing residential areas. After the Comprehensive Plan was approved, we became aware of what we feel is the inappropriate inclusion of two residences into the CE zoning of SE Holgate Blvd (Proposed Change # 257). The residences, at 1126 and 1138 SE Reynolds, now zoned R2.5 are not on Holgate and, in fact, have R2.5 residences on the opposite three corners of the intersection of SE Reynolds and SE 12th. None of the adjacent homeowners received notice of this change.

CM1 and certainly CE structures are not compatible with the surrounding residential neighborhood and would only further erode the residential area of Brooklyn. With the increasing shortage of residential property in Brooklyn and throughout Portland, these close-in homes should be protected.

This testimony was approved by the BAC Board of Directors by a unanimous vote on October 11, 2016.

Don Stephens

Land Use and Board Member

Brooklyn Action Corps

PO Box 42341

Portland. OR 97202

**From:** [Division Design Initiative](#)  
**To:** [BPS Comprehensive Plan Testimony](#); [Adamsick, Claire](#)  
**Cc:** [Nettekoven, Linda](#); [Commissioner Fritz](#); [Dufay, Anne](#); [Manning, Barry](#); [Cunningham, Bill](#); [Stockton, Marty](#); [Chris Flint Chatto](#); [chris@chrissmith.us](mailto:chris@chrissmith.us); [Houck, Mike](#); [Jeff Cole](#); [Michael Molinaro](#); [Allen F](#); [Matt Otis](#)  
**Subject:** Comprehensive Plan & MUZ Testimony  
**Date:** Thursday, October 13, 2016 4:29:30 PM  
**Attachments:** [Flint Chatto Testimony on Com Plan & MUZ 10.13.16.pdf](#)  
[Equity & Innovation Solar Policy - 1.7.15 DRAFT.pdf](#)  
[Sustainability Scorecard.pdf](#)

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City Council members,

Attached is my letter of testimony which represents my personal recommendations on the Comprehensive Plan & Mixed Use Zoning.

Included as well are:

1. Images showing impacts from overly boxy buildings, examples of how setbacks contribute to greater compatibility, plus a form based policy example
2. Sample Sustainability Scorecard
3. Draft Equity & Innovation Solar Policy

Thank you for your consideration,  
Heather Flint Chatto, 541-915-0120  
2121 SE 32nd Avenue, Portland, OR 97214

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**DIVISION DESIGN INITIATIVE**

Research | Community Advocacy | Design Resources | Neighborhood Planning Tools

Website: [www.divisiondesigninitiative.org](http://www.divisiondesigninitiative.org)

Email: [ilovedivision@gmail.com](mailto:ilovedivision@gmail.com)

# Sustainability Scorecard

*Because you can't manage what you don't measure*

	No impact	Some impact	Major Impact	Notes/Mitigation or Benefit
<b>Social Sustainability</b>				
Affordability				
Access to Shelter				
Access to Food				
Heath (Noise, Air & Light)				
Universal Accessibility				
Cultural & Historic Resources				
Safety				
Diversity				
Walkability				
<b>Environmental Sustainability</b>				
Materials (includes embodied energy of materials)				
Energy				
Water				
Air Quality				
Habitat				
Climate: Urban Heat/Cooling				
<b>Economic Sustainability</b>				
Access to Services				
Access to Natural Resources				
Diversity of Business Types				
Support for Energy Independence				

# Portland Solar Equity & Innovation Policy for Consideration in the Comprehensive Plan Update PRELIMINARY DRAFT 1.7.16

## GOALS

1. **Maintain Quality Access to Air & Light** (Equity)
2. **Encourage Climate and Community Resiliency through Innovative Energy Efficient Building Design** (Environment)
  - a. Provide incentives and bonuses for net zero energy and other ultra-low energy, verified, high performance buildings
3. **Retain Value for Commercial & Residential** (Economy)
  - a. Properties
  - b. Energy Generation/Solar (Hot water & PV)
  - c. Energy Efficient Passive Strategies (e.g. daylighting, thermal heating, and natural ventilation)
  - d. Urban Agriculture Production

## POLICY RECOMMENDATIONS

### 1. **Equity: Maintain Access to Air & Light**

Recommendation:

- a. Maintain fair and reasonable access to sun, air and light for buildings, residents and the pedestrian right way.
- b. Provide windows on all sides of upper stories of residential buildings,
- c. Provide light wells where a building is planned to abut another future building façade

*Why to support this policy:*

- Support passive heating, and cooling and fosters more natural ventilation
- Minimizes large blank walls.
- Helps reduce overly concentrating windows on rear of buildings which can result in privacy impacts and “overlighting” at night of adjacent properties. Especially key where new development abuts residential zoning and existing residential uses.

### 2. **Environment: Foster Innovative Building Design & Climate Resiliency**

- a. Provide incentives to encourage compact, energy-efficient infill housing types. Buildings with x% solar or verified/certified ultra-low energy buildings (including net zero energy verified, or LEED, PassiveHaus, Earth Advantage certified mixed use buildings).

### 3. **Economy: Retain Value for Commercial & Residential Properties:**

Buildings built too tall on narrow east-west streets create a significant solar impact. This includes loss of access to the sun in the months Portlanders need it most for thermal comfort, heating, and daylighting, and also significantly impacts economic value for energy generation, and long term resiliency goals.

Policy Recommendation: Require a solar shading analysis as part of permit submittal requirements to identify and minimize/mitigate impacts where feasible through design strategies any significant overshadowing of an adjacent building or property. Measure solar shading onto adjacent properties on December 21<sup>st</sup>.

*Why to support this policy:*

- Saves energy and supports climate resiliency from passive heating and cooling, and natural daylighting.
- Excessive solar shading impacts thermal comfort. Access to natural daylight has commonly recognized and documented psycho-social impacts to health and well-being. Studies show connection between greater productivity and natural daylighting as well.
- Retain economic value of property owners on (or adjacent to buildings abutting) E-W corridors.



