

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

From: Anthony Schaefer [mailto:agschiro13@gmail.com]

Sent: Tuesday, May 24, 2016 3:22 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Mixed use zoning

Dear sirs,

I am writing today as a concerned citizen of SE Portland. I have lived in SE PORTLAND for 34 of the last 38 years. Many changes have occurred to our city , som good some not so. I believe that increased density must be accommodated in order to maintain a live able city. Community citizen input is vital to provide appropriate density and preserve the qualities of our city that make it so live able.

Mixed use zoning plans need amending to appropriately empower the community to have input on local development. To that end I ask the following:

1. Restore residential FAR requirements for mixed use bldg.
2. Incorporate the division design guidelines into the division st plan expanded to the Division main st plan boundaries.
3. Support Vintage low rise preservation.
4. Require quadrant design review. Community based review.
5. Create a SE area plan.

These 5 points need to occur now and should be incorporated during the current review.

I wish to live in a beautiful city , one populated with a diverse citizenship. A city that can accommodate both those here now and the many to come. These changes will provide balance to growth and preservation.

Thank you,

Dr. Anthony Schaefer DC  
5037532856  
4511 SE Hawthorne blvd  
Portland, Or 97215



**Ben Earle**

5524 NE 30<sup>th</sup> Ave.  
Portland, OR 97211

503-680-8322  
ben.earle@comcast.net

City of Portland Bureau of Planning and Sustainability  
Attn: Mixed Use Zones Project  
1900 SW 4th Ave., Suite 7100  
Portland, OR 97201  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

**Mixed Use Zones Project - Proposed Draft Comments**

May 24th, 2016

Dear Planning & Sustainability Commission Members,

First, you should know that though I am submitting these comments as a private citizen, I have become active over the past year with a variety of both residential and mixed use land use related concerns at the neighborhood level and have been serving as Secretary of the Land Use & Transportation Committee (LUTC) for the Concordia Neighborhood Association (CNA) since February 2015. I was also asked by DRAC Chair Maryhelen Kincaid and ReStore Oregon's then Sr. Field Programs Manager Brandon Spencer-Hartle – he has recently become the City of Portland's Historic Resources Program Manager – to be CNA's LUTC representative on the "Demo Tool Kit" Advisory Committee that developed guidelines to assist citizens and neighborhood associations in filing residential demolition delay extension applications.

These comments are in response to comments posted April 22 on the MUZP MapApp by Michele Reeves on behalf of herself and an unidentified commercial property owner, who also posted remarks following Ms. Reeves'.

I writing today to reiterate the importance of retaining the current planned CM1 designation for the "mini" commercial node at the intersection of NE 30th and Killingsworth.

**Brief History**

This CM1 designation came to be is that BPS specifically determined changing from the initial CM2, which was automatically assigned to all existing CS zoned properties in the first MUZP Draft, to CM1 was both appropriate and desirable for this corner after considering and agreeing with the reasons provided by the CNA LUTC at a meeting on August 18, 2015.

**Why CM1**

The most important reason for not changing the designation for this quaint yet vibrant intersection to CM2 is that its unique character of mixed retail, business, and residential use adjacent to a long-established classic Portland residential neighborhood, has grown organically and successfully and is exactly the type of location that the specific CM1 definition was established to both protect and nurture. A few of the key points are highlit below:

*Commercial Mixed-Use 1 (CM1):* This **small-scale** commercial mixed use zone is intended for sites in smaller mixed use nodes within lower density residential areas, as well as on neighborhood corridors, and at the edges of neighborhood centers, town centers and regional centers. The zone is also appropriate for key areas within neighborhood centers that have low-rise storefront character and **where this scale is intended to be maintained**. This zone allows a mix of commercial and residential uses. Buildings in this zone are generally expected to be up to three stories. Development is intended to be pedestrian-oriented and **generally compatible with the scale of surrounding residentially zoned areas**.

This "singling out" designation is critical precisely because Killingsworth is a busy East-West corridor that this "in between" intersection with very particular type of alternate oriented North-South access via 30th to the surrounding well established residential community. This is a very different intersection than the more heavily travelled major ones at 42nd Ave., 33rd St., 15th Ave., and of course MLK Blvd., Williams & Vancouver, and Interstate.

It is also essential to ensure the 35 ft / 3 story height limit and 85% coverage (not 50% as the online posted commenters erroneous base much of their argument on).

I strongly recommend that this CM1 designation is retained and let's see how the area develops of the next few years -- It can always be upzoned to CM2 in the future but downzoning would be almost impossible.

Thank you for your important work for the future of our city and for your serious consideration of these comments.

Sincerely,

Ben Earle

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

From: catherine dee [mailto:cathdee@msn.com]

Sent: Tuesday, May 24, 2016 11:25 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Division street initiative

Please stop demolishing existing homes.

Parking spots for new condo and apt essential .

Plan for avoiding congestion before building More greenspace. PLAN more greenspace when designing buildings. ie courtyard apts Restrict heights of buildings when neighborhood homes are 1-2 story homes

Most important really listen to what people want and don't just say "Sorry the permits been issued.Nothing can be done".

Catherine Dee  
3112 se 35th  
Portland  
97202

**From:** Charles Kingsley [mailto:chazkingsley@hotmail.com]  
**Sent:** Monday, May 23, 2016 8:31 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** testimony on the Mixed Use Zoning

I'm writing as one of the initial leaders of the Division Vision Coalition that has worked the past 15 years to improve the quality of Division Main Street developments. I want to encourage you to vote yes on four pieces of the Mixed Use Zoning developments:

1.       Restore a Residential FAR Requirement for Mixed Use Buildings.  
Not counting FAR in new buildings is creating many of the negatively perceived characteristics that has been the concern of community members including an overly box-like appearance, large blank walls, and significant shading, light overspill and privacy impacts on adjacent properties. I'm encouraging the City to fix this now and not wait until the Comp Plan approval timeline of 2018.
2.       Division Plan District: Incorporate the new Division Design Guidelines  
The Community, in partnership with the Division Design Initiative, and a coalition of Division neighborhood and business associations would like to codify where possible:
  - a)       The Division Design Guidelines be integrated into the "Division Plan District" in the new Mixed Use Zoning and
  - b)       The Division Plan District be extended to match the boundaries of the Division Main Street Plan (and the Division Design Guidelines) which extend from 11-60th.
3.       Support for Preservation of "Vintage" Low-Rise Commercial Areas
4.       Support for Design Review for main street developments  
None of the buildings on Division have had any Design Review by the City's Design Commission and many are concerned we need more design tools to better help new development blend better within the existing fabric of Portland communities.

Thank you for your interest and contributions,

Charles Kingsley  
2747 SE 37th, Portland, 97202  
503-568-4044

May 22, 2016

Portland Planning and Sustainability Commission  
1600 SW Fourth Avenue  
Portland Oregon

Dear Commission Members:

I was quite disturbed by Planning staff's response to my question about the wholesale EX to CM3 translation – that since housing is becoming a predominant use in the EX zone we should change the policy to match what the market is producing. I do not think that is appropriate planning – If our zoning is not successfully carrying out our policies, it is the zoning mechanisms that should be changed to support the policies, not the other way around. The CM3 zone will be quite successful in support of the policies in some EX zoned areas, but not in all of them.

The EX zone has become a catch all zone, covering a wide variety of areas with differing characteristics. It grew out of the M3 zone, which before 1980 was typically placed in areas that were transitioning from housing to small scale industrial uses like the eastern edge of NW, the western portion of Elliot, and other similar areas around the City. Through many years of efforts, the housing in these areas was stabilized and balance reached. The rezoning to CM3 will change that balance

The example I chose of St Johns was and is an appropriate example of the CM3 zone not being an appropriate fit. The St Johns Plan limits the proposed rezone area to 45' in height (55' with design review). By changing the zoning to CM3, the base height limit will be increased 10', with the possibility of 75' tall buildings when bonuses are used. Does this fit the neighborhood plan? What views will be blocked by 75' buildings? Would CM2 be a better match? I don't know, but it should be looked at.

Another area to look at is the Vancouver-Williams corridor which continues to have a successful mix of housing and small scale employment opportunities. Are we sure that we want this area to be converted to a multi-story housing district and lose the businesses which support the Central City?

Staff heard early from NWDA about the misfit between the NW Policy Plan's goals of job preservation and the CM3's emphasis on housing, and they have responded by proposing EG1 zoning for part of the EX zoned area. While not a perfect fit, it will meet the plans job preservation goals and should be accepted.

I worry, however, whether other similar areas have similar conflicts, but have not spoken up in the same effective manner as NWDA. I hope you will look more closely of at the differing characteristics of our present EX districts and not simply use CM3 as the default answer for all of them.

Rick Michaelson

## EX ZONE CHARACTERISTIC STATEMENT

### Central Employment.

This zone implements the Central Employment map designation of the Comprehensive Plan. The zone allows mixed-uses and is intended for areas in the center of the City that have predominantly industrial type development. The intent of the zone is to allow industrial and commercial uses which need a central location. Residential uses are allowed, but are not intended to predominate or set development standards for other uses in the area. The development standards are intended to allow new development which is similar in character to existing development.

## CM3 ZONE CHARACTERISTIC STATEMENT

The central commercial zone is intended to provide for commercial and mixed use development within Portland's most urban and intense areas, specifically the Central City and the Gateway Regional Center areas. A broad range of uses are allowed to reflect Portland's role as a commercial, cultural, residential, and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian oriented with a strong emphasis on a safe and attractive streetscape.







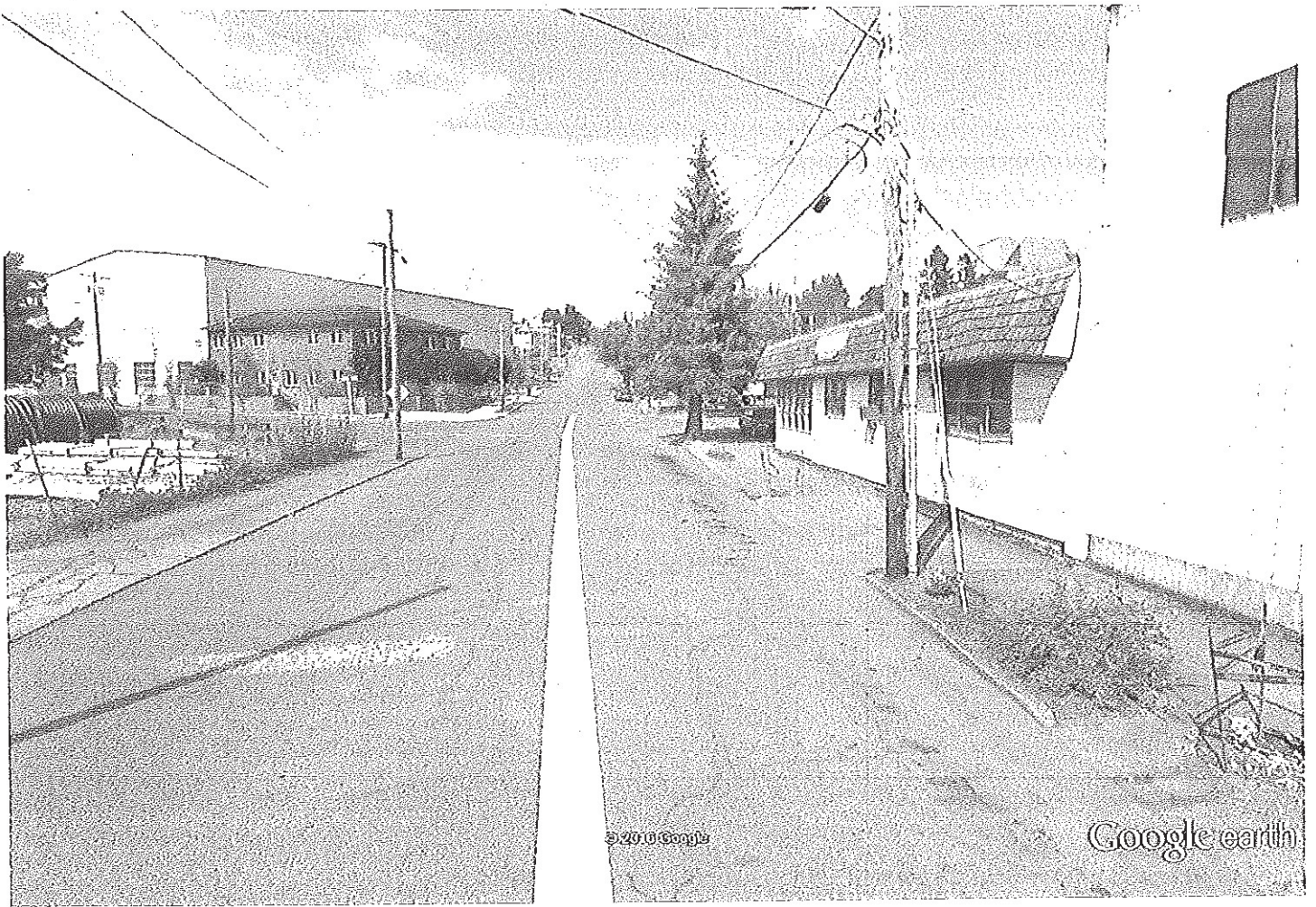


Google earth

feet 10  
meters 3







Google earth



Doug Klotz  
1908 SE 35<sup>th</sup> Place  
Portland, OR 97214

May 20, 2016

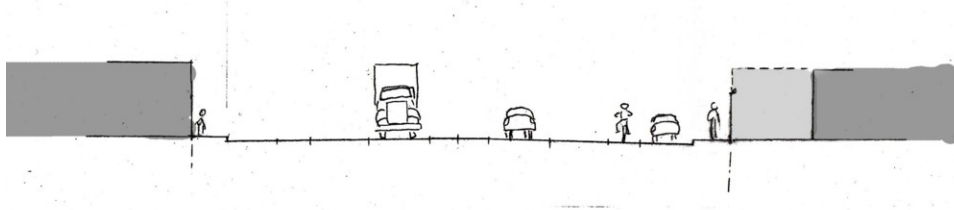
**Corrected Comments on 10' setback on Civic Corridors in Eastern and Western Neighborhoods**

To: Planning and Sustainability Commission  
Chair Schultz:

Here's some details on why the 10' setback is a bad idea for commercial, on Civic Corridors in West and Outer East Portland.

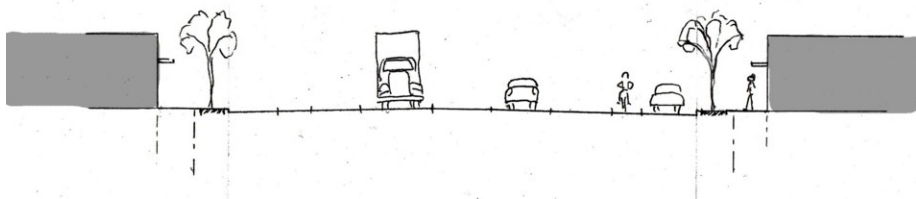
It causes the buildings to be further and further apart, reducing the chance that the street will feel like the sort of "outdoor room" that causes people to feel good about being there on foot. These rights-of-way are already overly wide for city streets. Here's a comparison:

Current Conditions on SE 122<sup>nd</sup> Ave. The Right of Way is 90 feet wide, with 6 foot sidewalks. (SE Hawthorne, for comparison, is 70' ROW)



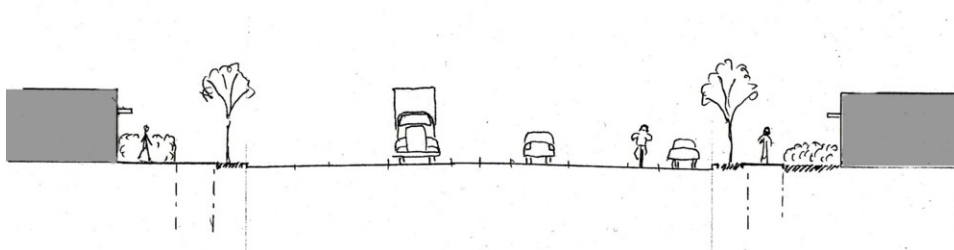
Building to building is **90 feet**.

As developed today. PBOT would require 6' dedications, to get 12' sidewalks



Building to building would be **102 feet**.

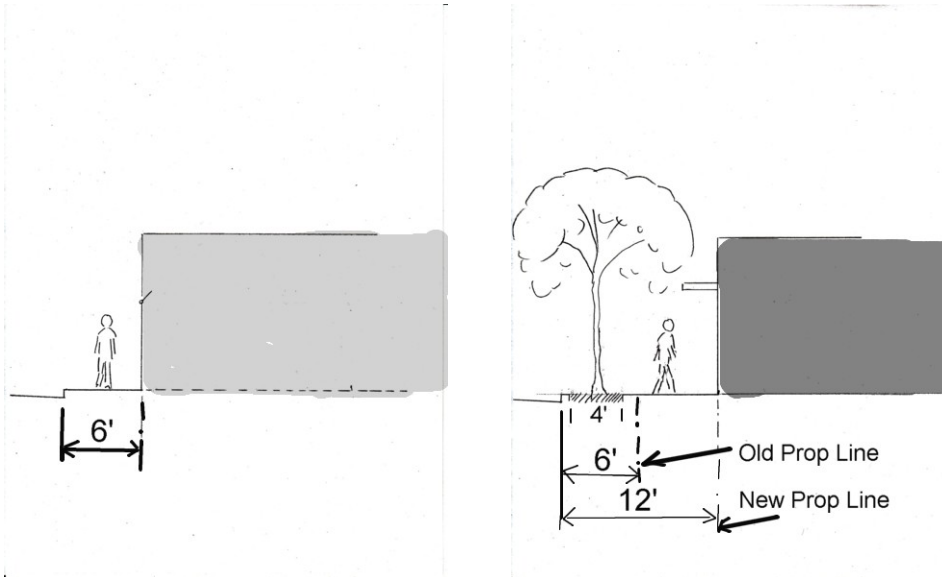
With current MUZ proposal, an additional 10' required setback beyond the 12' sidewalks



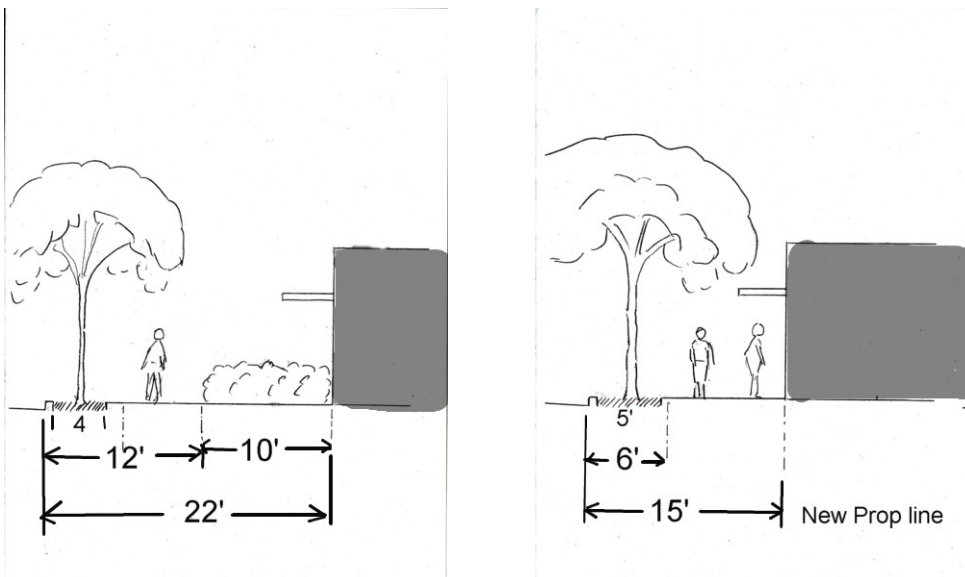
Building to Building would be **122 feet**. But is the pedestrian environment any better?

Here are some “closeups”:

The current condition: and the current 6' dedication to get 12' sidewalk



What the 10' MUZ setback would do; and my alternative: 9' dedication to get 15' walk



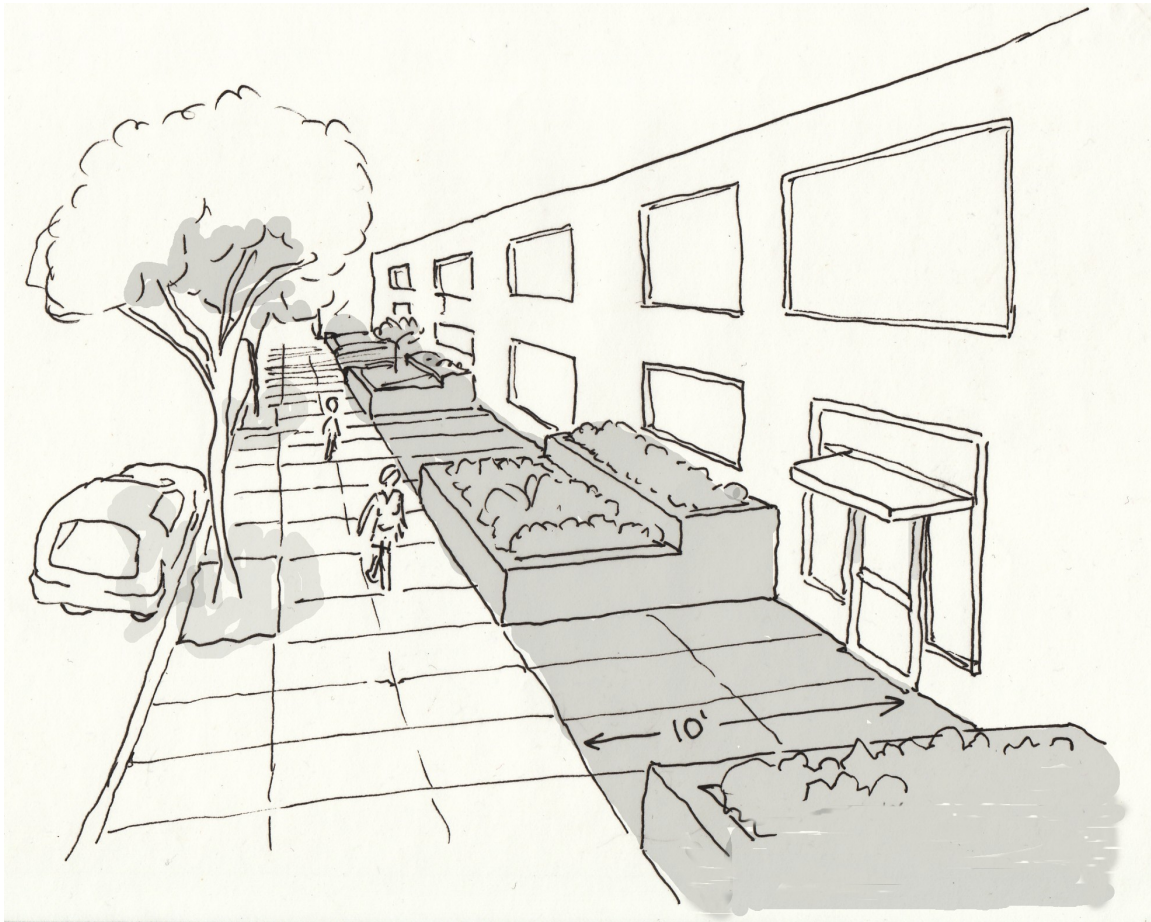
Acknowledging Rick Michaelson's comment Wednesday: I am not advocating for a additional 10' dedication to reach the 22' setback from curb that the current proposal results in.



I believe the purposes of separating pedestrians from traffic and getting more green space can be satisfied by increasing PBOT's required dedication by just 3', so the public sidewalk will be 15' wide instead of 12', which allows a wider, 5' tree well, and bigger street trees. It could even include continuous planting strips near the curb. Admittedly, this would have to be implemented by PBOT.

I agree with a required setback where there is residential on these streets. A 10' minimum for residential-only buildings would be alright. But I don't think the 10' additional space works well for retail and other commercial uses. The proposed code only requires 50% of it to be paved, so planters and other construction could occupy that space. So the result could be what I show below, which is not really a widening of the sidewalk. The public space would still be 12' wide. There would be additional private, perhaps unusable space between this public area and the building, isolating the building from pedestrians.

What proposal could result in:



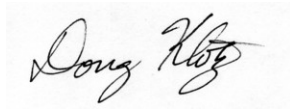
None of the 10' is usable for circulation. It's only good to access the occasional entrance, and perhaps for café tables. No one will window shop. This does not promote an

“enclosed” street space, but widens the “outdoor room” created by adjacent buildings, and doesn’t get walkers any further from the busy street.

As long as the Right of Way corridor itself is 12’, the tree wells can only be 4’ instead of 5’, and the resulting trees will be smaller and not spread as wide as could be achieved in a 15’ Right of Way corridor.

Please remove the required 10’ setback for retail and commercial uses on the outer Civic Corridors. It could remain for residential-only buildings, although the wider perceived corridor is still a detriment to a pedestrian-friendly streetscape.

Thank you.

A handwritten signature in black ink, reading "Doug Klotz". The signature is written in a cursive, flowing style. The first name "Doug" is written in a larger, more prominent script, and the last name "Klotz" is written in a similar but slightly smaller script, connected to the first name.

Doug Klotz

**From:** adawson@juno.com [mailto:adawson@juno.com]  
**Sent:** Friday, May 20, 2016 3:14 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Zoning--Hosford-Abernethy, near SE 21st and Powell

To the Planning and Sustainability Commission

Re: Hosford-Abernethy, near SE 21<sup>st</sup> and Powell

It may be noted that currently there are apartments to the north and west of this area. Changing this zoning from R2.5 to R1, should it be developed as such, will have the unintended consequence of turning an area with interspersed types of housing and a neighborhood feel into a large contiguous block of apartments. As it stands now, whether one lives in a house or an apartment in this area, one simply lives in the area. Once the area becomes primarily apartments, it becomes the place where people who cannot afford houses live, rather than just where people live.

Sincerely submitted,

Angel Dawson & Louis Hodes  
3106 SE 19<sup>th</sup> Ave  
Portland OR 97202

May 18, 2016

To The Planning and Sustainability Commission:

My name is Alem Gebrehiwot, I am the owner of the property located on North Fremont St. addressed as 311 W/N Ivy St. R316284. SECTION 27 1N 1E, TL 3100 0.25

I am writing you this letter to request a zone change. These property is currently zoned R1, my request is to change it to CM2, Mixed Commercial 2.

As a long-term property owner and resident of the neighborhood I have carefully planned to develop my property. I would like to develop said property to fulfill the demand for store front and residential needs, primarily focusing on enhancing the economic circumstances of minorities in this district that have been or are in danger of being generified out. It will also create housing for those who work downtown and rely on easy access to public transportation and or safe bicycle routes. I believe this will create opportunities not only for small businesses but also create access to affordable shops for community members.

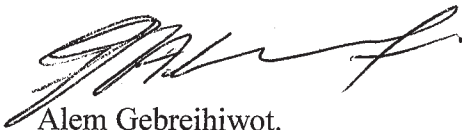
At its current zoning R1, and in light of all of the high density development going on around it, it is a misuse of this land. These properties have close access to a grocery, schools and public transportation. A zone change would improve the condition of this neighborhood and give affordable access to those who wish to remain in it. Current neighborhood development of multi-story and high-density residential has demonstrated that this model is successful.

For all the above reasons The City Council voted to change those lots to the Mixed Use designation, but at this point, the zoning is R1. The timing for this change is both critical and now. I would like to request that Planning and Sustainability Commission honor my request for this zoning change, to match the proposed designation. Which is the most appropriate zoning would be CM2, Mixed Commercial 2.

I believe this might offer an economic benefit to both small business owners and needy residents.

Thank you for your consideration of my request, and I thank you deeply for your time to listen my testimony and your commitment to our community.

Sincerely Yours



Alem Gebrehiwot.

Small business owner, resident and property owner.

**From:** adawson@juno.com [mailto:adawson@juno.com]  
**Sent:** Wednesday, May 18, 2016 10:29 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Zoning--Hosford-Abernethy, near 21st and Powell

To the Planning and Sustainability Commission:

Re: Hosford-Abernethy, near SE 21<sup>st</sup> and Powell.

We are writing to request that our existing zoning of R2.5 not be changed to R1. Our property, 3106 SE 19th Ave, is zoned R2.5. We feel this is the appropriate designation. The proposed zoning identified in the Residential and Open Space Zoning Map is R1.

The justification for this is proximity to amenities and services. Yes, this area is within ¼ mile of the SE17th/Rhine Station on the Max Orange Line, but, just barely and the effort required to cross Powell Boulevard makes it uncommon that the Rhine Station is the station used by those in this neighborhood. Further, there are a number of other properties within this ¼ mile proximity that would remain zoned R2.5.

The next justification given is infrastructure availability. Again, most of the other properties within the area have the same availability and retain their R2.5 zoning. Further, I believe that some of the properties on this block, those facing SE 20<sup>th</sup> Avenue, actually do not have sufficient infrastructure to support R1 zoning.

Again, stating that this area is adjacent to an employment area, is nothing different from the many properties around us zoned R2.5.

Under additional factors considered, is given the fact that to the north and the west there are apartments (R1). It should be noted, though, that this immediate area, as built up, is very stable. The **mix** of single dwelling units with multiple dwelling units is part of the reason for that.

Further, these smaller, single dwelling units are suitable for raising families within the city, unlike R1 zoning. There are few families whose ideal is to raise children without yards and have little if any place for grandparents to garden.

One of the goals of the Comprehensive Plan Update is to allow the continuation of the residential scale and characteristics of Portland's residential neighborhoods. Maintaining the R2.5 zoning of our property allows such a continuation and is in keeping with the goal of affordable middle housing.

The Hosford-Abernethy Neighborhood Action Plan desires to encourage the improvement and maintenance of residential properties, especially those that are non-owner occupied (Objective 2.1) and protect the fragile residential area within which our property lies. We feel that the R2.5 zone does this better than an R1 zone would. This very specific area has a higher percentage of non-owner occupied homes than the citywide average.



We have spoken with our neighbors and there is agreement that R2.5 zoning suits this stable block much better than R1 zoning would.

Again, we request that our zoning remain R2.5

Thank you for your consideration of this matter.

Truly,  
Angel Dawson & Louis Hodes  
3106 SE 19<sup>th</sup> Ave  
Portland OR 97202

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

Name: Sherrie Wright

Address: 4410 SE WOODSTOCK BLVD, PORTLAND OR 97206



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

From: Mark Wheeler [mailto:mark@rootsrealty.com]

Sent: Tuesday, May 17, 2016 9:17 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

Greetings,

I oppose the downzonings from CM-2 to CM-1 in the Low-Rise Commercial Storefront areas of Portland. We need more density in these areas, not less. Thank you.

Mark Wheeler  
628 SE 58th Avenue  
Portland, OR 97215

## Planning & Sustainability Commission Members:

The University Park Neighborhood Association Board and Land Use Committee and the North Portland Land Use Group (comprising the Land Use Committee Chairs of the eleven neighborhood associations in the NPNS coalition) offer the following comments and recommendations:

1) We request that the Health Overlay previously requested by NPLUG and University Park Neighborhood in January 2016 be applied to the Mixed Use corridors and centers within North Portland, and perhaps City Wide. This Health Overlay proposal is attached as a MS Word document, and below:

Subject: Health Overlay Zone

### Introduction

North Portland is a vibrant, diverse community of single and multi-family homes, commercial centers, and industrial preserves situated at the confluence of the Columbia and Willamette rivers. Our eleven neighborhoods face increasing growth and density in the coming years. The City of Portland Comprehensive Plan identifies inner neighborhood areas such as North Portland as ideal for increased density. The plan recognizes, however, that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers.

In order to meet the coming growth in our community without compromising the health and well being of our residents, North Portland's neighborhood representatives recommend a health overlay zone. This zone applies specific land use, design, and monitoring requirements on new development in North Portland to mitigate negative health and safety impacts. The health overlay zone supports a vision along with goals and strategies outlined below that together preserve and enhance our way of life while accommodating new development in our community.

Our community draws inspiration for our recommendations from two key sources. Portland's comprehensive plan update, Policy 4.28.d, encourages design and land use patterns that mitigate negative air quality and noise impacts in Portland neighborhoods, especially near high vehicle traffic areas, and other sources of air pollution. Similarly, Portland's Climate Action Plan (CAP) goals 1-4 aim to reduce the environmental impacts of new development through more sustainable land use and design principles.

### Vision

A North Portland community that preserves and enhances the health and well being of its residents while accommodating growth and density needs.

### Goals

To achieve our vision, North Portland's neighborhoods propose the following three goals:

- Better Air and Water Quality: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on energy demand, air conditioning use, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality.
- Reduced Noise Pollution: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- Increased Safety: Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on criminal activity and emergency preparedness.

## Strategies

Goals provide benchmarks by which to measure progress towards our vision. Each goal, however, is supported by specific, actionable strategies that residents, community leaders, and City of Portland staff can use to better our community. We provide an illustrative list of strategies below based on NPLUG discussions, but we expect individual neighborhood association meetings to generate and refine strategies to best fit our community vision.

### Better Air and Water Quality

- Improve storm water management design standards for new developments
- Require air filtration in all new residential developments
- Improve ventilation requirements for new residential developments
- Require building features that facilitate less energy use
- Require moisture-infiltration and ventilation features that reduce mold formation
- Eliminate exposure to harmful asbestos materials
- Install traffic-calming, pedestrian, and bicycle features to minimize the use of single-occupancy vehicles (SOVs)
- Install more and better transit infrastructure to encourage more energy-efficient transportation modes
- Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments
- Install air-monitoring stations in North Portland neighborhoods[ Monitoring stations do not directly affect air quality, but do allow for on-going evaluation of air quality mitigation efforts.]

### Reduced Noise Pollution

- Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

### Increased Safety

- Educate residents on emergency preparedness procedures
- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

## Conclusion

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.

2), The University Park Neighborhood Association Board and Land Use recommend that the Mixed Use designation be INCREASED in the Mid-Lombard Center to provide for 5 story buildings. This would provide a mechanism to provide efficient and economical development of a commercial district.

3) TDM should be required for all Mixed Use projects over 5 residential units

4) The UPNA Board is pleased with the Mixed Use Project report in general.

Thomas Karwaki

Vice Chair, UPNA and Land Use Chair

253.318.2075

**From:** Tom Brown [mailto:sellwoodbrown@gmail.com]  
**Sent:** Tuesday, May 17, 2016 3:16 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zone Testimony

Dear PSC-

My name is Tom Brown. This email follows my oral testimony provided to the PSC at the May 10, 2016 public hearing regarding the Mixed Use Zone proposal.

I would like to add the following points for the Commission's consideration:

- 1) My family is the long-time owner of the properties located in Westmoreland at the Southwest corner of Milwaukie and Bybee, "Block 7" in the Westmoreland business district, bounded by Milwaukie, Bybee, Rural and 16<sup>th</sup> Avenue. The City's proposed downzone from CS to CM1 affects the entire block of property owned by my family.
- 2) The properties referenced above and proposed for downzoning from CS to CM1 are all within one-half mile of the Milwaukie Light Rail Bybee Station. The Bybee Station Area is unique for light rail station areas because it is surrounded by a golf course, rail lines, and a park. Single family residential zoning surrounds the park and the golf course. Thus, the only area available for additional development within proximity to the light rail station area are those areas currently zoned CS, the very properties proposed for downzoning to CM1. The proposal to downzone the only property available for additional development and density in the light rail station area is not accompanied by a proposal for corresponding upzoning anywhere else in the light rail station area. The downzoning proposal runs counter to the planning completed for the Milwaukie light rail line and station area.
- 3) The properties proposed for downzoning are in the heart of the Westmoreland commercial district and are surrounded primarily by other commercial development. The proposal to downzone the core of the commercial district, but to leave the rest of the corridor that abuts directly against existing single family neighborhoods at a higher density runs counter to the City's traditional zoning policy of stepping zoning down in order to buffer residential neighborhoods. The current proposal inverts the City's normal zoning approach by allowing dense redevelopment adjacent to single family neighborhoods and reducing development potential in the commercial core. As mentioned in prior testimony, downzoning is the wrong tool to try to maintain neighborhood character.
- 4) I am the recent past President of the Sellwood Westmoreland Business Alliance. The Business Alliance was never notified or asked for input on the proposed change. The lack of outreach and public process by the City on the proposed major change to the zoning in the heart of the Sellwood Westmoreland business district really emphasizes the last-minute nature of this ill-considered proposal. It has not been fully vetted and should not move ahead at this time without broader input and additional work to refine the City's approach.
- 5) The fact is that most of the buildings on the property affected by the downzoning proposal are very old and are near the end of their lifespan. Preservation of neighborhood character can be achieved without limiting growth by the careful development and application of design standards. The City's proposal for downzoning does nothing, by itself, to assure that neighborhood character will be retained when redevelopment occurs.

Rather than downzoning, the City should take the time to work with the entire community (residents and businesses) to develop design standards that help to preserve neighborhood character, while accommodating planned growth. Even if the City chooses to move ahead with downzoning some properties, properties such as those at the corner of Bybee and Milwaukie that are within one-half mile of a light rail station should not be included in the downzone.

Tom Brown

May 17, 2016

ATTN:

Portland Planning and Sustainability Commission

[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

503-823-7700

RE: Proposed Mixed Use Zoning

Need protection for existing commercial properties in primarily residential neighborhood

To: Portland Planning and Sustainability Commissioners

Barry Manning

On behalf of the SWHRL Neighborhood Association Board, I would like to express a concern about the proposed Mixed Use zoning.

For primarily residential neighborhoods like SWHRL, which have little hope of being a “20-minute” neighborhood, it is crucial to us to preserve what few commercial amenities we have. We have only one property on the hill zoned for a grocery\* (property owner looking for new grocery tenant since Strohecker’s grocery closed), one café, open only for lunch and dinner, and a scattering of other shops or services.

\*NOTE: Commercial properties in SWHRL area to be CM1

Strohecker’s property, 2855 SW Patton Rd., has overlying land use conditions limiting use to a grocery.

Moreover, we have very limited transit – our one bus runs only during commuter hours, so that limits our ability to access stores and services in other neighborhoods. (Those commercial areas are at the bottom of our steep hill, so walking or biking back up – lugging purchases – is challenging indeed.) Our walkability score is very low. Perhaps the planners have not thought about some of the potential effects the new proposed Mixed Use zoning could have on such a community as ours.

Please consider adding into the new Mixed-Use zoning some kind of protection for commercial- and transit-poor neighborhoods such as ours that would protect an existing commercial property from conversion to residential / multi-dwelling only. We can’t afford to lose the few vital amenities we have!

Thank you for your consideration.

Best regards,

Nancy Seton, President/Land Use Chair,

Southwest Hills Residential League (SWHRL) Neighborhood Association

Phone: 503-224-3840

**From:** Schwab Mary Ann [mailto:e33maschwab@gmail.com]

**Sent:** Tuesday, May 17, 2016 6:56 PM

**To:** Ocken, Julie <Julie.Ocken@portlandoregon.gov>

**Subject:** Sunnyside Neighborhood established in 1888 has a Proud Past -- Bright Future (Friend just arrived, I leaving now for the Portland Building 7:15 p.m.)

1888 PROUD PAST -- BRIGHT FUTURE is at risk.

## PSC Commissioners:

My fear, the vacant lot North of 522 SE Peacock Lane is but the tip of the iceberg. Just learned Vic Remmer's has been serving on Commissioner Saltzman's newly formed key-stakeholder "in-the-middle" Residential Advisory Committee. That Developer who planned to cut three sequoias in Eastmoreland. So how can we prevent the Grinch from Stealing Christmas on Peacock Lane and protect the character and charm of Sunnyside's trolley line corridor? That depends on each of us, working with through city-wide partnerships and collaboration on so many levels. Especially, now that the Legislature fast tracked approval of the SB1533 inclusionary MFI 80%. The proposed "in-the-middle bonuses incentives are complicated and appear to deliver little certain public benefit in exchange for great massing of new construction. I believe the proposed zoning "in-fill-middle" Developer's Bonus "by-right" 20 units, simply invalidates the Comp Plan 2035.

Here is a link to the inclusionary zoning bill, SB 1533

(<https://olis.leg.state.or.us/liz/2016R1/Downloads/MeasureDocument/SB1533/Enrolled>). If you want to find out more information on the bill, here is the main page on OLIS for SB 1533

(<https://olis.leg.state.or.us/liz/2016R1/Measures/Overview/SB1533>). From here, you can click on the "Analysis" and "Meeting Material/Exhibits" tabs for more information.

## Mayor Sam Adam's Portland Plan Draft:

In 2007, I was one of seven citizens who testified. What I found missing were the sections on public involvement and land-banking public school property in perpetuity. Regrettably, within weeks, Title 34 was deluded, and the Mayor asked Gill Kelly to retire.

**Adopted by the City of Portland, Oregon on August 4, 2010, City of Portland Public Involvement Principles reads well on paper but lacks enforcement -- something Andre and Jeff referenced on May 10th. City Bureaus, PDC, Port of Portland all work in silos, reporting only to City Council. By passing PSC, one example where used as an X in the box, when AirB&B accessory short term rentals in 95 neighborhoods. But what a cost to our housing stock, -- Andre' will never tell Mayor Hale's "I told you so." <https://www.portlandoregon.gov/bps/66547>**



Portland City government works best when community members and government work as partners. Effective public involvement is essential to achieve and sustain this partnership and the civic health of our city. This:

- └ Ensures better City decisions that more effectively respond to the needs and priorities of the community.
- └ Engages community members and community resources as part of the solution.
- └ Engages the broader diversity of the community—especially people who have not been engaged in the past.
- └ Increases public understanding of and support for public policies and programs.
- └ Increases the legitimacy and accountability of government actions.

These principles are intended to set out what the public can expect from city government, while retaining flexibility in the way individual city bureaus carry out their work.

The following principles represent a road map to guide government officials and staff in establishing consistent, effective and high quality public involvement across Portland's City government.

### **High Schools' Status under Proposed Campus Institutional Zones**

Fast forward, I am deeply concerned knowing the camel's nose is under the tent, sleeping until the Comp Plan 2035 is approved by City Council.

I no longer trust Portland Public Schools, who already have met in work-sessions behind closed doors last November/December, 2016.

I have read the 148 pages, Campus Institutional Zoning Project, Early Implementation of the 2035 Comprehensive Plan Proposed Draft - November 2015.

Let's review both Hospitals on Marquam Hill and High Schools are also assigned Institutional Campus (IC) designation of the recommended Comprehensive Plan Map. This is intended to be an interim measure until such time as a high school base zone or alternative regulator approach is developed in cooperation with high schools and relevant stakeholders.

... Starting with Neighborhood Association Land Use and Committee members, Parents, Teachers, over potential Developers? Industry?

As a follow-up to my testimony this evening, please use the following link:

[Proposed Draft of Campus Institutional Zoning Project](#)

See boxed discussion of high schools on pg 6.

- Public and Private High schools over 10 acres in size are designated on the recommended Comprehensive Plan as Institutional Campus (IC)

See Table 150-1 Campus Institutional Zone Primary Uses on pg. 35

Note that schools are "prohibited" uses in both the newly proposed CN1 and CN2 zones.

- They remain a "conditional use" in the existing Institutional Residential zone. This is no change from the existing zoning code.

### **Peacock Lane - History - 1925 American Building Magazine - 1920s.**

Kudos to Clair Coleman-Evans for sharing the Peacock Lane - History - 1925 American Building Magazine - 1920s. on Facebook. Like those copied herewith, I was disappointed knowing Commissioner Dan Saltzman was not able to intervene. It's not looking good for 522 SE Peacock lane. Hales needs to stop this nonsense by calling a emergency "in-fill-middle" moratorium, until the Planning and Sustainability Commissioners have time to weight in on finding possible solutions to protect housing stock. <http://www.antiquehomestyle.com/primary-sources/american-builder/peacock-lane.htm>

A 2002 code change, reflected today as PCC 33.445.510, is what allows owners of Inventory properties to request removal from the Inventory without delay or notification. With deepest regrets, come summer when Bureau of Planning and Sustainability releasing their discussion draft of possible code language that may require delay and notification following an owner's request to remove their property from the Inventory -- it will be tooooo late to prevent the Cinch from Stealing Christmas. We can only hope, the ORS 197.772 limits the City's authority to protect Inventory properties or apply new local designations against the consent of an owner.

Meanwhile, what can PSC and Portlanders do now to assist the Peacock Lane property owners to protect their 1925 circa -- **English Cottage style**. <http://www.peacocklane.org> ?

### **Peacock Lane: Sunnyside Land Use Update** 3d ago

Jeff Cole from Sunnyside



Here's a quick update on the recent purchase of 522 SE Peacock Lane and proposed lot split with a new house to be built next to existing structure. This topic was discussed at a well attended Land Use meeting for Sunnyside this past Thursday night.

Multnomah County public records show the new owner of 522 SE Peacock Lane as Fidelity Trust, 16915 NE 40th Ave., Vancouver, WA 98686. This is to whom Portland Commissioner Dan Saltzman issued a letter on behalf of Peacock Lane residents (see pics).