# PROPOSED EQUITY & INNOVATION SOLAR POLICY

## Comprehensive Plan Policy Implications & Recommendations

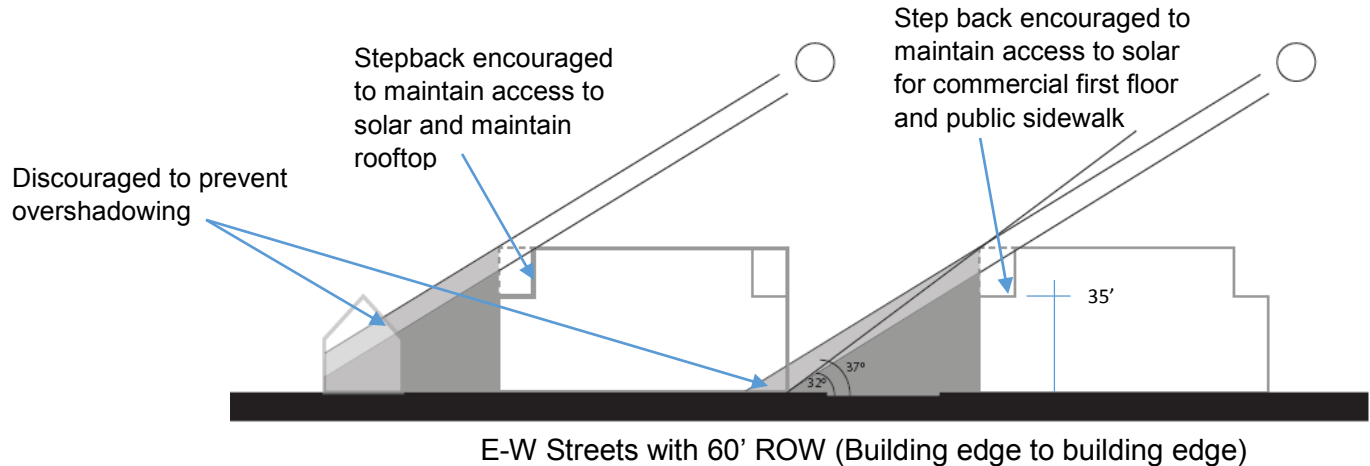
### Comprehensive Plan

1. Maintain fair and reasonable access to sun, air and light for buildings, residents and the pedestrian right way.
2. Scale Building Heights to Street Widths -> Build taller buildings on wider streets.
3. Growth Strategy: Focus taller buildings on North-South Streets where shading impact is the least impactful to adjacent existing residential neighborhoods

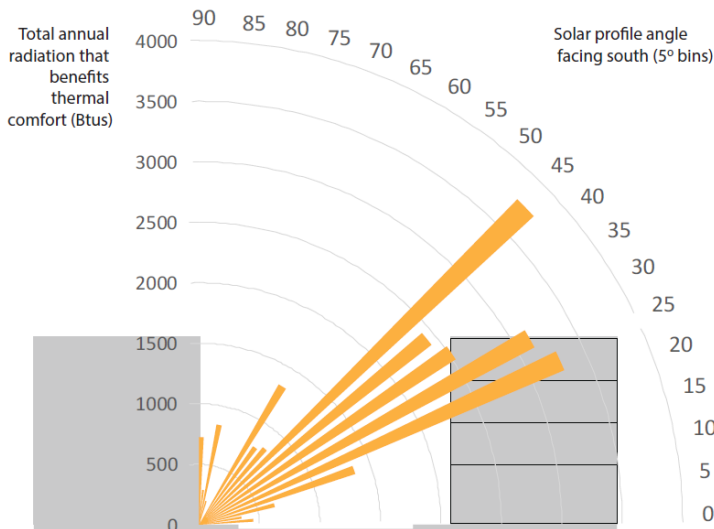
### Mixed Use Zoning Recommendations:

1. 8'-12' step back of main street building façade beginning at 4th floor of street frontage
  - a. Specifically on narrow/60' E-W main street corridors. (e.g. Division, Sellwood)
  - b. Areas with a Neighborhood Center designation if desired (Woodstock)
  - c. Areas with smaller scale historic main street character (e.g Hawthorne, Mississippi, Belmont)
2. Provide windows on all sides of upper stories of residential buildings
3. Provide light wells where a building is planned to abut another future building façade

### Encouraged and Discouraged Building Form & Shading Conditions on East-West Streets



### PRELIMINARY SOLAR ANALYSIS FOR 60' RIGHT OF WAY (ROW)

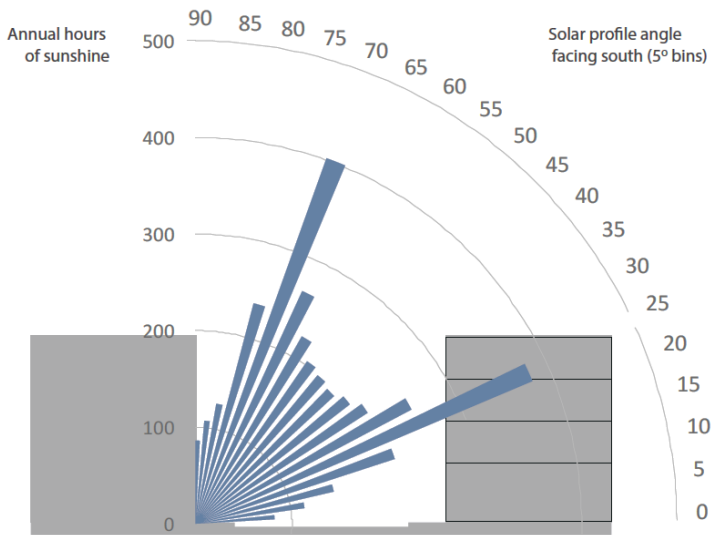


The Radial charts:

1. The number of hours per year that the sun is at a certain elevation, define by bins of 5 degree increments (and where each number represents 5 degrees less and up to that number), as measured off the horizon facing due south.

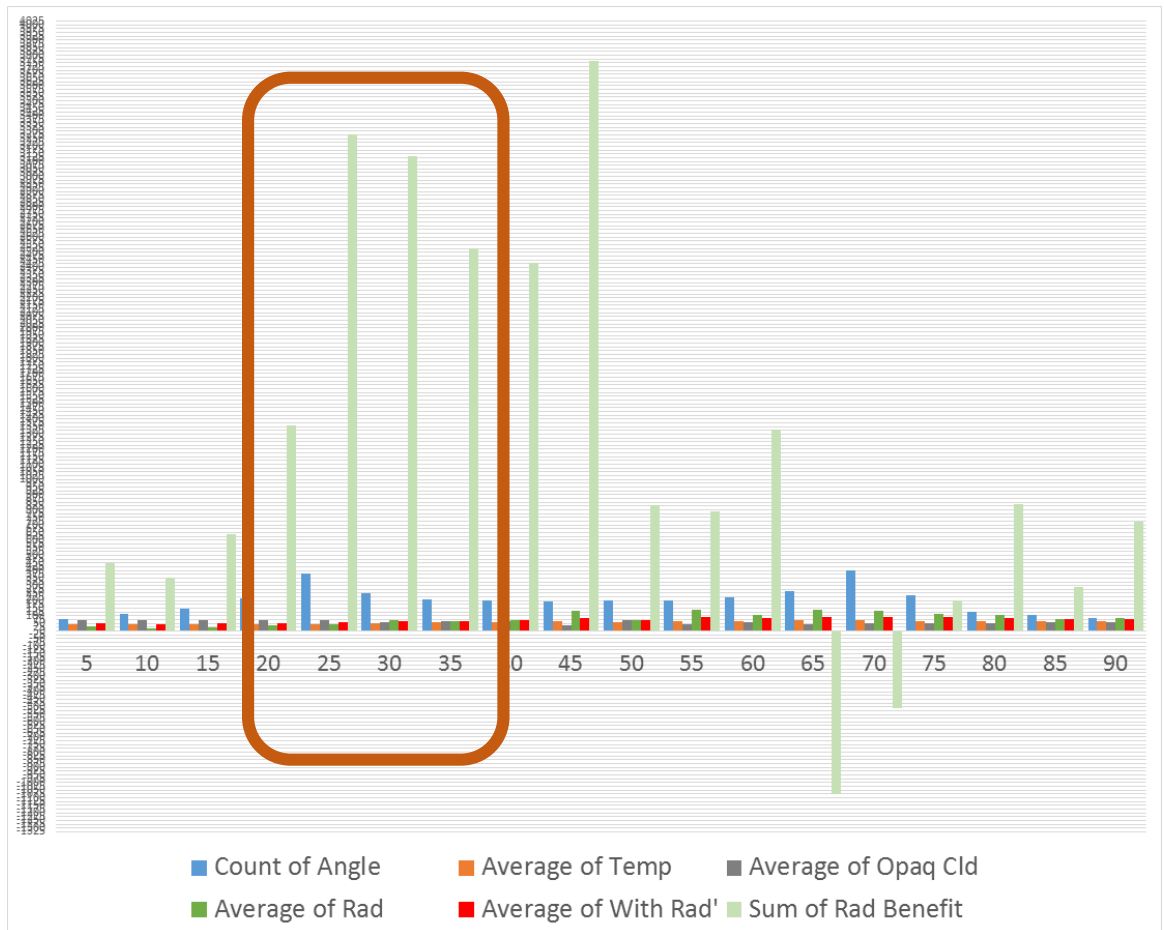
The sum of radiation is the number of useful BTUs (to bring effective temperature for a person outside up to 75F comfort), with the same southern angle binning.

## Solar Shading Impact Analysis 60' Wide Right of Way Street



2. This second radial chart shows the number of hours that the sun is at certain angle. This diagram shows the beneficial radiation (which counts radiation when temp is < 75F), which shows the preponderance of these hours at low angle winter times.

3. The chart below shows the average temp (F), average radiation (Btu) and average cloud cover (0-10).



### Conclusions:

- A significant amount of radial benefit is lost when blocking 20-35 degree sun angles on E-W streets.
- Buildings built too tall on narrow east-west streets create a significant solar impact.

Portland City Council  
1221 SW 4th Ave, Room 130  
Portland, OR 97204

Attn: City Council Testimony on Comprehensive Plan & Mixed Use Zoning

Portland City Council members:

As an urban planner and designer with over 17 years of experience in policy, sustainability planning and green building, I am writing to submit testimony on the Comprehensive Plan Update and the proposed Mixed Use Zoning. Based on my own experiences with the Division Design Initiative's extensive community engagement over the last two years of more than 1,000 community members, I would like to advocate the Council consider the following recommendations for increased density with fewer impacts and greater neighborhood compatibility.

While I am writing to testify on behalf of myself, nearly all of these topics have been included in past testimony from myself, the Division Design Committee and other neighborhood groups.

- 1. Support for the Division Design Guidelines work to inform the DOZA project and new Main Street Design Guidelines/Standards for our street-car era corridors, and the Division Plan District.** These areas connect us to our history, identity and sense of place. They are irreplaceable treasures and incompatible design takes away from their quality and success as business districts. Infill is certainly supported but better compatibility standards and preservation approaches are needed for these areas.
- 2. Support for including Design Overlays on Civic Corridors**  
Major civic corridors like Powell and others need this design overlay too if they are to become the "Great Streets" they are intended.
- 3. Support for Stepbacks and Stepdowns above the Third Floor** (See Figures 2-4 on stepback examples)  
It is of great concern that the Planning Commission has recommended removal of the stepdown/stepback requirement at the street for smaller zones (CM1 & CM2). We're going taller so we need the stepbacks and stepdowns (especially on narrow streets) to help make better transitions and better compatibility in existing neighborhoods. Hawthorne Boulevard Business Association (HBBA) has recommended these stepbacks above the third floor as has the Division Design Committee. HBBA has stated in past testimony that "it would be disruptive to the ambiance, mass and scale of the District to create a designation that allows more 4 story buildings without a stepback above the 3rd floor." This is an important livability and compatibility issue needed to help new development fit better. It also impacts solar access and shade impacts which can impact daylighting, heating and associated utility costs for the first floor of commercial buildings on the N. Side of narrow E-W streets. Please restore these stepdown requirements to help neighborhood better accept increased density with fewer impacts.
- 4. Support for Compatibility Criteria and a Design Commission per Quadrant.**  
We absolutely need to increase our housing capacity. However, as recent evidence has demonstrated, quantity does not always equal quality. It takes thoughtful design that is sensitive to context, neighborhood character and patterns of design that make Portland so special and desirable. To do this effectively we need compatibility criteria and a few more area-specific design review boards.