The Realtor representing the buyer at 522 Peacock Lane is Darryl Bodle II (<http://www.darrylbodle.com/>). The Realtor has provided the following information to Peacock Lane on behalf of the buyer:

- 1) They decline a request for a meeting with residents of Peacock Lane
- 2) They will not be residing at 522 Peacock Lane

- 3) 522 Peacock Lane will not be demolished.
- 4) 522 Peacock Lane interior will be updated and then will be sold.
- 5) All inquiries regarding the newly created vacant lot next to 522 Peacock Lane should be directed to Everett Custom Homes.

Vic Remmers (Everett Custom Homes) has quoted a \$350,000 price for purchasing the newly created lot; otherwise he will proceed with building a new home.

There has been recent construction work at 522 SE Peacock lane to repair the sewer. No demolition permit has been applied for, and if it is, an automatic 35 day delay period will kick into action. The SNA board has pre-approved a demolition appeal should one be filed.

Of note: nearly a quarter million folks visit the free Christmas Light show on Peacock Lane held every year over the holidays. Nearly all the buildings were designed by the same architect in the English Cottage style. <http://www.peacocklane.org/>

Thanks to everyone who attended this meeting, including many residents of Peacock Lane who provided much of this information.

We'll try to keep everyone posted.

Jeff Cole

Sunnyside Neighborhood Association Land Use Co-Chair

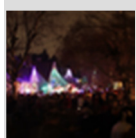
Edited 3d ago · Shared with [Sunnyside + 8 nearby neighborhoods](#) in [General](#)

\*\*\*

Peacock Lane is being threatened by demolition and infill. The street is looking for public support via this petition. Please take a moment to read what is happening and sign our petition. We are trying to save a nearly 80 year old tradition on a 100 year old street.

Thank you.

<https://www.change.org/p/portland-mayor-...>



Portland Mayor Charlie Hales: Save Peacock Lane  
PETITIONING PORTLAND CITY COUNCIL Save Peacock Lane Peacock Lane in SE Por...  
[CHANGE.ORG](https://www.change.org/p/portland-mayor-...)

Mary Ann Schwab, Community Advocate  
605 SE 38th Avenue  
Portland, OR 97214-3203  
(503) 236-3522

17 May 2016

Portland Planning and Sustainability Commission  
psc@portlandoregon.gov

Re: Mixed Use Zoning project amendments testimony

Dear Chair Katherine Schultz, members of the Commission

I wish to thank the Commission and the Department of Planning and Sustainability for this opportunity to (1) serve on the project advisory committee and (2) to submit comments regarding the package of amendments.

Amongst the many considerations in putting the package of materials before you, the ones I worked hardest to have incorporated included:

- (1) requiring building facades to be articulated, that is not just be a flat surface the entire front surface for large, long building faces,
- (2) Height scaled to the width of the street right-of-way so as to provide users with a less like 'canyon' experience,
- (3) Enabling active uses other than retail to occupy the ground floor of a complex.

The big disappointment in the final product was our inability to incorporate how low income (affordable) housing could be included in the package as an incentive for builders/developers. It seems that the the biggest impact in providing affordable housing is to reduce onsite parking, as much as \$25-30,000 per space for structured parking. The owner needs to recoup that investment and the only way for that is to add it into the cost or rent of the unit. With that in mind fewer or zero onsite parking still requires at least frequent mass transit service, supports walking and biking as transport modes as well as working to achieve better health choices, supports the Town Center designation (of St Johns), helping to reduce human impacts on climate change. A word of caution in considering adding an additional floor to structures without tiering it back (to accommodate more affordable housing) is the impact it would have on the street scale, by allowing an additional floor as an incentive to include affordable housing would re-create the 'canyon' feel that many persons who attended our meetings spoke against.

With respect to including affordable housing as part of the mixed use package I would ask that including it at the expense of requiring other amenities such as private and public plazas not be approved. All residents need both private and public space for rest, relaxation and recreation. It should not be at the expense of others needs.

Thank you again for this opportunity,

Respectfully,  
Curt Schneider.                      curt.j.schneider@gmail.com  
6904 N Charleston AV  
Resident of Cathedral Park/St Johns 97203

Cc: Barry Manning

Hi Julie:

Below is the complete testimony, with pictures, sent from a real computer and not a phone.

Thank you for following up and allowing this correction.

Sincerely,

Loulie Brown

Dear Commissioners,

Sabin CDC, a non-profit affordable housing developer in Inner N/NE Portland, currently owns 3 apartment complexes that front on to NE Alberta St and NE Killingsworth that are slated to remain R-1 zoning (5025 NE 8th Ave, 5421 NE 14th Place, and 5010 NE 19th Ave), in spite of the fact that the adjacent zoning will be moving to CM-2 with the adoption of the new Comp Plan and associated Zoning Code.











Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

May 17, 2016

**VIA EMAIL**

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

**Re: MUZ Project - RTF/ICSC GR Committee Comments re CE Zoning**

Dear Chair Schultz and Commissioners:

This letter is submitted on behalf of the Retail Task Force (RTF) and the Oregon Government Relations Committee for the International Council of Shopping Centers (ICSC) regarding the proposed Mixed Use Zones Project. Please make this letter a part of your hearing record.

We wish to thank planning staff, especially Barry Manning and Bill Cunningham, for the for the hours they have spent with us since first meeting with our interest group on November 19, 2015. See the copy of my attached confirming message to Barry Manning outlining our group's goals for the MUZ project.

**AUTO-ACCOMMODATING ZONING NEEDED FOR MULTIMODAL SYSTEM**

The proposed Mixed Use Zones ("MUZs") effectively eliminate the remaining auto-accommodating elements of Portland's Zoning Code by converting all of the commercial zones to mixed use zones that are not auto-accommodating<sup>1</sup>. That is neither fair, equitable, nor legally sustainable for a multimodal system. Millions of dollars have been invested by Portland business owners in long-term auto-oriented developments, which have useful lives of twenty (20) to forty (40) years, in good-faith reliance on the City's auto-accommodating commercial zones. That zoning inequity can be avoided by not making existing auto-accommodating developments nonconforming by zoning them CE and making the CE zone more auto-accommodating. The proposed zoning often overlooks the built environment and proposes urban densities that will not have market support within the planning period and which then create

---

<sup>1</sup> In the City's 1991 Zoning Code Rewrite Project, the City downzoned approximately 20% of its general commercial land inventory to pedestrian and transit-oriented zoning districts (the CS, CM, CO1/2 and CN1/2 zones).



nonconforming development sites that are not market-friendly and which will only impede and stifle redevelopment or upgrades. We have asked Suzannah Stanley of MacKenzie to prepare four case studies of built retail projects that are auto-oriented and superimpose the new mixed-use zoning standards to show how they are not feasible to redevelop under the new standards, and should therefore be zoned CE. See copies of the MacKenzie case studies attached.

As we testified to the City Council regarding the proposed 2035 Comprehensive Plan, we urge you to implement the portion of the Portland Plan calling for the eradication of Portland's food deserts, where great segments of the City are underserved by supermarkets offering affordable, healthy food choices. See copy of Portland Plan's Policy Conclusions and Key Findings attached, plus a copy of a map link to the areas of Portland's Food Deserts. The food desert issue, while recognized early in this legislative planning process, is now being virtually overlooked and disregarded. The problem can be addressed through a zoning solution, which is to provide an adequate inventory of commercial lands zoned for auto-accommodating supermarket development.

The only zone remotely suitable for that type of development under the Mixed Use Zones Project is the new CE zone, most similar to the old CG zone, both of which are auto-accommodating. However, the purpose statement for the new CE zone is for a mixed-use first, with auto-accommodation only a second thought. Accordingly, the MUZ project offers no purely auto-accommodating zone. We believe that the City should proceed in a two-step fashion to address that omission: 1) zone land CE that is now zoned CG or developed for auto-accommodation; and 2) make the CE zone more auto-accommodating. Unfortunately, approximately 40% of the land currently zoned CG and approximately 60% of the properties now zoned CG are being converted to zones other than the CE zone, thus dramatically reducing the City's inventory of auto-accommodating land zoned for grocery supermarket and other auto-accommodating development. See Figure VII-1 and Figure VII-2 attached.

The City should increase the amount of CE zoning where the property fits the locational criteria of the CE zone regarding existing auto-accommodating development, rather than decreasing it, for the above reasons. The City should do a bottom-up rather than a top-down zoning exercise, since the City is a built environment and not a blank planning slate. We have prepared and attached a proposed CE map to show existing commercial lands that need to be zoned CE in satisfaction of the locational standard of the CE zone paraphrased as: built as auto-oriented in an area not likely to urbanize soon.<sup>2</sup> It also appears that the areas for the new Comprehensive Plan designations allowing the CE zone as a corresponding zone should also be increased, an issue that we raised in our testimony to City Council, as well as our position that the City's Goal 9

---

<sup>2</sup> See copy of email correspondence with Tom Armstrong of March 8, 2016 regarding the need for an adequate inventory to work from, ground up.

analysis for retail is legally flawed.<sup>3</sup> See new Council Policy 4.79 (#P44), 6.17 (#P50) and new Policy after 6.65 (#P60) adopted by Council on May 10, 2016.<sup>4</sup> Policy 4.79 and the new Policy

---

<sup>3</sup> The City is required to include findings explaining how new proposed site development restrictions will not adversely impact its Goal 9 inventory. Such inventory must be preserved or expanded based on an Economic Opportunities Analysis (EOA) that identifies the characteristics and types of “other employment uses” (OAR 660-009-0015), which are defined to include “all non-industrial employment activities *including the widest range of retail* (emphasis added), wholesale, service, non-profit, business headquarters, administrative and governmental employment activities.” OAR 660-009-005(6). In addition, the EOA must identify sites that are expected to accommodate employment growth based on the site characteristics typical of expected uses. OAR 660-009-0015(2). The resulting plan must base its inventory of employment lands, in part, on the site characteristics of the various employment uses expected to generate employment growth. OAR 660-009-0025. Stated plainly, the EOA must analyze the need for, and inventory of, “other employment” uses based on their particular site characteristics, and must provide for such sites in the resulting plan.

Goal 9, subparagraph 3, requires that the City’s inventory of suitable commercial sites be adequate not just in terms of total acreage, but also with regard to size, type, location, and service levels, to provide for a “variety of industrial and commercial uses consistent with the plan policies.” When the City adopts site design and development regulations that limit the feasibility of commercial uses on such affected properties, the City is obligated to demonstrate how it remains in compliance with the Goal 9 requirement for an adequate inventory of commercial sites. *Opus Development Corp. v. City of Eugene*, 28 Or LUBA 670 (1995). In the relatively recent case of *Gunderson, LLC v. City of Portland* (62 Or LUBA 403 (2011)), LUBA held that the City erred when adopting greenway regulations that, while they did not include express use restrictions, effectively converted industrial land to open space by imposing extremely restrictive site development requirements. LUBA also found fault with the City’s EOA because it categorized industrial uses by their geographical distribution rather than by site characteristics. *Id.* at 418.

The City’s current EOA and its proposed amendments appear to take the same approach that LUBA rejected in *Gunderson* (it should be noted that the 2012 EOA was developed prior to the proposed zoning code amendments and therefore would not reasonably have evaluated such impacts). Even if the City decides to restrict the development of a certain type of commercial use, such as large format retail, it must at least demonstrate that it considered the impact on such retail uses before enacting such restrictions, and must demonstrate that it retains a sufficient supply of Goal 9 land, considering site characteristics, notwithstanding such restrictions. *Home Depot v. City of Portland*, 37 Or LUBA 870 (2000). The City’s enactment of very stringent site development restrictions that would limit several commercial uses, including large format commercial and drive-throughs, was not critically evaluated in the City’s draft EOA. Thus, the City has failed to demonstrate that such site development restrictions will not adversely impact its supply of Goal 9 land, based on the site characteristics of certain use categories.

<sup>4</sup> Policy 4.79. Requested by Saltzman (Council agenda #P44).

Grocery stores and markets in centers. Facilitate the retention and development of grocery stores, neighborhood-based markets, and farmers markets offering fresh produce in centers. Provide adequate land supply to accommodate a full spectrum of grocery stores catering to all socioeconomic groups and providing groceries at all levels of affordability.

Policy 6.17 – New Sub-Policy. Requested by Saltzman (Council agenda #P51).

Consider short-term market conditions and how area development patterns will transition over time when creating new development regulations.

New Policy after 6.65. Requested by Saltzman (Council agenda #P61).

after 6.65 both adopt policy statements requiring that more land be devoted to the full spectrum of grocery store development, which requires auto-accommodating zoning. See letters to City Council from Bob LeFeber/CRA regarding the lack of adequately zoned land for auto-accommodating grocery supermarkets.

The City still needs to have an auto mode that is accommodated. Even if the mode split shift goes down on the east side past 39th and on the west side past the ridge, over the next 20 years the mode split is likely to still be 60% to 70% autos at 2035. See Metro's "A snapshot of how the Portland region gets around." We need areas for auto accommodating uses that do not have the FAR and building orientation limitations of the Storefront zones. See the definition of "Auto-Accommodating Development" in the Code below. By contrast, see the purpose statement for the new CE zone also printed below, but marked to show revisions to make it more auto-accommodating, where the CE zone is intended to be pedestrian and transit friendly first, with auto-accommodation only as an after-thought. The City's multimodal system will lack adequate accommodation for the auto mode if the 2035 Plan and the MUZ Project are approved. Most households make 9 plus trips a day but only travel 4.4 miles from their home. Travel to downtown will continue to make great strides in mode split, but other trips will take more time and density to evolve because of lack of transit choices and service times available. Auto-accommodating uses need equitable zoning treatment under the MUZ project.

Currently there is no auto-accommodating zone proposed to address the short term market needs as new areas of the City continue to urbanize and become more dense over the planning period. New council policy 6.17 seeks to allow interim market-based development to avoid nonconformity. The City needs to implement the new Council policy in the MUZ project. We have requested phasing of the application of the CMSO overlay until there is a realization of 15-minute frequent transit service and a 50/50 mode split in the proposed CMSO areas. Converting more land to CE zoning is another way to phase in the mixed use zones during the next planning period, with CE being a short-term market placeholder. We can discuss other ideas with staff after the hearing.

## **MAKE CE ZONE AND DEVELOPMENT STANDARDS MORE AUTO-ACCOMMODATING**

We request amendments to the CE zone's purpose statement and standards to make them more auto-accommodating, as required for a multimodal system, and as described in the Zoning Code's definition of Auto-Accommodating Development:

---

Retail Development. Provide for a competitive supply of retail sites that support the wide range of consumer needs for convenience, affordability, accessibility and diversity of goods and services, especially in underserved areas of Portland.

"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."

**1) Revise CE Zone Purpose statement to make more auto-accommodating (new language underscored):**

**D. Commercial Employment zone.** The Commercial Employment (CE) zone is a medium-scale zone intended for sites along corridors in areas between designated centers, especially along Civic Corridors that are also Major Truck Streets or Priority Truck Streets. The zone allows a mix of commercial uses, as well as some light manufacturing and distribution uses that have few off-site impacts. The emphasis of this zone is on auto-accommodating commercial and employment uses, but residential use is also allowed. Buildings in this zone will generally be up to four stories tall. Development is intended to be auto-accommodating, as well as pedestrian-oriented, ~~as well as auto-accommodating,~~ and complement the scale of surrounding areas.

**2) Provide development standards in CE zone for auto-accommodation (See marked copies of key standards attached, as summarized below):**

- Allowance for parking between buildings and streets.
  - Section 33.130.215.C.1. & Table 130-2. Exempt street frontages in a CE zone abutting major city traffic streets on district collector streets in Section 33.130.215.C.1 attached. Change the Max. Building Setbacks in CE from 10'/20' to "NA" for sites adjacent to a Major City Traffic Street or a District Collector; add an exemption from the vehicle area frontage limitations of Section 33.266.130.C.3.b., for sites adjacent to a Major City traffic Street or a District Collector. Note: the pedestrian standard of Section 33.130.240 provide a safe and convenient crossing of these areas.
- Transit street main entrance location oriented to parking.
  - Section 33.130.242.B.3. Applicability – Add new subsection “3. This section does not apply to street frontages in a CE zone abutting Major City Traffic or District Collector streets.”
- Allowance for blank walls.
  - Section 33.130.230.B.2.d. Ground Floor Window Standard Exemption

- Revise subsection 2. to add a new subsection “d exemption.” Retail store walls devoted to truck loading or external to interior areas used for storage, refrigeration or mechanical equipment, are exempt from this Section.”
- Alternative maximum building setback for large retailers in mixed-use zones other than CE.
  - Section 33.130.215.E.2
    - Change 60,000 sq. ft. to 40,000 sq. ft.
- See copies of above code sections (except 33.130.215.E.2) marked to show proposed changes by underlining the new language.

## **DO NOT MAKE EXISTING DEVELOPMENTS NONCONFORMING**

We are also concerned with the proposed prohibition of drive through facilities in many new locations. The Mayor’s new policy provides for prohibition of new drive throughs in the Central City and for limitations in Ring Districts and centers. The proposed application was dropped in corridors. Accordingly, existing drive-through prohibitions in corridors should be changed by zoning those properties CE, which does not prohibit drive-throughs. Regardless of the ultimate area of prohibition, drive through facilities should not be made nonconforming, but should instead be deemed conforming as preexisting development. New Plan Policy 6.17 supports this approach.

The CE zone is also the only zone which does not prohibit drive-through facilities. Grocery supermarkets utilize drive-through facilities in their operations for on-site fuel stations, pharmacy pick-up windows, and grocery pick-up lanes. Drive-through facilities should not be prohibited in centers, corridors and other areas along Major City Traffic Streets and District Collectors suitable for auto-accommodating grocery store development for equitable zoning reasons.

It is important to be in the proper zone as a nonconforming development. The nonconforming situation review criteria require that “the new use or development will not detract from the desired function and character of the zone.” See copy of Section 33.258.080.3. attached. Accordingly, auto-dependent development that is zoned anything but CE, the only auto-accommodating zone, will be found to be inconsistent with the purpose statements of any of the mixed-use zones, which would make the effort to obtain nonconforming situation review approval to modify an auto-oriented development in any new zone except CE unfeasible for that reason.

We propose the following pre-existing code language for commercial land:

*“At the time an area now zoned commercial is zoned for a CM, CM2 or CM3 base zone or a CMSO overlay, existing auto-oriented development which was allowed by a former*



*commercial zone covering the site and which would otherwise become non-conforming by the mixed use zoning, shall be allowed to continue as allowed developments.”*

**Limit Areas of Prohibition of Drive-Through Facilities.** Drive-through facilities are important adjuncts to grocery supermarket store development, both for their own drive-throughs (for pharmacy and grocery pick-up and for fuel stations) and for their pad users to help spread the cost of development. They do not generate traffic as a destination, as operate off pass-by traffic. They operate safely and do not have a history of unsafe operations in the City. Therefore, drive-throughs should not be prohibited broadly, but only in special areas such as the areas now proposed for CMSO zones west of 39th Avenue and the areas mapped to recognize the City’s Low-Rise “Trolley Car Era” Commercial Storefront areas. See attached map. The CE zone’s use limitations for drive throughs should be removed. In the small block areas of Portland, all CE sites will be within 50’ of an R zone. The buffer standards should be re-imposed as a flexible way to address the issue instead of a prohibition “overkill”.

We propose the following language to create preexisting development status for existing drive throughs, as follows:

**33.130.260 Drive-Through Facilities**

New drive-through facilities are allowed in the zones which are intended for auto-accommodating development. Existing, legally established facilities in all commercial/mixed use zones are allowed outright. The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. **CM1, CM2, CM3, CX, and CE zones.** In the CM1, CM2, CM3, CX, and CE zones, all legally established drive-through facilities in existence as of the effective date of the code, are allowed outright and are not subject to Chapter 33.258, Nonconforming Situations.
- B. **CM1, CM2, CM3, and CX zones.** Establishment of new drive-through facilities is prohibited in the CM1, CM2, CM3, and CX zones.
- C. **CE zone.** Establishment of new drive-through facilities is allowed in the CE zone, subject to the following:
  - 1. New drive-through facilities within 50 feet of a residential zone boundary must incorporate landscaping to the L2 standard between the drive-through facility and the residential zone.

Portland Planning and Sustainability Commission  
May 17, 2016  
Page 8

We very much appreciate the time that staff has taken to work with us to date. We offer to continue to work with staff through the hearing process on our proposed revisions to the code requested above and we request the formation of a PSC approved workshop for that purpose.

Respectfully submitted,

A handwritten signature in black ink, reading "Mark Whitlow". The signature is written in a cursive, flowing style.

Mark D. Whitlow

MDW:sv  
Enclosures

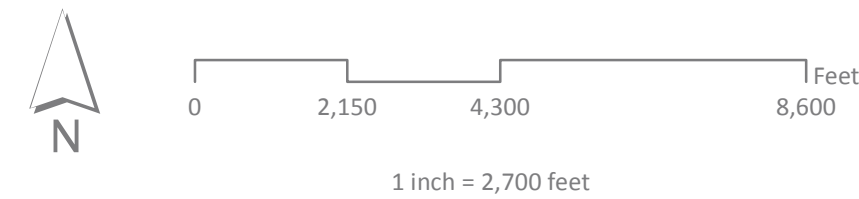


# CE ZONE & NON-CMSO RECOMMENDATIONS Portland, Oregon

## LEGEND

- Recommended CE Areas
- Recommended CMSO removals
- Proposed CMSO
- Proposed Zones**
- CM1 - Mixed Commercial
- CM2 - Commercial Mixed Use 2
- CM3 - Commercial Mixed Use 3
- CE - Commercial Employment
- Current Zones**
- CG (If no hatch, changing to other comp plan desig.)
- Traffic Classifications**
- Regional Trafficway
- Regional Trafficway & Major City Traffic Street
- Major City Traffic Street
- Traffic Access Street
- District Collector
- Neighborhood Collector
- Freight Classifications**
- Major Truck Street
- Priority Truck Street

33.130.030.D:  
The Commercial Employment (CE) zone is a medium-scale zone intended for sites along corridors with a Neighborhood Collector or higher traffic classification, especially along civic corridors that are also Major Truck Streets or Priority Truck Streets. This 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...

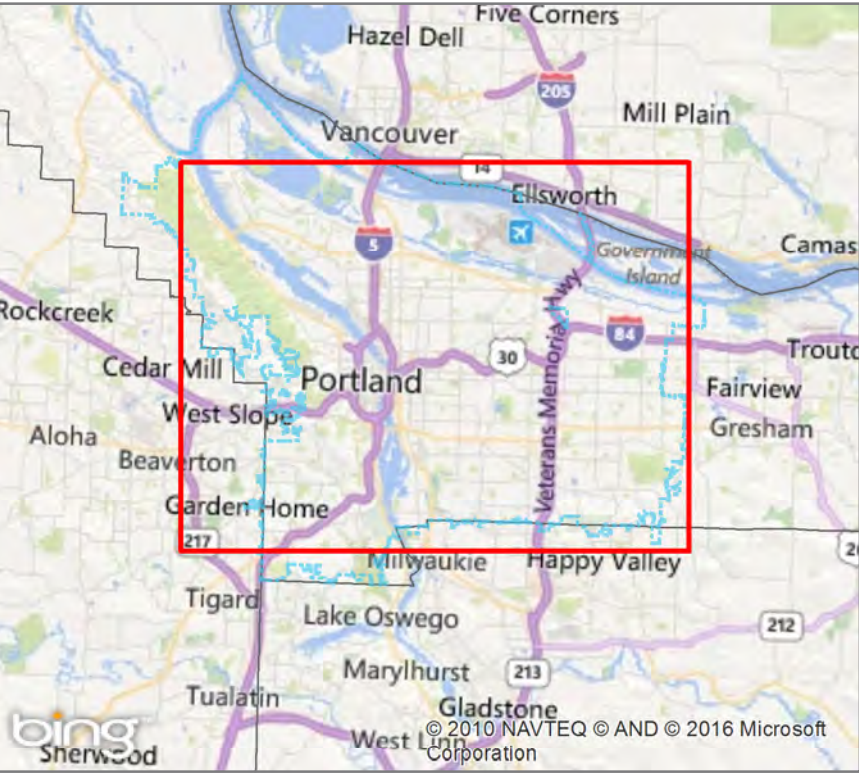


SOURCE DATA:  
Metro RUS Lite Base Data,  
Aug 2014

GEOGRAPHIC PROJECTION:  
NAD 83 HARN, Oregon North  
Lambert Conformal Conic

Date: 5/17/2016  
File: CE Area Recommendations

Map Created By: SHS  
Project No: 2160034.00



# MACKENZIE.

P 503.224.9560 • F 503.228.1285 • W MCKNZE.COM  
RiverEast Center, 1515 SE Water Avenue, #100, Portland, OR 97214

Portland, Oregon • Vancouver, Washington • Seattle, Washington

© 2014 MACKENZIE ALL RIGHTS RESERVED  
Ord. 188177, Vol. 2.3.H, page 9490



**Whitlow, Mark (Perkins Coie)**

---

**From:** Whitlow, Mark (Perkins Coie)  
**Sent:** Thursday, December 24, 2015 10:36 AM  
**To:** Manning, Barry (Barry.Manning@portlandoregon.gov)  
**Cc:** 'RTF Participants'; Vogel, Stephanie (Perkins Coie)  
**Subject:** Portland Mixed Use Zones Project - RTF/ICSC GR Committee Preliminary Comments II

Barry,

This message continues to follow-up from our meeting with you and your staff on November 18th and provides additional preliminary comments from the first set provided in my email to you on November 19th. Since then we have hired consultants and are preparing a detailed set of industry comments and market analyses to send to you as soon as possible. In the interim on December 1st, I provided you with the packet of prior RTF communications with the Planning Director, Portland Planning Commission and Portland City Council circa 1989-1991, with the comment that the issues of concern then are essentially the same as the ones the retail segment of the industry has now:

- rampant down-zoning of general commercial land;
- over-application of building orientation standards for pedestrian and transit-oriented development in areas not suitable for that type of use or development
- resulting nonconformity of existing commercial uses and developments based on the above, which impedes economic growth and development; and
- general lack of any city-wide economic commercial retail policy to ensure an adequate inventory of commercial land to serve the City's wide spectrum of retail shopping needs, especially grocery, at all economic levels of the community.

You have asked me to provide as much detail as I can as soon as I can regarding what we are concerned about and what we need to see changed. We will take the basic position that:

- the new overlay should be applied when the subject area is served with 15 minute transit service with a demonstrated 50/50 mode split, with the overlay standards being revised to prevent non-conformity when applied
- CG land should only be converted to CE land (general commercial to commercial employment)
- CE purpose statement and standards should be revised to be more auto-oriented
- In all commercial zones, building orientation standards should only be applied to areas having 15 minute transit service, so we request a roll-back of the areas that are subject to building orientation, consistent with our testimony 20 years ago.
- we will offer specific case studies of why the proposed zoning doesn't work, including the existing Safeway store development at 221 NE 122nd & and the existing Albertsons store development at 5850 NE Prescott

We will provide more detail as soon as we can. In the interim, I would appreciate your early feedback. Thank you again for your time.

Best, Mark

Mark Whitlow | Perkins Coie LLP  
PARTNER  
1120 N.W. Couch Street Tenth Floor  
Portland, OR 97209-4128  
D. +1.503.727.2073  
F. +1.503.346.2073  
E. [MWhitlow@perkinscoie.com](mailto:MWhitlow@perkinscoie.com)

# MIXED USE ZONES PROJECT CASE STUDIES



February 16, 2016

Mark Whitlow, Perkins Coie  
Eric Hovee, E.D. Hovee  
Suzannah Stanley, Mackenzie





## Introduction

### FOUR CASE STUDIES

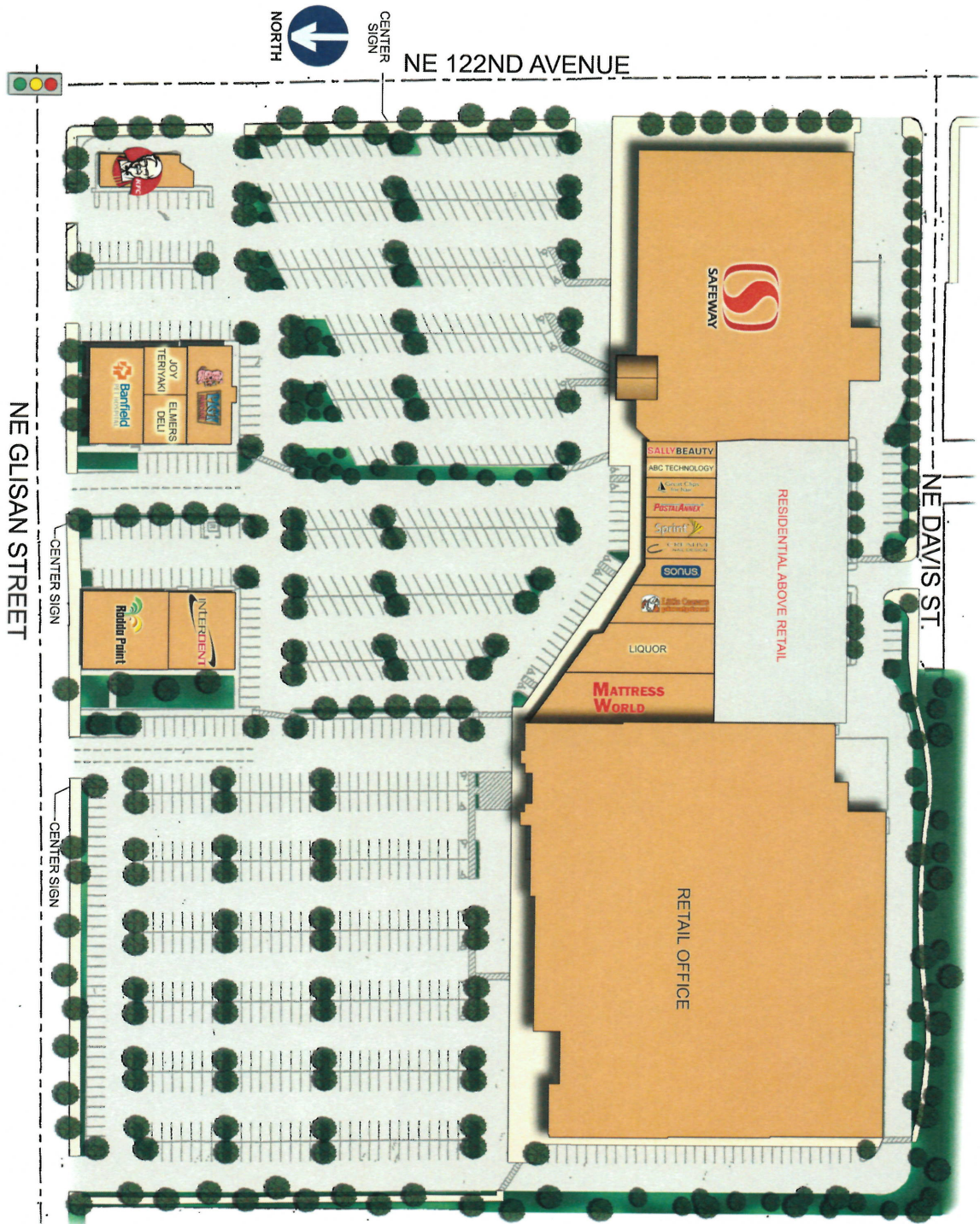
The following document presents four existing or recently permitted retail sites providing affordable and/or value-based grocery in northeast and southeast Portland. The sites were analyzed for their compliance with the proposed zoning language of the Mixed Use Zones project.

Applicable code sections with changes proposed are addressed. Code sections with which each site would not comply as built or recently permitted are shown in red.



# POWELL DEVELOPMENT

2625 Northup Way  
Bellevue, WA 98004  
P-425.828.4444  
WWW.POWELLDDEV.COM



## GLISAN STREET STATION

Ord. 188177, Vol. 2.3.H, page 9495



## 1: Safeway: 221 NE 122nd (Glisan Street Station)

*Existing retail development*

**Current Zone:** CX (Central Commercial)  
**Proposed Zone:** CM3m (Commercial Mixed Use - 3), Centers Main Street Overlay zone (CMSO)  
**Site Area:** 768,629 SF (seven tax lots in development)  
**Building Area:** 330,949 SF (all buildings)

### SUMMARY

The existing development does not meet several of the proposed standards for the new base zone or CMSO. From the proposed base zone standards, maximum setbacks of 20' are allowed and setbacks must be improved for pedestrian use. Additionally, transit street, main entrances are required for all buildings, at no more than 200' apart (none are currently provided). To meet CMSO standards, development at this site would have to have 70% of building facades to be within 20' of streets, with no more than 40% of the site's frontages for vehicle areas. At least 60% of facades must be windows. Additionally, a minimum FAR of 0.5 is required (currently there is 0.43 across the buildings and lots).

Also per the CMSO, vehicle access would be prohibited from transit streets (both 122nd and Glisan), meaning the site would be required to be accesses from NE Davis St, an approximately 30'-45' wide local street south of the Safeway building which currently only provides access to the private parking for the apartment development on the site.

### ANALYSIS

#### Proposed base zone CM3:

- 33.130.205 Maximum FAR changing from 4:1 to 3:1 or 5:1 with bonuses
- 33.130.210 Maximum height decreasing from 75' to 65' before bonuses
- 33.130.215.C. Maximum Building Setbacks: 10' for zone but 20' for both 122nd and Glisan ("Civic Corridors" per Map 130-1). At least 50% of street-facing facades at ground level must meet max setback. (These must be met on two out of the three streets the site fronts—122nd and Glisan, since they are the highest classifications.) Existing buildings are within 20' of both streets at some locations, but less than 50% of all street-facing facades are within 20' (particularly western large building).
- 33.130.215.C. at least 50% of complying maximum setback areas must be improved for pedestrian use. Existing site does not meet this. Small plaza area at northeast corner of Safeway building on 122nd, two walkways to buildings on Glisan. New buildings would be required to be closer to frontages and setbacks improved for pedestrians.
- 33.130.222.B. Maximum building length: 110' per building (multiple buildings within 20' of street must be at least 20' apart when on same site). Existing Safeway building within 10' of 122nd is approx. 194' (not met). Street-facing facade on Glisan is approximately 374' long and set back approximately 428'. Smaller buildings at northeast corner are approximately 82' and 98' long within maximum setback.
- 33.130.222.C. Facade articulation: Applies to buildings 45'+ high—at least 25% of each facade within 20' of street must be divided into facade planes that are off-set by at least 2'. (Assumed does not apply to subject site building, likely less than 45' high).
- 33.130.230.B. Ground floor window standard: 40% of street-facing facade within 20' of street must be windows (2-10' above-grade area). (Formerly this was 25% of the area between 2-9' above grade.) Less than 40% of 122nd facade or Glisan-facing facade of large building contain windows.
- 33.130.242.C. Transit Street Main Entrance location—no changes to commercial building standards. No main entrances provided on either Transit Street frontage, for any buildings (including smaller buildings on Glisan).
- 33.130.242.D. Transit Street Main Entrance distance between entrances—one entrance required for every 200' of building length within the maximum setback. Existing buildings do not meet setback or transit street main entrance locations, so cannot meet this standard.
- 33.130.260 Drive-Through Facilities: Prohibited in CM1, CM2, and CM3 zones. There is an A&W/KFC on corner of 122nd and Glisan.

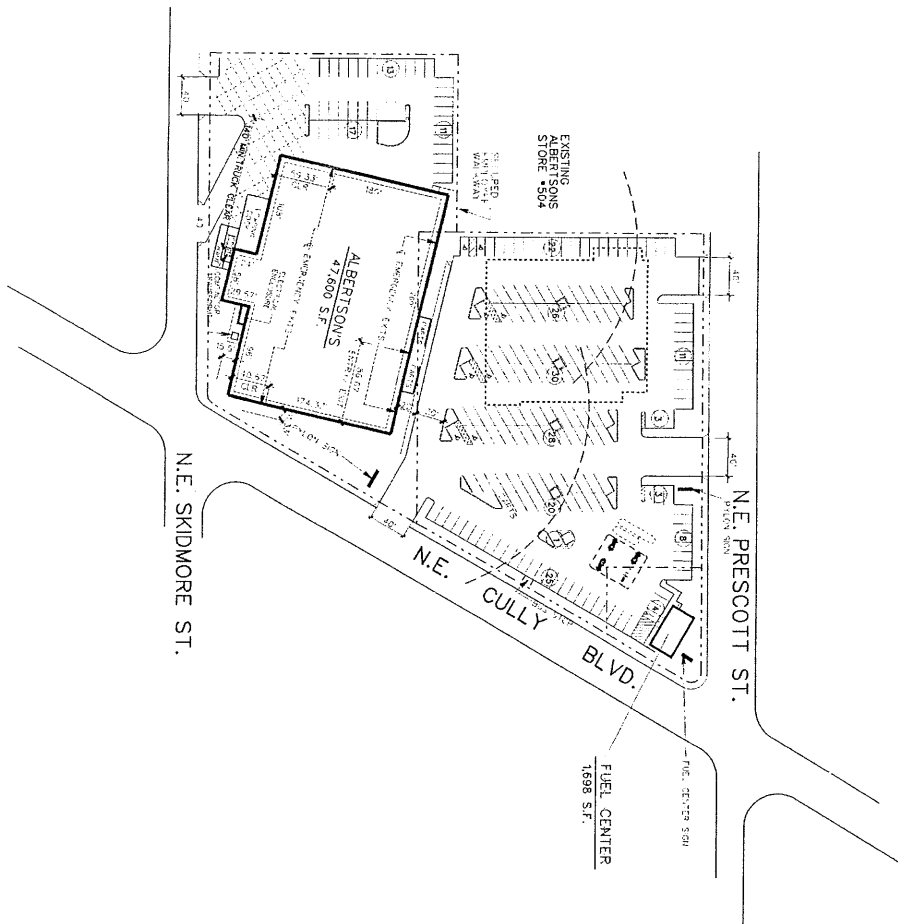
#### Proposed Centers Main Street Overlay:

- 33.415.100 Quick-vehicle servicing (fuel stations) would be prohibited. (Note: these are currently permitted by way of a specific exception in the existing East Corridor Plan District).
- 33.415.200 Active ground floor uses are required within 100' of a transit street (Glisan and 122nd) and must consist of 50% of the ground floor area. Met with retail uses.
- 33.415.300 Drive-through windows are prohibited. There is an A&W/KFC on corner of 122nd and Glisan.
- 33.415.310 A minimum FAR of 0.5:1 is required for all new development. (Existing: 0.43)
- 33.415.320 Maximum Building Setbacks: At least 70% of street-facing facade at ground level must meet max setback of the base zone. (On two out of the three streets the site fronts—122nd and Glisan, since they are the highest classifications.) Neither this nor the base zone standard of 50% is met.
- 33.415.330.B. Frontage limitation: No more than 40% of frontage of transit street can be used for vehicle areas or exterior display. Subject site has approx. 857' of drive or parking area on approx. 1,719' of frontage (50%). Not met.
- 33.415.330.C. Access to "on-site parking" or "vehicle areas" prohibited on 122nd and Glisan, which are transit streets. The site currently takes access from those two streets and Davis (to the apartments only).
- 33.415.340 Ground Floor Windows: On transit streets, 60% of street-facing facade must be windows. Less than 60% of 122nd facade or Glisan-facing facade of large building contain windows.
- 33.415.350.B. Transit street entrance frequency: 1 entrance per 100' of building length. No existing buildings have transit street entrances.

- 33.130.260 would allow drive-through facilities to be rebuilt if demolished under the following circumstances:
  - The new drive-through must be part of a development with an FAR of at least 1:1.
  - Only one drive-through would be permitted.
  - The replacement drive-through must be built on the same lot.
  - A replacement drive through is not permissible if the original has been disused for 2 years or more.





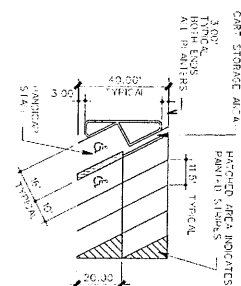


**LEGEND**

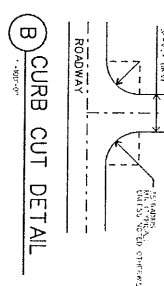
PROPERTY LINE  
 PARCEL LINE  
 BUILDING AREA  
 HAVY DUTY AVAIL

**GENERAL NOTES**

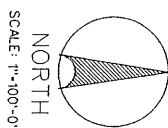
DRAWN WITH OUT BENEFIT OF SURVEY  
 NO TRUCK WELLS NATURAL DOCK ONLY  
 PARKING REQUIREMENTS:  
 1/400 S.F. W/ 25% REDUCTION  
 ON TRAILER STREET  
 BUILDING SETBACK REQUIREMENTS:  
 10' AT STREETS  
 15' AT INTERIOR PROPERTY LINES  
 LANDSCAPE REQUIREMENTS:  
 20' S.I. 2' TYPING SLAB  
 2' AT INTERIOR PROPERTY LINES  
 10' AT STREETS  
 ZONING REQUIREMENTS:  
 EXISTING - SR - RESIDENTIAL CONVERSION  
 REQUIRED - SR - RESIDENTIAL CONVERSION



**A** PARKING DETAIL  
 1'-0"=0'



**B** CURB CUT DETAIL  
 1'-0"=0'



SCALE: 1"=100'-0"

**EXHIBIT "A" SITE PLAN**

TOTAL GROSS BUILDING AREA	49,798 S.F.
TOTAL CARPARKS REQUIRED	725 (47/2) BY 100' (0.5) (724 (47/2) 000)
TOTAL CARPARKS PROVIDED	222 1-258/2200
TOTAL CARPARKS W/IN 200' RAD.	175
TOTAL SITE AREA	778,711 S.I. (4,604 AC.)

APPROVED BY:	DATE:
CHAIRMAN	SIGNED
PRESIDENT	SIGNED
EXEC. V.P.-S.F.	SIGNED
SR. V.P.-CONSTR.	SIGNED
SR. V.P.-REC.	SIGNED

**ALBERTSONS NO. 575 (504)**  
 S.W.C. N.E. PRESCOTT STREET & N.E. CULLY BLVD. PORTLAND, OR

220 PARKCENTER BLVD. 9006, 3rd FL. 97214

1

## 2: Albertsons: 5850 NE Prescott

### Existing retail development

**Current Zone:** CGH (General Commercial w/ Aircraft Landing overlay)  
**Proposed Zone:** CM2m (Commercial Mixed Use - 2), CMSO  
**Site Area:** 160,675 SF (Albertson's lot only, 1N2E19DA 11500)  
**Building Area:** 47,600 SF

### SUMMARY

The existing 47,600 Albertson's store does not comply with several of the proposed base zone and overlay standards. Per the proposed base zone, the building would be required to be within 10' of both Prescott and Cully with building design (articulation, windows, transit street main entrances, building length) and site design standards (setbacks improved for pedestrian use). Per the CMSO, the minimum FAR would be 0.5 (currently the lot has 0.3) and no vehicle access would be allowed from either Prescott or Cully. On those streets, no more than 40% of the frontages could be for parking/vehicle areas. Additional ground floor window and transit street entrance standards would apply.

### ANALYSIS

#### Proposed base zone CM2:

- No significant changes to height or maximum FAR (went from 3:1 to 2.5:1)
- 33.130.215.C. Maximum Building Setbacks: 10'. At least 50% of street-facing facade at ground level must meet max setback. (These must be met on two out of the three streets the site fronts—Prescott and Cully, since they are the highest classifications.) Existing building is within 10' from Cully at corner, but less than 50% of Cully street-facing facade is within 10' and none of facade facing Prescott is within 10'.
- 33.130.215.C. at least 50% of complying maximum setback areas must be improved for pedestrian use. Existing site does not meet this—only landscape area is provided.
- 33.130.222.B. Maximum building length: 10' per building (multiple buildings within 20' of street must be at least 20' apart when on same site). Existing building is approx. 176' long along Cully.
- 33.130.222.C. Facade articulation: Applies to buildings 35'+ high—at least 25% of each facade within 20' of street must be divided into facade planes that are off-set by at least 2'. (Assumed does not apply to subject site building, likely less than 35' high.)
- 33.130.230.B. Ground floor window standard: 40% of street-facing facade within 20' of street must be windows (2'-10' above-grade area). (Formerly this was 25% of the area between 2'-9' above grade.) Existing building has no windows on either street-facing facade and minimal windows on the northern facade that is required to face Prescott.
- 33.130.242.C. Transit Street Main Entrance location—no changes to commercial building standards. The building does not have a main entrance on either transit street (Cully or Prescott).
- 33.130.242.D. Transit Street Main Entrance distance between entrances—one entrance required for every 200' of building length within the maximum setback. Existing building does not meet setback or transit street main entrance locations, so cannot meet this standard.
- 33.130.260 Drive-Through Facilities: Prohibited in CM1, CM2, and CM3 zones. None exist.