5. **Support for HBBA Testimony on Recommendations for Building Size and FAR** - "...continue a 45' height limit combined with a new 2.5 Floor Area Ratio (FAR) to address concerns about boxy, massive infill on corridors. While we would be more comfortable with the former C2 limit of three stories or a 45' limit, the introduction of the 2.5 FAR restores balance to the this zoning equation." (See Figure 1)
6. **Support for Adding Impact Assessments of New Development (DDI Ten 10 Policy Recs #10)**  
Solar, privacy, noise, loss of historic resources, traffic, air quality are often significant yet we are lacking the tools we need to properly evaluate and measure the impacts of new development. We need assessments both +/- if we are going to grow denser and maintain livability. This should be a part of permit review but should also be included as a goal in the Comp Plan and standards for higher density buildings. We can't manage effectively what we don't measure. (See Sustainability Scorecard attached).
7. **Support for Incentives & Bonuses for Innovation & Resiliency** - (These should be integrated in both the Mixed Use & Other Comp Plan Programmatic Approaches)
- a) Incentives for Reuse/Preservation of Existing Buildings are Needed (ideally tied in with projects that undergo seismic upgrades supported by SDC fee waivers, etc.). This would support resiliency in our existing building stock, incentives upgrades for small business owners, and support preservation of important community character and identity.
  - b) Incentives or bonuses for Energy efficiency & Building Innovation such as zero energy buildings (i.e. buildings that generate their own energy) - Buildings account for more than 40% of our national energy. Therefore, it is absolutely critical and can have a direct impact on affordability by significantly reducing monthly heating and lighting bills for low income occupants, as well as help meet our long term climate goals. California has committed to a zero energy building goal for all new residential becoming zero energy by 2020 and all new commercial by 2030. We should be at least as visionary here in Portland if we want to retain our title of a bastion of sustainability. Staff should come back with a recommendation for this to be included in the Mixed Use Zoning Bonuses or a proposal for a short term market incentive (e.g. first 20 zero energy buildings get fee reductions perhaps).
  - c) Incentives for development in underserved areas (e.g. 82nd, Powell, etc) that could benefit from increased services new development would bring both through diverse businesses, increased walkability and density for greater transit (via SDC's and other fee waivers or reductions, or other bonuses).

8. **Support for an Equity & Innovation Solar Policy**

We need to rethink the way we design buildings with greater sensitivity to climate, sun, wind and energy efficiency. In addition to the innovation incentive noted above, we also are in dire need of a solar policy. NBI and I have both submitted testimony on this previously. In support of this, attached is my rough draft of a recommendation for an "Equity and Innovation Policy for Portland." In support of better building design approaches for a solar innovation policy and incentives noted in 7b above, please consider this policy proposal and the following additional quote from a leading zero energy building designer:

*"As architectural designers we still tend to design the building massing and then figure out where the PVs go. We need to get better at letting the solar access shape the form of the building." We have been able to achieve [zero energy buildings] without exotic or expensive systems, but by optimizing common building approaches with well integrated design. Our designers, engineers, and clients are now seeing how it's feasible within conventional budgets, and that is transforming all our assumptions that we bring to our future projects."*

*– Scott Shell, leading architect of many zero energy buildings, EHDD Architects*

9. **Do not let Developers Drive the Direction for our City.** Take greater stock in community input. Community members and residents who have invested in building this great city have expressed strong concerns about loss of neighborhood character and compatibility but this has largely been disregarded in this process. Design and planning approaches that would help such as stepbacks and stepdowns, impact analysis, compatibility criteria, impact assessments, and adaptive reuse of existing buildings have been recommended to both support new development density but with fewer impacts. We are being short sighted in our approach and have let the financial conversation by developers continue to chip away at any environmental bonuses, as well as livability and compatibility supportive design and zoning criteria. **Assumptions that design restrictions or guidelines will stop or slow development should not be the driving force for our policy.**

To emphasize this point, a leading innovative developer shared the opinion below further emphasizing that developers should not be driving this conversation. His quote below (approved by him to share):

*"I would be willing to make time to meet with decisionmakers to let them know that developers should NOT be driving the bonus and planning conversation. I think we should be, quite frankly, ignored. Developers ALWAYS want more and ALWAYS complain that new restrictions will do them under .... yet they somehow still manage to build over and over again - usually in damn ugly ways."*

*– Kevin Cavenaugh, Portland Developer, Guerrilla Development*

I strongly advocate you to place greater value on residents' concerns over developers who frequently do not have the long term vision or care for building quality as well as quantity.

10. **Long term vision, innovation and leadership in creating a livable city should be our guide, not a single emergency issue.** Density is but one tool in our toolbox. We need more research and attention to the displacement impacts currently seen by gentrification of new development that shifts residents in walkable neighborhoods to farther out more affordable locations then causing them to now drive where they formerly could walk. We are shifting the problem in inequitable ways and furthering gentrification. We need to focus on where the density can create multiple benefits of greater demand for transit, not just where we already have transit. We need to provide development with neighborhood serving businesses in areas that need them the most instead of solely focusing on the neighborhoods that already have them as it is also further displacing vibrant locally serving businesses and making functional neighborhoods more visitor serving and less neighborhood serving. This would tie in with our recommendation 7c above regarding incentivizing new development in the areas needed most, not in the ones that are already working (a key principle from A Pattern Language by Christopher Alexander).