#### Proposed Centers Main Street Overlay:

- 33.415.100 Quick-vehicle servicing (i.e. fuel stations) would be prohibited. (These are currently permitted outright.) Existing development on site includes a Mobil fuel center.
- 33.415.200 Required Ground Floor Active Use: If building is within 100' of a transit street (Prescott and Cully), 50% of ground floor area must be an active use such as retail. Existing building meets this with Retail use.
- 33.415.300 Drive-through windows, including replacement drive-throughs, are prohibited.
- 33.415.310 A minimum FAR of 0.5:1 is required for all new development. (Current is 0.3.)
- 33.415.320 Maximum Building Setbacks: At least 70% of street-facing facade at ground level must meet max setback of the base zone. (On two out of the three streets the site fronts—Prescott and Cully, since they are the highest classifications.) Neither this nor the base zone standard of 50% is met.
- 33.415.330.B. Frontage limitation: No more than 40% of frontage of transit street can be used for vehicle areas or exterior display. Subject site has approx. 167' of parking area on approx. 364' of frontage (45%). Not met.
- 33.415.330.C. Access to "on-site parking" or "vehicle areas" prohibited on Prescott and Cully, which are transit streets. The site currently takes access from those two streets and Skidmore.
- 33.415.340 Ground Floor Windows: On transit streets, 60% of street-facing facade must be windows. No windows exist on Cully facade.
- 33.415.350.B. Transit street entrance frequency: 1 entrance per 100' of building length. Existing building has no transit street entrances.

- 33.130.260 would allow drive-through facilities to be rebuilt, if demolished under the following circumstances:
  - The new drive-through must be part of a development with an FAR of at least 1:1.
  - Only one drive-through would be permitted.
  - The replacement drive-through must be built on the same lot.
  - A replacement drive-through is not permissible if the original has been disused for 2 years or more.







### 3: Grocery Outlet/Dollar Tree: 10721 NE Sandy (Parkrose)

*Shell recently permitted*

**Current Zone:** CGhx (General Commercial). (Aircraft Landing Zone, PDX Noise Impact Zone overlays)

**Proposed Zone:** CM2hxm (Aircraft Landing Zone, PDX Noise Impact Zone, CM50 overlays)

**Site Area:** 54,336 SF

**Building Area:** 22,860 SF

#### SUMMARY

The recently approved site plan does not comply with several of the proposed code changes—specifically, improving areas within the maximum setback for pedestrian use, maximum building length, ground floor window standards (of the base zone or overlay), minimum FAR in overlay, or vehicle frontage limitation in overlay.

#### ANALYSIS

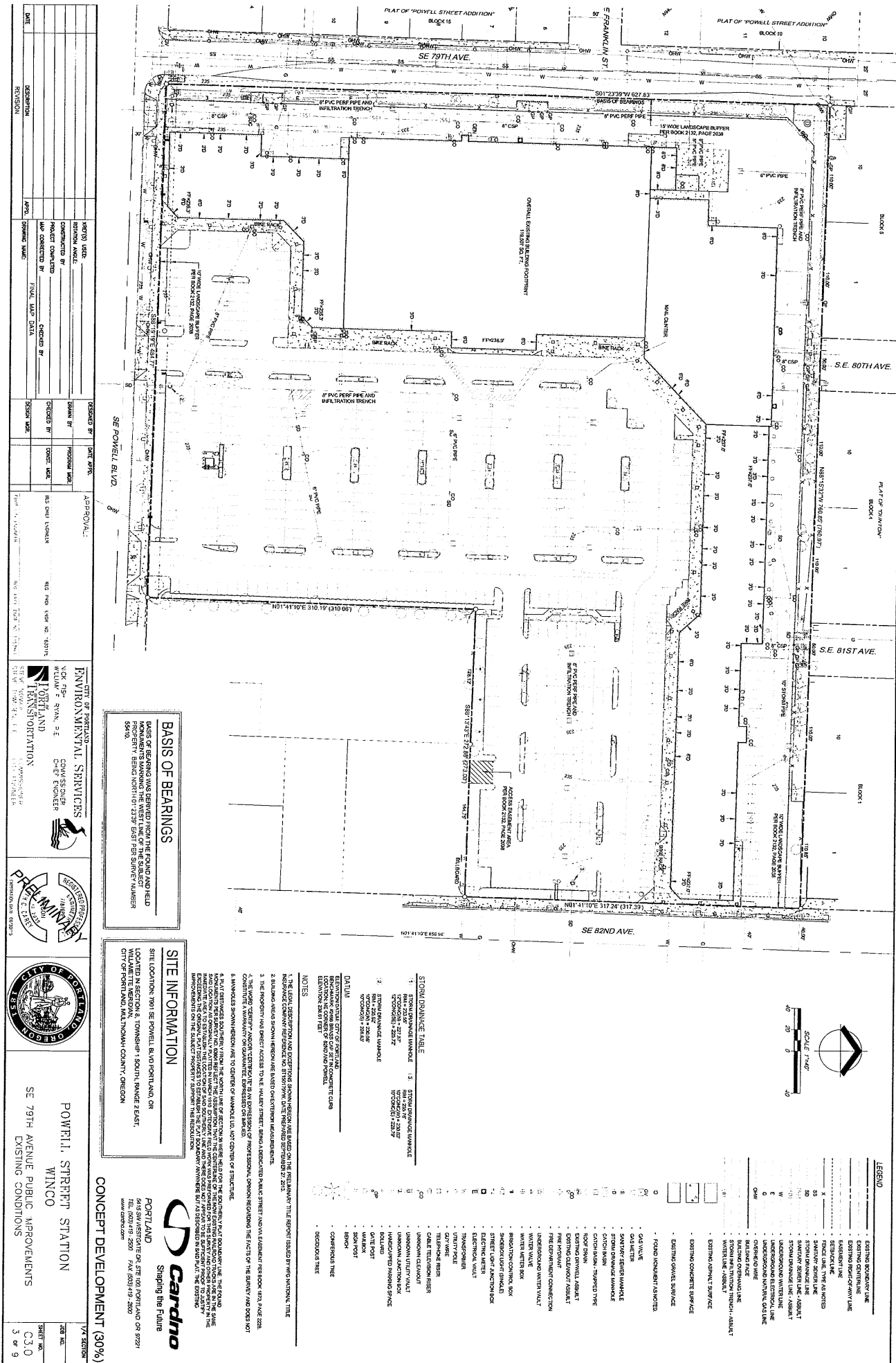
##### Proposed base zone CM2:

- No significant changes to height or maximum FAR (went from 3:1 to 2.5:1)
- 33.130.215.C. Maximum Building Setbacks: 10' for zone but 20' for this portion of Sandy Blvd ("Civic Corridor" per Map 130-1). At least 50% of street-facing facade at ground level must meet max setback.
- 33.130.215.C. at least 50% of complying maximum setback areas must be improved for pedestrian use. Current site plan does not meet this. (410' landscape area is provided)
- 33.130.222.B. Maximum building length: 110' per building (multiple buildings within 20' of street must be at least 20' apart when on same site). Current site plan building is approx. 130' long within 20' of Sandy.
- 33.130.222.C. Facade articulation: Applies to buildings 35' high—at least 25% of each facade within 20' of street must be divided into facade planes that are off-set by at least 2'. (Assumed does not apply to subject site building, likely less than 35' high.)
- 33.130.230.B. Ground floor window standard: 40% of street-facing facade within 20' of street must be windows (2-10' above-grade areas). (Formerly this was 25% of the area between 2-9' above grade.) Elevations not provided for Dollar Tree/Grocery Outlet building but may not meet this standard.
- 33.130.242.C. Transit Street Main Entrance location—no changes to commercial building standards
- 33.130.242.D. Transit Street Main Entrance distance between entrances—one entrance required for every 200' of building length within the maximum setback. Current site plan meets this with one entrance and approx. 130' of building length on the transit street
- 33.130.260 Drive-Through Facilities: Prohibited in CM1, CM2, and CM3 zones.

##### Proposed Centers Main Street Overlay:

- 33.415.200 Required Ground Floor Active Use: If building is within 100' of a transit street, 50% of ground floor area must be an active use such as retail. Site plan meet this.
- 33.415.310 Minimum FAR: 0.5:1. For 54,336 SF site, that's 27,168 SF of building. Approved building is only 22,860 SF or 0.42:1. Not met.
- 33.415.320 Maximum Building Setbacks: At least 70% of street-facing facade at ground level must meet max setback of the base zone.
- 33.415.330.B. Frontage limitation: No more than 40% of frontage of transit street can be used for vehicle areas or exterior display. Subject site has approx. 130' of parking area on approx. 260' of frontage (50%). Not met.
- 33.415.340 Ground Floor Windows: On transit streets, 60% of street-facing facade must be windows. Elevations not provided for Dollar Tree/Grocery Outlet building but may not meet this standard.)
- 33.415.350.B. Transit street entrance frequency: 1 entrance per 100' of building length. Subject site plan has 1 entrance per 130' of building (met).





## 4: Winco: 7901 SE Powell Blvd (Powell Street Station)

*Tenant improvement for Winco recently permitted; permit for site upgrades recently permitted*

**Current Zone:** CG (General Commercial)  
**Proposed Zone:** CM2 (Commercial Mixed Use – 2)  
**Site Area:** 393,869 SF  
**Building Area:** 117,766 SF

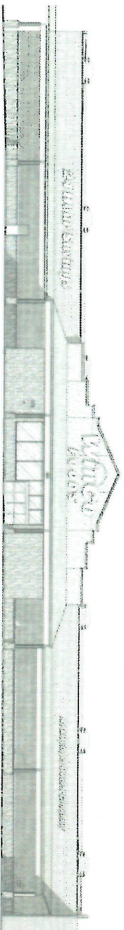
### SUMMARY

The existing building does not meet maximum setback standards of new base zone; due to site configuration in L-shape around another site, these would be difficult to meet even for new development. Additionally, the existing building does not meet the new pedestrian improvement area standards, building length, or transit street main entrance standards.

### ANALYSIS

#### Proposed base zone CM2:

- No significant changes to height or maximum FAR (went from 3:1 to 2.5:1)
- 33.130.215.C. Maximum Building Setbacks: 10' for zone but 20' for both 82nd and Powell ("Civic Corridors" per Map 130-1). At least 50% of street-facing facade at ground level must meet max setback. (These must be met on two out of the three streets the site fronts—82nd and Powell since they are the highest classifications.) Existing building is within 20' of both streets at corners, but less than 50% of either street-facing facade is within 20'.
- 33.130.215.C. at least 50% of complying maximum setback areas must be improved for pedestrian use. Existing site does not meet this—no walkways or pedestrian plazas between street and building (and no complying setback areas).
- 33.130.222.B. Maximum building length: 110' per building (multiple buildings within 20' of street must be at least 20' apart when on same site). Existing building within setback is approx. 90' maximum, but building does not meet maximum setback requirements. Street-facing facade on Powell is approximately 580' long.
- 33.130.222.C. Facade articulation: Applies to buildings 35' + high—at least 25% of each facade within 20' of street must be divided into facade planes that are off-set by at least 2'. (Assumed does not apply to subject site building, likely less than 35' high.)
- 33.130.230.B. Ground floor window standard: 40% of street-facing facade within 20' of street must be windows (2'-10' above-grade area). (Formerly this was 25% of the area between 2'-9' above grade.) Both facades along streets are close to 100% windows, but the building does not meet the street-facing facade requirement.
- 33.130.242.C. Transit Street Main Entrance location—no changes to commercial building standards. Entrance on SE Powell is at a 45 degree angle (meets standard), but no entrance provided on 82nd.
- 33.130.242.D. Transit Street Main Entrance distance between entrances—one entrance required for every 200' of building length within the maximum setback. Existing building does not meet setback or transit street main entrance locations, so cannot meet this standard.
- 33.130.260 Drive-Through Facilities: Prohibited in CM1, CM2, and CM3 zones. None exist on subject site but there is an A&W/KFC on corner of Powell and 82nd.



- 33.130.260 would allow drive-through facilities to be rebuilt if demolished under the following circumstances:
  - The new drive-through must be part of a development with an FAR of at least 11.
  - Only one drive-through would be permitted.
  - The replacement drive-through must be built on the same lot.
  - A replacement drive through is not permissible if the original has been disused for 2 years or more.

# POLICY CONCLUSIONS

## Key Findings

*The City of Portland currently lacks a Comprehensive Plan goal regarding food systems.*

The City of Portland can influence food systems through the consideration of food issues during the planning process and through support of policies, programs, and investment priorities conducive to expanding food access, urban agriculture and encouraging healthy behavior choices.

The Bureau of Planning and Sustainability can focus efforts for the Portland Plan to direct urban development in a manner supportive of providing opportunities to access healthful food and grow food locally. A planning goal describing our commitment to food access and urban agriculture would support community values around this issue and bring food into the City's comprehensive planning framework.

Without food systems as a consideration within planning, future decisions made through the Portland Plan may cause unintended consequences that work counter to our community's physical health. Food is related to many issues of importance that the Portland Plan is undertaking: climate change, affordability, human health, neighborhood health, urban form and more, and decisions made in these areas will impact the food environment.

*The City's current Comprehensive Plan does not include policies related to healthful food access.*

Access to healthful food is one of the most significant health-related policy gaps in the City's current Comprehensive Plan.

Potential policy areas to promote greater access to healthful foods should center on improving walkability and access to healthy food outlets; removing zoning and land use barriers that restrict the siting of healthful food outlets; removing obstacles to the growing and sale of food in urban areas; providing land for growing food in appropriate locations; encouraging the planting of fruit and nut trees in appropriate locations; and utilizing incentives, economic development tools, and education to support the expansion of local producers, processors, distributors, and retailers.

*Food comes up as a major component to several issues under exploration in the Portland Plan.*

- **20-minute neighborhoods:** Grocery access has already been identified as a key feature of the 20-minute neighborhood. In early outreach, the public has suggested community gardens as being important. Programming urban plazas, or community gathering places, with events like farmers markets, can also contribute to walkable, vibrant communities.
- **Growth:** In many U.S. cities, urban agriculture (UA) is thriving where cities are in decline and there is much vacant land available. We have an opportunity with the Portland Plan to define UA for a growing, largely land-locked city. There are many creative ideas for providing more of our food without expanding the urban growth boundary or losing growth potential within the boundary.
- **Affordability:** As housing costs rise, less money is available for other basic needs like food. While transportation is certainly key and accounts for a larger proportion of the household budget, food costs are significant and are often the expenditure that gets reduced when other costs rise. Key to the affordability discussion is the ability to meet all basic needs, including healthful food.
- **Community resiliency:** There is growing interest in preparing communities to face unexpected turmoil or deep changes due to climate change, peak oil, and a changing economy. As we seek to address these challenges and prepare for an uncertain future, food is a key issue in the discussion.

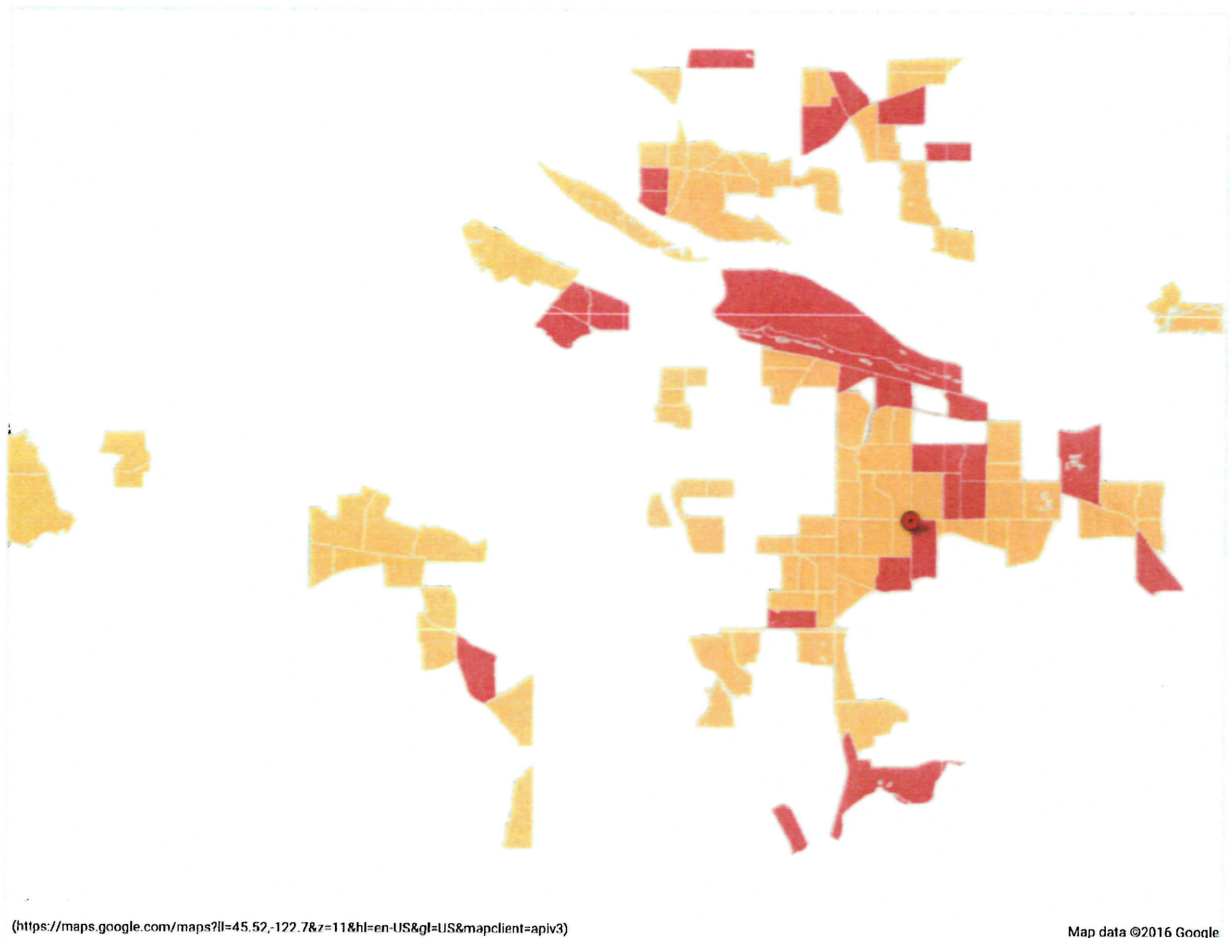


(<http://www.oregonlive.com/>)

## Portland-area food deserts

Below is a map of low-income census tracts in the Portland metro area where the U.S. Department of Agriculture has determined that a significant number or share of residents is more than **a half-mile** or **a mile** from the nearest supermarket in urban areas or more than 10 miles from the nearest supermarket in rural areas. For a nationwide map, **see the USDA site.** (<http://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx>) Read more: **Grocery Outlet's opening in east Portland brings promise to an area lacking supermarkets** ([http://www.oregonlive.com/portland/index.ssf/2013/03/grocery\\_outlets\\_opening\\_in\\_eas.html](http://www.oregonlive.com/portland/index.ssf/2013/03/grocery_outlets_opening_in_eas.html))

 New Grocery Outlet store



(<https://maps.google.com/maps?ll=45.52,-122.7&z=11&hl=en-US&gl=US&mapclient=apiv3>)

Map data ©2016 Google

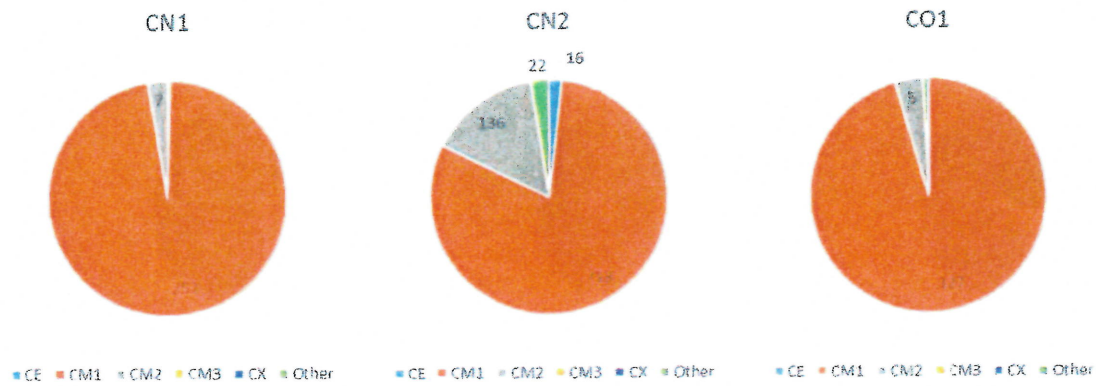
Sources: U.S. Department of Agriculture, U.S. Census Bureau; Map: Mark Friesen/The Oregonian



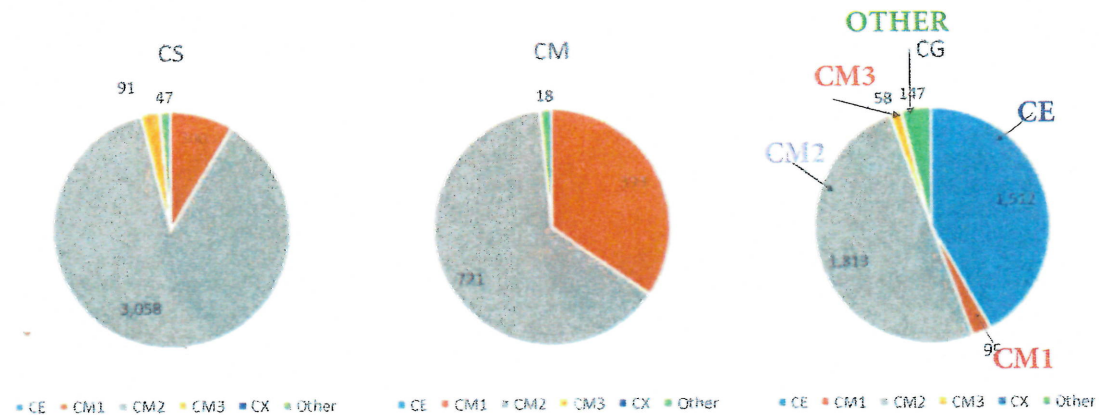
**Figure VII-1: Commercial/Mixed Use Rezoning Summary**

Number of properties assigned to each new zone, by old zones. Other = non Commercial/Mixed Use (EG1, EG2, R1, etc.)

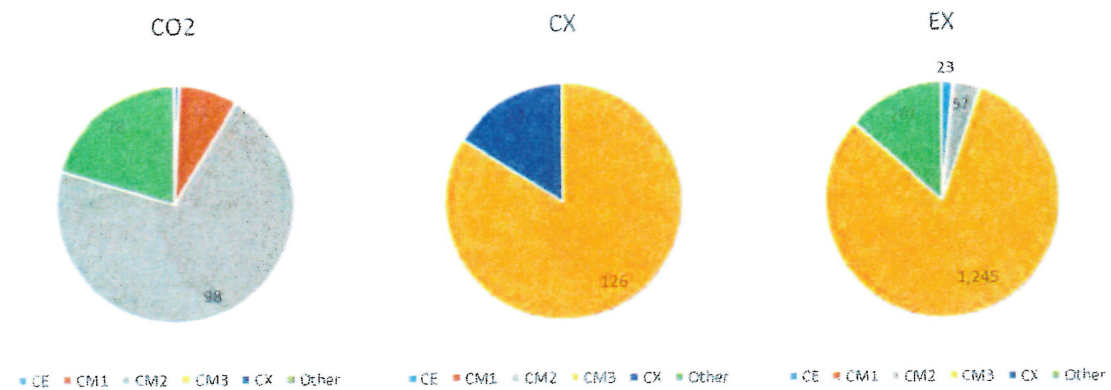
**Small scale commercial zones**



**Medium scale commercial zones**



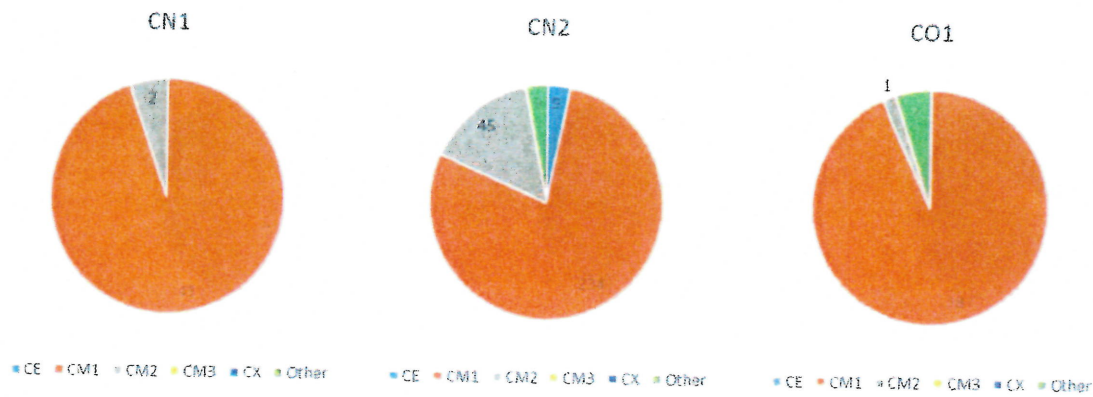
**Medium and large scale commercial zones**



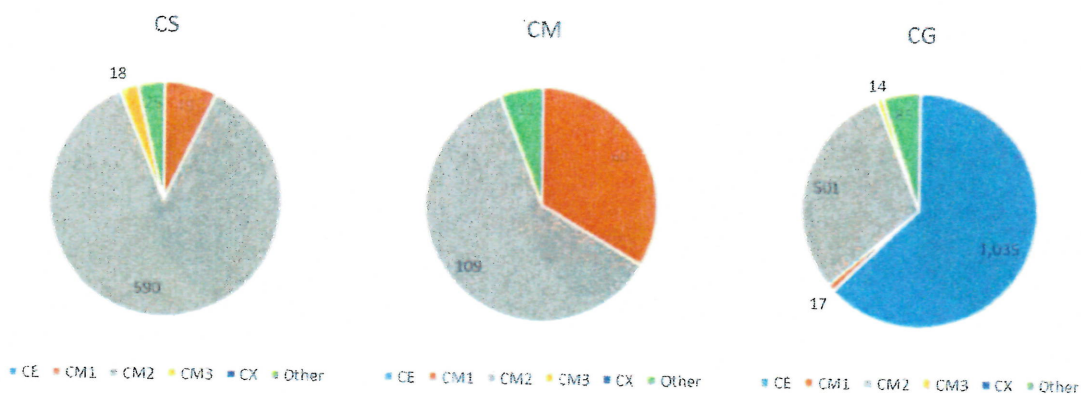
**Figure VII-2: Commercial/Mixed Use Rezoning Summary**

Number of acres assigned to each new zone, by old zones. Other = non Commercial/Mixed Use (EG1, EG2, R1, etc.)

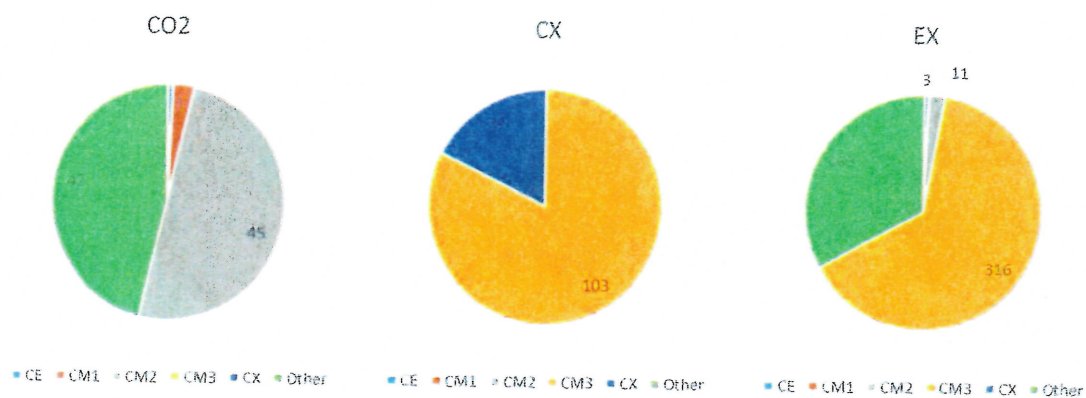
**Small scale commercial zones**



**Medium scale commercial zones**



**Medium and large scale commercial zones**



## Whitlow, Mark (Perkins Coie)

---

**From:** Whitlow, Mark (Perkins Coie)  
**Sent:** Tuesday, March 08, 2016 2:20 PM  
**To:** 'Armstrong, Tom'  
**Cc:** Engstrom, Eric; Kountz, Steve; Manning, Barry; Cunningham, Bill; Buono, Shannon; Dunphy, Jamie; Grumm, Matt; Eric Hovee (eric@edhovee.com); Suzannah Stanley (SStanley@mcknze.com); 'Gary Oxley'; 'Bob LeFeber'; 'Joseph Angel'; Vogel, Stephanie (Perkins Coie)  
**Subject:** RE: Retail policies in Comp Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Tom,

We wish to thank you and your BPS colleagues for being generous with your time to work with us since late last year. BPS has made some helpful changes based on our comments, for which we also thank you.

Our goal is to reestablish the commercial zoning and commercial development standards needed for the continued viability of the automobile mode of Portland's multimodal system, consistent with the Portland Zoning Code's definition of "auto-accommodating":

*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.*

We look forward to the next draft, and we will take you up on the offer to work with BPS in the following months to seek an accord wherever possible.

Mapping is as important to us as the text, so we will urge owners of commercial land to make their mapping requests to the PSC in May. We do believe that the CE zone should be made more auto-accommodating along Major City Traffic Streets and District Collectors and that more land should be zoned CE, especially land heavily populated with existing drive-through developments.

Regarding our EOA concerns, the state's administrative rule to Goal 9 includes "the full spectrum of retail" as "other employment". We think that the term "full spectrum" has meaning and creates an obligation to conduct a layered analysis of at least the different basic types of land inventories needed for auto-accommodating versus transit & pedestrian-oriented retail development opportunities. Providing an adequate inventory of buildable commercial land zoned for "retail" does not satisfy the Goal 9 requirement to provide an adequate inventory of land zoned for the "full spectrum of retail". We look forward to your response on this issue.

Thank you, again, for your time and constructive comments.

Best, Mark

Mark Whitlow | Perkins Coie LLP  
PARTNER  
1120 N.W. Couch Street Tenth Floor  
Portland, OR 97209-4128  
D. +1.503.727.2073  
F. +1.503.346.2073  
E. MWhitlow@perkinscoie.com

COMMERCIAL  
REALTY  
ADVISORS

NORTHWEST, LLC



Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

January 4, 2016

VIA EMAIL

**Re: 2035 Comprehensive Plan Testimony**

Dear Mayor Hales and Council Members:

I have been a retail broker active in the Portland region for almost 20 years. I have been fortunate to represent some great retailers over these years, including large-format operators selling affordable groceries. These grocery operators need properly zoned commercial sites with access in the close-in urban area to allow their loyal customers to shop local and not have to drive out to their stores in the suburbs to save on their shopping. Appropriate zoning for these grocery operators would allow traditional horizontal development with ample off-street parking and convenient access. There are few, if any, sites in Portland that are large enough with appropriate zoning to accommodate traditional grocery stores.

It would be great if in this round of amendments to the Comprehensive Plan a concise retail policy could also be adopted to provide better direction in the zoning code implementation, especially now that the Zoning Code is also being amended without that needed guidance. With appropriate retail zones that allow market-based development, land within existing centers and commercial strips might be assembled into sites large enough to accommodate grocers providing affordable food to customers using all modes of transportation, including the auto. The City needs to create some retail zones with safe harbors for auto-oriented grocery store and related pad development in the city's commercial zoning regulations that make development or redevelopment within those zones affordable for these grocery operators.

For the above reasons, I urge you to adopt the retail policy proposed by the RTF and ICSC into the City's Comprehensive Plan to give better guidance to the City in adopting new amendments to the city's Zoning Code. Thank you for the opportunity to comment.

Sincerely,

Robert L. LeFeber  
Principal Broker

cc: Tom Anderson, Eric Engstrom, and Susan Anderson. BPS  
RTF/ICSC GR Committee





Mayor Charles Hales  
Portland City Council  
c/o Council Clerk  
1221 SW 4th Avenue, Room 130  
Portland, OR 972014

April 22, 2016

VIA EMAIL

**Re: 2035 Comprehensive Plan Testimony**

Dear Mayor Hales and Council Members:

This letter supplements my January 4<sup>th</sup> letter and verbal testimony on April 14<sup>th</sup>. As stated at the hearing, I urge you to: oppose P32 the proposed policy on drive-thrus; support P44 on grocery stores; support P51 the proposed policy to consider the market when proposing new development regulations; and support P60 the proposed policy to provide an adequate supply of land for all types of retail.

CRA represents great retailers including higher end grocers and larger format grocers selling more affordable goods. Grocery operators need auto-accommodating commercial sites of sufficient size in convenient locations with good auto and transit access to satisfy "the widest range of retail" from upper end to value-based grocery. People need a wide range of goods to truly make Portland a complete community. If they can not get what they want in Portland evidence shows they will travel to the suburbs or outer regions of Portland to get what they need. This adds unnecessary trips and disadvantages those without cars or direct transit access who then resort to unhealthy food choices.

Appropriate zoning for grocery stores would allow traditional horizontal development, drive-thrus, ample off-street parking and convenient access. There are few, if any, undeveloped sites in Portland that are large enough with appropriate zoning to accommodate traditional grocery stores. The problem is particularly acute with larger format affordable grocers. Larger format discount grocery customers typically travel from a greater distance and stay longer thus requiring more parking. Preferred parking ratios are at least 4 spaces per 1,000 sf of building and preferable 5 spaces per 1,000 sf. They have lower profit margins in order to offer lower prices. They can not afford higher land values, expensive design requirements and especially structured parking. A 50,000 sf store needs around 5 acres for parking, circulation, pedestrian connections and landscaping. Hopefully these new comprehensive plan policies will lead to more appropriate sites. Thank you again for the opportunity to comment.

Sincerely,

Robert L. LeFeber, Principal Broker

cc: Tom Anderson, Eric Engstrom, and Susan Anderson. BPS  
RTF/ICSC GR Committee

**C. Maximum building setbacks.** Except as stated in Subsection E., the maximum building setback standards are stated below.

1. Maximum setback standards. Unless otherwise specified, the maximum a building can be set back from a street lot line is 10 feet, except on Civic Corridors shown on Map 130-1, where the maximum set back is 20 feet, and street frontages in a CE zone abutting Major City Traffic or District Collector streets, where there is no maximum setback. At least 50 percent of the length of the ground level street-facing facade of the building must meet the maximum setback standard.
2. Applying the standard.
  - a. Where an existing building is being altered, the standards apply to the ground level, street-facing facade of the entire building. See Figures 130-4 and 130-5.
  - b. Where there is more than one building on the site, the standards of this paragraph apply to the combined ground level, street-facing facades of all of the buildings. See Figures 130-6 and 130-7.
  - c. In the CM1, CM2, CM3, and CX zones, and in the CE zone within a Pedestrian District, if the site has street lot lines on three or more streets, the maximum setback standard only applies to two of the streets. When this occurs, the standard must be applied to the streets with the highest transit street classifications. If the site is a through lot, the maximum setback standard only applies to the street with the highest transit street classification. If multiple streets have the same highest transit street classification, the applicant may choose which street or streets to apply the standard.
  - d. In the CE zone outside of pedestrian districts, the maximum setback standard only applies to transit streets unless the site does not have a street lot line on a transit street. If the site does not have a street lot line on a transit street, then the maximum setback standard applies to one street, and if there is more than one street, the applicant may choose which street to apply the standard. If the site has street lot lines on three or more transit streets, the maximum setback standard applies only to two of the streets. When this occurs, the standard must be applied to the streets with the highest transit classification. If multiple transit streets have the same highest street classification, the applicant may choose which streets to apply the standard.
  - e. For buildings where all of the floor area is in residential use, the street-facing facade of an open porch that meets the following standards is included as part of the ground level, street-facing facade of the building:
    - (1) For houses, attached houses, manufactured homes and duplexes, the porch must be at least 25 square feet in area. For multi-dwelling structures, the porch must be at least 9 feet wide and 7 feet deep;
    - (2) The porch must have at least one entrance facing the street; and

**Table 130-2**  
**Summary of Development Standards in Commercial/Mixed Use Zones**

<b>Standards</b>	<b>CM1</b>	<b>CM2</b>	<b>CM3</b>	<b>Cx</b>	<b>CE</b>
Maximum FAR (see 33.130.205, and 33.130.212 [bonus FAR])	1.5 to 1	2.5 to 1	3 to 1	4 to 1	2.5 to 1
Base Height (see 33.130.210.B.1)	35 ft.	45 ft.	65 ft.	75 ft.	45 ft.
Step-down Height (see 33.130.210.B.2)					
- Within 10 ft. of street lot line adjacent to street < 70 ft. wide	NA	NA	55 ft.	NA	NA
- Within 25 ft. of lot line abutting RF - R2.5 Zones	35 ft.	35 ft.	35 ft.	35 ft.	35 ft.
- Within 25 ft. of lot line abutting R3, R2, R1 Zones	NA	45 ft.	45 ft.	45 ft.	45 ft.
- Within 15 ft. of lot line across a local service street from RF - R2.5 Zones	35 ft.	35 ft.	35 ft.	35 ft.	35 ft.
- Within 15 ft. of lot line across a local service street from R3, R2, R1 Zones	NA	45 ft.	45 ft.	45 ft.	45 ft.
Bonus Height (see 33.130.212)	See Table 130-3	See Table 130-3	See Table 130-3	See Table 130-3	See Table 130-3
Min. Building Setbacks					
- Street Lot Line	none	none	none	none	none
- Street Lot Line abutting selected Civic Corridors	10 ft.	10 ft.	10 ft.	10 ft.	10 ft.
- Street Lot Line across a local street from an RF - R1 Zone	none	5 or 15 ft.	5 or 15 ft.	5 or 15 ft.	5 or 15 ft.
- (see 33.130.215.B)					
Min. Building Setbacks					
- Lot Line Abutting OS, RX, C, E, or I Zoned Lot	none	none	none	none	none
- Lot Line Abutting RF - RH Zoned Lot (see 33.130.215.B)	10 ft.	10 ft.	10 ft.	10 ft.	10 ft.
Max. Building Setbacks					
- Street Lot Line	10 ft.	10 ft.	10 ft.	10 ft.	10 ft.
- Street Lot Line Abutting Selected Civic Corridors	20 ft.	20 ft.	20 ft.	20 ft.	20 ft.
- <u>Lots Abutting Major City Traffic or District Collector Streets</u> (see 33.130.215.C)	NA	NA	NA	NA	none
Max. Building Coverage (% of site area)					
- Inner Pattern Area	85%	100%	100%	100%	85%
- Eastern, Western, and River Pattern Areas (see 33.130.220)	75%	85%	85%	100%	75%
Min. Landscaped Area (% of site area) (see 33.130.225)	15%	15%	15%	none	15%
Landscape Buffer Abutting an RF - RH Zoned Lot (see 33.130.215.B)	10 ft. @ L3	10 ft. @ L3	10 ft. @ L3	10 ft. @ L3	10 ft. @ L3
Required Residential Outdoor Area (see 33.130.228)	Yes	Yes	Yes	No	Yes
Ground Floor Window Standards (see 33.130.230)	Yes	Yes	Yes	Yes	Yes

**C. On-site locations of vehicle areas.**

1. Location of vehicle areas. The allowed on-site location of all vehicle areas is stated in Table 266-3.
2. Building setbacks for structures that contain vehicle areas.
  - a. Structures that contain vehicle areas are subject to the building setbacks of the base zone, where exiting in a forward motion is provided.
  - b. Structured parking that does not allow exiting in a forward motion in R Zones is subject to the garage entrance setback standard of the base zone.
  - c. Structured parking that does not allow exiting in a forward motion in C, E, or I Zones must be set back 18 feet from the street lot line.
3. Frontage limitation.
  - a. The standard of this subparagraph applies outside the Central City plan district in the R3, R2 and R1 zones. No more than 50 percent of the frontage on a street may be used for vehicle areas. On sites with more than one street frontage, this standard applies to the street with the highest transit designation. If two streets have the same highest transit classification, the applicant may choose on which street to meet the standard. Sites where there is less than 100 square feet of net building area are exempt from this standard.
  - b. The standard of this paragraph applies outside the Central City plan district in the RH, RX, IR, CM1, CM2, CM3, CE, CN, CO, CG, CX, EG1, and EX zones. Where vehicle areas are adjacent to a transit street or a street in a Pedestrian District, no more than 50 percent of the frontage on the transit street or street in a Pedestrian District may be used for vehicle areas. Sites where there is less than 100 square feet of net building area and street frontages in a CE zone abutting Major City Traffic or District Collector streets are exempt from this standard.



**33.130.242 Transit Street Main Entrance**

- A. Purpose.** Locating the main entrance to a use on a transit street provides convenient pedestrian access between the use and public sidewalks and transit facilities, and so promotes walking and the use of transit.
- B. Applicability.**
1. Generally. All sites with at least one frontage on a transit street, and where any of the floor area on the site is in nonresidential uses, or residential use in a multi-dwelling structure, must meet the following standards. If the site has frontage on more than one transit street, the standards of Subsection C, below, must be met on at least one of the transit streets;
  2. Houses, attached houses, manufactured homes, and duplexes. Houses, attached houses, manufactured homes, and duplexes must meet the standards of 33.130.250.C, Residential Main Entrance, instead of the requirements of this section.
  3. This section does not apply to street frontages in a CE zone abutting Major City Traffic or District Collector streets.
- C. Location.** For portions of a building within the maximum building setback, at least one main entrance for each nonresidential tenant space on the ground floor, and one main entrance to a multi-dwelling structure must meet the standards of this section. The ground floor is the lowest floor of the building that is within four feet of the adjacent transit street grade. The main entrance must:
1. Be within 25 feet of the transit street;
  2. Allow pedestrians to both enter and exit the building; and
  3. Meet one of the following:
    - a. Face the transit street;
    - b. Be at an angle of up to 45 degrees from the transit street, measured from the street property line, as shown in Figure 130-13; or
    - c. If it is an entrance to a multi-dwelling structure:
      - (1) Face a courtyard that is adjacent to the transit street and that is landscaped to at least the L1 level, or hard-surfaced for use by pedestrians; and
      - (2) Be within 50 feet of the transit street.
- D. Distance between entrances.** For portions of a building with any nonresidential uses within the maximum building setback, a minimum of one entrance is required for every 200 feet of building length.

**33.130.230 Ground Floor Windows**

**A. Purpose.** In the commercial/mixed use zones, blank walls on the ground level of buildings are limited in order to:

- Provide a pleasant, rich, and diverse pedestrian experience by connecting activities occurring within a structure to adjacent sidewalk areas, or allowing public art at the ground level;
- Encourage continuity of retail and service uses;
- Encourage surveillance opportunities by restricting fortress-like facades at street level; and
- Avoid a monotonous pedestrian environment.

**B. Ground floor window standard.**

1. General standard.

- a. Windows must cover at least 40 percent of the ground level wall area of street-facing facades that are 20 feet or closer to a street lot line or a publicly-accessible plaza. For the purposes of this standard, ground level wall areas include all exterior wall areas from 2 feet to 10 feet above the finished grade. See Figure 130-11.
- b. If the lot has more than one street frontage, then the ground floor window standard in Subparagraph B.1.a. applies to the facade that faces the highest transit street classification. All other ground level street-facing facades that are 20 feet or closer to the street lot line must have windows that cover 25 percent of the ground level wall area. If two or more streets have the same highest transit street classification, then the applicant may choose on which of those street to meet the higher standard. Transit street classifications are identified in the Transportation Element of the Comprehensive Plan.

2. Exemptions:

- a. Houses, attached houses, manufactured homes, and duplexes are exempt from this Section;
- b. Ground floor street-facing walls of dwelling units are exempt from Paragraph B.1., but the walls must meet one of the standards in Subsection D.; and
- c. The walls of structured parking that face a secondary street frontage are exempt from the 25 percent standard in Subparagraph B.1.b. if the facade is set back at least 5 feet and landscaped to the L2 standard.
- d. Retail store walls devoted to truck loading or external to interior areas used for storage, refrigeration or mechanical equipment, are exempt from this Section.

**33.258.075 Determination of Legal Nonconforming Status Review**

- A. Purpose.** This review will determine if a use or site has legal nonconforming situation rights. In addition, it will determine what the current legal use is, based on the use categories in Chapter 33.920.
- B. When this review is required.** Determination of Legal Nonconforming Status Review is required where a land use review or building permit is requested, and the applicant does not provide standard evidence or the Director of BDS does not find the evidence to be satisfactory. (See 33.258.038). This review also may be requested by an applicant when it is not required.
- C. Procedure.** Determination of Legal Nonconforming Status Reviews are processed through a Type II procedure.
- D. Approval criteria.**
  - 1. The legal status of the nonconforming situation will be certified if the review body finds that:
    - a. The nonconforming situation would have been allowed when established; and
    - b. The nonconforming situation has been maintained over time.
  - 2. The review body will determine, based on the evidence, what the current legal use is, using the definitions in Chapter 33.910 and the use categories in Chapter 33.920.