Thank you for your thoughtful consideration of these critical issues that should be better integrated into the Mixed Use Zoning and Comprehensive Plan implementation. Please support these important issues that impact both our short term and long term community goals for a more livable, resilient and sustainable Portland.

Sincere respect and appreciation for the commitment and work you do for our City.

Thank you,

Heather Flint Chatto, Planner and Designer, Cofounder of the Division Design Initiative  
2121 SE 32<sup>nd</sup> Avenue, Portland, OR 97214

ATTACHMENTS: Equity & Innovation Solar Policy; stepback/massing photos; Sustainability Scorecard



**FIGURE 1 | OVERLY BOXY BUILDINGS & ADJACENCY IMPACTS ON DIVISION**

- New development is architecturally interesting but by trying to have each make a unique statement, do not relate to nearby buildings at all, and draw attention away from the unity of the district as a whole. Buildings are overly flat, with boxy massing. Both aspects causing incompatibility with neighborhood character.
- Impacts to solar access on the north, significant light overspill to neighbor to south at right means they don't have to turn on their lights at night, and privacy impacts from residents of new developments looming over adjacent single family residential backyards. Community members feel boxed in on the narrow street of Division.
- Salt & Straw draws significant regional visitors, traffic, noise, trash and parking impacts. Not a bad business nor terrible buildings unto themselves but in their context very impactful to the neighborhood.

How are these development and business impacts to the street and neighborhood measured and mitigated? They aren't.





**FIGURE 2 | STEPBACKS HELP COMPATIBILITY IN BEND** – Not a wedding cake as BPS staff modeling shows. This is an example of good looking step backs in Bend that keep the pedestrian scale feeling of the older area while supporting more density above.



**FIGURE 3 | STEPBACKS HELP COMPATIBILITY IN PORTLAND** – Goat Blocks. Both images show better compatibility and density. Less box-like massing, stepbacks (in this case at the first floor instead of the third), varied window patterns, and brick in both Figure 2 & 3 creating better relationships to neighborhood patterns that keep the pedestrian scale and relationship to context while supporting more density above.

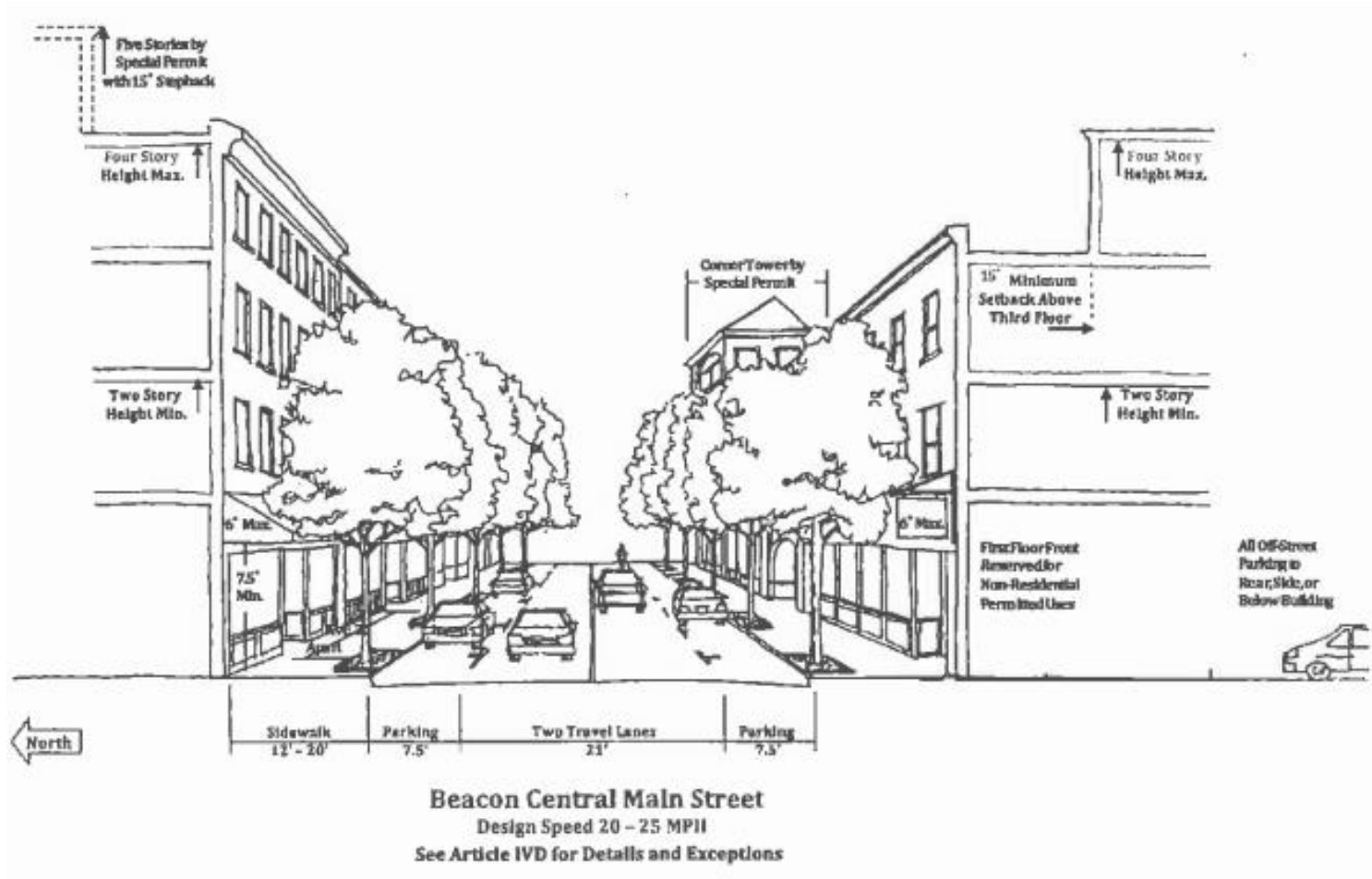


**FIGURE 4 | STEPBACKS & FORM BASED GUIDELINES IN BEACON, NY**

This image is from the Beacon NY Design Standards showing required stepback on S. side of street to support great solar access:

**Section D. Dimensional Regulations:**

**(7) “For any building over three stories on the south side of Main Street or four stories on the north side, a setback of at least 15 feet behind the facade shall be required for the top story...”**



Façade recommendations on the MUZ proposal including:

- a) Required upper level façade stepbacks above 3 stories (at a minimum on Southern street side)
- b) Design criteria for maintaining light and air on side facades and minimizing blank walls
- c) Smaller façade and roofline interval breaks to relate to better relate to inner ring context



October 13, 2016

Portland City Council  
1221 SW 4<sup>th</sup> Ave, Room 130  
Portland, OR 97204  
Attn: Comprehensive Plan Implementation

RE: 3111 SE 13<sup>th</sup> Ave, Portland, OR 97202 (1S1E11BD 2500)

I am the property owner for this property and have been a property owner in this area since 1995 (Located South of Powell Blvd and East of SE 12<sup>th</sup> Ave). Through hard work my properties and the neighborhood have continued to improve year to year. I am proud to be an active participant in this progress. Crime has also been reduced significantly with the helpful cooperation of many Portland Police Officers.

My current zoning is CG and is proposed to go to CE. I find this change adds many more restrictions including but not limited to setback requirements from residential. If my zoning is changed to CE, I request monetary compensation for the lowering in property value but also for the inability to develop my property as expected over these many years of hard work. The compensation and other remedies are not limited to but certainly include the City of Portland. The new CE zoning may have its place but in this situation reduces the incentives for revitalization. I request my zoning be left as it is at CG or moved to the established CX zoning. This is a critical time to get it correct.

As a point of perspective, the properties directly to my North on the North side of Hwy 26 (otherwise known as Powell Blvd) and East of SE 11<sup>th</sup> Ave are both traffic and land locked. They are locked in by MAX tracks and Main Railroad on the North and East, HWY 26 on the south with very little obvious methods of improving access. One of the only access points is a congested intersection at the max station on SE 11<sup>th</sup> Ave. At a minimum, ODOT would likely need a traffic impact study for HWY 26 to include effects on Ross Island Bridge flow. Simple facts are that these properties are owned significantly by The City of Portland (fire station already being moved) in addition to a mix of PDC, Tri-Met and developer interests. Clearly the proposed zoning change to EX is an increase in these property values but with potential downsides to both nearby property value's like mine and livability to surrounding communities.

I share a wish for the City of Portland to develop in a meaningful and community based manner. These are huge changes affecting a broad spectrum of Portland. There are undeniable financial interests at stake. Today's input may be an important step in getting

direct involvement from small property owners as well. It is likely relatively easy for large property owner and/or developer to provide input but for a small property owner like myself the process is daunting. Please do more to consider and allow the small property owner to have an equal voice. In many cases, we know our communities.

AN IDEA: This is a suggestion made by an exceptional architect regarding the traffic and land locked properties largely owned by the City of Portland north of SE Powell Blvd. Transform all the properties North of Powell and East of SE 11<sup>th</sup> into a special PARK zone but much more then just green. Portland is a Green City and we can include art and green energy but also a pedestrian hub. Incorporate a park and ride structure to reduce traffic flow into downtown and over Ross Island Bridge likely gaining ODOT support. Blend the two into a pedestrian gateway to SE utilizing the existing Max Station. A very special idea I ask you?

Sincerely,

Brainard Brauer  
Property Owner  
Mailing Address:  
18876 S. Lyons Rd.  
Oregon City, OR, 97045  
(503) 238-1414

October 13, 2016

Portland City Council  
1221 SW 4<sup>th</sup> Ave, Room 130  
Portland, OR 97204  
Attn: Comprehensive Plan Implementation

RE: 3205 W/ SE 13<sup>th</sup> Ave, Portland, OR 97202 (1S1E11BD 1900)

I am the property owner for this property and have been a property owner in this area since 1995 (Located South of Powell Blvd and East of SE 12<sup>th</sup> Ave). Through hard work my properties and the neighborhood have continued to improve year to year. I am proud to be an active participant in this progress. Crime has also been reduced significantly with the helpful cooperation of many Portland Police Officers.

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Sincerely,

Brainard Brauer  
Property Owner  
Mailing Address:  
18876 S. Lyons Rd.  
Oregon City, OR, 97045  
(503) 238-1414

**From:** [Wetjen, Sarah \(NBCUniversal\)](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Subject:** zoning change Lair Hill (South Portland Historic District)  
**Date:** Thursday, October 13, 2016 4:23:33 PM

---

Greetings,

Would like to express my concern re: Lair Hill (South Portland Historic District) change from CS to CM2.

As a long time resident of Lair Hill, I am committed to maintaining the quality and historic nature of the Lair Hill neighborhood.

While I understand some changes are to be expected and feel the following changes will impact the livability of the neighborhood.

I am not in favor of the following:

- reducing FAR from 3 to 2.5
- allowing quick vehicle servicing
- allowing commercial parking
- raising the allowable height limit

Thank you,

Sarah Wetjen  
3418 SW First Ave  
Portland Or. 97239

**From:** [Mark Stromme](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Stark, Nan](#)  
**Date:** Thursday, October 13, 2016 4:23:04 PM  
**Attachments:** [RCPNA-SupportStrommeZoneChange12282015-TDR.pdf](#)

---

Fwd: City Council Testimony Recommended Comp. Plan: RCPNA Supports Zone change from Med.D.Residential to Mixed Use for 2537 NE 56th Ave. & requests the same for Fire Station 28

Greetings,

I was at the permit center today to follow up and confirm that things had been addressed for my property located at 2537 NE 56th.