**33.258.080 Nonconforming Situation Review**

- A. Procedure.** A nonconforming situation review is processed through a Type II procedure.
- B. Approval criteria.** The request will be approved if the review body finds that the applicant has shown that all of the following approval criteria are met:
  - 1. With mitigation measures, there will be no net increase in overall detrimental impacts (over the impacts of the last legal use or development) on the surrounding area taking into account factors such as:
    - a. The hours of operation;
    - b. Vehicle trips to the site and impact on surrounding on-street parking;
    - c. Noise, vibration, dust, odor, fumes, glare, and smoke;
    - d. Potential for increased litter; and
    - e. The amount, location, and nature of any outside displays, storage, or activities; and
  - 2. If the nonconforming use is in an OS or R zone, and if any changes are proposed to the site, the appearance of the new use or development will not lessen the residential character of the OS or R zoned area. This is based on taking into account factors such as:

- a. Building scale, placement, and facade;
  - b. Parking area placement;
  - c. Buffering and the potential loss of privacy to abutting residential uses;  
and
  - d. Lighting and signs; and
3. If the nonconforming use is in a C, E, or I zone, and if any changes are proposed to the site, the appearance of the new use or development will not detract from the desired function and character of the zone.



**From:** Betsy [mailto:betsy.w.reese@gmail.com]  
**Sent:** Tuesday, May 17, 2016 10:38 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

To Planning and Sustainability Chair, Katherine Schultz:

I oppose the downzoning from CM-2 to CM-1 proposed in the so-called Low-Rise Commercial Storefront areas of 35th to 37th on Division, and 35th to 38th on Hawthorne.

We need greater urban density in order to provide more affordable housing close to transit and within walking or bicycling distance of jobs, schools, and amenities.

Thank you for considering my testimony.

Betsy Reese  
3221 SE Brooklyn St.  
Portland, OR 97202

TO: Katherine Schultz  
Planning and Sustainability Chair

FROM: Linda and Tom Ralley  
2615 SE 31<sup>st</sup> Avenue  
Portland, OR 97202  
Richmond Neighborhood  
503-481-6431

SUBJ: PSC Mixed Use Zones Testimony

DATE: May 17, 2016

Dear Ms Schultz:

This will be very short. We oppose the downsizing from CM-2 to CM-1 proposed in the "Low Rise Commercial Storefront Areas" in the blocks SE 33<sup>rd</sup>-SE 38<sup>th</sup> along SE Division.

We own a home just off Division and have lived here for about 20 years. The changes we have seen along Division in the past few years have been extraordinary, needed, and wonderful. The area is beginning to be the vibrant, pedestrian-friendly, easy to access community we want to live in. There needs to be an increase in density and this area along Division is the ideal location.

We are not a "streetcar suburb." We are in the heart of Portland where people want to live with access to all kinds of transportation. The area, the street needs the ability to build high for the benefit of the community, the future people who will come here and for the city of Portland.

Thank you.

May 17, 2016

Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

**Re: Powell-Glisan Associates' Request for CE Zoning at Glisan Street Station**

Dear Chair Schultz and Members of the Commission:

This office represents Powell-Glisan Associates ("Powell"), owner of several properties located within Glisan Street Station at the southwest corner of NE 122nd Ave. and NE Glisan Street. These are specifically identified as tax lots 101, 102, 105, and 106 of Multnomah County Assessor's Map 1N2E34DA. **Exhibit 1.** This letter is submitted to respectfully request that these individual properties, as well as the other lots within Glisan Street Station, be zoned Commercial Employment (CE) and without the Centers Main Street Overlay Zone (CMSO) as part of the City's Mixed-Use Zoning project.

These properties include commercial spaces abutting the existing Safeway store, two existing out-parcel commercial buildings with various tenants, and a KFC restaurant. These are zoned CX and CS. **Exhibit 2.** These businesses depend on convenient auto access to operate and in the case of the KFC restaurant, an operational drive-through window.

The proposed Commercial-Mixed Use 2 and 3 (CM2 and CM3) zoning of these properties, as well as application of the CMSO, will substantially reduce Powell's tenants' ability to operate their businesses and will reduce the future development potential of Powell's properties by reducing the amount of available floor area ratio ("FAR"). In particular, this new zoning will have the following substantial adverse effects on Powell's properties:

- The maximum FAR of CS-zoned property will be reduced from 3:1 to 2.5:1 when it is rezoned CM2. PCC 33.130, Table 130-2.
- The maximum FAR of CX-zoned property will be reduced from 4:1 to 3:1 when it is rezoned CM3. PCC 33.130, Table 130-2.
- Drive-through uses will be prohibited. PCC 33.130.260.
- The CMSO would require the following additional development restrictions:
  - A minimum .25:1 FAR is required.

- No more than 50% of a transit street frontage (including both Glisan and NE 122nd) may consist of vehicle areas.
- A minimum 60% of a first-floor façade must be windows. PCC 33.415.340.
- At least one transit street entrance is required per 100 feet of building wall. PCC 33.415.350.


These properties do not meet many of the proposed regulations; therefore, application of the CM2 and CM3 zones and CMSO will cause significant nonconformity. A zoning analysis that identifies areas of potential nonconformity is attached as **Exhibit 3**. Nonconforming status lowers market value, makes it more difficult to obtain financing and sell, and makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE, with no CMSO overlay, will be necessary to avoid excessive nonconformity. Also, market value of these properties will be further reduced by City's down-zoning through reduced FAR limits.

Glisan Street Station is "auto-accommodating" as defined in the Portland Zoning Code. None of the proposed mixed-use zones provide development standards which are as auto-accommodating as the development standards contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities.

Powell needs auto-accommodating development standards to allow its tenants to operate and grow their businesses in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around Glisan Street Station are slow to redevelop and we do not anticipate it doing so in the foreseeable future.

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

Very truly yours,



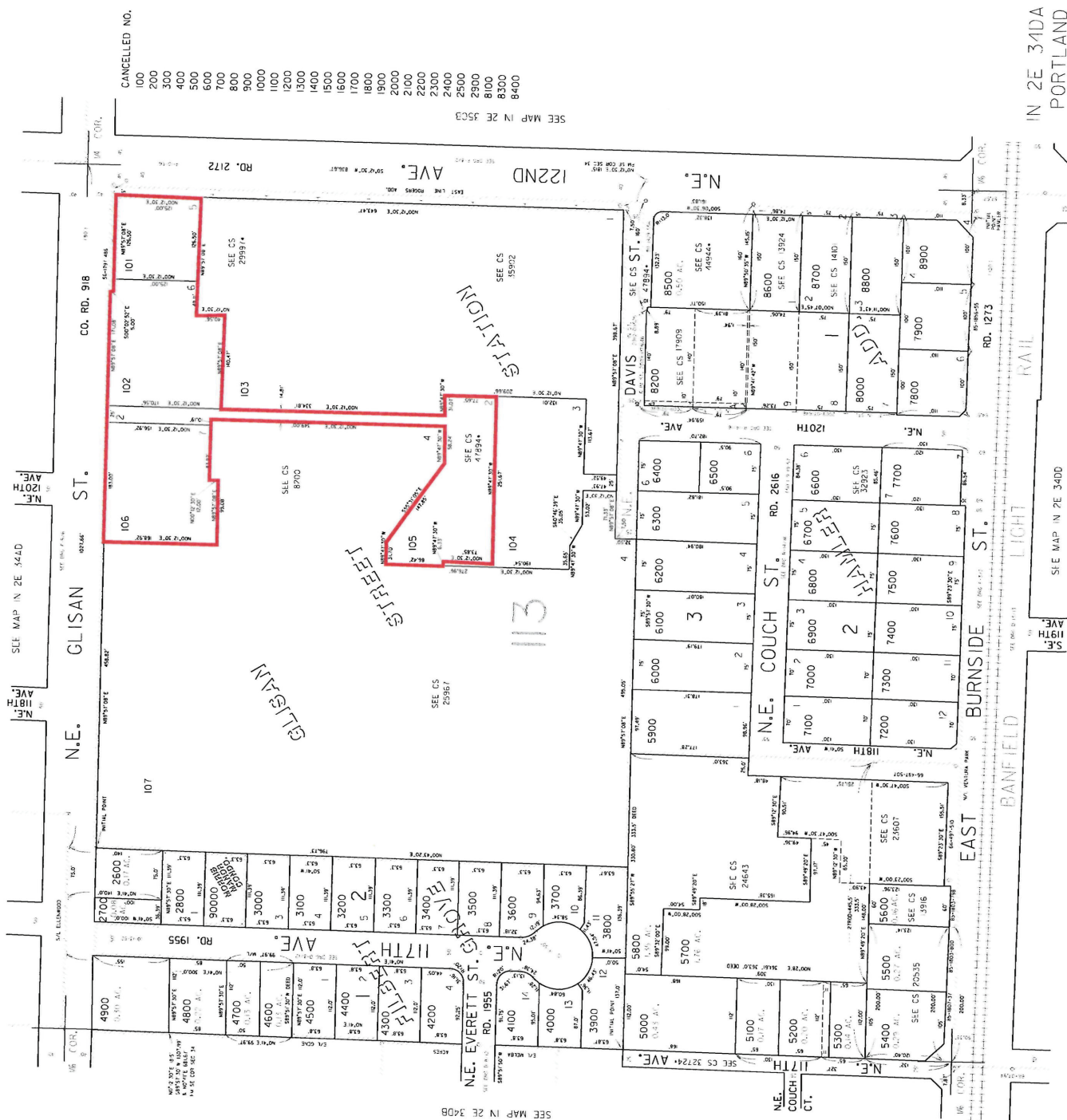
Mark D. Whitlow

Cc: Mr. Peter Powell (via email) (w/encl.)

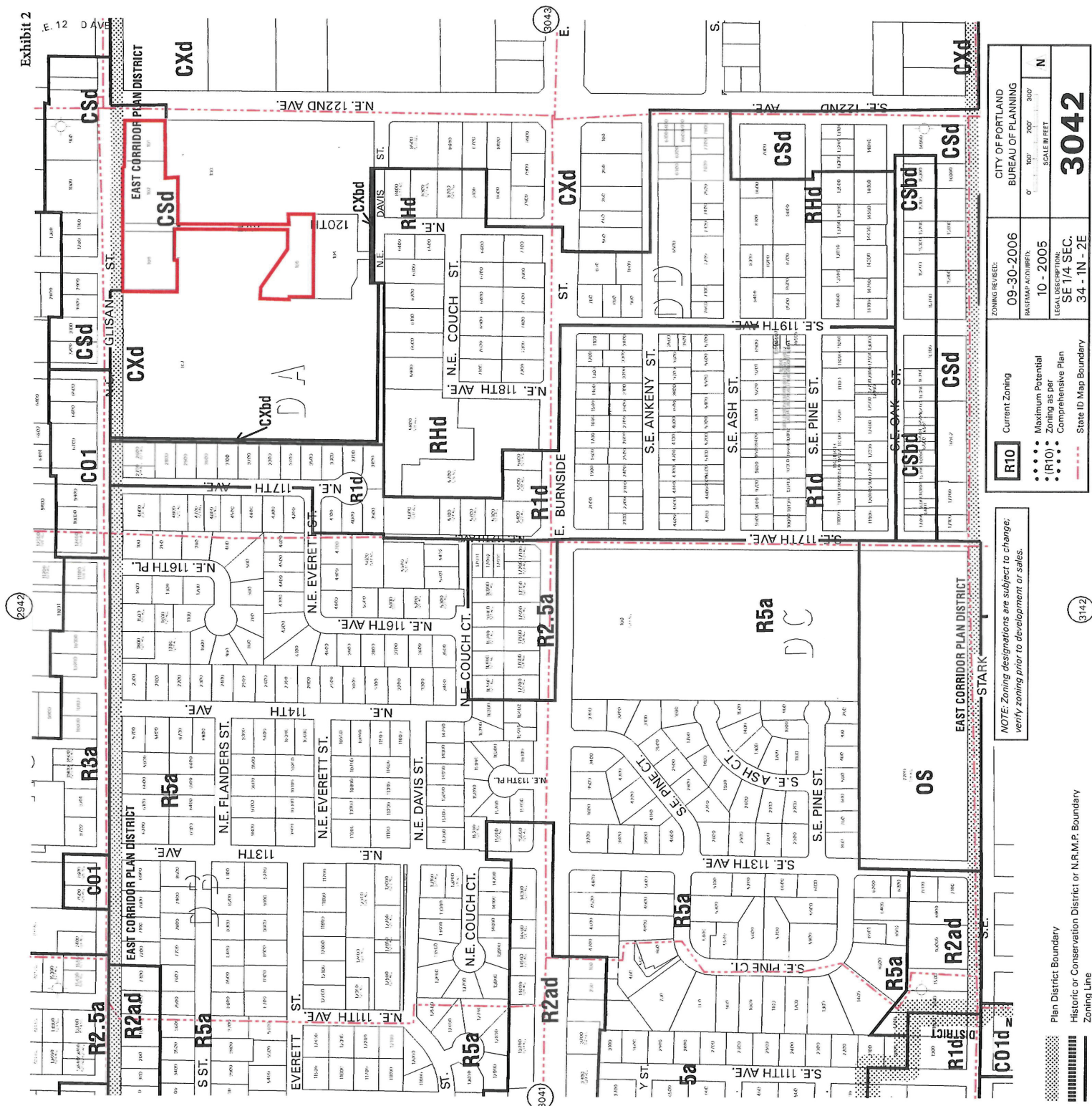


NE1/4 SE1/4 SEC.34 T.1N. R.2E. W.M.  
MULTNOMAH COUNTY

THIS MAP WAS PREPARED FOR  
ASSESSMENT PURPOSE ONLY



N 2E 34DA  
PORTLAND



## Exhibit 3

# MIXED USE ZONES PROJECT CASE STUDIES



February 16, 2016

Mark Whitlow, Perkins Coie  
Eric Hovee, E.D. Hovee  
Suzannah Stanley, Mackenzie





## Introduction

### FOUR CASE STUDIES

The following document presents four existing or recently permitted retail sites providing affordable and/or value-based grocery in northeast and southeast Portland. The sites were analyzed for their compliance with the proposed zoning language of the Mixed Use Zones project.

Applicable code sections with changes proposed are addressed. Code sections with which each site would not comply as built or recently permitted are shown in red.



2625 Northrup Way  
Bellevue, WA 98004  
p-425.828.4444  
WWW.POWELLDEV.COM



# POWELL DEVELOPMENT





## 1: Safeway: 221 NE 122nd (Glisan Street Station)

*Existing retail development*

**Current Zone:** CX (Central Commercial)

**Proposed Zone:** CM3m (Commercial Mixed Use – 3), Centers Main Street Overlay zone (CMSO)

**Site Area:** 768,629 SF (seven tax lots in development)

**Building Area:** 330,949 SF (all buildings)

### SUMMARY

The existing development does not meet several of the proposed standards for the new base zone or CMSO. From the proposed base zone standards, maximum setbacks of 20' are allowed and setbacks must be improved for pedestrian use. Additionally, transit street main entrances are required for all buildings, at no more than 200' apart (none are currently provided). To meet CMSO standards, development at this site would have to have 70% of building facades to be within 20' of streets, with no more than 40% of the site's frontages for vehicle areas. At least 60% of facades must be windows. Additionally, a minimum FAR of 0.5 is required (currently there is 0.43 across the buildings and lots).

Also per the CMSO, vehicle access would be prohibited from transit streets (both 122nd and Glisan), meaning the site would be required to be accessed from NE Davis St, an approximately 30'-45' wide local street south of the Safeway building which currently only provides access to the private parking for the apartment development on the site.

### ANALYSIS

#### Proposed base zone CM3:

- 33.130.205 Maximum FAR changing from 4:1 to 3:1 or 5:1 with bonuses
- 33.130.210 Maximum height decreasing from 75' to 65' before bonuses
- 33.130.215.C. Maximum Building Setbacks: 10' for zone but 20' for both 122nd and Glisan ("Civic Corridors" per Map 130-1). At least 50% of street-facing facades at ground level must meet max setback. (These must be met on two out of the three streets the site fronts—122nd and Glisan, since they are the highest classifications.) Existing buildings are within 20' of both streets at some locations, but less than 50% of all street-facing facades are within 20' (particularly western large building).
- 33.130.215.C. At least 50% of complying maximum setback areas must be improved for pedestrian use. Existing site does not meet this. Small plaza area at northeast corner of Safeway building on 122nd, two walkways to buildings on Glisan. New buildings would be required to be closer to frontages and setbacks improved for pedestrians.
- 33.130.222.B. Maximum building length: 110' per building (multiple buildings within 20' of street must be at least 20' apart when on same site). Existing Safeway building within 10' of 122nd is approx. 194' (not met). Street-facing facade on Glisan is approximately 374' long and set back approximately 428'. Smaller buildings at northeast corner are approximately 82' and 98' long within maximum setback.
- 33.130.222.C. Facade articulation: Applies to buildings 45'+ high—at least 25% of each facade within 20' of street must be divided into facade planes that are off-set by at least 2'. (Assumed does not apply to subject site building, likely less than 45' high.).
- 33.130.230.B. Ground floor window standard: 40% of street-facing facade within 20' of street must be windows (2'-10' above-grade area). (Formerly this was 25% of the area between 2'-9' above grade.) Less than 40% of 122nd facade or Glisan-facing facade of large building contain windows.
- 33.130.242.C. Transit Street Main Entrance location—no changes to commercial building standards. No main entrances provided on either transit street frontage, for any buildings (including smaller buildings on Glisan).
- 33.130.242.D. Transit Street Main Entrance distance between entrances—one entrance required for every 200' of building length within the maximum setback. Existing buildings do not meet setback or transit street main entrance locations, so cannot meet this standard.
- 33.130.260 Drive-Through Facilities: Prohibited in CM1, CM2, and CM3 zones. There is an A&W/KFC on corner of 122nd and Glisan.

#### Proposed Centers Main Street Overlay:

- 33.415.100 Quick-vehicle servicing (fuel stations) would be prohibited. (Note: these are currently permitted by way of a specific exception in the existing East Corridor Plan District).
- 33.415.200 Active ground floor uses are required within 100' of a transit street (Glisan and 122nd) and must consist of 50% of the ground floor area. Met with retail uses.
- 33.415.300 Drive-through windows are prohibited. There is an A&W/KFC on corner of 122nd and Glisan.
- 33.415.310 A minimum FAR of 0.51 is required for all new development. (Existing: 0.43)
- 33.415.320 Maximum Building Setbacks: At least 70% of street-facing facade at ground level must meet max setback of the base zone. (On two out of the three streets the site fronts—122nd and Glisan, since they are the highest classifications.) Neither this nor the base zone standard of 50% is met.
- 33.415.330.B. Frontage limitation: No more than 40% of frontage of transit street can be used for vehicle areas or exterior display. Subject site has approx. 857' of drive or parking area on approx. 1,719' of frontage (50%). Not met.
- 33.415.330.C. Access to "on-site parking" or "vehicle areas" prohibited on 122nd and Glisan, which are transit streets. The site currently takes access from those two streets and Davis (to the apartments only).
- 33.415.340 Ground Floor Windows: On transit streets, 60% of street-facing facade must be windows. Less than 60% of 122nd facade or Glisan-facing facade of large building contain windows.
- 33.415.350.B. Transit street entrance frequency: 1 entrance per 100' of building length. No existing buildings have transit street entrances.

33.130.260 would allow drive-through facilities to be rebuilt if demolished under the following circumstances:

- The new drive-through must be part of a development with an FAR of at least 1:1.
- Only one drive-through would be permitted.
- The replacement drive-through must be built on the same lot.
- A replacement drive through is not permissible if the original has been disused for 2 years or more.



# STIVEN

planning and development services, llc.

May 17, 2016

Chair Katherine Schultz & Members of the Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, OR 97201

Dear Chair Shultz and Members of the Commission,

I am writing on behalf of Richard Piacentini and am submitting this written testimony regarding the Proposed 2035 Zoning Map designations. Richard Piacentini is owner of Belmar Properties, and manages properties controlled by members of the John Piacentini family, including those in the following ownerships:

- Rosehill Investment, LLC
- John B. Piacentini Trust
- Louise Piacentini
- J&F Investments, LTD

Collectively, the companies and individuals own thirty (30) properties impacted by the Proposed 2035 Comprehensive Plan and the implementing zoning. Although two properties are vacant, the majority of the sites are occupied by small, retail businesses and they fall into all four of the Proposed Mixed Use Zones.

Belmar Properties supports the proposed zoning on most of the sites. This letter addresses the zoning of nine (9)) properties that we believe should be zoned differently than what has been proposed at this time. Those properties can be grouped together in one of four groups as follows:

- Properties proposed for Commercial Mixed Use 2 (CM2) but we believe should be zoned Commercial Employment (CE);
- Properties proposed for Commercial Mixed Use 1 (CM1) but we believe should be zoned CE;
- Properties zoned CM1 but we believe should be zoned CM2; and,
- Property zoned CM2 that we believe should be zone Commercial Mixed Use 3 (CM3).

Table 1 provides the details of the first four properties which include those that are proposed for CM 2 zoning that we believe should be zoned CE. All four properties are currently developed as single story retail sites and are located in Portland's outlying areas (three are east of I-205 and one is in the Linnton community). The CE zones while allowing all of the uses allowed in the CM2 zone allow a few additional auto oriented uses such as vehicle servicing, self service storage and limited warehousing. In addition the CE zone allows drive through windows such as those provided at banks, pharmacies and food establishments. By allowing the CE zoning, the

Table One  
Proposed CM2 /Requested CE Zoning Designations

Map #	Street Address	Cross Street	Proposed Comp Plan	Existing Zoning	Proposed Zoning	Overlay	Requested Zoning
1194	12217 SE Foster Road	SE 122 <sup>nd</sup>	MU- Civic Corridor	CG	CM2	None	CE
1007	4504 SE 122 <sup>nd</sup> Ave	SE Holgate	MU – Civic Corridor	CS	CM2	None	CE
44	11150 SE Division	SE 112 <sup>th</sup>	MU-Civic Corridor	CN2/R2	CM2	(a)	CE
1179	11030 NW St Helens Rd		MU- Neighborhood	CG	CM2		CE

sites will remain viable development sites until the more dense mixed use development is in demand.

#### 12217 SE Foster Road (Map Change 1194)

Specifically, the site at SE 122<sup>nd</sup> and SE Foster Road is appropriate for the CE zoning. The site is located on the northeast corner of the intersection of SE 122<sup>nd</sup> and SE Foster Road and is occupied by a Plaid Pantry shop. A service station is located on the northwest corner of the intersection. The three other corners of the intersection have been proposed for CE zoning. The CE zoning is surrounded by proposed CM2 zoning on three sides SE 122<sup>nd</sup> Avenue includes four drive lanes with a center turn lane. SE Foster Road is four lanes with a center median until it narrows to 2 lanes east of the subject property. There is no discernible difference between the properties northwest, southwest or southeast of the intersection and the subject property located at the northeast corner. The entire corner is appropriate for CE zoning and development. The request for CE zoning at the northeast corner of the intersection can be accommodated by moving the line between the CE and the CM2 further east. There would be no further impact on the nearby residential development as the CM2 zoning would still be present between the proposed CE zoning at the corner and the residential developments to the north and east. Therefore, there seems to be no reason that the subject corner was deemed appropriate for CM2 zoning and not the CE zoning on the other corners. Belmar Properties requests that the CE zoning be placed on this property.

#### 4504 SE 122<sup>nd</sup> Avenue (Map Change 1007)

This site is located southeast of the intersection of SE 122<sup>nd</sup> and SE Holgate. All of the properties surrounding the intersection are proposed for the CM2 zoning. However properties surrounding other intersections along SE 122<sup>nd</sup> have been designated for the CE zoning, specifically at the intersections of Foster Road and Powell Boulevard. The land use and development pattern appears similar at the 122<sup>nd</sup>/Holgate intersection and could be similarly zoned CE. There is no land zoned for CE development along Holgate between I-205 and Gresham. It is appropriate for intersection of SE Holgate and SE 122<sup>nd</sup> to allow the additional auto-oriented uses allowed in the CE zone.



11132 SE Division (Map Change 1179)

This site is located southwest of the intersection of SE 112 Avenue and SE Division Street. The Division Street corridor between I-205 and just east of SE 112<sup>th</sup> Avenue is zoned for Mixed Use development along its entire length. On the north side of SE Division, the properties between SE 104<sup>th</sup> and SE 112<sup>th</sup> are zoned CE. On the south side of SE Division, the properties are zoned CE from SE 105<sup>th</sup> to one lot east of SE 111<sup>th</sup>. The CE zoning excludes the corner of SE 112<sup>th</sup> and SE Division Street, where it seems most conducive to the auto oriented uses allowed by the CE zoning and not allowed in the CM2 zone. Again, this could be remedied by moving the zoning line between the CE and CM2 zoned properties to the east, without altering the land use pattern or impacting the nearby residential properties.

11080 NW St Helens Road (Map Change 44)

This site is located between Highway 30 and railroad tracks that run parallel to the highway and is occupied by a Plaid Pantry shop. The land to the west of Highway 30 has been proposed for CE zoning and the property to the east has been proposed as CM2 zoning. It is unlikely that this area will support redevelopment or the increased densities allowed in either the CM2 or CE zones. Therefore, in order to allow flexibility in future land uses until redevelopment is likely to occur the CE zoning is appropriate for either the east or west sides of Highway 30. For this reason, Belmar Properties is requesting the CE zoning on this property.

10350 SE Holgate (Map Change 1006)

16152 NE Sandy (Map Change 990)

Two properties are proposed for rezoning to CM1 but Belmar Properties believes that the CE zoning is more appropriate. Both sites are developed as the Plaid Pantry Convenience markets. The underlying Comprehensive Plan Designation is Mixed Use- Dispersed and as such, there are only two zones that can be implemented---CE or CM1. Both of these sites are located east of I-205 and are less likely to redevelop in the near future and would benefit from the allowance of auto oriented uses, such as drive through pharmacies, coffee shops or bank windows. For this reason, Belmar Properties requests that the CE zoning is implemented at these two locations.

Table Two  
Proposed CM1 /Requested CE Zoning Designations

Map #	Street Address	Cross Street	Proposed Comp Plan	Existing Zoning	Proposed Zoning	Overlay	Requested Zoning
1006	10350 SE Holgate	SE 103rd	MU- Dispersed	CS	CM1	None	CE
990	16152 NE Sandy	NE 161 <sup>st</sup>	MU- Dispersed	CN2	CM1	(h) (x)	CE

1206 SE Belmont (Map Change 1168)

The third category of property includes only one site---1206 SE Belmont, southeast of the intersection of SE Belmont and 12<sup>th</sup> Avenue. Twelfth Avenue is the eastern boundary of the Central City. As shown in Table Three, Belmar Properties requests that the vacant property be

zoned CM3 which would allow for greater height and density. The proposed code identifies where the CM3 zone is appropriate and states one of the criteria as “in locations close to the Central City. This site is currently undeveloped and with the amount of development occurring

Table Three  
Proposed CM2 /Requested CM3 Zoning Designations

Map #	Street Address	Cross Street	Proposed Comp Plan	Existing Zoning	Proposed Zoning	Overlay	Requested Zoning
1168	1206 SE Belmont	SE 12 <sup>th</sup> Avenue	MU-Urban Center	CG	CM2	(d)	CM3

in the vicinity is likely to redevelop in the near future. It has the ability to blend with the Central City EX zoning which is on the west side of 12<sup>th</sup> Avenue where maximum building height with the bonus can range from 50 feet to 125 feet. This is an excellent site to accommodate greater density with a high likelihood of occurring in the near future. This corner can be zoned and developed as CM3 property without negative impact on the land use pattern as the property to the west of the site is proposed for CM2 development. Moving from west to east along SE Belmont Street, the pattern would be EX west of 12<sup>th</sup> Avenue, CM3 at the corner and moving east, CM2. The area along SE Belmont from SE 12<sup>th</sup> Avenue to mid-block between NE 15<sup>th</sup> and NE 16<sup>th</sup> is within a design district allowing for control over building transitions, frontages and exterior design. For these reasons, Belmar Properties believes CM3 is the best zone for this site.

Table Four includes the final category of requested zone changes. They include properties that are proposed as CM1 properties that we believe are better suited to CM2.

Table Four  
Proposed CM1 /Requested CM2 Zoning Designations

Map #	Street Address	Cross Street	Proposed Comp Plan	Existing Zoning	Proposed Zoning	Overlay	Requested Zoning
254	815 SE 60 <sup>th</sup>	SE Belmont	MU-Neighborhood	CO1	CM1	None	CM2
254	SE 61st & SE Belmont	vacant	MU-Neighborhood	R5	CM1	None	CM2

815 SE 60<sup>th</sup> Avenue & NE corner of SE 60<sup>th</sup> Avenue and SE Belmont Street

The City Council approved to amend the Proposed Comprehensive Plan map on these two properties from the originally recommended MU-Dispersed to MU-Neighborhood. The MU-Neighborhood Comprehensive Plan district allows for the implementation of three zones -- CM1, CM2 and CE. Based on the fact that the Council found that the site was more appropriate for the Mu- Neighborhood plan designation, based on the surrounding land uses, the planned improvement for the intersections along SE 60<sup>th</sup> Avenue and the minimal incremental impact on the street system, Belmar Properties requests CM2 zoning at this location.

Chair Shultz and Members of the Planning & Sustainability Commission  
May 17, 2016

Specifically, properties at SE 60<sup>th</sup> and Belmont are suitable for a zone that allows greater development intensity than that which is allowed by the CM1 zoning. The property at SE 60<sup>th</sup> and SE Belmont is comprised of two adjacent properties. The city identifies one as 815 SE 60<sup>th</sup> Avenue and the other as SE 60<sup>th</sup> and SE Belmont, as shown in Table One. This location is well served by transit, is on a corner, and across the street from the five story Acute Rehab Medical Facility and is appropriate for mixed use development.

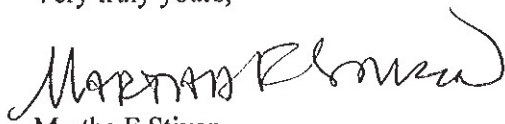
In addition, the intersections along SE 60<sup>th</sup> including Stark, Belmont, Burnside and Glisan are included for safety improvements in the propose Transportation System Plan. See project 70006. We have submitted written testimony to the Planning and Sustainability Commission in support of the 60<sup>th</sup> Avenue Corridor Project and requested its funding. I have attached a copy of the March 22 testimony. Together with the nearby development, the planned improvements to SE 60<sup>th</sup> and the revised Comprehensive Plan Designation, the CM2 zone is the most appropriate zone at this location.

**Non-conforming Development**

We understand that the mixed use zoning project addresses building scale, transitions, historic and local character and other design and context related issues. These standards have the potential to create nonconforming development issues for 27 built properties affected by the mixed use zoning project. As the proposed comprehensive plan designations will be implemented by the zoning designations, we are not able to support any plan that may render existing development non-conforming. If properties are made to be non-conforming, it may hinder their upkeep and/or expansion.

Thank you for the opportunity to present this testimony.

Very truly yours,



Martha F Stiven

Attachment

Cc: Richard Piacentini, Belmar Properties  
Mike Robinson, Perkins Coie



PROPERTIES  
**BELMAR** INC

March 22, 2016

Ms. Katherine Schultz, Chair  
City of Portland Planning and Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201

RE: Proposed Transportation System Plan

Dear Chair Shultz and members of the Planning and Sustainability Commission

My name is Richard Piacentini and I am submitting this written testimony regarding the Proposed 2035 Transportation System Plan ("TSP") in conjunction with the 2035 Comprehensive Plan update. Our company, Belmar Properties, manages properties controlled by members of the John Piacentini Family including those in the following ownerships:

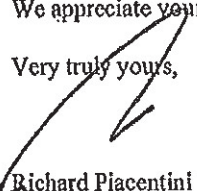
- Rosehill Investment, LLC
- Siena Capital, LLC
- John B. Piacentini Trust
- Louise Piacentini
- J&F Investments, LTD.

We own property located on the Northeast corner of the intersection of SE Belmont Street and SE 60<sup>th</sup> Avenue. We understand that the proposed TSP identifies improvements to intersections along SE 60<sup>th</sup> Avenue, including improvements at the Burnside, Stark, Belmont and Glisan intersections. This project is identified as Project 70006. We also understand that the project is identified as an unconstrained (unfunded) project. We would like to encourage that the Planning & Sustainability Commission recommend moving the project from unconstrained (unfunded) to constrained (funded) in order to improve the chances for these improvements to occur.

We are working with the City Council and staff to change the proposed Comprehensive Plan Map from Mixed Use-Dispersed to Mixed Use-Neighborhood and know that there are concerns about the capacity at some locations along SE 60<sup>th</sup> north of Belmont. TSP Project #70006 will serve to mitigate those concerns..

We appreciate your consideration of our request.

Very truly yours,

  
Richard Piacentini  
Belmar Properties

Cc: Mayor Charlie Hales  
Commissioner Steve Novick  
Michael C. Robinson, Perkins Coie  
Marty Stiven, Stiven Planning & Development Services, LLC.

2001 SIXTH AVENUE—SUITE 2300  
SEATTLE, WASHINGTON 98121

PH 206.448.1975 | FX 206.448.1978

richardp@belmarprop.com



**PROTECTING YOUR  
RIGHT TO ROAM**

May 17<sup>th</sup>, 2016

Portland Planning and Sustainability Commission  
psc@portlandoregon.gov

RE: Oregon Walks Comments on Mixed Use Zones Proposed Draft, March 2016

Chair Schultz and Planning Commissioners:

Oregon Walks advocates for safe and convenient conditions for walking in Oregon. We have reviewed the Proposed Draft Mixed Using Zoning and strongly support the provisions that emphasize the development of pedestrian friendly city by providing for a mix of land uses and development regulations in centers and corridors that make it easy, safe, and comfortable to walk or use transit to meet our daily needs.

The continued restrictions on new Drive Through Facilities in section 33.130.260 will help reduce the negative effects that drive throughs have on the pedestrian experience. Driveways generally create potential conflicts for users of the sidewalk because they are the locations where automobiles cross the pedestrian realm. Drive throughs, which generate significantly greater volumes of cars, present a greater danger to pedestrians.

Likewise, Oregon Walks supports the increased requirements for GroundFloor Windows in the Mixed Use Zones, from 25% to 40% of the ground floor wall area. Groundfloor windows make a big difference for walking, giving pedestrians a view into stores and building lobbies, increasing visual interest and increasing personal safety by ensuring “eyes on the street” from those within the building.

We are concerned, however, that the requirement for a 4' high maximum for the bottom of windows is proposed to be removed from section 33.130.230, C. The windows must be at eye level to allow pedestrians to see into buildings, and to allow those inside to be able to see people on the outside, call for help when needed, as well as provide an interesting and varied pedestrian experience. Without a maximum bottom height, builders can set windows with their sills at 6 feet, say, and extending to 10 feet height to achieve the required window area, without providing pedestrians a visual connection to the life inside the building.

We welcome the additional window percentage requirements in the Mixed Use Zones proposal, and request a change in the draft proposed language requiring the windows be placed at a maximum 4' bottom height to ensure that people are able to see in and out at eye level on any window assembly counting toward the standard.

Thank you for your consideration,

Lidwien Rahman  
Chair of Oregon Walks Plans & Projects Committee



# Northwest District Association

## Planning and Sustainability Commission

### RE: Comments on the Mixed Use Zones Project Proposed Draft

The Planning Committee of the NWDA has been reviewing the changes to the commercial zoning in the neighborhood as recommended in the Mixed Use Zones Project Proposed Draft and we offer the following comments.

First, we want to thank Planning staff for listening to our comments on the Discussion Draft and making several changes that we support. We appreciate that the Proposed Draft has removed the Main Street designation from the streetcar streets. Equally we agree that height & FAR bonuses are not appropriate in the Alphabet Historic District and that the bonuses in the proposed mixed use zones are now restricted to affordable housing and commercial. The changes in support of retaining jobs in the Eastern Edge of the district by moving some of the EX to EG1 is important.

However, we still have several concerns.

1. There are inconsistencies between and the proposed MUZ and the policies, plans and codes adopted by City Council for our neighborhood. Extensive local planning has been done in our neighborhood and prior to the adoption of this new code, the NW Plan District code must be revisited to identify conflicting language and changes need to be made to reconcile the Plan District code to the new code.
2. In the SE section of the neighborhood the Historic District Guidelines and NW District Plan support retaining the low scale residential development and legacy employment that has been there for decades. CM3 zoning is not appropriate there. Staff has identified some of this area as more appropriate for EG1 designation. We think there may be more areas currently used as light industrial or other employment uses in which that zoning is appropriate. Also, the remaining properties around the EG1 in this area of the neighborhood should also not be CM3 but CM2, a scale more compatible to the employment uses and low scale residential. We request that property in this area be zoned either EG1 or CM2 depending on its current pattern.
3. The MUZ project is proposing to make all CS and CM in the neighborhood CM2. The current zoning along the Thurman Corridor has been a mix of CM and CS to encourage more finely grained development as described in the NW District Plan. If it is all CM2 we lose that granularity which is what makes the area unique and enables a transition to a smaller scale of development in an area that is currently more low scale residential than commercial or mixed use. To retain this mix, the CM zones should be rezoned CM1. Both CM1 and CM2 in this area should also have a design overlay.
4. The NW Plan District code specifies height overlays and bonuses targeted for specific areas to encourage housing, including affordable housing over more intense office development. The MUZ has bonuses that are allowed in all MUZ areas outside the Historic District. This inconsistency in the existing and proposed bonuses need to be evaluated for their appropriateness in the NW Plan District and changes made to the NW Plan District code to resolve them.

Board of Directors  
2015-2016

President  
Tavo Cruz

1st Vice President  
Juliet Hyams

2nd Vice President  
Vacant

Secretary  
Karen Karlsson

Treasurer  
Wayne Wirta

Board Members  
Carla Charlton  
Wendy Chung  
Rodger Eddy  
Don Genasci  
Page Stockwell  
Ron Walters  
Bill Welch



5. While we support that the only bonuses proposed in the MUZ is for affordable housing and commercial, we feel that the affordable housing bonus as written will produce the amount of affordable housing for the bonus given. We encourage a system of graduated bonuses that would create housing affordable to a wider range of persons and families. In addition, while in-lieu fees make sense in some conditions, they must be substantial to avoid simply creating a fund to provide affordable housing in other neighborhoods. We want in-lieu fees to stay in the neighborhood they come from.

6. The development standards that are proposed in the MUZ may work well in Corridors but in some cases do not fit well in our district. For example, in some areas step-backs on all four sides may be appropriate. We will need to look more carefully at the development standards to determine where we have issues.

7. We support the requirement of a Transportation Impact Review for Mixed Use projects but are concerned that simply annual reporting is not enough. In areas such as NW, code that ties TDM performance to the ability to restrict parking passes should be included.

There is a lot of work to do to coordinate the proposed MUZ with the NW Plan District, the Historic District Guidelines, and our NW District Plan and we request Planning staff to work with us on resolving these issues before this code is finally adopted.

Sincerely,

A handwritten signature in black ink that reads "John Bradley". The signature is written in a cursive, slightly slanted style.

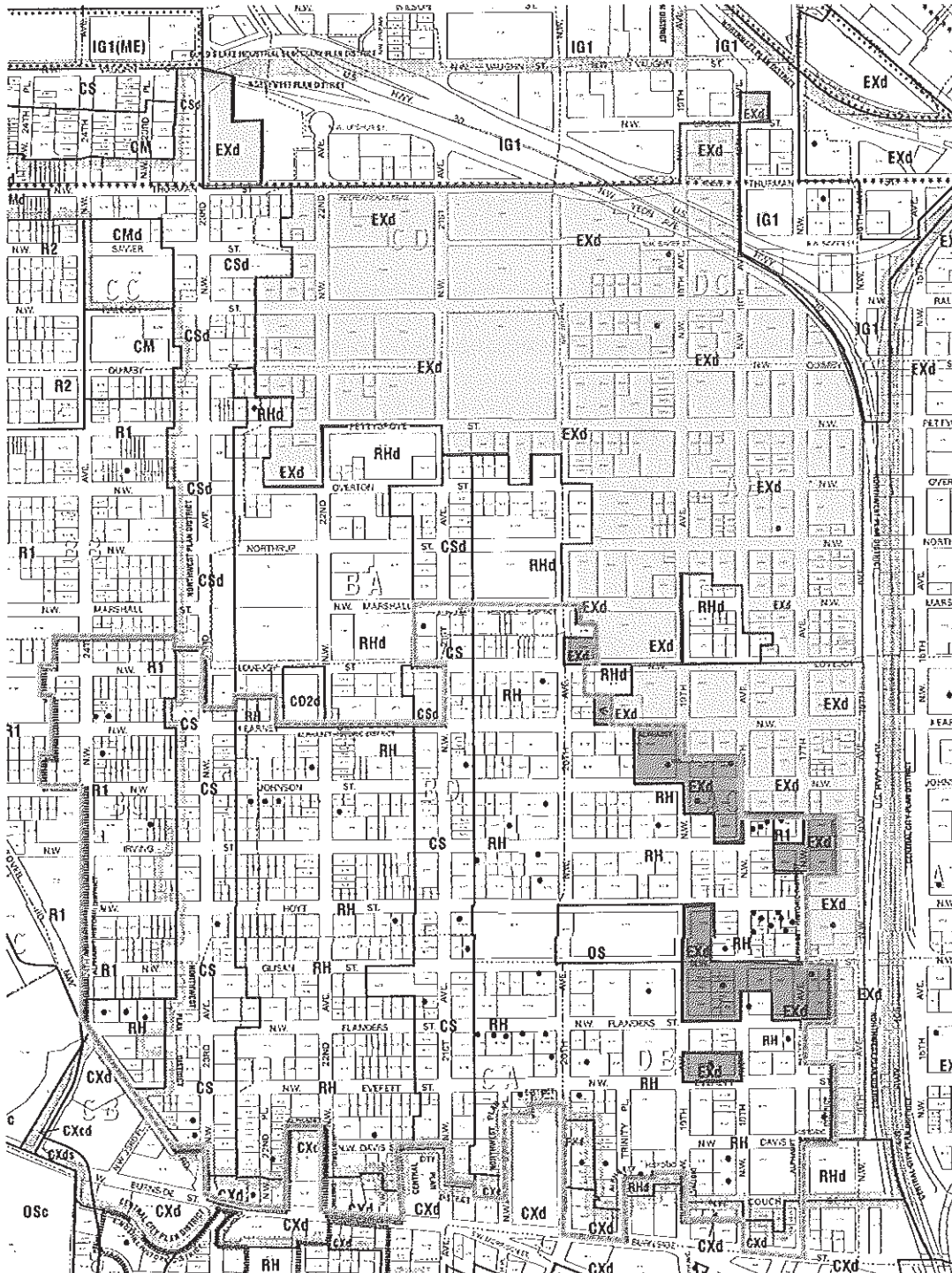
John Bradley, Chair

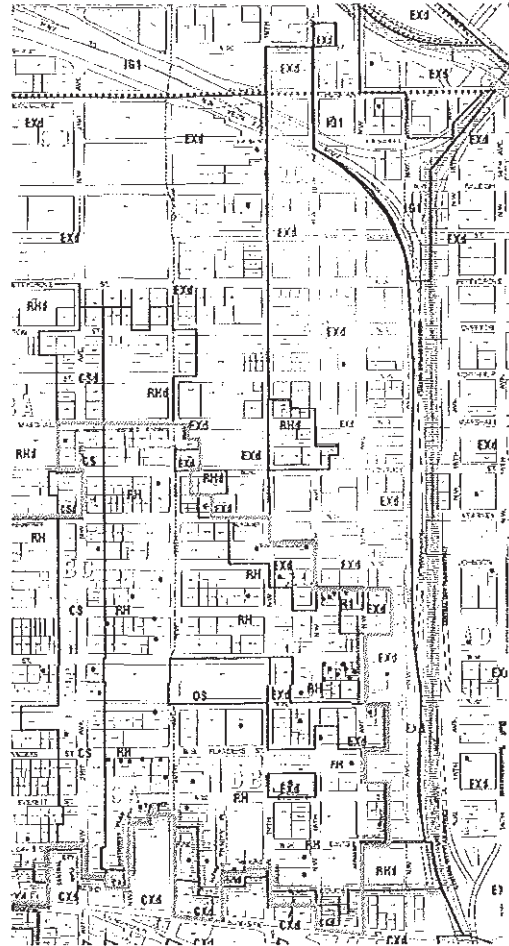
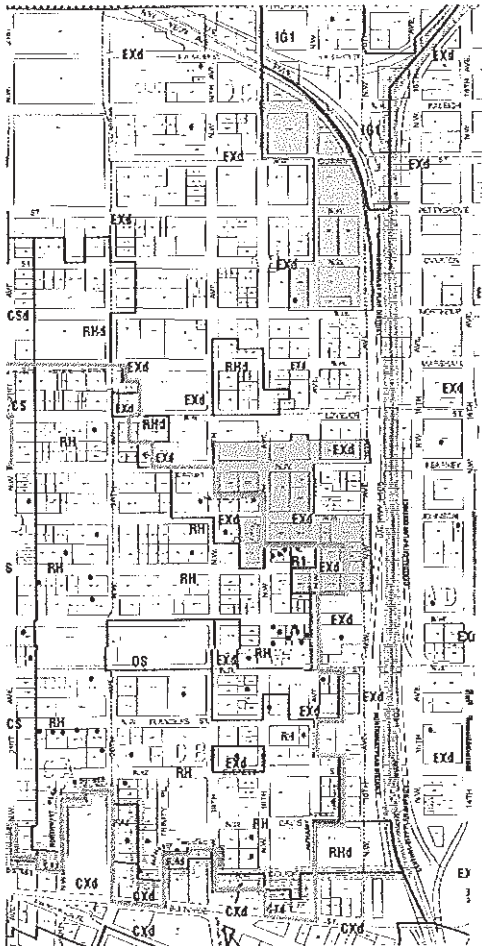
Northwest District Association Planning Committee

**NW DISTRICT – Areas in Blue proposed CM3**

## Dark Blue Outline is Alphabet Historic District

### Areas in Grey proposed CM3 in Alphabet District

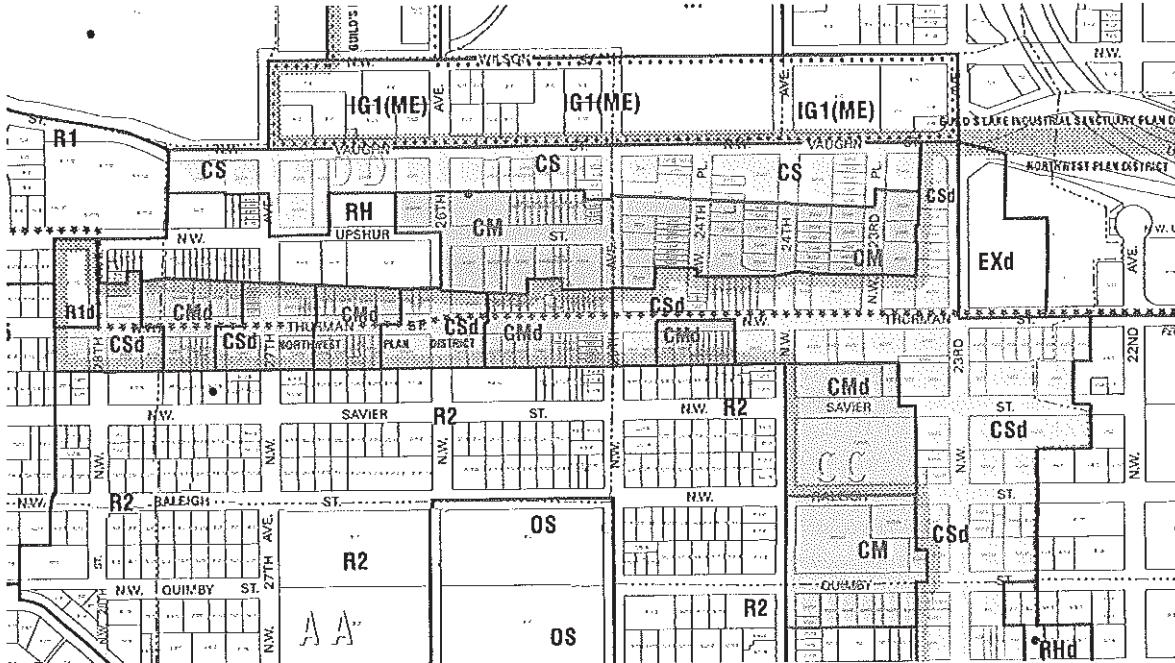




**Areas in Green – Staff proposed EG1**

**Areas in Yellow – NWDA request not CM3**





Areas in Green proposed as CM2 – NWDA requests CM1

Areas in Purple proposed as CM2 – NWDA OK with CM2

**PLanning and Sustainability Commission**  
**RE: Testimony on Mixed Use Zones Proposal**  
**Date: May 17, 2016**

Thank you for this opportunity to comment on the Mixed Use Zoning Proposal. It represents a great deal of very hard work on the part of staff, consultants and community volunteers and we are appreciative of the effort that has brought us to this point. In addition to working with the DDI I am a long time officer and board member of the Hosford-Abernethy Neighborhood District Association or HAND, but I am not speaking on behalf of HAND since our neighborhood association will not meet until this evening.

As Heather indicated, the Division Design Initiative (DDI) represents the ongoing work of another group of very dedicated volunteers and low bono consultants. Because the Mixed Use Zones proposal must look at the entire city in its recommendations, it is difficult to tailor approaches like the “vintage, low rise commercial” to the needs and preferences of particular corridors. Since Division has functioned as a defacto learning lab for mixed use development along our corridors, the DDI has tried to focus attention on how development has been playing out on the ground. Our recommendations try to address the opportunities the MUZ will create, the changes they will allow and whether familiar parts of neighborhoods are likely to disappear.

In considering the DDI recommendations please remember they have emerged after extensive community involvement efforts. Over the past two years, the Division Design Initiative has engaged more than 1,000 community members in developing a vision for the future of Division. We have been listening to the community through extensive outreach and engagement including:

- Facilitated 20+ public meetings, neighborhood design walking tours, community mapping events to identify key sites and special places, an open house, development workshop, and education forums.

- Built and installed “idea boxes” at a variety of key spots along the corridor

- Conducted community preference surveys on vision and design priorities in partnership with Portland State University and Architecture for Humanity

- Developed policy research and design recommendations including: Top Ten Policy Recommendations for the City of Portland, RNA adopted Community Notification & Engagement Policy, and the Division Street design guidelines

- Maintained a website with proposals and links to a variety of community resources.

Our goal remains to be as transparent, inclusive and innovative as we can in addressing community concerns regarding affordability, displacement, density and design that we are hearing from all sides.

**Support for Good Design**

Although we usually think of good design as creating beauty, which to some people seems superficial and unimportant, I want to remind you that thoughtful design does so much more. It recognizes and/or creates opportunities for greater sustainability and resilience, improved functionality, and a better use of existing, limited resources — whether it be the design of tiny houses, temporary shelter for our houseless neighbors, new affordable apartments, compatible infill slipping seamlessly into our single family neighborhoods or adaptive reuse and new growth along our commercial corridors. Design and preservation efforts should not be seen as a luxury only available to wealthy areas and individuals, but as something that underlies all the work we

do as we grow our city. Design and adaptive reuse are critical to achieving our larger goals and we plan to continue to work with our neighbors and the City to find a middle path that can achieve affordability and density as well as good design. We have draft design guidelines for Division that we hope will be of use for other streetcar era corridors and we count on the City to work with us to improve the community design standards and add new design tools to our toolkit.

Thank you.

Sincerely,

Linda Nettekoven  
2018 SE Ladd Ave  
Portland, OR 97214

**PS I am opposed to Portland Public School's effort to rezone the 1.33 acres at the former Washington High School site. The City has a first option to purchase on the acreage ...but has yet to act. This land was never intended for a huge development and only became RH (instead of R1) because another building was torn down downtown years ago and the density was transferred to that site...rather than staying downtown.**

**I join the SEUL Land Use Committee (of which I am a member) and Board in opposing the upzoning which would lead to development of the site. This open space is needed for the future..especially in light of the allowable increase in density expected in that area and the potential needs of the long planned, future community center..which Inner SE really needs. This is a critical opportunity to provide needed recreational uses to support a planned for increase in population.**



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) MICHAEL J. ROCHE & BRENDA PETRIS

(Your Address) 3920 SW 40th Ave. Portland, OR

cc: 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)

City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Walter J. Pettigrew (Walter J. Pettigrew)

(Your Address) 7416 SW Capitol Hwy PDX 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Mr. Pagenstecher

(Your Address) 8936 SW 40th Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Shuler Maranja Hillier

(Your Address) 4048 SW Vermont St Portland OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Irina N Perol

(Your Address) 7420 SW Capitol Hwy, Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

*Nancy J. Pond*

(Your Address)

*7420 S.W. Capitol Hwy., Portland, OR 97219*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Romana Preisner

(Your Address)

9039 SW 38th Ave Portland OR

97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Lynne Schneider

(Your Address)

4040 SW MARIGOLD ST. - PDX 97219

cc: 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)  
City Auditor, LaVonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

②

(Your Name)

Tamsin T. Gilbert Gary Gilbert

(Your Address)

3521 SW Dolph Ct. Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

② Victoria Cummings + Ronald Cummings

(Your Address)

3511 SW Dolph Ct, Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Kara Fernis

(Your Address)

7418 SW 31 Ave Port. OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Brian Montello

(Your Address) 7430 SW 31st Ave. 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)



(Your Address)

7424 SW 31 Ave Port. OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

ERIC BLATHM

(Your Address)

7417 SW 31<sup>st</sup> Ave, Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Susan Berger

(Your Address)

7403 SW 31 Ave Port. OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Amerinda Alpern

(Your Address) 7230 SW 81st Ave Portland OR 9721

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Michael Leavitt

(Your Address) 7511 SW 31<sup>st</sup> Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Kim Isaacson

(Your Address) 7127 SW 31 Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Roda O'Hara

(Your Address) 7135 SW 31 Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Matthew J. Kaiser

(Your Address) 7203 SW 31st Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Rae Peronneau

(Your Address) 7444 SW 31st Ave, Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Kelley Baker

(Your Address) 3123 SW Dolphin Ct. #8 Portland, 97239

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Amy Baggio

(Your Address)

8820 SW 35<sup>th</sup> Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Tami Bryant

(Your Address)

3540 SW Evans St. Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

KRISTINA G. MASTHEM

(Your Address)

8959 SW 40<sup>th</sup> AVE, PDX 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Janet Techina

(Your Address) 3834 SW Dolphi Ct 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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

### Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

JOAN BROOKS

(Your Address)

3960 SW FREEMAN ST PD 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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

**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) MEGIN BROOKS



(Your Address) 3960 SW FREEMAN ST. PORTLAND, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Jan W. [Signature]

(Your Address)

3440 SW Dolph Ct Port 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Colleen Nasreen

(Your Address)

3440 SW Dolph Ct.

97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Janet Mawson

(Your Address) 7623 SW 33rd Ave Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Greg Schmidt

(Your Address) 7522 SW 32nd Ave Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

*Kathleen A. Mills*

(Your Address)

*7544 SW 32nd 97219*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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

### Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Joyce Thomas

(Your Address) 7611 SW 32nd Ave HD, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Mandy Downing

(Your Address)

1244 SW 33rd Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Peter Gibson

(Your Address)

7441 SW 33<sup>rd</sup> Ave

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Alan Kirkland

(Your Address) 7623 SW 33<sup>rd</sup> Ave. Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) MICHAEL MULLIGAN

(Your Address) 1588 SW 33<sup>RD</sup> AVE BDX OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Susan Kilsa

(Your Address) 15296 SE Crown D 97224

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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

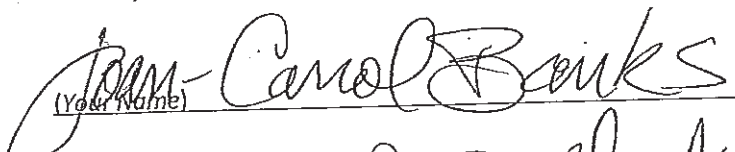
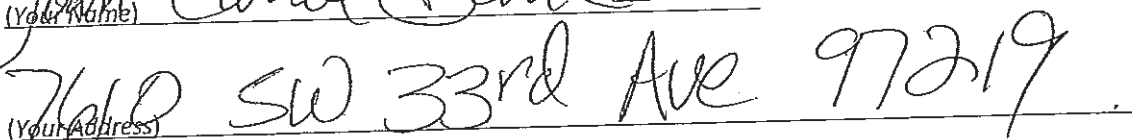
**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

  
(Your Name)  
  
(Your Address)

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Patricia Sheie

(Your Address)

7511 SW 35<sup>th</sup> Ave, Portland, OR

97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Ibrahim Badredine

(Your Address) 7444 SW 33rd Ave Portland OR 97239

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) 

(Your Address) 7316 SW 33<sup>rd</sup> 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

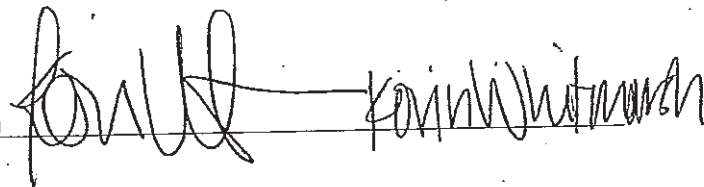
The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)



(Your Address)

7224 SW 32nd Ave. Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

*Marge Moore*

(Your Address)

*7207 SW 33rd Ave Portland, OR 97215*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) David Moore

(Your Address) 3328 SW Nevada Ct, Pdx OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) TRAVIDS SMITH

(Your Address) 7445 SW 32nd Ave, Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

(Your Address)

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Michael Loftis

(Your Address)

7507 SW 32ND AVE. PORTLAND OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97219

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

(Your Address)

*Stephan Barz*  
*7515 SW 32 Ave #4 97219*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

*Deanne Larkin*

(Your Address)

*7533 SE 32nd Ave*

*97219*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Devon Flynn Devon Flynn

(Your Address) 7516 SW 32<sup>nd</sup> Ave, Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Valeri P. Chiappetta

(Your Address) 7136 SW 29<sup>th</sup> Ave, Portland, 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

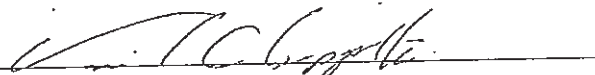
The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)



(Your Address)

7136 SW 29th Ave

97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Justin H. Koerschgen

(Your Address) 4048 SW Vermont St. Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Lena-Liis Kiesel LENA-LIIS KIESEL

(Your Address) 4048 SW VERMONT ST PORT OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) CLARA-LIIS HILLIER

(Your Address) 4048 SW VERMONT ST PORTLAND, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Holly Paris

(Your Address) 5416 SW Dolph Dr Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

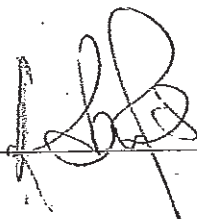
The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

 Adam Paris

(Your Address)

5416 SW DOLPH DRIVE PORTLAND, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

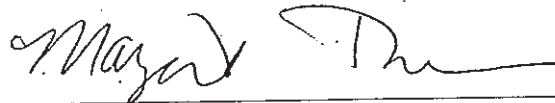
The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)



(Your Address)

6911 SW Honore Lane PHL OR

97223

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

Bruce Adams  
(Your Name)

9038 SW Excalibur Pl, Portland, OR 97219  
(Your Address)

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Susan Adams

(Your Address) 9038 SW Excalibur Pl. Portland, OR  
97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Daniel Spork Gabrielle Negro

(Your Address) 7225 SW 31st Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Whitney Norris

(Your Address) 7240 SW 31st Ave Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you;

(Your Name)

Sara & Nick Arling

(Your Address)

7507 SW 35th Ave Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

 (Your Name) Sandra E. Ashley Best

(Your Address) 3543 SW Troy St #15 Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

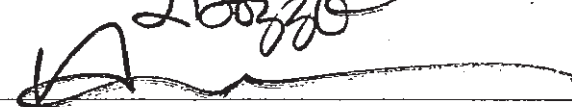
The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(3) (Your Name)

CD  
Lily Bozzo  


Coligny Dana  
Lily Bozzo  
HEATHER DANA

(Your Address)

7700 SW 21TH AVE. PDX, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

②

(Your Name) Steve + Teresa Glenaghen

(Your Address) 7410 SW Oleson Rd FMB 330 PDX OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97223



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(2) (Your Name)

Kim Donaghue Sitanni Donaghue

(Your Address)

5044 8W Miles St. Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

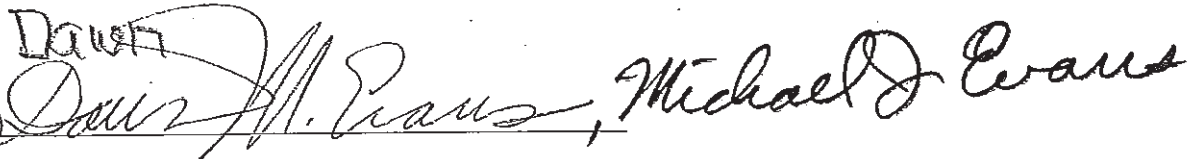
The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

  
Michael D. Evans

(Your Address)

8702 SW 41<sup>ST</sup> Avenue, Portland, OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97219

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(2) (Your Name) KIRK & JENNY HOWARD

(Your Address) 3835 SW CALDWAY ST., PORTLAND 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Megan  
Megan Ingle JEREMY INGLE

(Your Address)

3421 SW Caraway Ct Pdx 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record:

Thank you,

(Your Name)

John Koser  
Linda Koser

(Your Address)

11339 SW H5<sup>th</sup> Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(2) (Your Name) Jana Childes & Patrick Keller

(Your Address) 10845 SW 61<sup>st</sup> Avenue 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(2)  
(Your Name)

*Joe + Barry Newman*

(Your Address)

*4055 NW Twilight Terr., Portland*

*97229*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

②

(Your Name) CAYLA PANITZ and Daniel Blake

(Your Address) 4521 SW Brugger Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

*Patricia  
P. Fritz*

(3)

(Your Name)

*Elizabeth & Susie Fritz*

(Your Address)

*7423 SW 33rd Ave. Portland OR, 97219*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

(Your Address)

*(Daniel Samuel)*  
*Marley Samuel*  
*Sandy Samuel*  
*Jordan Samuel*  
*Sandy*

*7607 SW 26th Ave, Portland OR 97219*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

② (Your Name) Amata Small + Claire Small

(Your Address) 8225 SW 39th Ave 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

② (Your Name) Karin Van Velarde

(Your Address) 11313 SW 49th Ave. 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Justine Abrak

(Your Address)

5405 SW Taylor Ferry Rd.

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

Portland 97219

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Nancy Ahlberg

(Your Address)

6450 SW Loop Dr PDX 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) LORI ALFONSO

(Your Address) 3315 SW Falcon St. Pdx OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Donna Bestwick

(Your Address)

7506 SW 31 Ave Port. OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Angela Betita

(Your Address) 5156 SW Multnomah Blvd #E Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Janine Blatt

(Your Address)

11439 SW 28th Pl., 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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

### Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Steve Bloch

(Your Address)

431 NW Flanders Portland 97209

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) J. Michael Burke

(Your Address) 10208 SW 32nd Ave. PDX

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Katherine Christensen

(Your Address)

341 SW Dolph Ct. Portland OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Andrew Conradt

(Your Address) 10275 SW Butler Rd Portland, OR 97229

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Mary Anne Corbett

(Your Address)

2723 SW Texas St 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Glen Corbett

(Your Address)

2723 SW Texas St, 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

Diehl

(Your Name)

Kenan Diehl

(Your Address)

3330 SW Illinois St Portland OR 97239

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) NATASHA DOCEZAL

(Your Address) 5655 SW Hahn St Pdx 97221

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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

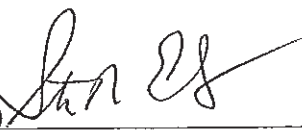
### Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)  Stu Art Ellis

(Your Address) 2774 SW Moss St Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Ian Frantz

(Your Address) 6124 SW 50<sup>th</sup> Ave PMB, OR 97221

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Valentina Gordon - Valentina Gordon

(Your Address) 14944 SW Barbur Blvd. Portland OR 97239

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Mary Lynn Haas

(Your Address)

3843 SW Canby St Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) SHAWN HENNESSY

(Your Address) 4933 SW ILLINOIS ST PORTLAND 97221

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) SIMON HYDE

(Your Address) 3421 SW MASS ST, PORTLAND 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

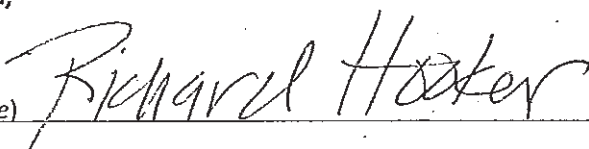
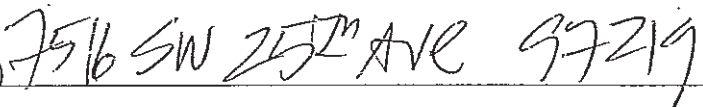
With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

(Your Address)

  
  
cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Lee Hudson

(Your Address) 2911 SW Spring Garden St. PDX 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Heene Ingram

(Your Address) 7524 SW 35<sup>th</sup> Ave, Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

*William F. Kielhorn* William F. Kielhorn

(Your Address)

4311 SW Freeman St., Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Brian Kimmel

(Your Address)

8236 SW Woods Creek Ct. Portland, OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97219

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

*Todd Laramie*

(Your Address)

*2807 SW TROY PORTLAND*

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

*Portland 97219*

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Emma Lewins

(Your Address) 1630 SW Clay Ave, Portland, OR 97201

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Carol McCarthy

(Your Address) 4311 SW Freeman St, Portland, OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97219



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Jackie McQuiston

(Your Address) 5524 SW miles Ct, Portland OR

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97219

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Tony Montoya

(Your Address)

4724 SW 45<sup>th</sup> Av 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Wendy Morgan

(Your Address)

Wendy Morgan

5705 SW  
48th Ave

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susari Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

Portland 97219

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Marie Mouin

(Your Address)

4920 SE 140<sup>th</sup> Ave, Portland

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) FELIX NAVARRO

(Your Address) 2711 SW 36th AVE PORTLAND, OR - 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Richard Nitti

(Your Address) 1405 SW Cady St. 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)  Katie Oranen

(Your Address) 4805 SW Orchard Lane, Portland, OR 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Elizabeth Pepper

(Your Address) 7315 SW 53rd Ave PDX 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Kelly Peterson

(Your Address)

7236 SW 27<sup>th</sup> Port, OR 97219

cc: 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)

City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) James Polzin

(Your Address) 9110 SW 36<sup>th</sup> Av. Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Peggy Piens M. Ed

(Your Address)

4739 SW Capitol Hwy Suite 220

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

Portland 97219

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Sarahtha Piers VanderPlag

(Your Address) 4703 SW Panama St PDX OR 97209

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mna.landUseCommittee@gmail.com](mailto:mna.landUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) ERIC SANDSTROM

(Your Address) 3513 SW LOGAN ST Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Kaily n shattuck

(Your Address)

Kaily n shattuck@gmail.com

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

LARRY Shellen

(Your Address)

15085 W Dewitt, #1 POX,

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

Leslie Simpson

(Your Address)

8444 SW 45th Ave Portland

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

97219

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Susanne Stevens

(Your Address) 32 113th Ave. Portland OR 97216

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name)

(Your Address)

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Alex Wyman

(Your Address) 1634 SE Hawthorne Blvd Portland, OR 97214

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

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

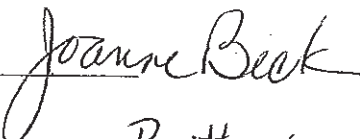
### Re: Multnomah Village CS Zones

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request City Council change this designation to CM1, to which limits building height to 35 feet in the business district of Multnomah Village with a D overlay, in the 2035 Comprehensive Plan.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Your Name) Joanne Beck 

(Your Address) 2705 S.W. Moss St, Portland 97219

cc: 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)  
City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)  
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)



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)

Council Clerk , [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

Chair PSC Katherine Schultz, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Planning and Sustainability Commission, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW 4th Ave, Suite 7100,

Portland, OR 97201

RE: 2035 Comprehensive Plan

PSC Hearings Mixed Use Project

The Portland Planning and Sustainability Commission hearings on the 2035 Comprehensive Mixed Use Project needs to be postponed or the record needs to be left open at least 45 days until after the City Council adopts the 2035 Comprehensive Plan Policies and Mixed Use Project staff provides the citizens with the basic required information needed to analyze the effect of the project on their neighborhoods. Projections made over a year ago by the BPS staff on the changes the Mixed use Project would have on Multnomah Neighborhood showed a 28 % increase in capacity. The Mixed Use Project has significantly changed since the projections were made and the Multnomah Neighborhood Association has not received needed information to determine the effect of the Mixed Use Project will have on the neighborhood. Below is an email exchange showing that needed information will not be available until after City Council adopts the Comprehensive Plan Policies and it is unclear how the amendments will affect the Mixed Use Project

<http://www.portlandoregon.gov/bps/article/569929>. The hearings for the Comprehensive Plan have been put on a fast track, basic information is not being provided and there is not enough time for citizens, neighborhood associations and neighborhood coalitions to respond to plan for the long term future growth of the city. Provisions of Goal 1, Metro's citizen involvement policies, the existing Comprehensive Plan and the city code are not being followed.

Please add these to the record.

Thank you,

James F. Peterson

Multnomah

Land Use Chair

2502 SW Multnomah Blvd

Portland, Oregon 97219

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

From: Barry.Manning@portlandoregon.gov  
To: mnalanduse@swni.org  
CC: Joan.Frederiksen@portlandoregon.gov; Eric.Engstrom@portlandoregon.gov  
Subject: RE: Mixed Use Project  
Date: Fri, 8 Apr 2016 19:02:24 +0000

Hi Mr. Peterson:

BPS has not yet finalized capacity modeling on the proposed zoning. We will be doing that soon, but are waiting on final City Council plan amendment outcomes before we do so. It will probably be May before this happens. I will follow up when we have that information and will also look back at my meeting notes regarding any additional analysis/information we have for Multnomah Village.

On the topic of the Low-rise Storefront Area proposal that led to CM1 zoning in selected neighborhood centers, please refer to the Proposed Draft (<https://www.portlandoregon.gov/bps/70425>), specifically pages 40, 41 (building scale issues), 43, and implementing code on pages 228-229. For additional background you should also review the slideshow we presented to the Project Advisory Committee in January, as well as the notes from that meeting

1/20/16 PAC Meeting Presentation: <https://www.portlandoregon.gov/bps/article/562090>

1/20/16 PAC Meeting Notes: <http://www.portlandoregon.gov/bps/article/572097>

Please give me a call if you wish to discuss the Mixed Use Zones Proposed Draft (<https://www.portlandoregon.gov/bps/70425>); I will follow up with additional information on the modeling (or work with Joan on this) as soon as we have that information.

Thanks.

Barry

Barry Manning | Senior Planner

Portland Bureau of Planning and Sustainability

1900 SW 4th Avenue #7100, Portland, OR 97201

503.823.7965 (p) | 503.823.7800 (f)

[barry.manning@portlandoregon.gov](mailto:barry.manning@portlandoregon.gov)

**From:** customwoodworking@msn.com [mailto:customwoodworking@msn.com] **On Behalf Of** James Peterson

**Sent:** Thursday, April 07, 2016 1:24 PM

**To:** Manning, Barry <Barry.Manning@portlandoregon.gov>

**Cc:** mnachair@gmail.com; martie sucec <martie.sucec@gmail.com>; Claire Coleman-Evan <eclair27@comcast.net>; Michael Miliucci <michaelmcterry@hotmail.com>; Jan Wilson <jannett.wilson@gmail.com>; Frederiksen, Joan <Joan.Frederiksen@portlandoregon.gov>; Jim Redden <jredden@portlandtribune.com>; anne.debbaut@state.or.us

**Subject:** Mixed Use Project

Hi Barry

You were going to forward the analysis of the increase in capacity that is the outcome of the Mixed Use Project. Now that the project is going to the planning commission the numbers should have changed from the early analysis that Joan provided us some time ago.

Some members of the MNA were at one of your recent meetings and it was stated that there had been some analysis of the Mixed Use Zones in the village. Please forward this information

Some of the CM2 in the village was change to CM1 please forward the policies and the analysis of staff that resulted in these changes.

Thank you of your attention to this matter

James Peterson

Please add these to the record.

Thank you,

James F. Peterson  
2502 SW Multnomah Blvd.  
Portland, Oregon 97219

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

**From:** Mastrantonio, Lori [mailto:LoriM@co.clackamas.or.us]

**Sent:** Tuesday, May 17, 2016 6:51 PM

**To:** Manning, Barry <Barry.Manning@portlandoregon.gov>; Planning and Sustainability Commission <psc@portlandoregon.gov>

**Subject:** PSC Mixed Use Zones Testimony

To: The Planning and Sustainability Commission  
Chair Schultz and Commissioners

In addition to my letter submitted May 10, 2016 and my testimony at the PSC hearing of May 10, 2016 I am submitting the following noted below.

I concur with Doug Klotz's comments and analysis described in his email below explaining why the proposed downzoning to CM1 as part of the Mixed Use Zones Project draft which includes the area between SE 35<sup>th</sup> and SE 38<sup>th</sup> within the Hawthorne District is not supportable and actually not needed.

As noted by Doug, "with the historic protections in place, and opportunities for more housing on several sites, this example shows that even well-known "vintage" districts are not necessarily appropriate for this Low-Rise Commercial Storefront downzoning scheme. There are opportunities to get needed density in this area without destroying any pre-war buildings, and which could actually enhance the district with needed residential vitality. The proposed downzoning is not needed and would be detrimental to many Comp Plan goals."

As mentioned in Ken Eiler's letter dated May 16, 2016, the draft proposal does not allow the wholesale of goods and limits building height to three stories. These new standards are problematic for a number of existing buildings. If the city is supportive of increasing jobs, supporting businesses and the growth of existing businesses, and encouraging more housing density, then allowing up to four stories and allowing the wholesale of goods would help to meet those goals.

Adjacent zoning of CM and R2.5 to the north of our property at 3621 and 3623 SE Hawthorne allows for building heights of 45' and 35' respectively. The existing structure behind our building appears to be about 40-45' in height. Nearby residential units are higher than 35' due to the way height is calculated and many are 40-45' in height.

I support the uses and heights allowed in the CS zone (current zoning of our property) and request that the PSC consider allowing four stories in any new overlay or zoning district proposed as part of this project.

Thank you.

Lori Meuser  
11426 SW Oak Creek Drive  
Portland, OR 97219

503 293-6999



### Proposed Rezoning of Property Located at 3621 and 3623 SE Hawthorne

The current zone of this site is CS. The proposed new zone is CM1. The Public Notice I received indicated that this proposal to revise zoning was “developed by City planners based on feedback from a project advisory committee.” I was told by City staff that this committee was actually split specifically regarding the height restriction that’s proposed and that there was not a clear majority supporting that particular restriction. The existing building at 3621 and 3623 SE Hawthorne and property are quite small and the potential for redevelopment under the current zone is reasonable. This is a single-story building 1,980 square feet in size and the lot consists of 3,330 square feet. The proposed new zoning substantially reduces the value and redevelopment potential of the site. The significant adverse impacts of the new zone include but are not limited to the following:

#### Current Zone-CS

Allows up to 4 stories

Retail Sales and Service-Limited

Vehicle Repair-Allowed

Wholesale Sales-Allowed

Height-45’ (Update allows bonus of 5 stories)

#### New Zone-CM1

Limits height to 3 stories

Retail Sales and Service-Allowed

Vehicle Repair-Not Allowed

Wholesale Sales-Not Allowed

Height-35’ Max., No Bonus Options

My understanding from staff is that neighbors object to 5 story buildings. If this is the case, then redefine how the height is measured and limit the height to 4 stories. It is not necessary to limit the height of a small section of Hawthorne to 3 stories to create a “main street”. If 5 stories adversely impact nearby neighbors, then why would the City propose up to a maximum of 5 stories (e.g. if affordable housing is proposed another story is allowed)? The designation of a maximum of 3 stories between SE 35<sup>th</sup> and 38<sup>th</sup> along Hawthorne appears to be capricious and arbitrary. The City is proposing to take away our right to redevelop up to a 4 story building. There doesn’t appear to be historic buildings in the area or a uniqueness to the existing development. There are a number of 4 story buildings in the area.

How does the appearance of up to 5 stories and then down to 3 stories for 3-4 blocks and then back up to 5 stories create a main street effect? Old Town zoning allows much higher than 5 stories and I believe no height limit for a short section and yet it has a main street feel to it. I would say that Hawthorne already has the main street feel with the current zoning. The existing development includes a variety of heights and includes buildings that are 4 stories in height.

Forcing the “core” area blocks to be dwarfed by up to 5 story buildings will result in less light and more shadows for those buildings. In addition, the much taller buildings will look down on our development resulting in a lack of privacy and a “fish bowl” effect. Allowing a combination of 4 to 5 stories results in less adverse impacts and provides more equity.

Some of the other criteria staff cited to define the “core” area include predominantly pre-war buildings- (many were built after the war, ours was built in 1956), buildings are built next to the sidewalk (most of the buildings are built next to the sidewalk now), and the buildings have a 0’ setback (most have 0’ setbacks now).

City staff indicated that there would be an opportunity to potentially receive a zone change from CM1 to CM2 (CM2 allows up to 4 stories) but this is misleading as it is very costly to apply for a zone change and obviously there is no guarantee of approval.

I urge the Planning and Sustainability Commission to allow buildings up to 4 stories in height in the CM1 district.

I appreciate your consideration regarding this matter.

Sincerely,

Lori Meuser  
11426 SW Oak Creek Drive  
Portland, OR 97219

503 293-6999

[Meuser.lori@gmail.com](mailto:Meuser.lori@gmail.com)

**From:** Tom McTighe [mailto:[mctighe.tom@gmail.com](mailto:mctighe.tom@gmail.com)]  
**Sent:** Tuesday, May 17, 2016 11:41 AM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** PSC Mixed Use Zones Testimony

Hi -

Thanks for your hard work. I am on the board of the Richmond Neighborhood Association, but speak on my own behalf in this email.

I oppose the downzonings from CM-2 to CM-1 that have been proposed for the "Low Rise Commercial Storefront areas" of 35th to 37th on Division, and 35th to 38th on Hawthorne. This will only make Portland's housing crisis worse, and goes against what planners concerned with affordability recommend.

Please do not make it more difficult to build multistory, multifamily housing in the neighborhoods that need it most.

Thanks,

Tom McTighe

3004 SE Brooklyn St.  
Portland, OR 97202

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

From: Becky Luening [mailto:becky.pdx@gmail.com]  
Sent: Tuesday, May 17, 2016 10:15 AM  
To: Planning and Sustainability Commission <psc@portlandoregon.gov>  
Subject: PSC Mixed Use Zones Testimony

Date: May 17, 2016  
Attn: Planning and Sustainability Chair, Katherine Schultz

Dear Ms. Schultz,

I support of the proposal to downzone specific sections of SE Woodstock Boulevard from CM-2 to CM-1. When I participated in the Woodstock Charrette held in November 2014, I came away from that first large public meeting with the feeling that many people in our neighborhood (including myself) prefer to keep Woodstock low profile, i.e., retaining the feeling of a small-town neighborhood center, and for that reason I believe our main street is a good fit for "Low-Rise Commercial Storefront."

To be fair, when development experts presented the pros and cons of various development options to the neighborhood, making a case for taller commercial buildings, neighbors were not entirely opposed, but weighed in strongly for mitigations such as setbacks and stepbacks, to minimize the impacts of taller developments. In my opinion, it's especially important to require such mitigations for any proposed new construction that will reach or surpass the height of the recently developed New Seasons market, for example.

Commercial property owners may make the case that down zoning will take away the rights they have to build to a certain height dictated by current zoning, but it seems to me that, in order to give sufficient "loft" to the ground floor commercial spaces that we are told is best for creating vibrancy, a three-story building may still reach considerable height.

Depending on orientation of new commercial buildings on Woodstock, the city should also have in place required mitigations (i.e. stepbacks) to minimize shade being thrown on residences that may exist on the back sides of those blocks. I would also encourage the city to institute basic usage restrictions, depending on a building's proximity to a residential zone, to minimize the noise and smoke nuisance that often accompany late-night eating and drinking establishments.

I should also mention that in conversations about projected new commercial development on Woodstock, concerns that get raised again and again relate to increased traffic, parking, and the numerous unimproved roads close-in to our main street -- all of which are contributors to increased congestion on our boulevard.

Finally, I believe it important to give neighbors the opportunity to comment on any planned major commercial development in their neighborhood.

Rebecca Luening  
5209 SE 60th Ave  
Portland, OR 97206  
503-774-9197

**From:** Susan Lindsay [mailto:lindsays@pdx.edu]  
**Sent:** Tuesday, May 17, 2016 4:21 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Opposition of PPS Requests for 14th and Morrison site...RH to CM 3

Dear Chair Baugh and Fellow Planning and Sustainability Commissioners,

I write in response to Portland Public Schools desire to effect a zoning change and large scale build out at a piece of property in the Buckman Neighborhood in the Washington High site.

I ask you to deny this request.

The City of Portland holds an option to buy for this 1.33 acre parcel and it is needed as available and very valuable open space in an area rapidly changing and will tremendous allowable infill potential.

The neighborhood and nearby neighbors have had no contact from PPS about their interest to develop this open area with the exception of a brief and only attendance last year at a neighborhood association land use meeting which came about only at the behest of BPS. They presented an rough and gross drawing of a large monolithic structure, and stated they did not intend to own the property or use it when developed.

Other than that brief appearance, there has been no contact or effort on the part of PPS to connect with anyone about this parcel.

During the work on the Inner SE Portland Community Center, this parcel was always identified as a valuable space that could be used with the center. With the recent total destruction of St. Francis Park and the building of over 700 new housing units in the immediate area, open space is critical to acquire and maintain for the next generations.

In time, much of the existing EXD of 11th and 12th Avenues, as well as on parts of Morrison and Belmont will contain new multi-floored, multi-family structures. We need this space for parks and open space, in an area that no longer has any room to spare for recreation.

Please deny this request and let the City act of acquiring it for the future.

Thank you,

Susan Lindsay  
625 SE 17th Avenue  
Portland, Oregon 97214

--

Susan Lindsay



Planning and Sustainability Commission, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW 4th Ave, Suite 7100, Portland, OR 97201

Attn: Mixed Use Zones Testimony

**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request that the PSC change this designation to CM1 to limit building height to 35 feet (3 stories) in the business district of Multnomah Village with a D overlay.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

*Loren L. Gore*  
*3433 SW Multnomah Blvd*  
*Portland OR 97219*

cc: 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)

City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

Planning and Sustainability Commission, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW 4th Ave, Suite 7100, Portland, OR 97201

Attn: Mixed Use Zones Testimony

**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request that the PSC change this designation to CM1 to limit building height to 35 feet (3 stories) in the business district of Multnomah Village with a D overlay.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

(Name) *Jim & Liz Davis*

(Address) *7910 SW. 31st #104  
PORTLAND, OR 97219*

cc: 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)

City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

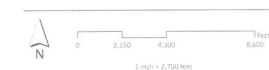
Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

# CE ZONE & NON-CMSO RECOMMENDATIONS Portland, Oregon

- LEGEND**
- Recommended CE Areas
  - Recommended CMSO removals
  - Proposed CMSO
- Proposed Zones**
- CM1 - Mixed Commercial
  - CM2 - Commercial Mixed Use 2
  - CM3 - Commercial Mixed Use 3
  - CE - Commercial Employment
- Current Zones**
- CG (if no hatch, changing to other comp plan design)
- Traffic Classifications**
- Regional Trafficway
  - Regional Trafficway & Major City Traffic Street
  - Major City Traffic Street
  - Traffic Access Street
  - District Collector
  - Neighborhood Collector
- Freight Classifications**
- Major Truck Street
  - Priority Truck Street

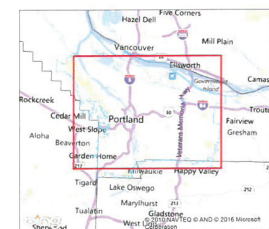
33.130.030.D:  
The Commercial Employment (CE) zone is a medium-scale zone intended for sites along corridors with a Neighborhood Collector or higher traffic classification, especially along civic corridors that are also Major Truck Streets or Priority Truck Streets. This zone is generally not appropriate in designated centers, except on a site that is currently developed in an auto-oriented manner and urban scale development is not economically feasible...



SOURCE DATA:  
Mackenzie Area Study 2016, Aug 2014

GEOSPATIAL PRODUCTION:  
Mackenzie Area Study 2016, Aug 2014  
Lambert Conformal Zone

Date: 8/1/2016 Map Created By: SPS  
Map: CE Area Recommendations Project No: 2310034.00



**MACKENZIE.**

503.224.9560 • 503.228.1285 • MCKENZIE.COM  
RiverEast Center, 1515 SE Water Avenue, #100, Portland, OR 97214

Portland, Oregon • Clackamas County • Multnomah County • Washington County

© 2016 MACKENZIE. ALL RIGHTS RESERVED



**From:** David Kingston [mailto:dave.kingston@gmail.com]  
**Sent:** Tuesday, May 17, 2016 1:42 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Cc:** Stockton, Marty <Marty.Stockton@portlandoregon.gov>  
**Subject:** Testimony - Mixed Use Zones Project

May 17, 2016

Members of the Planning and Sustainability Commission,

My name is David Kingston and I am the owner occupant at 4434 SE 26<sup>th</sup> ave, in SE Portland.

As part of the Mixed Use Zones project, I am writing to urge the planning and sustainability to rezone my property as well as the ones at 4432 SE 28TH AVE, and 4435 SE 28TH PL **in accordance with their current/new comprehensive plan designation of Mixed-Use Dispersed.**

Specifically, in order to allow for the growth anticipated for the Portland Metro Area and City of Portland while respecting the urban growth boundary, **these properties should be zoned CE** – which is a mixed use commercial employment zone.

These properties are in a location that should be encouraging more infill. Specifically they are:

- • Near transit, such as the recently completed Orange line, and the #17 bus line
- • Easy biking distance to the downtown core and the inner east side neighborhoods
- • Close to major employment centers such as OHSU
- • Near major educational centers such as Reed College, OHSU, NCNM and more

Rezoning these properties is **in character with the surrounding uses** as they are nearly surrounded by Commercial uses and multi-family housing.

Rezoning these properties to match the comprehensive plan designation also **helps to fulfill the long term growth vision for the City of Portland** of neighborhood commercial centers and main street corridors while preserving the charm of historic Portland.

Rezoning as CE provides a myriad of **advantages** for the citizens of Portland, whether it be bike and transit friendly housing for students, **broadening the housing opportunities** to city residents, or small-scale neighborhood services. This aligns with the decisions to rezone the abutting properties as CE.

Lastly, as owner occupied properties, there is **no risk of displacement** of those occupants, which can help prevent any exacerbation of the housing emergency that Portland faces. If anything, the rezoning **can help mitigate that housing crisis** in a small way and prevent the underutilization of this space.

The level of activity in the neighborhood has already increased significantly from when the last comprehensive plan update was developed, and will undoubtedly continue to increase in the following years. Taking this action now can help ensure that the Planning and Sustainability Commission continues its great work of setting the stage for a well-planned and sustainable Portland, for the residents of this neighborhood and the city as a whole.

Thank you,  
David Kingston  
Owner-occupant at 4434 SE 26<sup>th</sup> ave, Portland, OR 97202

May 17, 2016

Dana L. Krawczuk  
DKrawczuk@perkinscoie.com  
D. +1.503.727.2036  
F. +1.503.346.2036

**VIA EMAIL (PSC@PORTLANDOREGON.GOV)**

Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201-5380

**Re: Killian Pacific's Mixed Use Zones Project Testimony  
8112 SE 13th Avenue and 4534 SE McLoughlin Boulevard**

Dear Chair Schultz and Members of the Planning Commission:

This office represents Killian Pacific ("Killian") the owner of 8112 SE 13th Avenue in Sellwood, as shown on the attached Figure 1 (the "Tacoma Site") and 4534 SE McLoughlin Boulevard, as shown on the attached Figure 2 (the "McLoughlin Site").

The Tacoma Site is proposed to be designated Mixed Use Neighborhood under the Recommended Draft of the 2035 Comprehensive Plan and split-zoned CM1 and CM2 under the Proposed Draft of the Mixed Use Zones Project ("MUZP"). Killian requests that the Commission consider eliminating the split-zone and encouraging redevelopment of this under-utilized property by zoning the full Tacoma Site CM2 or CM3 under the MUZP.

The McLoughlin Site is proposed to be designated Mixed Use Neighborhood under the Comprehensive Plan and zoned Mixed Use Employment ("CE") under the MUZP. Killian requests that the Commission consider rezoning the McLoughlin Site CM3 to encourage large-scale employment or housing development more appropriate for this property.

We appreciate your consideration of these requests, which are detailed below.

**Tacoma Site**

The corner lot of the Tacoma Site is proposed to be down-zoned from Storefront Commercial ("CS") to Commercial Mixed Use 1 ("CM1") with a Main Street ("m") overlay. Killian requests that the Commission consider eliminating the split-zone and encouraging redevelopment of this under-utilized property by zoning the full Tacoma Site CM2 or CM3 under the MUZP.

The CM1m zoning is proposed as part of the Low Rise Commercial Storefront Areas effort to retain the character of older main street areas with low-rise Streetcar-Era storefront buildings.



Killian has no current plans to redevelop the Tacoma Site and is happy to defer to community desires to retain the Tacoma Site as-is. However, Killian questions whether down-zoning commercial corridors throughout the City is too blunt of a tool. A corridor does not necessarily lose its character through the addition of buildings with greater heights and FAR. Killian appreciates the competing goals of the City's rezoning effort in which it is important both to safeguard recognized storefront corridors in the City's commercial neighborhoods, and to appropriately zone commercial areas to encourage redevelopment and density. We hope this balance can be struck without unnecessarily depressing development potential in commercial areas.