I had requested that my property be included in the mixed use designation along the Hollywood business corridor.

The city council had adopted this recommendation in June for inclusion in the Comp Plan, but it appears there may have been an oversight in not bringing the zoning map into compliance for this property and the adjacent fire station on the corner of 56th and Sandy Blvd, together.

I went before the Rose City neighborhood association and received their endorsement, which is attached, to facilitate the zone change.

I would greatly appreciate a follow up reply to this email in order to confirm that this process has been completed appropriately, the oversight corrected, and the zoning map be brought into conformance with the city councils previously adopted comp plan change.

Thank you so much,

Sincerely,

Mark Stromme, Property Owner  
503-314-4412

Mark Stromme  
mstromme@aol.com  
503-314-4412

-----Original Message-----

From: Tamara DeRidder, AICP <[SustainableDesign@tdridder.users.panix.com](mailto:SustainableDesign@tdridder.users.panix.com)>

To: City Council <[cctestimony@portlandoregon.gov](mailto:cctestimony@portlandoregon.gov)>; City Council <[karla.moore-love@portlandoregon.gov](mailto:karla.moore-love@portlandoregon.gov)>

Cc: Anderson Susan <[Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)>; Zehnder, Joe <[Joe.Zehnder@portlandoregon.gov](mailto:Joe.Zehnder@portlandoregon.gov)>; Nan Stark <[nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov)>; Alison Stoll <[alisons@cnncoalition.org](mailto:alisons@cnncoalition.org)>; Mark Stromme <[mstromme@aol.com](mailto:mstromme@aol.com)>

Sent: Mon, Dec 28, 2015 4:06 pm

Subject: City Council Testimony Recommended Comp. Plan: RCPNA Supports Zone change from Med.D.Residential to Mixed Use for 2537 NE 56th Ave. & requests the same for Fire Station 28

Dear Karla,

Please forward the attached testimony to the City Council as additional RCPNA testimony on the Recommended Comprehensive Plan Update. The letter supports the rezone of property 2537 NE 56th from Med. Density Residential to Mixed Use Commercial and recommends that the City implement the same rezone on their abutting Fire Station 28 property at the same time, located at 5540 NE Sandy Blvd.

Please contact me if you have any questions.

Happy New Year!

Best,

Tamara

Tamara DeRidder, AICP  
Chair, RCPNA  
1707 NE 52nd Ave.  
Portland, OR 97213  
503-706-5804



Dec. 28th, 2015 (Transmitted this day via e-mail to the following)

City of Portland  
City Council <karla.moore-love@portlandoregon.gov>  
1221 SW 4th  
Portland, OR 97204

CC: Susan Anderson, BPS Director, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
Joe Zehnder, Long Range Planning [Manager, Joe.Zehnder@portlandoregon.gov](mailto:Manager, Joe.Zehnder@portlandoregon.gov)  
Nan Stark, BPS NE District Liaison, [nan.stark@portlandoregon.gov](mailto:nan.stark@portlandoregon.gov)  
Alison Stoll, Executive Director Central NE Neighbors, [alisons@cnncoalition.org](mailto:alisons@cnncoalition.org)

Subject: Recommended Comprehensive Plan Map - RCPNA Supports Rezone from Medium Density Residential to Mixed Use for Mark R. Stromme located at 2537 NE 56<sup>th</sup> Ave. and propose the City includes Fire Station 28 at 5540 NE Sandy in this zone change.

Honorable Mayor Hales and City Commissioners:

Thank you for the opportunity to testify on the Recommended Comprehensive Plan Map. On Tuesday December 1st, 2015 the Rose City Park Neighborhood Association Board accepted their Land Use and Transportation Committee's recommendation to up-zone one property located at 2537 NE 56<sup>th</sup> Ave. from Medium Density Residential to Mixed Use Commercial. The property currently contains the maximum number of residential units, 13 units on 13,000 square feet. Yet, only one-half of the property is developed. Given the proximity of the site to Sandy Blvd., the site has the possibility of increased residential use if zoned Mixed Use. Nonetheless, concern was raised as to the substandard right-of-way for NE 56<sup>th</sup> that provides sole access to the site and the need for off-street parking for additional units. Property owner Stromme shared that he lives in the area and any future development will be completed with the needs of the neighbors in mind.

The majority of the RCPNA Board voted to support the rezone on 2537 NE 56<sup>th</sup> Ave. from Medium Density to Mixed Use Commercial based on the following supportive facts include:

1. The subject property abuts a commercial property (MUC) to the west and a Fire Station to the north (MDR), which both front on NE Sandy Blvd. The southerly property line abuts the Sandy Crest Terrace Apartments (MDR);
2. The subject property is flat and located on NE 56<sup>th</sup> Ave. within 200 feet of NE Sandy Blvd.;



3. The subject property has been developed to the maximum density of 13 units on 13,000 in the RI zone;
4. Only the northern ½ of the property contains the apartments leaving the remaining area primarily covered with grass, offering possible space for more apartments if zoned Mixed Use Commercial.

Thank you again for the opportunity to provide input on the Recommended Comprehensive Plan Map.

My best,



Tamara DeRidder, AICP  
Chair, RCPNA  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213

Exhibits:

- A. Letter to the Neighbors, Mark Stromme
- B. Request to City Council for zone change, Mark Stromme
- C. Applicant site map – Zoning Map
- D. Recommended Comp. Plan Map

The following information was received from property owner Mark Stromme via e-mail, [SustainableDesign@tdridder.users.panix.com](mailto:SustainableDesign@tdridder.users.panix.com), on November 25<sup>th</sup>, 2015. Signed Tamara DeRidder, 11/29/2015

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Thank you Tamara. Below please find the letter I sent to neighbors last night, after stopping to visit with John and Kate Robinson who live across the street and I know I am driving now and hope that Andrew will forward that to you, but I will do so if I do not see soon. Thank you again for your consideration on this.

Letter to neighbors delivered last night.