**If the City moves forward with the Storefront Area regulations, Killian requests that the Tacoma Site's down-zone to CM1 be removed for the following reasons:**

First, as shown on Figure 1, the Tacoma Site's predominate frontage is on SE Tacoma Street, which is an established commercial corridor and proposed for CM2 zoning. As shown on the attached Figures 3 and 4, all of the retail establishments in the Tacoma Site's current development face SE Tacoma Street and Killian anticipates that this will continue to be the case under a redevelopment scenario because of the increased commercial intensity along SE Tacoma Street. Applying the more restrictive Storefront Area zoning to the Tacoma Site simply because it also has frontage along SE 13th will not cause redevelopment to front SE 13th or be designed to mimic its main street character.

Second, it is appropriate and consistent with the desired storefront character of SE 13th to have more intense development on corners where SE 13th fronts a more developed corridor like SE Tacoma Street. Rezoning the Tacoma Site and other properties that front both Tacoma and 13th to CM2 allow this more intensive development at a natural point along the SE 13th corridor.

Third, only one of the lots at the corner of 13th and Tacoma contains a building from the Streetcar Era (1950's and before) which the Storefront Areas are designed to protect. The development on the Tacoma Site was built in 2000 and does not have historic significance. The remainder of the corridor does contain some Streetcar Era buildings but according to the Draft Low Rise Commercial Storefront Analysis has the lowest percentage of lots with Streetcar Era storefront buildings (52%) and ties for lowest percentage of street frontage with these buildings (50%). This is considerably lower than the other proposed Storefront Areas, which typically have 70 percent or higher coverage with Streetcar Era buildings.

Fourth, the Tacoma Site is significantly under-developed. As shown on the attached Figure 5, the Site contains a large surface parking lot that occupies half of its 13th Avenue

frontage. Under the proposed CM1 zoning redevelopment is unlikely to be financially feasible or attractive, which will preserve the existing underutilization of the Site.

Finally, the MUZP proposes to split-zone the Tacoma Site CM1 and CM2. The existing building on the property is located on both lots within the Site. The City has a policy against split zoning sites and buildings and this should be considered when rezoning the Tacoma Site.

### **McLoughlin Site**

The McLoughlin Site is currently zoned General Commercial (“CG”) and is proposed for rezoning to CE. As shown on the attached Figures 6 and 7, the McLoughlin Site is primarily developed as a surface parking lot. It is adjacent to a 24-Hour Fitness, other parking lots and various commercial uses. The Site is not near more sensitive residential neighborhoods and has easy access to the MAX Orange line at the nearby SE 17th and Holgate MAX station, as well as frequent Tri-Met bus service on lines 17, 19, 30 and 70. For these reasons, the approximately 32,000 square foot McLoughlin Site is ideal for large-scale employment, housing, or mixed use development. The proposed CE zoning will limit the Site to a base height of 45 feet and base FAR of 3:1, while the CM3 zone allows 65 feet of base height.

According to the MUZP Section 33.130.030.D, the Site’s proposed CE zoning is intended to emphasize commercial and employment uses and allows for drive-through’s and auto-accommodating uses. In contrast, CM3 zoning is a large-scale zone intended for sites in high-capacity transit station areas, and is not appropriate for sites where adjacent properties have single-dwelling residential zoning. The McLoughlin Site is near the new MAX line and not adjacent to single-dwelling areas. The Site is in an ideal location for additional density and CM3 zoning will drive redevelopment that is unlikely to occur under the proposed CE zoning. Killian has been approached by drive-through businesses with an interest in the McLoughlin Site, but hopes to instead redevelop the property to maximize density for employment, housing, or mixed uses.

Killian acknowledges that the current version of the Comprehensive Plan adopted by City Council designates the McLoughlin Site Mixed Use Neighborhood, for which CM3 is not an allowed zone. Killian requests that the Commission consider rezoning the Site to CM3 under the MUZP and request that the City Council reconcile the Comprehensive Plan discrepancy later in the planning process.

Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 17, 2016  
Page 4

Killian appreciates the City's competing tasks to respond to neighborhood concerns regarding higher density, while maximizing the investment in light rail and other infrastructure that should drive higher density in mixed-use areas. Killian has no current plans to develop either the Tacoma or McLoughlin Sites at this time, but requests that the Commission consider rezoning both Sites to allow greater density. Both Sites are located within commercial areas that can support greater heights and density than is currently proposed. If the City wishes to see properties like these redeveloped within the 2035 planning horizon, additional density will encourage this in a way the proposed zoning will not.

Thank you for your consideration of these requests.

Very truly yours,



Dana L. Krawczuk

DLK:rsr

cc: Mr. Noel Johnson (via email)  
Mr. Barry Manning (via email)

Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 17, 2016  
Page 5

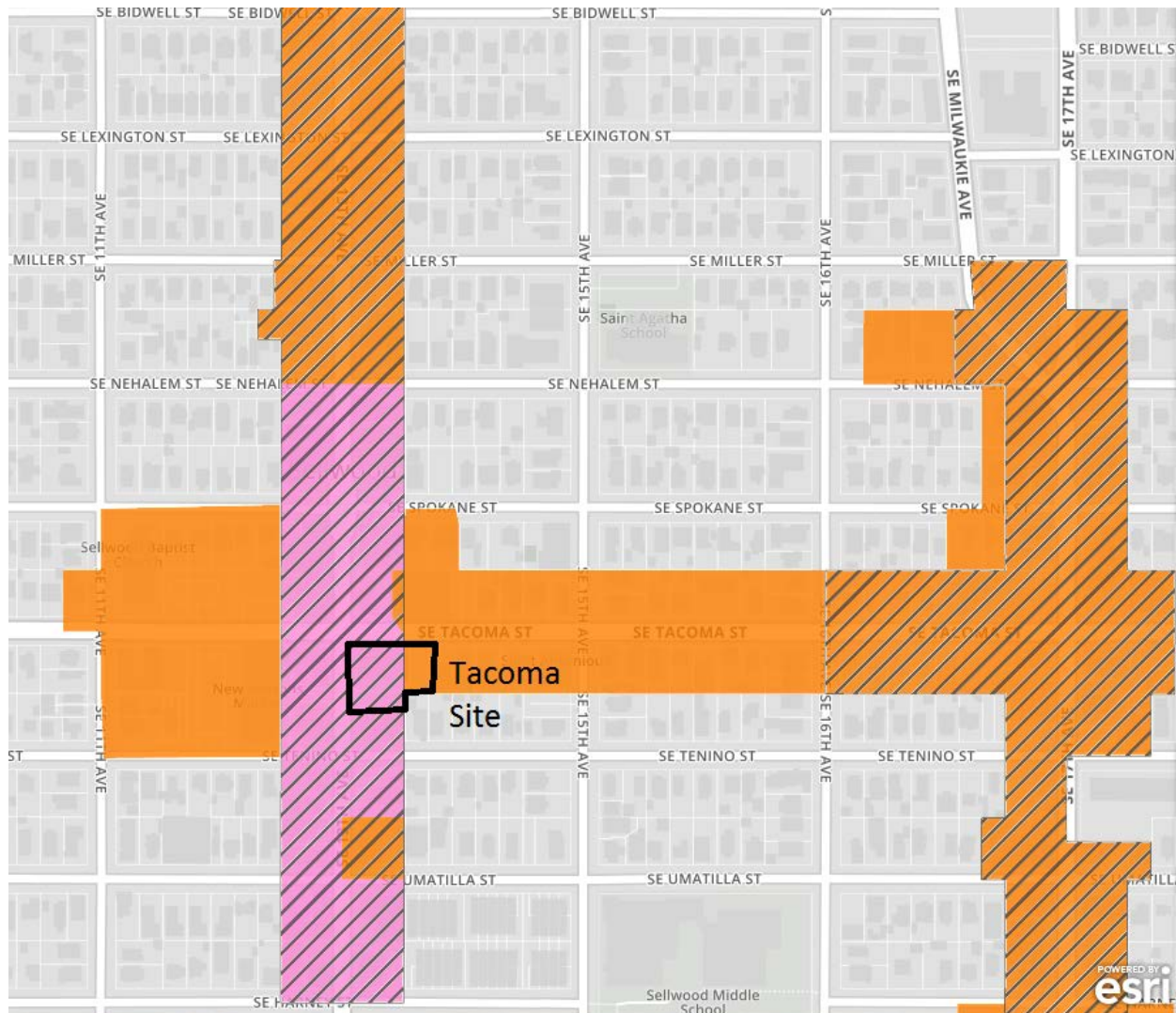
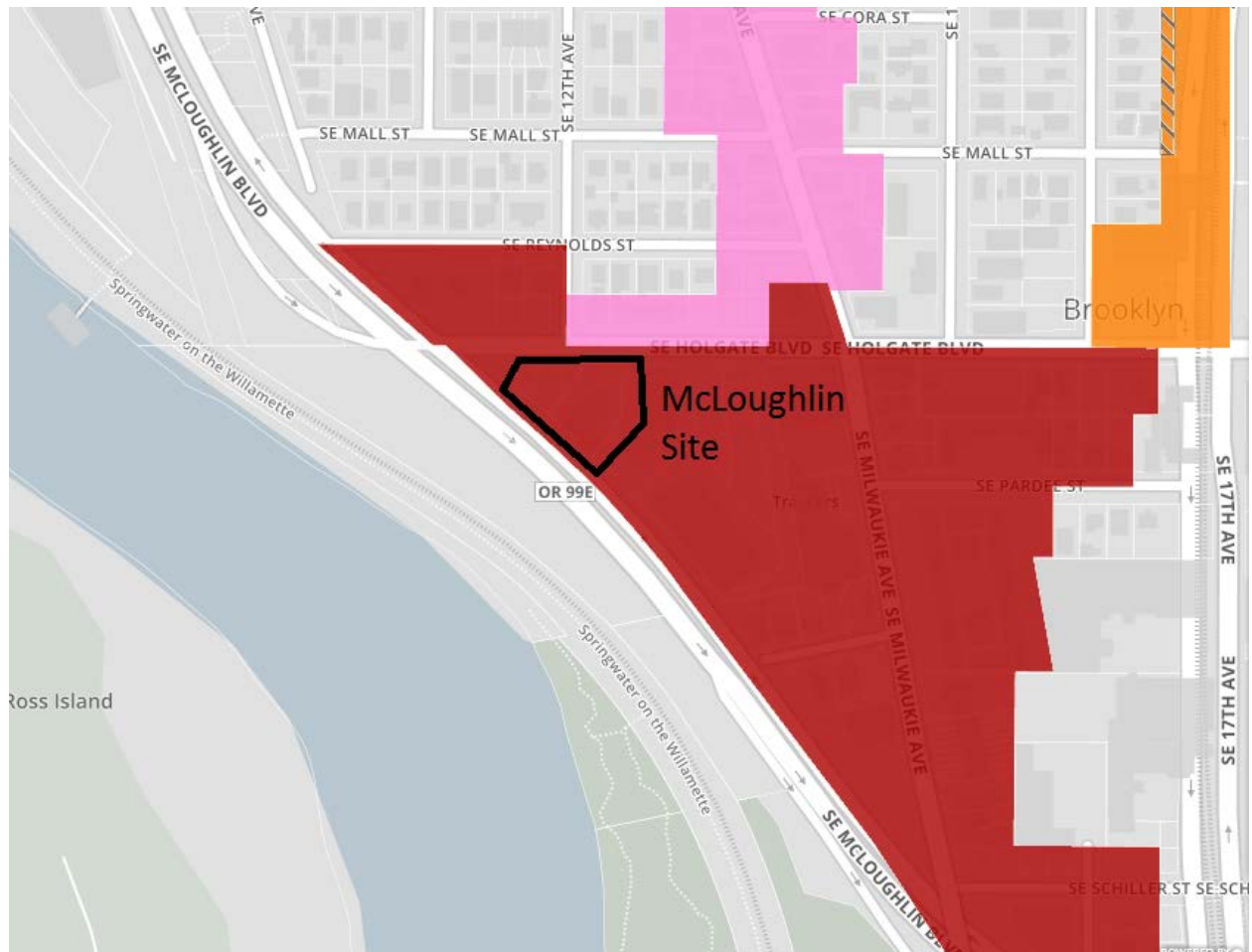


Figure 2: McLoughlin Site





Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 17, 2016  
Page 7

Figure 3: Tacoma Site Frontage Along SE 13th Avenue



Figure 4 - Tacoma Site Frontage Along SE Tacoma Street



Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 17, 2016  
Page 8

Figure 5: Tacoma Site Aerial





Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 17, 2016  
Page 9

Figure 6 McLoughlin Site Aerial



Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 17, 2016  
Page 10

Figure 7: McLoughlin Site Development



**From:** Alan Kessler [mailto:alankessler@gmail.com]  
**Sent:** Tuesday, May 17, 2016 10:14 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** I Oppose Downzoning of "Low-Rise Commercial" Areas

Dear Planning and Sustainability Chair, Katherine Schultz:

I am a resident of the Richmond neighborhood and a member of the board of directors for the Richmond Neighborhood Association, though I am writing only on my own behalf.

I wish to express my strong opposition to the proposed downzoning of so-called "Low-Rise Commercial Storefront Areas."

As you are aware, the proposed CM1 zones are a political response to a coordinated attempt by certain citizens to reduce much-needed density on corridors in their neighborhood. This is bad policy. The corridors are intended to continue to develop into vibrant social spaces, with eyes on the street and rich opportunity for social contact. We should be promoting density and good urban design in these places as much as anywhere in the city.

The proponents of this amendment claim that their intent is to preserve the "historic" 1- and 2-story buildings: This is pretext.

Limiting buildings to 3 stories will mean that when the older buildings are torn down, fewer homes will replace them than would under the original draft. If some of these buildings are historic assets, they should be listed on the federal register. Zoning is both ineffective and the incorrect tool for saving these buildings from demolition.

Please reject this amendment.

Best Regards,  
Alan Kessler  
2725 SE 36th Ave  
Portland, OR 97202



To: Planning and Sustainability Commissioners

From: Kalberer Properties, LLC

CC: Susan Anderson, Joe Zehnder, Eric Engstrom, Bill Cunningham, BPS

Subject: Mixed Use Zones Project

I would like to write in opposition of the planned change in zoning for our property located at 3557 SE Hawthorne, the Hawthorne Retail Center, from the current zoning of CS to the new rezoning of CM1. This site is 14,500 total square feet supporting a 7,100 square foot retail center and is an extremely important parcel along this section of SE Hawthorne. With a major renovation in 2010, this retail center is home to Umpqua Bank, Goodwill and Toadstool Cupcakes along with 28 much needed parking stalls in support of the Center. This parcel is also one of the largest developable parcels along this section of Hawthorne as well.

Currently the CS (Storefront Commercial) zoning would allow us to develop a building with a maximum height of 45 feet and a maximum floor area ratio of 3 to 1. Under the proposed new Commercial/Mixed Use Development Standards for CM1, our maximum height would be reduced to 35 feet and the maximum floor area ratio reduced to 1.5 to 1 with a bonus FAR of up to 2.5 to 1. As this is part of the Comprehensive Plan update for the 2035 planning process, this significant reduction is not taking into consideration the growth and density that the City of Portland will experience over the next 20 years. In our opinion, this rezoning to CM1 is in conflict with the envisioned future growth and density under the Comprehensive Plan. Understanding that this is an extremely sensitive issue and acknowledging that this area is a unique district with an identity that needs protection, we need to ensure that we can still meet this City's growth and density with smart and compatible infill development. This is a key site for such compatible infill development under the current zoning for height and floor area ratio, but will be a missed opportunity under the proposed zoning changes.

A community-valued commercial center is our shared vision for this center and the reason that we made an enormous investment into this property. Many businesses were upset with the larger developments that occurred to the west of this location and we believe that this zoning change to CM1 is a direct response to ensure that those types of developments do not happen in this section along Hawthorne. But drastically reducing the zoning is not the solution. The zoning change of CM2, which would retain the maximum height of 45 feet and decrease the FAR to 2.5 to 1 with a bonus FAR of up to 4 to 1, is the appropriate zoning for this district. This bonus FAR will allow the owner / developer to meet the City goals of housing or other appropriate goals and there cannot be any development that is over 4 stories tall. Understanding height and FAR and how they impact building design are not easy subjects to understand for everyone, we believe that under the CM2 zoning on our parcel of 14,500 square feet, you will get a better designed building with setbacks than you would under CM1 zoning since we would not have to design a vertical block building to maximize FAR.

Of course future infill development is a concern for this unique district. Rather than dramatically changing zoning, we recommend and support CM2 zoning for this area and accompany this rezoning with specific design guidelines that address the real concerns of compatible infill development. These

design guidelines can address setbacks, building materials, compatibility and other design issues that ensure this district remains special and unique and meets district goals into the future.

We recommend and support CM2 zoning for this area and our property and look forward to working with the BPS staff on this important long term planning helps move this extraordinary Hawthorne commercial district into the future as a vibrant, economically healthy and viable neighborhood for this city.

Thank you for your consideration in this important matter.



Philip A. Kalberer

Member

Kalberer Properties, LLC

**From:** Tony Jordan [mailto:twjordan@gmail.com]  
**Sent:** Tuesday, May 17, 2016 11:18 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Chair Katherine Schutlz,

Please accept the following testimony opposing downzoning on the "Low Rise Commercial Storefront areas."

I live in the Sunnyside Neighborhood and enjoy frequenting the Hawthorne and Belmont commercial storefront areas for shopping and entertainment.

I can empathize with concerns about some segments of these districts seeing demolitions and redevelopment, however, I feel that downzoning these vibrant centers of our main streets will do more harm than good.

Historic preservation, where applicable, and incentives for maintaining the classic storefronts of some of these buildings would be more appropriate actions to save the look and feel of these low-rise commercial segments.

Thank you,  
Tony Jordan  
4540 SE Yamhill St.  
Portland, OR 97215

Recommendations per RTF/ICSC participants Bob LeFeber of Commercial Realty Advisors, Joe Angel of Pacific Star, McDonald's, Albertsons/Safeway, Dutch Bros Coffee, and Fred Meyer Stores. The recommendations are based on a review of the existing built environment, TSP traffic classifications, and the locational criteria of the CE Zone. These state that the CE zone is "...intended for sites along corridors with a Neighborhood Collector or higher traffic classification, especially along civic corridors that are also Major Truck Streets or Priority Truck Streets..." and is appropriate on "...a site that is currently developed in an auto-oriented manner and urban scale development is not economically feasible."

### **Recommended CE Areas**

- 1) N Richmond and Ivanhoe: The Safeway property at the SEC should be CE.
- 2) N Lombard, between Tyler and Polk: The Grocery Outlet and Dollar Tree should be CE zoning.
- 3) The Hayden Meadows Shopping Center: This area is currently proposed to be EG2, but was redeveloped with a number of large retail stores (Lowe's, Dick's, Walmart) and serves North Portland & Vancouver residents as well as travelers along the I-5 corridor. CE is most appropriate for the current use, and the area is anticipated to remain serving this purpose.
- 4) N Lombard and Interstate: The Fred Meyer at the SEC, and the NEC and SWC corners should all be CE. The SWC has a very successful gas station.
- 5) NE Ainsworth and MLK Blvd: At the SEC of Ainsworth you have a Safeway that should be CE, a Walgreen at the NEC that has a drive-thru. The NWC & SWC corner also have drive-throughs.
- 6) NE Killingsworth & 33rd Ave: At the SEC is a very successful New Seasons. These should be rezoned to CE so they can be rebuilt if necessary.
- 7) NE Killingsworth & 42nd Ave: The NEC and the SEC should be zoned CE. There is a former grocery store on the NEC currently owned by PCC that could redevelop one day.
- 8) NE Cully and 57th: The Albertsons should be CE.
- 9) NE Freemont and Sandy: The Safeway at the SWC should be CE.
- 10) NE Schuyler and 33rd: At the NWC is a QFC. This should be rezoned to CE so they can be rebuilt if necessary.
- 11) SE Hawthorne and 39th Ave: Fred Meyer is at the NWC. This site unlikely to be torn down given its success, but could be rebuilt.
- 12) Burnside and 55th Ave: The SEC where QFC is should be CE.
- 13) NE Glisan and 67th Ave: The Fred Meyer at the NWC should be CE.
- 14) SE Stark and 82nd Ave: The McDonalds at the NWC & gas station at the SWC should be CE.
- 15) Burnside and 82nd Ave: The SWC has an old Safeway that was re-tenanted by an Asian market called Hong Phat. The CE zoning should continue to Ash.
- 16) NE Halsey and 102nd Ave: The McDonald's at the NEC should be CE.
- 17) NE Glisan to SE Stark and 122nd Ave: At the SW Corner of 122nd and Glisan, where Safeway is located and the former Target has been re-tenanted, should be CE. Going South, on the Eastside of 122nd there are a number of car dealerships that are more likely to redevelop with CE zoning. At the corners of Stark and 122nd there are old shopping centers including a gas station, bank and Burgerville right on the corners. Part of this is CE, but all 4 corners should all be CE.
- 18) SE Stark and 148th Ave: There are old shopping centers that can be redeveloped at this corner. While the land was not CG before, it would be easier to redevelop as CE
- 19) SE Stark and 162nd Ave: The old shopping center at the SW corner of Stark with Perry's Dollar Store and neighboring automotive uses should be CE.

- 20) SE Powell Blvd and 39th Ave: At the corner of Powell you have Safeway at the SEC and the NEC is redeveloping to accommodate Natural Grocers. Both corners should be CE.
- 21) SE Schiller St and 39th Ave: A very successful Trader Joes is at the NWC with Schiller, this area should be CE.
- 22) SE Woodstock Blvd. between 43rd and 46th: The Bi-Mart and Safeway should be CE zoned. It appears that the frontage of these lots may be CMSO too.
- 23) SE Foster Rd and 67th Ave: The old shopping center at the SEC of 67th and Foster that used to have a grocery store should be CE down to 70th.
- 24) SE Powell Blvd and 82nd Ave: The 4 corners of 82nd and Powell should all be zoned CE. There are a number of drive-throughs and the large shopping center on the NW corner recently had a vacant grocery store that was just re-tenanted with WinCo.
- 25) SE Foster RD and 82nd Ave: The 4 corners should also be zoned CE and the CMSO overlay removed. There is a Fred Meyer at the NWC, Big 5 at the NEC (former Safeway) and several drive-throughs and gas stations in the area.
- 26) SE Division and 122nd Ave: Where there are a number of older shopping centers, all of this should be CE. The largest center at the SW Corner is a well-maintained larger center with a Rite Aid and a closed Albertsons that was recently re-tenanted with a Grocery Outlet. The center also has a Burger King. The NEC has a gas station. These are appropriate for this node in this area and far more likely to be improved and re-tenanted with CE zoning.
- 27) SE Division and 136th Ave: There are Dutch Bros and Dairy Queen drive-throughs on the SEC and a Drive in Diner on the SWC of the intersection that should be zoned CE.
- 28) SW Capital Hwy and Barbur Blvd: There is a Barbur Foods, Walgreens, an auto service center, gas station, McDonalds and other auto oriented uses. This area should be CE and the CMSO overlay removed.
- 29) SW Barbur Blvd and Multnomah Blvd: The Safeway should be CE.
- 30) SW Barbur Blvd and Bertha Blvd: The Fred Meyer should be CE.

### **CMSO Removal Recommendations**

- A) N Richmond and Ivanhoe: The CMSO within the proposed CE next to the Safeway at N Richmond and Ivanhoe should be removed.
- B) NE Killingsworth & 42nd Ave: The NEC and the SEC should be zoned CE. There is a former grocery store on the NEC currently owned by PCC that could redevelop one day. The CMSO within this CE should be removed.
- C) NE Cully and 57th: The CMSO should be removed around the Albertsons on this corner.
- D) NE Freemont and Sandy: The CMSO should be removed at the Safeway located on the SWC.
- E) SE Hawthorne and 39th Ave: The CMSO should be removed over the Fred Meyer at the NWC.
- F) SE Powell Blvd and 39th Ave: At the corner of Powell you have Safeway at the SEC and the NEC is redeveloping to accommodate Natural Grocers. The CMSO should be removed over both of these corners.
- G) SE Woodstock Blvd between 43rd and 46th: The frontage of the Bi-Mart and Safeway in this area both have a CMSO overlay that should be removed.
- H) SE Foster Rd and 82nd Ave: The CMSO overlay should be removed for all four corners of this intersection. There is a Fred Meyer at the NWC, Big 5 at the NEC (former Safeway) and several drive-throughs and gas stations in the area.



- I) NE Glisan and 122nd Ave: At the SW Corner of 122nd and Glisan, where Safeway is located and the former Target has been re-tenanted, this area should have the CMSO overlay removed.
- J) SE Stark St and 122nd Ave: The CMSO should be removed at the corners of Stark and 122nd, where there are old shopping centers including a gas station, bank and Burgerville right on the corners.
- K) SE Division St and 122nd Ave: Where there are a number of older shopping centers, all of this should have the CMSO overlay removed. The largest center at the SW Corner is a well-maintained larger center with a Rite Aid and a closed Albertsons that was recently re-tenanted with a Grocery Outlet. The center also has a Burger King. The NEC has a gas station. These are appropriate for this node in this area and far more likely to be improved and re-tenanted with CE zoning.
- L) SE Stark St and 148th Ave: The CMSO overlay should be removed over this intersection. There are old shopping centers that can be redeveloped at this corner.
- M) SE Stark St and 162nd Ave: The proposed CMSO dropped for the old shopping center at the SW corner of Stark with Perry's Dollar Store and neighboring automotive uses.
- N) SE Division St and 162nd Ave: The intersection is proposed to be CE around the Ross, Rite Aid, Regal properties and other corners, but there is a proposed CMSO overlay. The overlay should be removed.
- O) SW Capital Hwy and Barbur Blvd: There is a Barbur Foods, Walgreens, an auto service center, gas station, McDonalds and other auto oriented uses. This area should have the CMSO overlay removed.



May 17, 2016  
Comments from Dean Gisvold  
ICA Land Use Chair

**Corner lot at 15<sup>th</sup> and NE Brazee**

Of the three changes made by the Mixed Use Zoning Report (Report), two are acceptable and one is not.

For nearby residents, this is a significant change in zoning. The 2035 comp plan amends the R-5 zoning that has applied for decades to the 15,000 square foot property at the northeast corner of NE 15<sup>th</sup> and NE Brazee (the Property). All surrounding property retains the R-5 zoning designation, which predominates in the Irvington Historic District. The Comp Plan amendment makes this 15,000 sq foot property CM 1, which is a new mixed use zone designation. This means that the Property is commercially zoned and the Property loses its nonconforming status, which jeopardizes the Good Neighbor Agreement with the Hophouse Brew Pub. The Irvington Community Association and nearby neighbors oppose this change.

The Report, however, indicates that small commercial properties surrounded by single family zoning will retain the limitation on hours of use that such property enjoyed as a nonconforming use, **close by 11 pm and no morning activity until 6 am.**

But this limitation, as presently drafted, only applies to sites of 7,500 sq feet or less.

**Thus, the ICA proposes that the threshold for this limitation found on page 69 of the Report, Section 33.130.100 B 2 c be amended to 15,000 sq feet.**

**In the alternative, if this amendment is not made, the ICA proposes that the proposed up zoning for the Property be eliminated from the Comp Plan map, such that the zoning remains an R-5 zone.**

One other alternative not discussed by the ICA, but came to mind as I was preparing this testimony, is that if staff and the PSC have any heartburn over these proposals, you could narrow the scope of the change by making the 15,000 sq foot threshold apply only to properties located in historic or conversation districts. This narrowing was used in other part of the Report, such as the application of bonuses to properties in historic districts.

I have attached several pictures of the Property and surrounding houses, plus a copy of the City's zoning maps for this area.

Dean Gisvold, ICA Board member and ICA land use chair  
2225 NE 15<sup>th</sup> Ave, 97212  
Irvington resident

dpg\ica\mixed use zone\testimony



The 3 businesses and parking lot from  
Razee



Parking lot of property from 15th Ave





Houses north of Property on 15th

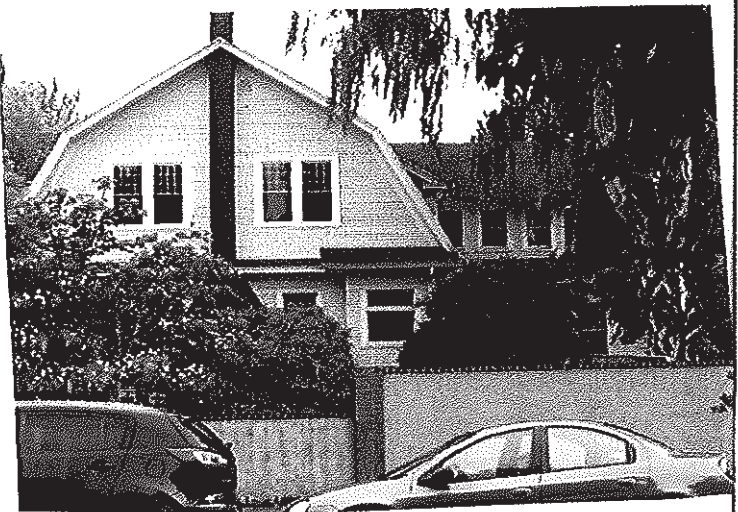
House immediately  
east of Property 2  
↓



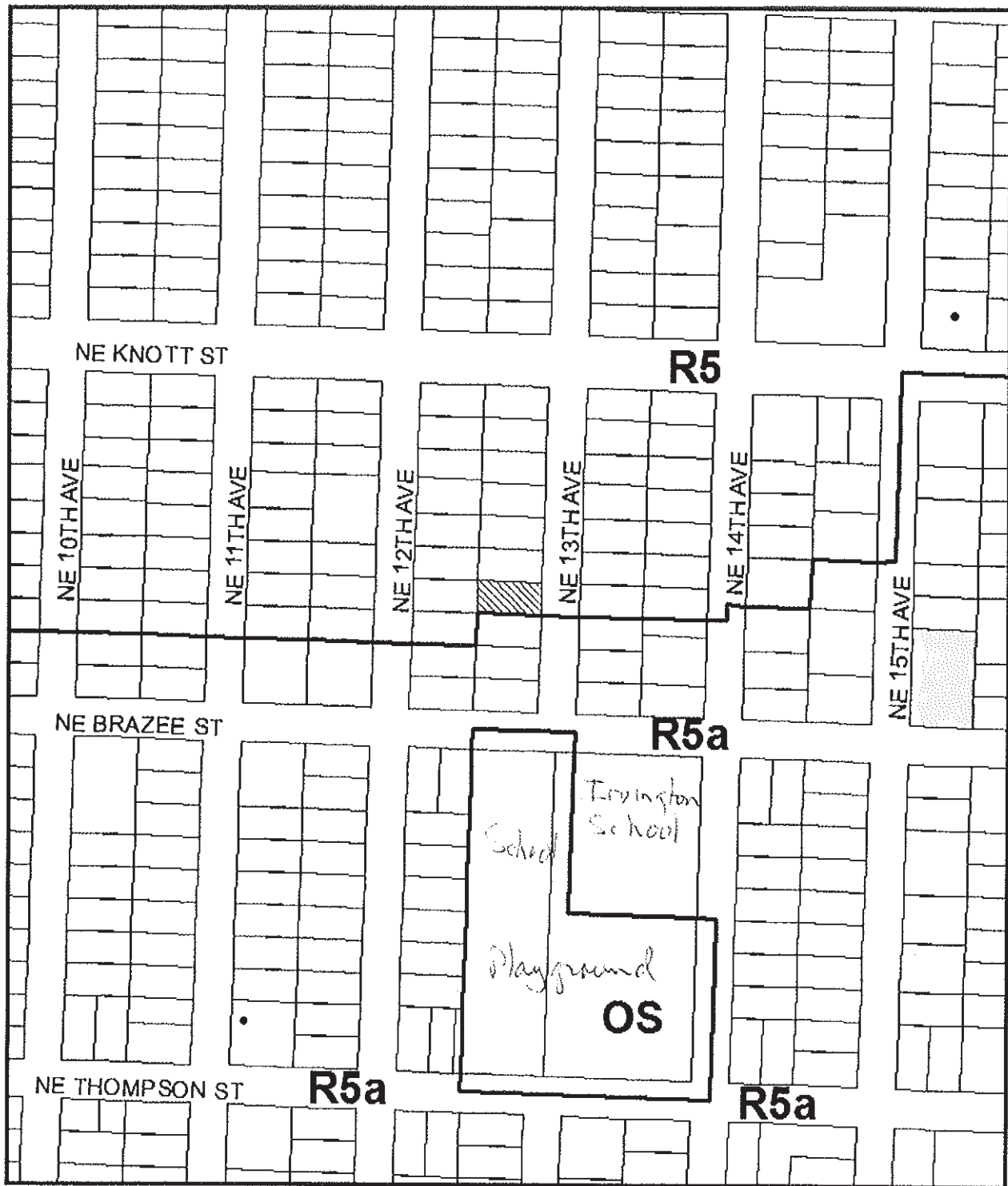
Houses west of Property on 15th



Houses south of Property on Prairie







# ZONING

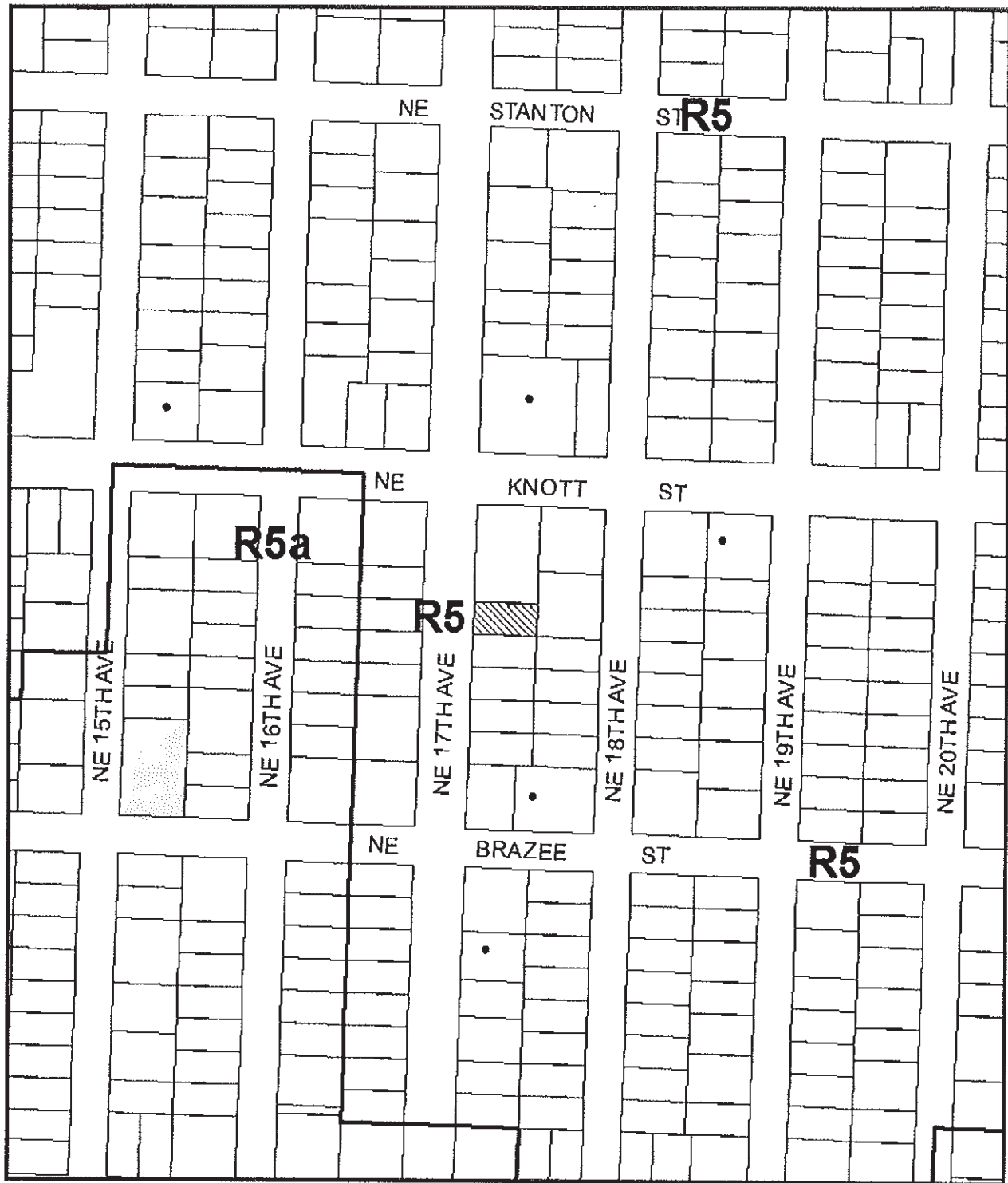


This site lies within the:  
IRVINGTON HISTORIC DISTRICT

 Site

• Historic Landmark

File No. LU 15-255518 HR  
1/4 Section 2731  
Scale 1 inch = 200 feet  
State\_Id 1N1E26BD 17900  
Exhibit B (Oct 27, 2015)



# ZONING



NORTH



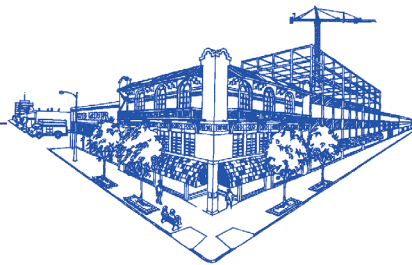
Site



Historic Landmark

This site lies within the:  
IRVINGTON HISTORIC DISTRICT

File No. LU 16-107530 HR  
1/4 Section 2732  
Scale 1 inch = 200 feet  
State\_Jd 1N1E26AC 15600  
Exhibit B (Feb 12, 2016)



## MEMORANDUM

---

To: Portland Planning & Sustainability Commission (PSC)  
From: Eric Hovee - Principal  
Subject: Revisions to MUZ Proposed Draft to Address Portland Retail Needs  
Date: May 17, 2016

---

On April 14 and 20, I provided testimony to the City Council supporting Comprehensive Plan policies related to retail development (P60), a full spectrum of grocery stores (P44), and development regulations that transition over time (P51). My oral comments were supplemented by transmittal of documents including discussion of *Retail Performance by Pattern Area* (as a draft document initially prepared January 14, 2016) and a memorandum titled *Portland and Pattern Area Retail Demand and Sales Analysis* (dated April 22, 2016).

This oral and written testimony was submitted on behalf of the Portland-based Retail Task Force (RTF) and International Council of Shopping Centers (ICSC). My understanding is that on May 9, the City Council approved inclusion of the three retail-related policies noted above.

### SUMMARY OF COMMENTS – MUZ PROPOSED DRAFT

As stated by the proposed draft of March 2016, the *Mixed Use Zones Project* (MUZ) is intended to “implement Portland’s new Comprehensive Plan.” Consistent with approved plan policies, the purpose of this memorandum is to request that the PSC take actions with the MUZ to:

- 1) Refine the BPS buildable lands inventory to focus on vacant/redevelopment parcels with current CG versus proposed CE zoning (with and without CMSO) prior to MUZ adoption.
- 2) Make map changes per separate RTF testimony for continued auto-accommodating uses including grocery retail at locations now designated for CG or other large site use.
- 3) Defer Centers Main Street Overlay (CMSO) implementation at current CG locations pending prior realization of 15-minute frequent transit service and 50/50 mode split.
- 4) Concurrently amend the zoning code to mitigate likely non-conforming development and use issues anticipated to arise with MUZ implementation.

The rest of this memo provides background and rationale for the requested revisions.

## BACKGROUND

In testimony before the City Council on April 14 and 20, several observations were made as pertinent to Comprehensive Plan policies and as also important for resulting MUZ consideration with Comprehensive Plan implementation: These observations were that:

- Outside of the Central City, Portland is under-retailed – not providing the widest range of retail as needed to conveniently meet the day-to-day needs of city residents, especially for grocery retail.
- In parts of the city like east Portland, grocery choices remain scarce and expensive.
- The lack of adequate, affordable full service grocery means that residents must travel further to shop or use convenience stores as a less healthy alternative.
- The city's *food deserts* are also the places where building rents are sub-par, making it more challenging for investment in quality retail to support high costs of new development.
- While transit, walking and biking are on the rise, auto use still accounts for more than 80% of trips outside the central city.
- City-wide development standards that work in higher density areas with good transit service run the risk of proving counterproductive for residents living in areas that are still auto dependent and with lesser access to quality, healthy and affordable retail services.

Our bottom line conclusion is that encouraging investment requires development standards *in sync* with what the market will support today – as well as where it might evolve longer term. While development today should be expected to largely match the existing built environment; conditions may change especially in more active market subareas, less so in areas of the City that even today may be underserved for goods and services that area residents shop for on a regular basis.

What is important is to not get too far ahead of what market demand and rents will support. Otherwise, investment freezes and Portland will move further from rather than toward the type of full service community that the Comp Plan envisions over the next 20 years.

Development standards can become more aggressive in places that become more walkable as transit service improves and auto use declines. Retail will respond with less parking and greater development intensity – getting closer to the customer.

The MUZ revisions requested are intended to address these concerns – in conjunction with the Comprehensive Plan policy aimed to consider short-term market conditions and how development patterns will transition over time when creating new development regulations. This background provides the underlying rationale for four requested MUZ revisions detailed as follows.

## 1) REFINE THE BUILDABLE LANDS INVENTORY

General Commercial (CG) currently is the primary zone with the stated intent to “allow auto-accommodating commercial development.” With the draft MUZ proposal, CG would be removed as a City zoning district. Over 600 acres (or nearly 40% of CG lands) would be re-designated from CG to less auto-accommodating zoning districts including CM1, CM2 CM3 and CX. Loss of auto-accommodating CG land and other non-CG zoned large sites may be further exacerbated with the proposed CMSO district overlay – affecting key development factors as for drive-throughs, minimum FARs, building design/orientation, and vehicle areas .

A related concern is that the fine-grained nature of the MUZ designations are reminiscent of *spot zoning* which greatly reduces the flexibility and incentives for development. This is especially the case when a single development may encompass two or more zone (plus CMSO) designations – greatly complicating and increasing both the cost and uncertainty associated with the development process. This will further accentuate challenges with meeting market demand in areas where commercial rental rates are not adequate to readily support the cost of new development – as in east Portland.

The extent of this reclassification and much more complex zone process potentially raises Goal 9 issues – especially as the buildable lands inventory included with the current Economic Opportunities Analysis (EOA) has not differentiated between auto-accommodating and other commercial uses. With respect to Goal 9 and associated EOA requirements, the most straightforward pathway to address this prospective *net loss* would be to refine the BLI by quantifying vacant and redevelopable auto-accommodating land area with CG as currently defined versus CE as proposed (with and without CMSO) in advance of MUZ adoption.

## 2) FACILITATE AUTO-ACCOMMODATING COMMERCIAL USE

A second recommendation is to consider and act on a series of location-specific re-designations as have been requested by individual retailers and on a coordinated basis via other RTF testimony. If the CG designation is to disappear, the overall thrust of these site specific requests is to:

- Most closely approximate the current zoning by having these properties (including many larger commercial sites) re-designated to CE – as the nearest comparable to existing CG.
- Not apply the CMSO overlay to these specific properties, providing greater flexibility and incentive for redevelopment that the market will support both now and over 20 years.

While this case-by-case approach will address some of the more significant issues currently identified (as with larger properties), it may not address situations not yet identified – including challenges as yet unforeseen for smaller site development as on commercial corridors with relatively limited parcel depth. Addressing as yet unforeseen consequences is a reason for considering a multi-prong approach – also involving recommendations #3 and #4.



### 3) DEFER CMSO IMPLEMENTATION

As noted at the outset, RTF/ICSC recommends deferring CMSO implementation on proposed CE and other MUZ properties at current CG designated locations, pending prior realization of 15-minute frequent transit service and 50/50 mode split.

Recognizing that 80% of trips in Portland are still by auto, standards that impede auto accessibility and convenience will similarly impair retail development feasibility and sustainability. This is the case in virtually all areas of the city except those where strong transit service and a high non-auto mode split is currently in evidence – as in Portland’s Central City.

While the CMSO proposal has been modified to better address these retail concerns, RTF/ICSC remains concerned that the current proposal will prove counterproductive. Specific concerns for CMSO proposed locations where auto use is still predominant relate to:

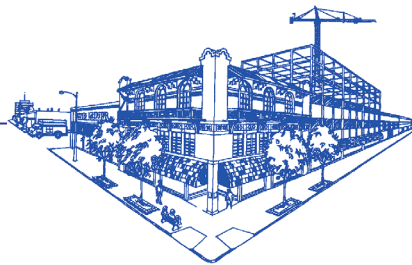
- Spot zoning effect – where one part of a development may be subject to CMSO while others are exempt, greatly increasing the complexity and cost of development.
- Prohibition of quick vehicle servicing and drive-through facilities at sites that may have transit service but are primarily auto reliant – at a time when drive-throughs are of increased importance not just to uses such as food service and banking but also in support of broader retail trends as with grocery and pharmacy.
- Minimum FARs that will be ahead of what the market supports – especially for sites and retail uses where parking demand remains high and structured parking is not feasible.
- Building design, orientation, minimum window area, and vehicular limitations – especially at sites situated on more than one transit street or adjoining residential neighborhoods with limited options for truck loading and back-of-house functions.

Transitioning to CMSO-related CMSO is requested to occur after rather than before demonstrated transit and related non-auto related benchmarks have been achieved. Otherwise, the effect will be to freeze much of the existing development pattern in place – with new investment required at much more rigorous standards deemed not feasible in the interim.

### 4) ADDRESS NON-CONFORMING DEVELOPMENT & USE ISSUES

A final concern is that the MUZ program, as proposed, may result in creation of significant non-conforming issues that could serve as a disincentive to ongoing property reinvestment and associated business financing capacity. It is understood that BPS is working to address this issue in conjunction with the Comprehensive Plan update and the MUZ. Recommended is that MUZ adoption not occur until pertinent city codes are amended to mitigate likely non-conforming development and use issues anticipated to arise due to MUZ implementation.

c: Mark Whitlow, Perkins Coie LLP



## MEMORANDUM

---

To: Mayor Hales and City Council

From: Eric Hovee - Principal

Subject: Portland and Pattern Area Retail Demand and Sales Analysis

Date: April 22, 2016

---

On April 14 and 20, I provided testimony to the City Council supporting Comprehensive Plan policies related to retail development (P60), a full spectrum of grocery stores (P44), and development regulations that transition over time (P51). By memorandum dated April 19, BPS staff responded to material I submitted at the initial April 14 City Council hearing titled *Retail Performance by Pattern Area* (as a draft document initially prepared January 14, 2016).

The purpose of this memorandum is to respond to the BPS analysis with supplemental discussion which is requested to be made part of the open record. The April 19 BPS memo makes two overall points summarized with our response as follows:

- 1) BPS staff does not think there is a need to amend the Economic Opportunities Analysis (EOA) to address retail capacity issues raised in testimony of Mark Whitlow and Eric Hovee on April 14 on behalf of the Retail Task Force (RTF) and International Council of Shopping Centers (ICSC).**

Response: While we raised the need for EOA revisions in earlier discussions with BPS, we have not made this request in oral testimony to the City Council as policy revisions (item #2) represent the greater RTF/ICSC priority for Council support. However, we ask that the written record include a request for Council consideration of substantive but minimal retail-related revisions to the EOA (per the Appendix to this memorandum).<sup>1</sup>

- 2) BPS supports amending or adding policies to the Comprehensive Plan in support of retail development, especially grocery stores – but takes exception to our supporting retail analysis.**

Response: These policies have been requested by Commissioner Saltzman and are supported as part of the BPS staff recommendation which is most appreciated. However, we would also take this opportunity to respond to specific concerns raised by the BPS memorandum.

The remainder of this memo provides additional detail regarding these two items.

# 1) AMENDING THE EOA

Reasons for requesting EOA amendments as manner proposed by the Appendix are three-fold:

- a) **To establish the most succinct, yet clear linkage between supporting Comp Plan documentation and resulting retail-related policies as currently proposed** – better assuring compliance with state Goal 9 requirements. Mark Whitlow has submitted testimony expressing the concern that rezoning away from general commercial (CG) will greatly reduce the supply of sites suitable for auto-accommodating retail, which is untenable when more 80% of trips outside the Central City are still made by automobile. For example, the City is required to include findings explaining how new proposed site development restrictions, such as those imposed with the Centers Main Street Overlay (CMSO), will not adversely impact its Goal 9 inventory. A related concern is that new site development constraints (as with the Mixed Use Zones proposal) will further undermine the buildable land/commercial supply analysis in the EOA. Commercially designated lands that currently support larger-format and value-oriented neighborhood commercial uses and drive-through facilities may no longer serve this function if proposed site development standards will prove either too physically constraining or too expensive for many lower-margin businesses – including grocery stores – to be feasibly sustainable. In effect, the City is proposing new and stringent site development standards that seriously limit the ability to the full range of neighborhood commercial uses – but without analyzing how such site development standards impact Portland’s new effective inventory of commercial land. In the absence of a revised inventory or appropriate policy guidance, the EOA appears vulnerable to falling short of the requirement that the plan accommodate “the widest range of retail” as defined by OAR 660-009-005(6).<sup>2</sup>
- b) **To reference more detailed retail analysis than has been included with the EOA** – the initial preparation of which dates to 2009. Of particular importance is the need to evaluate retail sales and leakage patterns by geographic (or “pattern areas”) of the city – as now proposed with Mixed Use Zones Project that will be considered by City Council following Comp Plan adoption – but not envisioned at the time the EOA retail analysis was conducted. Also relevant is the request to reference subsequent analysis for PDC indicating a “lack of available sites” for grocery stores. While it can be methodologically challenging to distinguish short term from long-term availability, this is an issue that nonetheless warrants Goal 9 consideration per OAR 660-009-0025(7).
- c) **To occur concurrently with other EOA revisions being requested by BPS** – while avoiding the need to have the EOA revised or amended in more comprehensive fashion. The relatively minor but substantive retail revisions being requested are consistent with though less significant than the EOA revisions being made by BPS to amend the Harbor forecast. Our understanding is that while BPS would prefer to minimize EOA revisions, these requested retail-specific additions could readily be made if so directed by City Council.

There are at least two ways of addressing questions related to adequacy of the current EOA. One option would be delay Comp Plan adoption pending revision of the existing buildable land inventory to more directly assess supply suitable for grocery and other large format uses vis-à-vis the proposed new mixed use zones. A second option is to proceed with Comp Plan adoption as now proposed – but with policies and EOA inclusions that provide clear guidance for subsequent implementation actions including Mixed Use Zone consideration. This second option meets with RTF/ICSC concurrence subject to appropriate policy and EOA safeguards.

## 2) RETAIL LEAKAGE

There are a number of concerns related to our retail analysis that BPS raises with its April 19 memorandum that can be addressed point-by-point. Before proceeding with this detailed discussion, it is important to first highlight a pivotal area of agreement between the retail analyses provided both by our firm and BPS, namely that:

*Both the BPS and Hovee analyses agree that there is grocery sales leakage when considered on a city-wide basis as well as for the east, west and inner pattern areas of the City. Because we use different data sources, estimates of the degree to which these pattern areas are under-retailed vary – but there is virtual 100% alignment on which areas of the City are underserved. This common finding provides clear empirical support for the retail policies that have been recommended by BPS and which we support for Council adoption (P44, P51, and P60)*

We now proceed to consider some of the areas of BPS concern in more detail.

**Different Data Sources.** For this analysis, we have used the two of the most prominent private demographic and retail sales leakage data sources in the country:

- **BPS utilized ESRI** – a firm best known for its geographic information system (GIS) software but which has become an important provider of location-specific demographic and economic data.
- **EDH utilized Nielsen** – a firm perhaps best known at one time for television ratings but now (with the acquisition of Claritas) is a significant provider of customized market data.

As with many private proprietary data bases, the internal economic modeling mechanics of ESRI and Nielsen are essentially a *black box* system, with specific modeling formulations not readily divulged. Both firms are somewhat more clear about the data sources and both appear to draw from similar sources of data. As defined by Nielsen (with data sets as we have provided to BPS):

Nielsen's Retail Market Power data is derived from two major sources of information. The demand data is derived from the Consumer Expenditure Survey (CE Survey, or CEX), which is fielded by the U.S. Bureau of Labor Statistics (BLS). The supply data is derived from the Census of Retail Trade (CRT), which is made available by the U.S. Census. Additional data sources are incorporated to create both supply and demand estimates.

More detailed statements of Nielsen demographic and retail analytics are provided by the web site: <http://www.tetrad.com/demographics/usa/nielsen/>.

Areas of potential divergence are that ESRI appears to place more reliance on Dun and Bradstreet business information than Nielsen while Nielsen appears to place greater reliance on American Community Survey (ACS) data of the U.S. Census Bureau for estimating household income.

In any event, Nielsen estimates in-city consumer demand (and household incomes) to be higher than what ESRI estimates, while ESRI indicates actual spending in Portland to be higher than what is indicated by Nielsen modeling.

If BPS is interested, we would be prepared to cooperate in a more detailed review of the data sources and methodologies used by both of these national data providers. In the absence of what might be a considerable research project, an alternative approach is to use the two retail analyses to bracket the likely range of potential retail performance and sales leakage in Portland. This is the approach taken with this memorandum.

**Overall Sales Leakage or Surplus?** While both ESRI and Nielsen agree that Portland experiences sales leakage in grocery, there is disagreement between the data two sources as to whether Portland experiences net sales leakage or surplus when considered for *all retail store types* combined. Nielsen data indicates net leakage for all retail of 9% while BPS-cited ESRI figures indicate a net surplus of 10%.

Our initial draft working paper on Retail Performance by Pattern Area (of 1-14-16) cited just the Nielsen figure, as we did not have the counterpart BPS-ESRI data at that time. Based on the combined sources, it is reasonable to say that while it is not clear whether Portland experiences overall net sales leakage or surplus, the City appears to be roughly in balance (with a range of about +/- 10%).

**Additional Sales/Leakage Caveats.** Two additional items are of note:

- Based on what we see with data in hand at this time, it also appears to be the case that any net positive retail contributions may be attributable primarily to Portland's Central City area where sales far exceed what the Central City's residential population alone supports. Based on Nielsen data, the other pattern areas of the city show overall sales leakage not just for grocery but for other retail sales categories. It would be helpful if BPS were to provide the data to confirm whether this is the case or not with ESRI data, as well. *Note:* BPS has provided leakage data by pattern area for grocery retail but does not provide this level of geographic detail for all retail store types combined (with its April 19 memo).
- Our retail performance analysis indicates that about 18% of retail sales (especially large format) activity city-wide occurs outside of BPS defined pattern areas – primarily at Hayden Island/Meadows and Cascade Station. For total comparability, it would be



useful for BPS to provide ESRI estimates for this *outside of pattern area* geography – or indicate how these otherwise unaccounted for in-city retail sales have been allocated.

**Vacancy Rates & Rents.** BPS analysis suggests that our findings of a higher vacancy rate and lower rents in East Portland are an indicator of retail space availability – also that something other than zoning capacity/land development is at work – most likely insufficient demand and business support. BPS further asserts that rather than rezoning more land for commercial retail, the solution is to “support business growth through programs like PDC’s Neighborhood Prosperity Initiative.”

The BPS analysis appears to overlook three critical items:

- There is more East Portland demand than supply evidenced by apparent sales leakage. With grocery, the deficiency is met in part by residents traveling elsewhere out-of-distance to shop and by spending more at the nearby but less healthy convenience store alternative.
- With lower East Portland incomes, unmet demand is evident but is not being adequately addressed by retailers operating at lower price points with discount stores or entrepreneurial startups that require lower cost space, operating at narrow profit margins. Design requirements that can be afforded in higher income, higher cost locales (as with the inner area) render development infeasible when development requirements and associated costs exceed what low rental rates will support.
- PDC programs tend to be limited in scope, eligibility and funding availability. If these resources are to be viewed as a city-wide mechanism to fill the financial feasibility gap for grocery and other retail, further financial analysis should be provided with the EOA or other BPS analysis to demonstrate adequacy of resources required over the 20-year time horizon of the proposed Comprehensive Plan.

In effect, the issue appears not to be one primarily of demand or even available financial incentives, but of supply. Zoning and associated development regulations do directly affect the supply of sites sized to the market with design standards and associated costs that either meet or exceed what area rents will support. For East Portland, addressing the pricing aspect of supply will prove instrumental to better taking care of unmet resident demand both in the near term and over the 20-year horizon of the Comprehensive Plan.

**Food Deserts.** We would concur with much of the BPS discussion regarding difficulties faced by West Portland grocers due to topographical constraints. Resolving this will require much different approaches than in East Portland. Redevelopment with SW corridor high capacity transit may afford new opportunities but with recognition of continued need for auto accessibility for residents located away from major arterials on streets best accessed by car.

The grocery map for parts of Inner and East Portland indicate grocery gaps that extend beyond the Parkrose and 122<sup>nd</sup>/Foster areas – with additional coverage gaps extending beyond the 1+ mile walking distance – as in inner Southeast and east of 122<sup>nd</sup> Avenue. While reduced housing

density in East Portland may support less grocery retail than elsewhere in the city, further planning attention is suggested to better assure availability of adequately sized, auto-accommodating and competitively priced sites in these underserved submarkets of the city.

**Buildable Land Inventory.** Several responses to the BPS analysis are noted:

- The 2011 PDC/Leland study is most useful at addressing short-term land availability and suitability (or lack thereof) for consistency with OAR 660-009-0025 (7), topics which are not well covered by the EOA.
- Our firm was most directly involved with the buildable land inventory (BLI) with the initial EOA draft in 2009, less so with the 2012 EOA as adopted by City Council, and not at all with subsequent revisions including the August 2015 and March 2016 drafts. It also should be noted for the record that none of the City's draft or adopted EOAs considered the wholesale conversion of all of the City's commercial land to mixed use, both in the proposed comprehensive plan text and map and, again, in the text of the proposed Mixed Use Zones zoning code and related zoning map.
- Of most significance is that the breakout of sites for pattern areas can be useful as a means of better evaluating realistic commercial development capacity with both this Comp Plan update and the Mixed Use Zones Project proposal. Of less utility is the April 19 BPS breakout which is limited to less than three acre versus more than three acre sites. Based on prior discussions with BPS, RTF/ICSC interest is most focused on 3-10 acre sites which are especially important for viable grocery development.

Our understanding of the current BLI is that 3-10 acre neighborhood commercial sites are in extremely limited supply, meaning that land shortages will need to be offset by parcelization of larger 10 – 50+ acre properties – if suitable and feasible. The BPS analysis would be far more useful if: a) the inventory would be disaggregated to separate 3-10 acre sites from other size classes; and b) the inventory in this size class and the larger size classes were mapped to better ascertain locational suitability for retail development near- and long-term.

## CONCLUSION

The following observations are offered by way of summary:

- RTF/ICSC may be in less disagreement about overall sales leakage than what the BPS report indicates. Given the two data sources now available, the range of retail performance city-wide could be anywhere +/- 10% net leakage or surplus – or roughly in balance.
- Of greater importance for the policy discussion, both Hovee and BPS analysis indicates that Portland experiences net grocery sales leakage that warrants appropriate Comprehensive Plan retail-focused policies – across all pattern areas except the Central City. And our understanding is that RTF/ICSC and BPS staff are both in support of policy amendments P44, P51 and P60.

- Council adoption of the above policies plus RTF/ICSC requested denial of adoption of P32 (regarding drive-through facilities as also pivotal to providing the widest range of retail possible) represent the highest priorities for RTF/ICSC. We also strongly urge City Council consideration of refining the EOA as outlined by the Appendix to this memorandum. This approach assures a better linkage between Comp Plan supporting documentation and policy, as data rather than policy-driven, and as representing a path that offers less risk of Goal 9 non-compliance.
- Whether now or subsequent to Comp Plan adoption (but prior to Mixed Use Zone adoption), we would urge BPS to refine and revise the buildable lands inventory as needed to better address proposed zoning changes and resulting retail suitability with transition from current general commercial to mixed use designations.

Bottom line, RTF/ICSC is prepared to work with the Council and BPS with final Comp Plan policy and ensuing inventory refinements with Mixed Use Zone discussions – together with on-going plan monitoring post-adoption.

Council and BPS considerations of this supplemental written testimony is most appreciated.

c: Mark Whitlow, Perkins Coie LLP

## APPENDIX. RETAIL-RELATED REVISIONS TO PORTLAND EOA (DRAFT 2-24-16)

As a result of meetings involving the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) with the City of Portland Bureau of Planning and Sustainability (BPS), policy revisions are proposed to strengthen Comprehensive Plan provisions to more clearly encourage grocery stores and retail development, especially in underserved areas of Portland. RTF/ICSC also recommends that the following minimal revisions be included with supporting documents of the City of Portland Economic Opportunities Analysis (EOA), August 2015 draft.

**EOA Section 1 Trends Opportunities and Market Factors.** The August 2015 EOA provides retail sales and leakage analysis based on now dated 2008 data at pages 60-67. Suggested for insertion (at page 62 of the Section 1 draft EOA document) is the following update paragraph:

Updated retail sales and leakage data (as of 2015) confirms initial 2008 EOA analysis that that Portland generally appears adequately retailed, when considered for all retail sectors combined. This is due in large part to the high retail volumes of the Central City attracting spending from both City and non-City residents. However, much of Portland outside the Central City area experiences significant sales leakage with retail sales not fully serving resident demand. 2015 retail sales data indicates that sales leakage is particularly pronounced for grocery stores, causing in-city residents to make longer trips outside of their immediate neighborhoods and even out of Portland to meet these daily needs.

**EOA Section 2/3 Employment Land Needs and Supply.** Page 39 of the existing Section 2/3 EOA document notes that: “As with the Town Centers geography, most of the Neighborhood Commercial capacity is in smaller, underutilized, redevelopable sites.” Suggested clarification would read as follows:

The ability to reduce sales leakage and better serve neighborhood business needs may be particularly limited for store types that require larger sites – as with grocery – and in parts of the city where building rents are not adequate to support redevelopment. Also noted is that more recent analysis conducted for PDC (Leland 2011) indicates that a current “lack of available sites” makes it difficult to facilitate grocery store development in underserved areas.

**EOA Section 4 – Community Choices.** Introductory text to existing EOA discussion of Neighborhood Business Districts (EOA Section 4, page 29) describes the importance of these neighborhood business district geographies to the city. Either here or in conjunction with text related to the proposed policies regarding grocery stores and/or retail development, insert a new paragraph as follows:

**Serving unmet neighborhood retail and service needs.** With the exception of Portland’s Central City area, retail needs generated by local residents are generally underserved, especially for grocery that often serves as a neighborhood business anchor use. Providing a diversity of goods and services that are convenient, affordable and accessible will better fulfill objectives of 20-minute neighborhoods, reduced auto use, healthy food choices and improved resident livability.

This listing of potential retail-related revisions to Portland EOA documentation has been prepared for the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) by the economic and development consulting firm E. D. Hovee & Company, LLC. For further information, contact firm principal Eric Hovee, phone: (503) 230-1414, email: [ehovee@edhovee.com](mailto:ehovee@edhovee.com), or website: [www.edhovee.com](http://www.edhovee.com).

## END NOTES

<sup>1</sup> By email dated February 29, 2016, Mark Whitlow transmitted the 1-page of *Retail-Related Revisions to Portland EOA* (draft of 2-24-16) to Steve Kountz and Tom Armstrong with the request that “we would like to continue (our) conversation about the need to amend the EOA in a very minor way as proposed by Eric Hovee in the attachment. Please consider it, as we think it is an important factual base that should be in the EOA.”

<sup>2</sup> As provided via email dated, April 6, 2016 from Mark Whitlow, Perkins Coie, LLP, to Tom Armstrong, BP: “... the City is required to include findings explaining how new proposed site development restrictions will not adversely impact its Goal 9 inventory. Such inventory must be preserved or expanded based on an Economic Opportunities Analysis (EOA) that identifies the characteristics and types of “other employment uses” (OAR 660-009-0015), which are defined to include “all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities.” OAR 660-009-005(6). In addition, the EOA must identify sites that are expected to accommodate employment growth based on the site characteristics typical of expected uses. OAR 660-009-0015(2). The resulting plan must base its inventory of employment lands, in part, on the site characteristics of the various employment uses expected to generate employment growth. OAR 660-009-0025. Stated plainly, the EOA must analyze the need for, and inventory of, “other employment” uses based on their particular site characteristics, and must provide for such sites in the resulting plan.

Goal 9, subparagraph 3, requires that the City’s inventory of suitable commercial sites be adequate not just in terms of total acreage, but also with regard to size, type, location, and service levels, to provide for a “variety of industrial and commercial uses consistent with the plan policies.” Where a City adopts site design and development regulations that limit the feasibility of commercial uses on such affected properties, the City is obligated to demonstrate how it remains in compliance with the Goal 9 requirement for an adequate inventory of commercial sites. *Opus Development Corp. v. City of Eugene*, 28 Or LUBA 670 (1995). In the relatively recent case of *Gunderson, LLC v. City of Portland* (62 Or LUBA 403 (2011)), LUBA held that the City erred when adopting greenway regulations that, while they did not include express use restrictions, effectively converted industrial land to open space due by imposing extremely restrictive site development requirements. LUBA also found fault with the City’s EOA because it categorized industrial uses by their geographical distribution rather than by site characteristics. *Id.* at 418.

The City’s current EOA and its proposed amendments appears to take the same approach that LUBA rejected in *Gunderson* (I should note that the 2012 EOA was developed prior to the proposed zoning code amendments and therefore would not reasonably have evaluated such impacts). Even if the City decides to restrict the development of a certain type of commercial use, such as large format retail, it must at least demonstrate that it considered the impact on such retail uses before enacting such restrictions, and must demonstrate that it retains a sufficient supply of Goal 9 land, considering site characteristics, notwithstanding such restrictions. *Home Depot v. City of Portland*, 37 Or LUBA 870 (2000). As we discussed, the City’s enactment of very stringent site development restrictions that would limit several commercial uses, including large format commercial and drive-throughs, was not critically evaluated in the of City’s draft EOA . Thus, the City has failed to demonstrate that such site development restrictions will not adversely impact its supply of Goal 9 land, based on the site characteristics of certain use categories. “

This review of *Portland and Pattern Area Retail Demand and Sales Analysis* has been prepared for RTF/ICSC by the economic and development consulting firm E. D. Hovee & Company, LLC with input from Perkins Coie, LLP. . On behalf of the Bureau of Planning and Sustainability E. D. Hovee was responsible for initial drafting of the City of Portland *Economic Opportunities Analysis* (EOA) in 2008-2009, with updated analysis made as part of the EOA document adopted by Portland City Council in 2012. E. D. Hovee has not been directly involved with the more recent EOA draft documents dated August 2015 and March 2016.

Since 1984, E. D. Hovee has provided economic and development consulting services for a range of public, non-profit and private clients – focused in the states of Oregon and Washington. In addition to Portland, EOAs and related Goal 9 analyses have been prepared for communities as diverse as Beaverton, McMinnville, Cascade Locks, Wilsonville, Forest Grove, Hood River County, Medford, Phoenix, and Ashland. E. D. Hovee has also conducted assignments elsewhere across the U.S. – particularly with respect to downtown/neighborhood business district revitalization and transit supportive development.



## RETAIL PERFORMANCE BY PATTERN AREA (DRAFT 1-14-16)

At the end of 2015, the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) submitted testimony to Portland City Council members expressing concern that current proposals for commercial areas of the city “will make access to affordable goods and services, including healthy food, more difficult.”

To understand the rationale for these concerns, RTF/ICSC has conducted in-depth evaluation of current patterns of retail sales and commercial real estate rental space city-wide. Principal findings are that:

- Portland is already under-retailed – especially lacking in meeting the day-to-day needs of city residents as for grocery retail.
- Disparities are greatest for areas removed from the city core – to the east where commercial space rents lowest and least adequate to support high costs of new development and to the west where viable retail sites are limited due to topography and proximity to Beaverton retail.
- City-wide imposition of development standards that may be workable in higher density areas with good transit service risk even greater shortfalls in retail availability for residents who already have the poorest access to quality, healthy and affordable retail services.

The remainder of this discussion paper details RTF/ICSC analysis and findings.

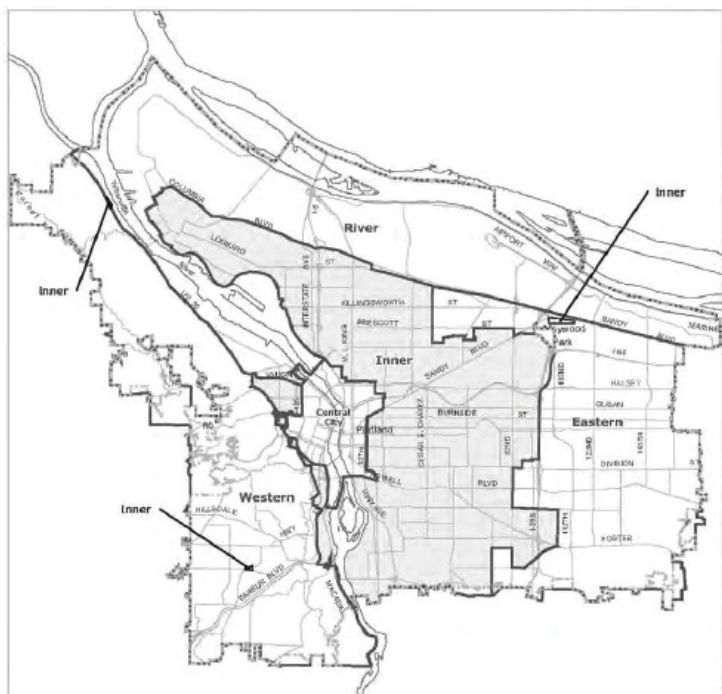
### CITY PATTERN AREAS

As part of the BPS-prepared *Mixed Use Zones Project – Discussion Draft* report, “pattern areas” were identified for areas of the city being considered for added mixed use zoning (including replacement of existing commercial zone designations):

- **Central City** – not part of the mixed use zones project but shown with this analysis for comparative purposes
- **Inner** – an area extending east to about the I-205 freeway
- **Eastern** – from the Inner area to the eastern city limits
- **Western** – extending west of the Central City area

Not included within any of the City pattern areas are industrial and other land uses generally extending along the Columbia and Willamette Rivers (north of the Central City). While not included, it is noteworthy that about 18% of all retail sales in the city are generated from these other non-pattern areas.

Proposed City of Portland Pattern Areas



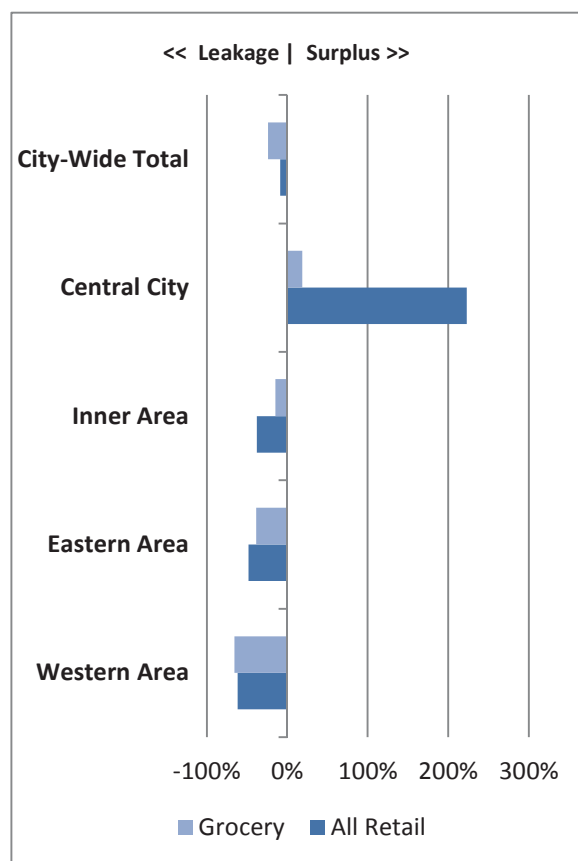
Source: City of Portland Bureau of Planning & Sustainability (BPS), *Mixed Use Zones Project – Discussion Draft*, September 2015.

## RETAIL SALES & LEAKAGE

As a *first step*, 2015 retail sales patterns have been evaluated using nationally recognized Nielsen (formerly Claritas) data for the entire City of Portland and for the pattern areas roughly aligning with those defined by BPS. Sales leakage estimates are income-adjusted, with consumer spending measured as a % of resident demand. A synopsis of findings reflects RTF/ISCS concerns.

- **City-wide** sales leakage is about 9% of resident-generated demand – meaning that spending in Portland is about 9% less than one would expect based on resident household incomes and typical expenditure levels. Grocery leakage is about 24%. Surplus sales (greater than supported by resident demand alone) are found only with categories of home furnishings, electronics, apparel and dining – based on substantial support from other metro area residents and visitors as well as Portland residents.
- **Central City**, not surprisingly, is the exception to the rule for the rest of the City. Retail sales in the Central City are more than double what the purchasing power of Central City residents alone would support. The only categories of apparent leakage are with health/personal care products, gasoline stations and general merchandise (including discount stores). Grocery stores are above par (somewhat).
- **Inner** areas are indicated as having net sales leakage at about 38% of resident demand, including grocery leakage of 15%. Overall sales leakage is least of the pattern areas (except for Central City) – with the strongest performing retail generally west of César Chavez Blvd. Retail categories noted as “oversupplied” for residents alone are home furnishings and dining.
- **Eastern** areas are indicated as having overall sales leakage at 48% of resident demand, including grocery leakage of 39%. Leakage is experienced across virtually all major categories. Interestingly, a couple of subcategories for which sales are indicated as above the norm are with convenience stores (a subset of grocery) and drinking places (a subcategory of food service/dining). Of Portland’s pattern areas, the western area is the most racially and ethnically diverse, albeit with lowest average incomes and highest rates of family poverty.
- **Western** has the highest overall sales leakage of any pattern area at 61% and grocery even higher at 66% – as many residents go over the hill to Beaverton, especially for day-to-day convenience purchases. Subcategories performing above the norm are computer/software and camera sales (subsets of the overall electronics/appliances category) and limited service dining.

**Retail Leakage by Pattern Area (2015)**



Source: E. D. Hovee & Company, LLC from Nielsen purchasing power and retail sales data.

As noted, about 18% of retail sales activity occurs outside of BPS defined pattern areas. Retail categories with relatively high volumes of sales activity (at 25% or more of city-wide sales) including motor vehicle and parts dealers, furniture and home furnishings, building materials and garden supply, and general merchandise (notably discount) stores.

These sales are occurring within areas designated largely for industrial use (as with Hayden Meadows and the Columbia Corridor) or with commercially zoned property outside of the pattern areas (as at Jantzen Beach). The types of retail activity represented tend to be strongly oriented to large format users – requiring more substantial building floor area and/or site acreage.

## COMMERCIAL RETAIL SPACE RENTS

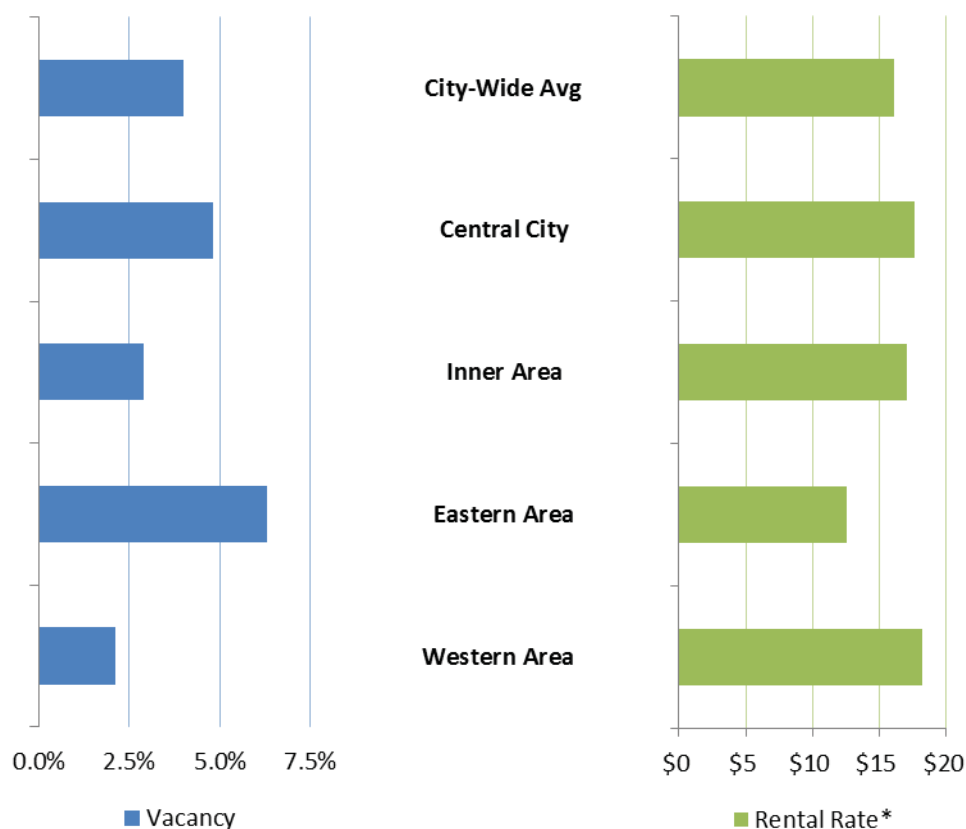
As a *second step* in evaluating retail performance, retail space leasing conditions also are compared for each of the BPS pattern areas – using data from the real estate information service CoStar.

The chart to the right provides a comparison for two important indicators of retail vitality – vacancy rates and rental rates.

As with the sales leakage analysis, this data shows considerable variation in retail performance between the BPS-designated pattern areas in Portland.

The eastern pattern area, in particular, is noted as having substantially higher retail vacancies and lower rental rates than the rest of the city.

**Retail Vacancies & Rents by Pattern Area (end of 2015)**



\* Note: Rental rates are shown as annual averages by pattern area.

Source: E. D. Hovee & Company, LLC from CoStar as of year end 2015.

Retail leasing and occupancy observations by pattern area are noted as follows:

- **City-wide**, CoStar has inventoried 42.6 million square feet of retail space. As of year-end 2015, retail space was renting at an annual rate of just over \$16 per square foot, typically quoted on a triple-net basis with tenants paying all expenses. Overall vacancy averaged just 4% city-wide.
- With about one-quarter of Portland's retail inventory, the **Central City** is experiencing rental rates above the city-wide average but also somewhat higher vacancies nearing 5%. Space absorption reportedly was negative in 2015 (meaning that more space was vacated than leased), although considerable added Central City construction is currently planned.
- The **Inner** area (including 23<sup>rd</sup> Avenue) accounts for the largest share of the city's retail space inventory, with above-average rental rates and below average vacancy under 3%. This area took a dominant share of retail space absorption in 2015 – with further planned construction ahead. *Note:* added analysis indicates rents are lower and space absorption slower in the portion of the Inner pattern area east of César Chavez Blvd than is the case going west to the City core.
- **Eastern** area rental rates average less than \$13 per square foot, about 20% below the city-wide average. At over 6%, vacancy rates are more than 50% above the City-wide retail vacancy figure of 4%. CoStar data shows no new construction in 2015, with little new inventory planned ahead. A challenging conundrum for Portland's eastside pattern area is that despite substantial unmet retail demand, the economics of new store construction in a lower rent environment do not appear to readily support adding more retail commercial space to better meet local need.
- At just over 2%, the **Westside** area has the lowest vacancy rate combined with rents of \$18+ that average the highest of Portland's pattern areas. Despite strong market pressure including substantial unmet local demand, delivery of new retail product is constrained by west hills topography, limited suitable retail sites, and substantial travel to shop in Beaverton (for day-to-day convenience goods) and Central City (for higher end, comparison goods). The challenge of finding suitable sites is highlighted by the fact that CoStar data indicates zero absorption of retail space in 2015 and no new construction in the pipeline as currently planned.

## IMPLICATIONS FOR CITY RETAIL POLICY & PROPOSED MIXED USE ZONES

Two implications for City policy and planning deliberation are drawn from this analysis:

- City policy and zoning as proposed appears counterproductive for places like the Eastern pattern area that already are grocery and retail deserts, as retail rents will prove ever more challenged to meet design requirements and higher development costs with proposed added regulations.
- Providing adequate retail goods and services throughout Portland requires regulations that not only reduce the development cost burden but also provide sites adequate for grocery and other retail not well represented throughout the city, including even much of the Inner pattern area.

RTF/ICSC participants stand ready to assist in framing and reviewing policies supportive of City Comprehensive Plan objectives that also can be crafted as customer and retail friendly.

This analysis of Portland retail performance by *pattern area* has been prepared for the Retail Task Force (RTF) and Oregon Government Relations Committee of the International Council of Shopping Centers (ICSC) by the economic and development consulting firm E. D. Hovee & Company, LLC. For further information, contact firm principal Eric Hovee, phone: (503) 230-1414, email: [ehovee@edhovee.com](mailto:ehovee@edhovee.com), or website: [www.edhovee.com](http://www.edhovee.com).

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

From: Adam Herstein [mailto:aherstein@gmail.com]

Sent: Tuesday, May 17, 2016 8:17 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

I oppose the downzoning from CM2 to CM1 in commercial districts as it doesn't allow the city to meet its goals of more people living in walkable town center areas.

Adam Herstein  
3115 SE 52nd Av  
Portland OR 97206



**From:** Marsha Hanchrow [mailto:m.hanchrow@gmail.com]  
**Sent:** Tuesday, May 17, 2016 10:20 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones testimony

I just heard that an effort to discourage density and decrease allowable building heights in low rise commercial storefront areas is being voted on tonight. Neighborhood commercial streets, like Hawthorne and Division, need to be the solid neighborhood spines that they are trying to be. Please don't downzone them from CM-2 to CM-1. The warehouse look is not what anyone really wants.

We can't prohibit density everywhere, so we should encourage it where it already wants to be.

Thanks,

Marsha Hanchrow  
1908 SE 35th Pl.  
Portland 97214

**From:** Brendon Haggerty [mailto:haggerb@gmail.com]  
**Sent:** Tuesday, May 17, 2016 7:06 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony

Commissioners,

I am concerned about the low-rise commercial storefront provisions contained in the draft proposal. As both a resident on a block that would be affected by these provisions and a member of the Mixed Use Zoning Project Advisory Committee, I feel I have an especially informed perspective. There are four important reasons I think the low-rise commercial storefront provisions should *not* be advanced.

1. **Climate change is more important than cuteness.** To meet our climate goals, we need to be promoting the low-carbon lifestyles afforded by higher density mixed-use development. Stifling development on our commercial corridors is irreconcilable with climate goals, as it disincentivizes sustainable growth in some of the areas best suited to accommodate it.
2. **This solution does not fix the problem.** The characteristics that make our commercial corridors engaging and charming are not related to the building height; a new three-story building does not preserve the character of these corridors better than a new four-story building. The things that draw us to those streets are continuous storefronts with lots of windows and frequent entrances, characteristics that can be provided by new construction as well as old. Those design characteristics are addressed elsewhere in the MUZ proposal, and I am confident that the proposal will create engaging pedestrian environments without the low-rise commercial storefront provisions.
3. **The low-rise commercial storefront proposal slows progress on seismic resilience.** This provision disincentivizes redevelopment of seismically vulnerable buildings.
4. **The public process for the low-rise commercial storefront proposal has been less robust than for other aspects of the MUZ proposal.** I commend BPS staff on the proposal and the process that we worked on together over the last two years. It's important that PSC commissioners know that while most of the process was robust and rigorous, the low-rise commercial storefront provisions were not discussed in as much depth as other parts of the MUZ proposal. These provisions were added just a few months ago, after most of the proposal was already in place.

The low-rise commercial storefront proposal is in conflict with important planning goals. I urge you not to include it in your recommendation.

Regards,  
Brendon Haggerty  
1720 SE 36th Ave  
Portland, OR 97214

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

From: marc gaudin [mailto:marcgdn@gmail.com]

Sent: Tuesday, May 17, 2016 10:57 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Mixed use Zone Testimony, Woodstock

To whom it may concern,

I have been land owner on Woodstock street for 20 years.

I am not in support of down zoning 7 properties in the Woodstock area. This is not fair to the land owners who loose value. It may also contribute to them not wanting to upgrade the property. It seems the planners are using a broad brush stroke that is not right for Woodstock. The Woodstock organizations do not support your most recent down zone. We never asked for it. Please take Woodstock out of the down zone and allow the owners what they deserve.

**From:** Shawn Morgan [mailto:mrshawnmorgan@yahoo.com]  
**Sent:** Tuesday, May 17, 2016 4:06 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Cc:** Brian Balla <brianballa@gmail.com>  
**Subject:** Proposed Foster Road Zoning Under Mixed-Use Zones Project

May 17, 2016

Foster-Powell Neighborhood Association  
4031 SE 74th Ave.  
Portland, OR 97206  
[mrshawnmorgan@yahoo.com](mailto:mrshawnmorgan@yahoo.com)

City of Portland Planning and Sustainability Commission  
1900 SW 4th Ave. #7100  
Portland, OR 97201

RE: Proposed Foster Road Zoning Under Mixed-Use Zones Project

Dear Commissioners,

The current Mixed-Use Zone proposal calls for Commercial Mixed Use 1 (CM1) zoning on Foster Road between 63<sup>rd</sup> and 68<sup>th</sup>. The Foster-Powell Neighborhood Association (FPNA) would like to express its support of the City's efforts to preserve the existing character of the one and two story "street car era" buildings within that corridor. A small number of residents and business owners have expressed concerns that limiting the zoning to CM1 is overly restrictive. However, the FPNA and the majority of its members encourage the preservation of the neighborhood's main street between 63<sup>rd</sup> and 68<sup>th</sup> and the city's efforts to limit the architectural transformation of that area.

Sincerely,

Shawn Morgan, FPNA Land Use Chair



# Restore Missing Residential Mixed Use Floor Area Ratio (FAR) Now

**May 17, 2016**

**Submitted By:**

**Jeff Cole**

4343 SE Madison St, Portland, OR 97215

**Heather Flint-Chatto**

2121 SE 32nd Ave., Portland, OR 97214

**Michael Molinaro**

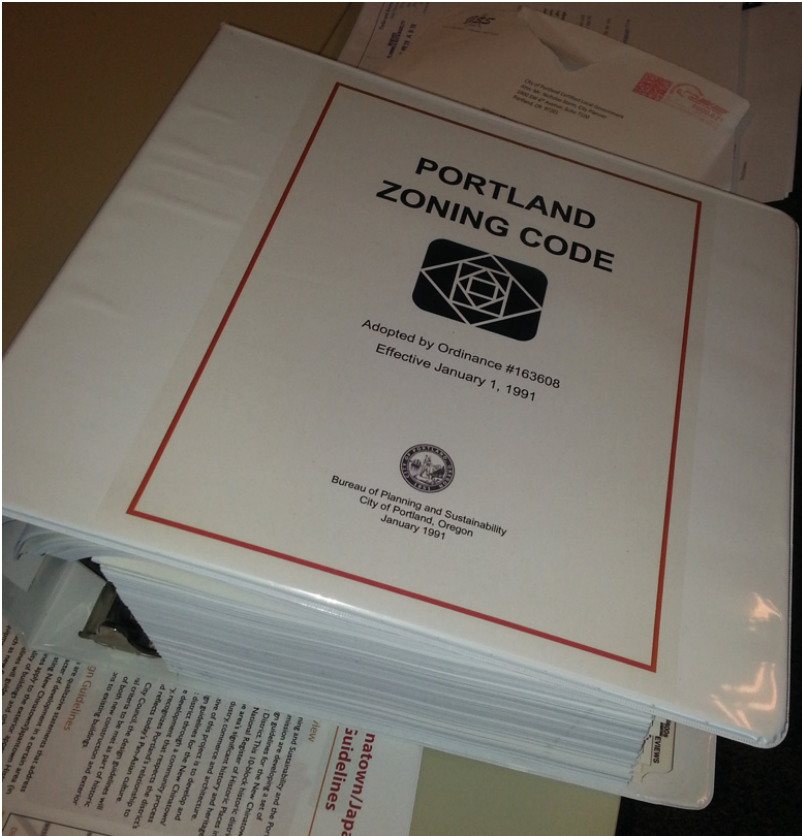
4007 SE Taylor, Portland, OR 97214



# Restore Missing Residential Mixed Use Floor Area Ratio (FAR) Now

**Title 33** contains over **1600 pages** —rules, instructions, limitations, etc. for the development of property in Portland

We are testifying to **36 words** that have gone generally unnoticed until the recent spate of development in our neighborhoods....





The large, generally shapeless big boxes comply current with the current zoning which allows virtually full site coverage from setback to setback up to the maximum height





There are growing concerns expressed by community members that recent mixed use buildings are incompatible with existing neighborhood patterns






Because Comp Plan 2035 new Mixed Use Zoning  
will likely not take effect until 2018 .....






And because Portland's building boom continues...





...we urge Portland Sustainability Commission to recommend immediate restoration of residential FAR limits to CS, CM and other commercial zones.





In the current version of the  
Mixed Use Zoning Project Draft Proposal  
the FAR residential loophole is slated for removal.  
That won't help until Comp Plan 2035 Adoption.  
It's a good idea - let's do it now!



# Restore Missing Residential Mixed Use Floor Area Ratio (FAR) Now

We urge Portland Sustainability Commission to recommend immediate restoration of residential FAR limits to CS, CM and other commercial zones.