John and Kate, thank you for having me in your home to chat about my apartment across the street.

Delani and Tyler, I am the owner of the Vista Villa Apts across the street from your homes on 56th.

John and Kate provided me your emails in order to communicate with you about this subject.

I wanted to let you know that I met with the Hollywood area planning committee this evening in order to talk about having my property included in the MU 1 zone with the comprehensive plan changes upcoming. They suggested I let the neighbors know, in the event you would like to attend a discussion of this at the board meeting upcoming [on December 1 at 7 pm](#), next week.

In a nutshell, I would like for the long range plan to allow for some additional residential construction on the vacant portion of my property at some point in the future. If not done now and allowed for through the comprehensive plan adoption now in the works, then it will likely not be up for discussion again for another 30 years or so, and I aint gonna be around then. :) I have owned this property for 28 years, and all of the density allowed on the site is contained within the one building, leaving the 70 x 100 foot sideyard just idle. We are on a transportation corridor where the city is encouraging more density, so from that standpoint it makes sense.

This is only the first of several steps that would need to be taken for it to even be included in the comp plan changes. Any development on the site would be a period of years away, and I would envision providing off street parking so as to not negatively impact the street. I have no intentions of selling the apartment property.

If you have any feedback for me, I would appreciate hearing it. I wanted you to be aware of the process I am working through, and would appreciate having either your support or neutrality on the issue.

Thanks so much, and Happy Thanksgiving.

Mark Stromme  
[mstromme@aol.com](mailto:mstromme@aol.com)  
503-314-4412

Portland City Council  
c/o Council Clerk  
1221 SW 4th Ave, Room 130  
Portland, OR 97204

**RE: City of Portland Draft Comprehensive Plan**  
2537 NE 56<sup>th</sup> Ave., Portland, OR

Dear City Commissioners:

Thank you for taking this request into consideration as part of updating the City of Portland Comprehensive Plan. I would also like to thank Nan Stark for discussing the pending updates with me. As the owner of the property at 2537 NE 56<sup>th</sup> Ave., I would like to provide comments and recommendations for the Comprehensive Plan as it relates to the site and the neighborhood.

My interest is for the Comprehensive Plan to encourage development that will enhance the long term interests and identity of this area.

Existing and Future (Draft Comprehensive Plan) Zoning Designation of property:

The property at 2537 NE 56<sup>th</sup> Avenue consists of approximately 12,800SF (100' x 128') of land located on the west side of 56<sup>th</sup> Avenue just south of NE Sandy Blvd. The property includes a 13-unit apartment building which is 2-stories, plus a partially depressed first level. The building is situated on the northern 40% of the site. The current zoning designation for the property, and those immediately around it on both sides of Sandy Blvd., is Multi-Dwelling Residential – R1, a medium-density multi-dwelling zone that allows 43 units per acre or more depending on amenity bonuses. Based on this zoning, the property already contains the maximum number of allowable units, leaving the southern 60% of the site undevelopable.

The existing R1 zone is an anomaly in the context of NE Sandy Blvd. For many blocks in both directions, the properties along Sandy Blvd. are currently zoned Commercial, generally CS – Storefront Commercial to the southwest, and CG – General Commercial to the northeast. Also, the R1 zone exists in this area despite that several of the properties in the zone are not residential. These properties include the restaurant directly adjacent to the west of my property, the fire station directly adjacent to the north, the bank across 56<sup>th</sup> Ave. to the northeast, and the dental office across 56<sup>th</sup> Ave. to the northeast.

The Draft Comprehensive Plan designation for my property is R1. Of the remaining properties in the R1 zone, only the restaurant and the bank properties are being proposed for a zoning change to Mixed Use – Civic Corridor (which is the proposed zoning for the

current CS and CG zones to the southwest and northeast along Sandy) to recognize the existing non-conforming uses.

Proposed Zoning and Comprehensive Plan Designation: (see attached exhibit)

As part of the updates to the Comprehensive Plan, I propose that the property at 2537 NE 56<sup>th</sup> Ave., along with the restaurant, fire station, bank, and dental office mentioned above, be included in the new Mixed Use – Civic Corridor (MU-CC) Comprehensive Plan designation. This MU-CC designation encourages mixed-use, pedestrian focused, transit oriented, and medium density development. My intention for the property is to allow for additional residential units on what is now an underutilized site – not to develop commercial use on the site.

Explanation in Support of Proposal:

The Mixed Use – Civic Corridor Comprehensive Plan designation I propose for my site is the same mixed-use designation that is currently proposed for properties to the southwest and northeast of my site. The inclusion of the above-referenced properties in the MU-CC will provide a more contiguous mixed-use zone along Sandy Blvd.

MU-CC seems a very appropriate designation for the Sandy Blvd. Corridor given its frequent transit service and medium-density commercial nature. According to the Draft Comprehensive Plan, "as the city grows, these corridors also need to become places that can succeed as attractive locations for more intense, mixed-use development." This is a prescription for higher density residential use along and just adjacent to Sandy Blvd. My property is a prime candidate for such development, as it is already a multi-family apartment building with an adjacent 7,500SF of currently undevelopable land that could easily support greater residential density near the NE Sandy Blvd. Transit Corridor.

Although there is a need for higher density residential, I am sensitive to the desire for commercial space not to push into lower density residential zones. Just to the south of my property, 56<sup>th</sup> Ave. offsets to the east before intersecting NE Sandycrest Terrace. This offset creates a natural break between the commercial- and transit-oriented Sandy Corridor, and the lower density neighborhood to the south.

Thank you very much for considering my proposal. Please keep me informed of opportunities to continue to participate in the conversation regarding the future of my site and neighborhood.

Sincerely,

Mark R. Stromme

Enclosures: Exhibit A  
cc: Nan Stark, City Planner / Northeast District Liaison  
Tamara DeRidder, Chair, RCPNA  
Hennebery Eddy Architects

Existing Zoning







Subject Site: 2537 NE 56<sup>th</sup> Ave.

Mixed Use Commercial