## 33.130.205 Floor Area Ratio

- A. **Purpose.** Floor area ratios (FARs) regulate the amount of use (the intensity) allowed on a site. FARs provide a means to match the potential amount of uses with the desired character of the area and the provision of public services. FARs also work with the height, setback, and building coverage standards to control the overall bulk of development.
- B. **FAR standard.** The floor area ratios are stated in Table 130-3 and apply to all ~~nonresidential development. Floor area for residential uses is not calculated as part of the FAR for the site and is allowed in addition to the FAR limits.~~

# Restore Missing Residential Mixed Use Floor Area Ratio (FAR) Now



**Thank You!**

Jeff Cole \* Heather Flint-Chatto \* Michael Molinaro

# ((D))VISION DESIGN INITIATIVE

3534 SE Main Street, Portland Oregon, 97214  
[www.DivisionDesignInitiative.org](http://www.DivisionDesignInitiative.org)  
ilovedivision@gmail.com

## **DIVISION DESIGN COMMITTEE**

*An inter-neighborhood coalition collaborating  
to refine a shared vision for a growing Division*

### **Division/Clinton Business Association**

Sydney Mead, DCBA Chair

### **Hosford Abernethy Neighborhood District**

Linda Nettekoven, HAND Board  
David Aulwes, Landscape Architect

### **Mount Tabor Neighborhood Association**

James Smith, Architect/MTNA Board

### **Richmond Neighborhood Association**

Heather Flint Chatto, Planner, RNA Board  
Cyd Manro, Chair, RNA Board  
Denise Hare, RNA Board, Economics Professor  
Charles Kingsley, Community Representative

### **South Tabor Neighborhood Association**

Sandra Hay Magdalena, STNA Board Chair

### **Southeast Uplift**

Bob Kellett, SEUL Staff

### **Sustainable Southeast**

Liz Potter, Community Representative

May 17, 2016

RE: Division Design Initiative Comments on Proposed Mixed Use Zoning  
Planning and Sustainability Commissioners,

On behalf of the inter-neighborhood Division Design Committee, an inter-neighborhood coalition representing seven neighborhood and business associations in Southeast Portland, the DDC Executive Committee is submitting the attached recommendations for the City of Portland as part of our testimony on the new Mixed-Use Zoning proposed by City staff.

This committee was initiated in 2013 response to significant community outcry about the lack of public involvement in the major redevelopment of the Division Corridor and concerns about incompatible neighborhood development. This coalition represents appointed and elected committee members from the Richmond Neighborhood Association, Hosford Abernethy Neighborhood District, Mount Tabor and South Tabor Neighborhood Associations, Division Clinton Business Association, Sustainable SE and SE Uplift.

Over the past two years, the Division Design Initiative has engaged more than 1,000 community members in developing a vision for the future of Division. We have been listening to the community through extensive outreach and engagement including:

- Facilitated 20+ public meetings, neighborhood design walking tours, community mapping events to identify key sites and special places, an open house, development workshop, and education forums.
- Conducted community preference surveys on vision and design priorities in partnership with Portland State University and Architecture for Humanity
- Developed policy research and design recommendations including: Top Ten Policy Recommendations for the City of Portland, RNA adopted Community Notification & Engagement Policy, and the Division Street design guidelines

During this two-year Division Design Initiative project, community leaders have actively worked to help shift the dialogue away from complexities that polarize communities when discussing issues of density to the fundamental importance of DESIGN, ideally focusing less on where we may be divided towards what we can agree upon as shared goals. Further, we have developed specific recommendations, after much rigor and research. These are attached as proposed design guidelines for the Division Plan District (See attachment 1 & 2).

## **Summary of Recommendations**

To engender community support for increased density and infill, we need to better systems in place to ensure compatibility. This includes: context-specific design guidelines and design review, enhanced permit submittal requirements and other mechanisms noted in these recommendations including a residential FAR measurement now, and retention of key vintage area character locations to maintain the Portland identity we have become so famous for and which we are in jeopardy of losing. Finally, we also need a more specific "Area Plan" to better refine the zoning proposed for the Richmond and surrounding neighborhoods that have been the focus of so much growth and change.

Ord. 188177, Vol. 2.3.H, page 9739



## Specific Recommendations

### 1. Division Plan District: Incorporate the new Division Design Guidelines

The Community, in partnership with the Division Design Initiative, and a coalition of Division neighborhood and business associations is nearing a final draft (see attached) that will go for adoption by the relevant neighborhood and business associations in the next 8-10 weeks. We would like to codify these where possible. We request:

- a) The Division Design Guidelines be integrated into the "Division Plan District" in the new Mixed Use Zoning and
- b) The Division Plan District should be extended to match the boundaries of the Division Main Street Plan (and also the Division Design Guidelines scope) which extend from 11-60<sup>th</sup>.

Many of the design preferences in these guidelines are also supported by the Division Perception Survey. (see attached 295 Design Preferences Responses). Based on this evidence, including support from the Richmond Neighborhood Association, and the extensive two-year public process, as well as supporting policy research and design recommendations developed based on broad community input, we would like to strongly urge the Planning & Sustainability Commission to include the Division Design Guidelines in the proposed Division Plan District.

### 2. Enhance Compatibility & Reduce overly Boxy Building Forms - Restore the Residential FAR Requirement for Mixed Use Buildings now, not in 2018.

A floor area ratio (FAR) for the residential in mixed use buildings is not counted as an intentional incentives to the development market placed into code in the 1990's to further encourage mixed use buildings. However, the market is now providing this in force and the unintended consequences of this waiver is now becoming a growing concern.

Community members have expressed significant concerns that recent buildings on Division and elsewhere in the City present an overly box-like appearance, with large blank walls, and significant shading, light overspill and privacy impacts on adjacent properties. This exclusion for measurement of residential floor area is contributing to many of the negatively perceived characteristics that has been the concern of community members both at many neighborhood meetings and in the Division Perception Survey results here: <https://divisiondesigninitiative.files.wordpress.com/2015/11/2-opinion-of-new-construction-on-division.pdf>.

Our consultant from Urbsworks, has identified this as a top issue to address now (see Attachment 4). We encourage the City to take action on this critical issue now to avoid creating more overly boxy, flat, and incompatible building design. This has also been identified as a top priority in the Division Design Initiative's Top Ten Policy recommendations, and has been supported by many neighborhood and business associations including RNA, DCBA, HBBA, MTNA, HAND and others.

*Please take immediate action to restore a measure of residential FAR now instead of creating another two years of unnecessarily overly bulky, boxy building forms if we wait until the Comp Plan approval timeline of 2018.*

### 3. Support for Preservation of "Vintage" Low-Rise Commercial Areas

We support this proposal by the City to limit development to a 3-story (35') scale in commercial storefront areas with continuity of 400' of pre-1920's buildings. These areas are often the established main street cores of Portland's mixed-use corridors. This would address the community concerns about preserving community character and some of our older, special places and buildings. The Richmond neighborhood has already voted for a three-story scale on Division so this is consistent with adopted board votes and community priorities further noted as a strong preference for buildings of 1-3 stories in the Division Perceptions survey. (See Attachment 3)

The Richmond Neighborhood Plan (1994) has stated goals to:

*“Accommodate anticipated population growth through ‘main street’ development (mixed residential/commercial uses along major transit streets) or other construction methods that retain or enhance existing neighborhood character.” (Policy 4: Housing, Objective 4.4)*

This policy is consistent with neighborhood priorities to accommodate new infill, however, it also highlights the community priority for retaining and enhancing existing neighborhood character.

#### **4. Support for Design Review & More Quadrant Design Commissions**

The new development on Division, while adding valuable housing capacity and needed revitalization, has also been a significant departure from existing neighborhood character. This stark contrast in scale, quality, building massing, style and character, and other resulting impacts has been the source of great community concern expressed through newspaper articles, extensive public testimony, neighborhood surveys and other media.

None of the buildings on Division have had any Design Review by the City’s Design Commission and many Richmond residents are concerned that we need more design review to ensure new developments support better compatibility within the existing fabric in established “pattern areas” of Portland communities. Design review will help but we also need more than one Design Commission to help facilitate a more efficient and timely review process. We need Quadrant or area design commissions that know the character and buildings in a community and can better respond to the context and compatibility considerations where new development is proposed. Further, we also need better design review criteria to assess compatibility in new development. To this end the Richmond Board has adopted their own Community Notification and Engagement Policy which highlights submittal materials that are needed for evaluation of compatibility (see Attachment 5) including a context elevation showing proposed new development adjacent to existing buildings, solar shading analysis, privacy and view impact analysis. These criteria should be included in design review and formal “Compatibility Criteria” should be added to evaluate new development.

#### **5. Request a Southeast Area Plan**

This has been done for almost all other areas of the City, however Southeast is one area that the City has neglected to do this for and it is long overdue. We support this as it may present an opportunity to refine zoning, parking, business district and other issues.

Thank you for your important work and your thoughtful consideration of these recommendations.

Respectfully,

Heather Flint Chatto, Urban Planner & Designer, LEED AP

Acting Chair, Division Design Committee & DDI Founding Member, RNA Board Member 2012-2016

2121 SE 32<sup>nd</sup> Avenue, Portland OR 97214

CC: Division Design Initiative, Executive Committee  
Susan Anderson, BPS  
Joe Zender, BPS  
Eric Engstrom, BPS  
Barry Manning, BPS  
Bill Cunningham, BPS  
Marty Stockton, BPS

Attachments as Supporting Documentation:

- (1) Specific recommendations for the Mixed Use Zoning overall and the Division Plan District
- (2) Proposed Draft Division Design Guidelines
- (3) Survey results from the Division Perceptions Survey on Design Preferences.
- (4) Recommendations from Urbsworks, Division design & policy consultant for the design guidelines
- (5) Richmond Neighborhood Notification & Engagement Policy

# Portland Proposed New Mixed Use Zoning Requirements

## TOP RECOMMENDATIONS

Applicable to Entire Mixed Use Zoning Requirements

### Building Form/Envelope

- a. **Stepback at 4<sup>th</sup> floor of Street Façade:** Specifically on narrow/60' E-W main street corridors (DDI has a solar analysis to support this rec). Areas with a Neighborhood Center designation may also warrant this.
- b. **Building Façade Divisions:** Refine the building articulation requirements to be smaller building increments (ideally 50' segments) at street facing façade within some areas to better match the older small lot pattern areas of our streetcar era lots and buildings.
- c. **Side Step backs on upper levels:** to encourage more windows that maintain air/light, support passive cooling/resiliency, and reduce/minimize creation of large blank walls. This would also reduce concentration of so many windows to the rear residential which have many resulting impacts as noted below.

### Landscape & Parking Approaches to Minimize Development Impacts

- a. **Add Screening Requirements:** Add screening requirements to prevent light overspill, privacy intrusion, noise, etc (e.g. balcony screens) where adjacent to residential zoning or existing uses.
- b. **Increase Building & Site Landscape Requirements:**
  - 1. Require bigger trees for bigger buildings at street to minimize appearance of building bulk and scale
  - 2. Requirements for increased landscape at rear as a buffer (impacts privacy, noise, light spillover)
  - 3. Increased building facade landscaping – e.g. trellises, kangaroo pouches on wall of building façade similar to Vancouver BC, living walls (impacts look and feel of corridor). City of Seattle uses “Green Factor” criteria to set menu of options for landscape criteria (see summary in Innovative Design & Development Codes, p 32-33)
- a. **Parking Impact Management Plans:** Transportation Demand Management plans (e.g. annual bus passes, shared use parking, onsite car share vehicles) for a lower threshold of units in no parking buildings, and additional loading requirements. City is currently proposing TDM Plans for buildings with ~20 units or more. However, 10 units would be a more appropriate threshold for TDM Plan requirements

### Incentives & Bonuses

- a. **Reuse of Existing Buildings** - Incentives for adaptive reuse of older buildings (Including those that may or may not be designated as historic). The focus is on older buildings with special character (e.g. Hawthorne-Belmont-Division in the 30s, & 11-12<sup>th</sup> and 20<sup>th</sup>/21<sup>st</sup> areas, Clinton corners at 21<sup>st</sup> and 26<sup>th</sup>, Fremont, Mississippi, Alberta, Albina, Foster/Powell sections). Transfer of Development Rights/credits are good but we need further tools like waivers of System Development Charges (SDCs).
- b. **Beneficial Uses** - Provide Incentives for beneficial uses such as affordable housing, senior housing, day care and alternative-transit oriented businesses. Waiver System Development Charges (SDCs).
- c. **Innovative Energy Performance** - Bonuses & Incentives for Zero Energy Buildings

- d. **Remove Residential FAR Exemption in Current Code for Mixed Use Buildings** – Expedite adoption of a residential FAR requirement for mixed use buildings. Dedicated residential and commercial use buildings have an FAR requirement but mixed use building do not have this for residential. The Mixed Use Zones proposal includes this but won't take effect until 2017, however we need this NOW.

## **New Division Plan District**

**Add Division Plan District Additional Design Standards:** Through more than 18 public meetings, an inter-neighborhood design committee, community surveys and extensive community outreach, we have defined many of our neighborhood design patterns, design priorities, compatibility criteria, and notification requirements. We would like to codify these where possible by adding to the Division Plan District. What might be appropriate for incorporating any of these from the proposed Division design guidelines (if ready and approved by NA's in time) into standards within the current MUZ proposal?

**Building Form, Landscaping & Screening** - Include all requirements for MUZ proposed above, especially

- Stepbacks at 4<sup>th</sup> floor
- Side stepbacks to minimize blank walls, add more windows for air and light and minimize concentration of windows on the rear of buildings facing residential uses
- Increased Landscape & Screening Requirements, etc.

**Add Permit Submittal Requirements to Evaluate Context Sensitivity/Compatibility:**

- Require submittal of elevations in context of existing adjacent building and block development to ensure new development does not create a significant neighborhood and street compatibility conflict by creating visual discontinuity in size, scale, style
- Statement of Compatibility with existing neighborhood goals and design guidelines
- Solar Shading Analysis
- Visual Impact Analysis – similar to Marty Eichenger project at 26<sup>th</sup> & Division

**Relate Building Form to Existing Established Division Main Street Patterns (typically found on Division, Hawthorne & Belmont):**

- 45 Degree Angle Cut Building Corners – maintains visibility for vehicles & pedestrians and when cut out solely at first floor can create areas to
- Raised Sills
- Clerestory Windows
- Visible Building Increments of 25'-50'
- Recessed entries
- Maintain Regular rhythm of entries every 15'-20'
- Include permanent awnings & overhangs for windows and entries
- Window variation and patterns that relate to adjacent buildings
- Articulated rooflines

**Include Strongly Encouraged Design Features that help articulate building massing**

- Oriel windows
- Balconies at the street that protrude from the façade beyond the roof and building edges to break up building massing
- Stepdowns to adjacent lower scale development



# PROPOSED DRAFT DIVISION DESIGN GUIDELINES

This design guidelines draft\* is proposed for adoption by the inter-neighborhood Division Design Committee (DDC) at their monthly public meeting on May 26, 2016

Once adopted by the DDC, subsequent meetings will be scheduled with the DCBA, RNA, HAND, MTNA & STNA for review and adoption over the next 8-10 weeks.

\* The final Division Design Guidelines will include graphics, illustrations and appendices.

**May 17, 2016**



# Division Design Guidelines Proposed Draft 5.17.16

## Scale & Massing

- ☐ Minimum of 18' first floor height
- ☐ 3 stories preferred, if 4<sup>th</sup> story, then should stepback top story a minimum of \_\_\_ x sf to maintain feeling of 3 stories.
- ☐ Step up/down to taller building heights
- ☐ Stepped heights: Not more than 2 stories scale transition preferred, but if not accommodated then alternatives should include x, y, and z (e.g. landscaping, art, windows, balconies)
- ☐ Avoid boxy building forms – by breaking up massing (balconies, stepbacks, articulated rooflines, stepping up and down roofs and building heights, etc.

## Stepbacks

- ☐ Upper level side stepbacks – Above the first story, use side stepbacks 10' from property line, maintain street wall
- ☐ Light wells – not less than 12 feet wide parallel to the exterior wall and not less than 5 ft deep (Illustrate with graphic)

## Compatibility & Contextual Design Transitions

- ☐ New development should demonstrate compatibility with the adjacent architecture by incorporating a minimum of 3 of the following 7 features similar to the neighboring architecture:

- ☐ Scale
- ☐ roof forms
- ☐ window proportion or patterns
- ☐ materials
- ☐ Style
- ☐ Ornamentation elements
- ☐ Color

- ☐ **Historic Preservation** - Use the Historic Review Procedures Hierarchy of compatibility to first match the building, then the adjacent development, then the character of the surrounding context/street

- ☐ Relate to neighborhood patterns: *Relate Building Form to Existing Context & Established Division Main Street Area Patterns (DDI Guidelines).* The following are typical area-specific neighborhood patterns found on Division, Hawthorne & Belmont):

- ☐ 45 Degree Angle Cut Building Corners – maintains visibility for vehicles & pedestrians and when cut out solely at first floor can create areas to
- ☐ Raised Sills (bulkheads) & Storefront Windows
- ☐ Clerestory Windows
- ☐ Visible Building Increments of 25'-50'
- ☐ Maintain Regular rhythm of recessed entries every 20'
- ☐ Include permanent awnings & overhangs for windows and entries
- ☐ Window variation and patterns that relate to adjacent buildings
- ☐ Articulated rooflines

- ☐ **Where transitions should be considered and mitigating design measures used for new development**

- a) On Arterials that abut Division
- b) On Division Street between buildings
- c) On new buildings facades abutting residential uses

New buildings should Avoid/Minimize:

- ☐ Light overspill
- ☐ Overconcentration of windows
- ☐ Privacy impacts (ensure balconies located with care)
- ☐ Excessive shading (define excessive) of adjacent properties. This is especially key for southern exposures, relationships next to food producing gardens, roofs with solar panels or structures that rely on passive or active heating/energy generation

Encouraged at Transitions:

- ☐ Provide screening from balconies to maintain privacy of adjacent neighbors
- ☐ Create or maintain larger landscape buffers to mitigate residential privacy impacts

## Storefront – Encouraged Elements

- ☐ Relate to neighborhood patterns
- ☐ Transom, clerestory windows
- ☐ Covered entries, and rain protections for the pedestrian along the sidewalk
- ☐ Building -integrated awnings, canopies and overhangs
- ☐ Operable windows (ex. American Local, Ken's in NW, rollup garage doors)
- ☐ Arcades
- ☐ Building integrated seating (Roman Candle)
- ☐ Entry Doors with transparent windows
- ☐ Incorporate art – tiles, bike parts,

## Architectural Style

Encouraged Styles that are traditionally represented in the Neighborhood [show examples of each style]:

- Main Street Storefront Commercial
- Art Deco
- Streamline Modern
- Arts & Crafts
- Spanish Mission

Exemplary SE building architectural examples [organize by corridor]:

- Ford Building
- Eugenio's (35<sup>th</sup> & Division?)
- Double Barrel (20<sup>th</sup> & Division)
- American Local (30<sup>th</sup> & Division)
- Roman Candle & Ava Gene's
- Oregon Theater
- Move the House Project (38<sup>th</sup> & Division)
- Sunshine Tavern Building
- BMW Building on Hawthorne
- Shanghai (28<sup>th</sup> & Division)
- Others....(more missing middle examples)

## Sustainable Design

- ☐ High Performance building design for energy and water (e.g. zero energy buildings, LEED, Passivehaus)

## Site Design

- ☐ Maintain "Solar Equity" for adjacent uses to the extent feasible
- ☐ Encourage "Missing Middle" housing types (courtyards, plexes, townhouses, ADU's) that both add significant density and also respond to neighborhood building massing and form.
- ☐ Include a plan for adequate loading & service access
- ☐ Pedestrian-oriented design is encouraged including walkways, paseos and passthroughs.

## Materials

- ☐ Corrugated panel allowed
- ☐ Natural and durable materials
- ☐ Brick, wood, metal and steel is encouraged
- ☐ Graffiti barrier coating of street level building materials is encouraged (e.g. sacrificial and permanent coatings
- ☐ "Real" Stucco – should include a plan for maintenance

## Landscape

- ☐ Preserve landscaping of significant size (X Caliper or height?)
- ☐ Maintain existing larger (define) plant materials
- ☐ Landscape screening abutting lessor zoned site
- ☐ Encourage native species

## Signage

- ☐ Figurative signs
- ☐ Classic Portland shaped signs
- ☐ Pedestrian oriented
- ☐ No internally lit box signs
- ☐ Billboards are not allowed
- ☐ Neon signage (see Goleta Design Guidelines)

## Lighting

- ☐ Dark sky lighting to protect from overlighting (see Tuscon code)
- ☐ Minimize light trespass
- ☐ Shielded - or at a minimum captured on façade (Ford Building example)

## Residential Unit Orientation & Configuration

- ☐ Encourage unit sizes and configurations that support flexibility in furnishing arrangements
- ☐ Encourage unit orientation that is sensitive to relationship with other neighbors within and outside the building
- ☐ Option to convert to live/work if on the first floor

## Commercial/Retail Space Configuration

- ☐ Design for future expansion (moveable walls)
- ☐ Big enough for a diversity of uses and business types (especially for neighborhood services as well as retail)
- ☐ Option to convert to live/work if market conditions are less supportive of retail
- ☐ Encourage reuse of existing residential buildings for commercial uses

## Public Space

- ☐ The neighborhood encourages all developments to provide shared indoor or outdoor space that will benefit the neighborhood (Examples: D-Street Village interior paseo, St. Honore courtyard)
- ☐ If including a public/private actively use space, ensure the following:
  - ☐ Plan for a noise mitigation approach (including landscape buffers, water features to provide white noise) and discourage outdoor uses after 10 pm (already in code)
  - ☐ Ensure availability for receptacles for trash and recycling
- ☐ Building encourages public interaction
- ☐ Space for sidewalk cafes
- ☐ Activation of alleyways for dining, seating, public access-ways, art
- ☐ Building integrated seating
- ☐ Plazas

## Discouraged/Not Allowed

- ☐ No blank walls above the second story
- ☐ Metal screens on the street facing facade
  - ☐ Vertical plane metal screens should not cover more than 25% of street facing façade (show an example here of what is not working and another of how it could be done better)
- ☐ Should not obscure windows
- ☐ Storefront windows should not be obscured more than 25 % (e.g Zoom Care, frosted or fritted glass, little big burger on Division)
- ☐ Façade – Composite panel siding not more than 25%
- ☐ Plastic siding

## Streetscape

GOAL: Unify the corridor through consistent design approaches. Encourage streetscape themes that connect and reflect the surrounding community through art, water, education, environment, history and culture.

- ☐ Decorative benches
- ☐ Trash & recycling receptacles
- ☐ Artful bike racks
- ☐ Kiosks
- ☐ Wayfinding that helps visitors navigate, reinforce neighborhood identity and sense of place (signage, sidewalk paving, roundabouts/traffic circles, art)
- ☐ Decorative, pedestrian-oriented lighting
- ☐ Interactive art (e.g. sculptures on Division)
- ☐ Planters, hanging baskets and other landscaping that softens the pedestrian environment
- ☐ Street trees that contribute to color, texture, habitat and, protective canopy
- ☐ Innovative stormwater management features that balance pedestrian flow with green infrastructure function

# **((D))Vision Design Initiative**

## **“YOUR VOICE MATTERS” SURVEY PROJECT**

### **Responses from the Division Perception Survey**

*Emphasis added (bold) to highlight frequency of issues of scale, building form, and site design preferences expressed from the community which, in addition to significant public outreach and engagement, have informed the DDI/DDC proposed design guidelines and mixed use recommendations)*

#### **About the Survey**

The Division Perceptions survey was developed by a Portland state university student in the Spring of 2014 for a community involvement class. It was distributed extensively through Southeast neighborhood and business associations via emails and newsletters, including RNA, DCBA, SEUL, MTNA & STNA. The survey was also promoted through takeaway cards at individual art box installations at local businesses in partnership with Architecture for Humanity along the Division corridor at key locations including New Seasons, Unfold Yoga studio, North Bar, Bollywood Theater, Village Merchants, the Richmond health clinic, et al.

Since the survey was never intended to be a statistical sample, it can only represent those in the survey pool. That said, the survey does represent a diverse array of southeast and Division area residents, business owners, occupations, ages and opinions.

It provides some key insights into community feelings about the recent redevelopment of Division, opinions and concerns, special places and buildings, desires and vision for the future that are strongly felt with some significant trends that are worthy of note and consideration in the Mixed Use Zoning proposed by the City.

Entire Survey Data Available Online at: <https://divisiondesigninitiative.org/division-perceptions-survey/>

## **PREFERENCES FOR FUTURE DEVELOPMENT ON DIVISION**

**Q| Design: What are your design preferences for future mixed-use development (Residential and Commercial uses in the same building) on Division? For example, size, scale, style, building form, facade, street frontage, etc.? (295 Respondents)**

- **Roof step downs to minimize bldg bulk & maintain solar access, breakup bldg massing**, durable & natural materials (e.g. brick & wood), balconies, more green design elements, green walls, PVs, green roofs, more variation of windows, **no blank walls, dividing up bldgs into smaller visible increments** to match existing 25' traditional rhythm of bldgs, **more step downs next to smaller scale bldgs. Incorp. of exist. building arch. styles on Division or nearby main streets** - incl. art deco, and main street facade elements. If a modern style, aim for a northwest design (shed roofs, wood and glass).
- no answer
- **2-4 stories, super-ped-friendly. Niches for public open space, for sure, and big sidewalks.**
- **Much smaller scale**, with parking. Mixed use. **No more square boxes.** High quality finishes. Self-sustaining architecture. Platinum LEED certified. Condos or townhomes.
- Get the damn cars off the street!
- **No more than 2 stories, preferably 1. Facade that is more natural - wood, metal. Less ugly painted siding.**
- **No building higher than two stories!** No building allowed within 100 feet of the property line of an existing single family residence. On-site parking required for permits for all new multi-occupancy dwellings.
- parking for residents
- Any new buildings need adequate parking. Buy spaces and build a parking structure to serve the neighborhood. Cost of building should be covered by all the housing/commercial units which have already moved into the

neighborhood and are causing the traffic nightmares. The traffic is bound to get worse as neighborhood density increases. Ensure commercial area is affordable to include shops such as Mirador and neighborhood doesn't change to reflect only Starbucks can move into new buildings.

- **"Stepped back above the second story!**
- **Prefer brick** and/or modern design."
- **Human and friendly.** Ditch the gray brick and the beige paint. Don't make it God-awful ugly like the Salt and Straw building. Modern design can be fun and appealing. **No taller than three stories.** Green plants as a feature. House tear downs not allowed to be replaced by out-sized houses that leave almost no yard in any direction. Some "square footage" is outside, and it has value too!
- "This is all too late to consider.
- The massive building is done
- maybe we can plant a tree or 2"
- Residential and commercial in the same building are my preference, and **not too huge, and fitting in with the era in which the neighborhood was built.**
- no answer
- Street level retail - **classic / traditional style; setback from street to allow for wide sidewalks**
- **3/4 story, stepping down to the neighborhood homes opposite the Division side of the lot. I like density but some outdoor space for residents and others taking breaks from walking the street is desired as well at street level.**
- **"Variety in size, color, something to break up the monolithic appearance of the new buildings. Shops flush with sidewalk and 2nd - 4th floor apartments set back at least 6 feet."**
- **Smaller and more in keeping with the age of the neighborhood. More welcoming from the street.**
- no answer
- fewer apartments and more parking. Families will not live in the tenements that are being constructed since there is no parking
- Include Parking.
- no answer
- **"The building on the corner of 30th and Division that houses American local - 2 story. Best blends into the neighborhood.**
- Parking required for all multi housing over a couple of units.
- NO MORE BIO SWALES or anything that takes parking off of Division."
- "Why do you assume we have to have mixed use? Lots of consumer oriented retail, and bars, bars, bars. **Two story stepped back designs.** None of that UDG crapola. Also, The Remmers are horrid developers.
- They make everything look like an ugly Portlandia-Beaverton hybrid."
- **Build and design in keeping with the blue-collar immigrant nature of the neighborhood, and in the greenest way, with lots of windows, solar access, patios that greet the neighbors not create a closed face. Again the white structure with the chain mail is a shining example of what should never again be built.**
- **"The new buildings need to be set back from the footpath. There really should be open spaces on each building site.**
- To reduce the impact of buildings, I believe green landscaping is important and softens the harshness of these shoe-box shaped buildings."
- love mixed use buildings. Would like to see more retail below, residential above. Feel it creates a safe vibrant streets. I think our **4 story limit is fine, work needs to be done about step backs.**
- glass and **not so tall right off sidewalk. more gradual raise from pedestrian stand-point.**
- **"No 4 story apartments looming over people's living space**
- 2 resident town homes
- **Take a look at the building on the north corner of Division and 30th restaurant below 1 apt above that is reasonable in size and aesthetics. If you are going to build, build with class not some 2 bit structure that is made on the cheap and will look like hell inside and out in 10 yrs"**
- **Love the use and re-use of buildings,** for example, at 34th & Division, where Roman Candle Bakery and Ava Gene's are located. A couple of the new apartment buildings are of a scale that works well and are integrated nicely (building where Salt & Straw is located). The apartment buildings at 37th and next to Sen Yai are simply dreadful.



- "I'd prefer buildings more in keeping with a local Portland neighborhood in style, rather than the ultra urban look of the current buildings in progress.
- **More space between buildings and the street, with some space between buildings. Limited to 2 or possibly three stories."**
- **small scale, consistent with the former aesthetic**, more local run businesses that are affordable.
- The four story, gigantic buildings are ugly atrocities, particularly the building at 37th and Division. In contrast, **the mixed-use developments at 38th and Division (Little Big Burger) and 32nd and Division (Sunshine Tavern) are lower profile and more in keeping with the neighborhood.**
- "I think I covered this in the above questions.
- **Smaller, smaller, smaller!"**
- **Courtyards, no more than 3 stories**, classic 'Brownstone' styling similar to many in the Pearl District, a focus on 1 or 2 bedroom units, Lots of storefronts, some side or back parking. We have enough bars, hopefully more family friendly restaurants.
- It would have been nice if the buildings had some architectural trappings reflecting the arts & crafts nature of the surrounding neighborhoods.
- **No more than 3 stories, not more than half a block wide, and a little back from the street to allow for either greenery and/or places to eat or to sit. No more flat-front facades, lack of artistic details, windowless sides of big buildings**, and boring color!
- "the dream that 82 units & no parking will be OK because the typical resident will be ""service industry, bike & public transit users"" is not a realistic plan for a city and a community. its more like a nightmare for the residents already in place.
- i totally understand that parking spaces cost money...but when the city takes sides and allows giant projects with no parking - they're taking a side that essentially sends a message
- ""sorry for your loss...but congestion is coming - suck it up""thanks city of portland."
- **We need performance spaces, and something to encourage diversity.**
- no answer
- Oh, for goodness sakes.....some imagination!!!! **No more big boxes!!!!!!**
- These "mixed use" buildings are ALL the same, wherever they are built. **They need to be less tall in height, with copious use of red brick or true-wood siding, vertical windows that at least look double-hung. Quality, traditional doors. Some kind of roof form. A bit of a setback.**
- **"Same size, maybe even taller if they step back the massing.**
- **Use forms and icons from the existing character for inspiration.**
- Somewhat traditional, but also contemporary.
- **Use brick!"**
- "One design rule would help.  $S=(F-1)*10$ . Set back from the sidewalk is equal to the floor # minus 1 times 8. first floor (retail) has no set back, 2nd fl. has 8' set back, 3rd. fl, 16""set back. Balconies and decks would not be counted. as needing set back, providing a 8"" deck for all units. This would **eliminate the sun blocking, wind tunnel effect of the present units.** Reasonable parking space requirements, say 8 spaces for every 10 residences"
- no answer
- **I'm personally a fan of the mix of modern and classic we're seeing already. I guess what is more important to me is a pedestrian scale - store fronts and restaurants that open up onto the side walk. I'd love to see some street seats pop up here and there too.**
- It would be nice to have less of the "greedy buildings" that have been mentioned in the Oregonian and Portland monthly. **It would be great if these new buildings incorporate green building principles, innovated architecture, parking, and other amenities that make them integrate into long standing neighborhoods in a better manner.**
- "1) 4-story max  
2) **avoid blank vertical facades**  
3) **alternate setbacks, courtyards, and plazas with sidewalk arcades**  
4) provide parking for residents and customers.  
5) revise city guidelines for all new structures of 10 or more dwelling units. Require 1) off-street car parking spaces for at least half of dwelling units; 2) car-share parking spaces and secure bicycle parking."

- **Modern, efficient, preferably no taller than 2 stories, require some type of runoff management** ("green roof", trees, swales, etc)
- no answer
- no answer
- I would encourage highly mixed use medium rise buildings to the specs of the current zoning. Style should be determined by current trends rather than forcing a false sense of nostalgia. **Perhaps a requirement that the building have architectural distinction.** But leave the definition vague.
- "That building near 34th - the white one with the grate on the front looks like a prison and pisses me off every time I see it. Why would anyone want to live there? So, no more of those.
- My ["immediate family member"] is relocating to SE Portland from ["major W. coast city"] and would have been delighted to buy one of the new condos BUT ["they (singular)"] would require a secure parking spot which is impossible. So, ["they (singular)"] will be buying someplace else."
- ground floor retail
- Mixed use could be positive. Parking and transportation need to be addressed. **Size and scale need to be balanced with regards to impacts to existing residences.** Street capacity and infrastructure resources are limited. Developments that impact that need to be capped within reasonable limits and/or bear the financial burden of mitigating the impacts. It is unfair and counter productive to put the additional tax burden on existing residents to pay for improvements that do not benefit them.
- Answered in previous question
- no answer
- **More green space and plantings. Mixed facade vs. flat surfaces.** Deep sidewalks. Benches. Cross walks.
- If you're going to do mixed use, **make more public plazas, preserve a space in your retail complex for small start ups and pop-up shops, create areas for food trucks and small vendors.**
- no answer
- "apartments need parking
- lower levels for stores/commercial"
- **I would like more of the new buildings to look old since the new apartments all look so contemporary.**
- no answer
- Wider sidewalks, underground parking, outdoor tables and public spaces for sitting, 3-4 [story] buildings in sections where ugly strip mall buildings stand.
- Residential and small biz retail. **No bigger than 3 stories and use of materials and design that fit into the neighborhood** - i.e. NO rusting metal, ultra modern angles, and tons of concrete!
- **It needs to be affordable**, so that it doesn't all have to be luxury rentals or condos. **But it would be nice to have more interesting facades facing Division, like on some of the older buildings. New buildings on Division should be 4 to 6 floors**
- Onsite parking provided, at least spaces for 75% of the adults intended to live in the structure. No more than one three story structure per block. Limitations on two-story structures per block. Setbacks from the sidewalk to provide space for dirt and plants.
- no answer
- **Small. Very, very small.**
- no answer
- **I want to see buildings that will age well.** I know modern is very popular right now, but this look becomes dated in a decade or two and buildings need to be around a lot longer than that. The majority of the houses in the area are craftsmen style bungalows from the early 1910 -1930s. **It'd be great if more of the new construction echoed building styles from that era -- and scaled appropriately.**
- I would like to see less height in the buildings as it leads to feeling cramped and closed in.
- "add parking
- require parking
- demand parking"
- **Shorter buildings, inviting outdoor seating areas.**
- **3 to 4 (up to 5?) story storefront buildings with awnings and balconies**
- **"Something that actually fits in the neighborhood** with some outdoor space features. Affordable housing to keep a diversity of residents.

- -Something that actually looks like an architect designed it instead of looking like a suburban developers budget cash cow."
- **smaller is better**
- "see above
- **Buildings should ""fit"" in with the neighborhood, not overwhelm it. While square-block boxes may be the most profitable and, apparently, cheapest to build. Ugly solid, (sometimes windowless!) walls leaving only enough room for a sidewalk don't seem to leave any breathing room for the street. Division is only one lane in each direction; it's not a Hawthorne. I thought we stopped building unappealing lifeless boxes in the 70s because they were just that."**
- **Smaller buildings no more than 2-3 stories.** Residential and commercial mix is Okay. Grocery stores and restaurants on the ground floor is fine. When we travel to Europe we find businesses we can easily walk to - we don't ever rent a car.
- no preference
- Ground floor commercial and 2nd / 3rd floor residential with on site parking. Access from Main Street (like the main street / green street plan dictates)
- **Smaller scale similar to the three-plex near 26th.** Brick or stucco facades. Limit the height for new buildings. Require natural materials be a primary component of facade designs. Limit color choices for facades. If we are a Greenstreet, then keep the palette natural. **Consider a more generous setback** for mixed use so that the sidewalks are easier and safer to navigate
- **Hi quality materials, some setbacks for plants, benches, extra sidewalk room, etc.** Something classy not flat and barren. **break up the flat space, use good materials on windows.** See Old Lauro Kitchen building, property on south side of Division at 37 or 38 - which has some space for gathering and breaks up space. big grey building west of Sen Yai is hideous as is the one south of Whiskey Soda lounge, **Those buildings need bigger spaces to look good. In a tight space, they are unattractive. Work with the space we have.**
- no answer
- **Need to avoid too many tall building and lose green space and lose neighborhood feel.**
- current is pretty good. make structures greater than 25 units have some off-street parking or pay a parking fee/tax to be used for mass transit, biking , etc.
- **Several story buildings with retail space on the ground floor. Preferably low-car complexes that add density and diversity to the area.**
- High density mixed use.
- **Two stories max with some variation on distance from street** and self-contained parking underneath
- I like the mixed use and think it's more sustainable.
- mixed use is fine, but STOP with all the new development already. Let things settle down. and **Please, stop razing old, charming buildings for big, ugly boxes. We are losing the aesthetic charm all along Division and across the city as developers knock down old for the new.**
- Three story mixed use is good, but could there be at least temporary limits on the number of units per block--until we see what the problems are? At present it is a grand experiment. I think the apartment buildings should have some common outdoor space-- like the one under construction at 48th and Division. **I'd like to see design review that would at least question features like the metal grate front that covers windows.** Ugh.
- pedestrian scale, commercial uses on the street level
- **low rise mixed use. retail/dining on ground floor, two or three stories of units above, preferably condos. They could be modern like those at 26th or more traditional.**
- craftsman homes, native plants and trees mixed use architecture
- **"size should be the important factor IF we make developer break up the facade (both in terms of projections into/away from the street and height both up and down from the street. if we can't hold developers to those guidelines, than we shouldn't allow an entire block to be developed at a single time.**
- it could be argued that the existing buildings built in the last few year meet the desired density, height and infrastructure for the next 10 years. if we halted all massive construction and let the next ten years be about smaller developers/homeowners building what they can the size/density/parking/other issue might work themselves out. but...if we keep allowing the same developers to buyup all houses on a given block and build a bohemoth building that takes up the whole block- than in 10 years we will have a street without businesses

because people will no longer wish to walk along it. the apartments will then turn to slums and we will have taken what is one of portlands best/most walkable neighborhoods and made it one of the worst.

- **I don't think that most neighbors grasp that this isn't a density problem and it isn't a parking problem. It's a QUALITY problem."**
- Parking!
- **I understand and support more density in inner SE. How about we space out these giant apartments? Attempt to blend in with a traditional neighborhood instead of making cheap "design" modernistic crap. A little less concrete, some of those look like they were made by the Corps of Engineers.**
- **"no more than three stories**
- **more reuse of existing buildings** like the old wild oats store"
- **How about a little set back? The street feels overpowered by the tall buildings on such a small street.** Or reduce the height of these buildings. There is money to be made so make some underground parking for goodness sakes. Does everything have to have the modern look? Can we keep cars off the bike route? Lots more cars, speeding and not stopping at stop signs because the traffic is backed up.
- **Not so tall. More congruent with those nearby.** Include parking. **Set back from the street so it's not like a canyon.**
- no answer
- **Nothing above three stories, as it creates a shady dark zone both on Division itself and on the residential properties to the north of Division. Pedestrian friendly, design.** Some off-street parking!
- "Parking beneath main level
- **3 stories and below in height**
- **Architecture in line with Old Portland Home design**
- Mixed use"
- **the current buildings going up are kind of ugly,** not sure what exactly it is
- **size: no more than 20 units, architecture that is interesting but not too flamboyent, nothing that overwhelms neighboring buildings, set back and space for public to gather, trees and natural features.** sustainability is important to me, so passive energy design features and sustainable design is key.
- **"no more than three stories.**
- **fits well (design) in the neighborhood.**
- adds to the center concept.
- reduces auto use and improve transit/pedestrian use.
- **landscaping is important.**
- If appropriate commercial should be on ground floor.
- **should fit a master plan for the area.**
- **include design review or other design control mechanisms."**
- **I'd like to see a good mix of modern and classic- the variety is what keeps portland unique.** Its also great that we have a great mix of dives to high-end establishments throughout division.
- no answer
- **I would love to see some sort of design standards to improve the quality of construction,** but I think it's very difficult to judge architecture by any "standards". I definitely think the City needs to require more than token parking when higher density structures are added. I'm not sure whose quality of life the planning department thought they were improving with this zoning.
- Hunh? This question is written in city planning jargon. I don't understand what the options are. What I know is, I prefer buildings that aren't ugly and that come with their own parking spaces. If new residences go up, **how about some duplexes or fourplexes.**
- **"it's nice when a building matches the 'flavor' of the street it's on.** but Division is first of all a commercial strip and second, the area is changing so rapidly there really is no one style. **shorter is better than taller for light and open feeling, wider sidewalks are preferable** (I prefer more sidewalk and less landscaping, if that's a choice that has to be made, otherwise a mix is best).
- Color would be nice. Don't scarifice convenience for style, don't make it more difficult to gain access to businesses or homes. What I'd really like to see is a jitney that runs up and down the strip with parking at either end, a free service that runs constantly all day long - wouldn't that be cool?"

- No fake brick or fake stone, buildings should be honest and not try to match historical buildings in a shoddy fashion. Instead they should reflect context in other ways, such as addressing human scale, choosing warm materials that aren't fake, and utilizing landscapes and plants to break up a building's bulk and invite diffuse light and color
- Mixed use development would be great. **4 to 6 stories along division that step down towards the neighborhoods. nothing over 8 stories.** if parking is required, put it out of sight - in garages or below ground. don't restrict styles, it makes things feel too homogeneous.
- **"Size: no bigger than today's buildings**
- Style: form follows function
- street interface to be gradual, from human scale to towering scale, w/shaded courtyards easing the transition.
- Not easy problems to solve."
- "Mixed use bldngs are fine but I worry we might build too much commercial before we are ready for it. Would like the following:
  - **Mix of bldng heights**
  - **Thoughtful solar access**
  - More creative step downs to house nearby
  - No blank walls
  - Clearly delineated, welcoming street entrances
  - room for vegetation as part of the architecture
  - Spots to pause as in benches in front of Roman Candle
  - Spaces for art
  - Views of trees and sky
  - Rooftop gardens
  - Common areas in bldngs so people can get to know each other
  - Some simple elegant architecture that lets your eyes rest -- right now too many of the bldngs seem to be competing for attention with no sense of pattern or rhythm
  - Continue emphasis on sustainability but not at the cost of better design"
- **"My ideal building is the one at the corner of 30th and SE Division on the northwest corner, where Caffè Pallino used to be. It is a low building with a few units and commercial space below. My second tier, and probably more sustainable, is the Sunshine Tavern building which has substantially more units and space for multiple businesses.**
- I am less happy with the **buildings that have gone up recently which are taller and often flat facing, with virtually no street character. They are cold and detract from the neighborhood vibe. They seem to be more about cramming in more units than helping shape the streetscape."**
- no answer
- **Buildings should look like they fit in the neighborhood not like they belong in the Pearl.**
- I would prefer buildings of 3-6 stories that feature setbacks after the street-front story, allowing light and space in. I love the residential over commercial type building. No preference on facade or style, but would like to see more variety.
- **"Ideally, 1-2 stories, with 3-story max.** Wood exteriors, earth tones, the building across street from Night Light is great example. **Sunshine Tavern building good for use of wood exterior. More consistency in roof lines and design between old and new buildings.**
- But, this question is beyond the vocabulary and understanding of mos people. I could point out much better what I mean tha put it into words. I don't have the architect/design speak to know what things/designs are called."
- Size of the current construction projects is about as big as I'd want to see in this neighborhood. Anything bigger would seem completely out of place.
- It would be nice to have some buildings that were constructed with some design intention beyond "cheap, easy and fast."
- I don't think mixed use commercial will work. Not very successful urban planning idea.
- **More green space flanking Division --- no buildings right up on the edge of the sidewalk; courtyards are great, but don't forget the green!**
- mix it up some...variety would be niceoffer courtyard space or something to soften the impact on the street...all of the these taller buildings built right up to the set back make it a little claustrophobic.



- Division Street should be lined with mixed use, dense, multi-story buildings with at least 4 stories each.
- 4 to 5 stories. Ground level commercial space.
- I am a believer in mixed use. Buildings should be close to the street, to create a sense of place. Style of new buildings should be modern, and NEVER try to imitate older styles. That is always a recipe for architectural mediocrity.
- **Two story. Three at most with commercial at street level** with adequate parking for residents and those interested in the commercial property.
- I would say that all development must include parking.
- no answer
- **Two story maximum** to protect residential areas surrounding it.
- **Two to three story, enough with the buffed boxes, back up a little from the street.**
- no answer
- **Smaller**, with parking, better materials. Concrete, brick, wood. No gypsum exterior panels.
- Conformity to style and character of existing neighborhood.
- **Smaller scale than the buildings like Richmond Flats, greater setbacks**, Craftsman or that era, lower height (at most one floor higher than the 2 story houses 1910s Craftsman houses - not the current "2 story houses with above ground "basements"), landscaping including trees and green ground cover, underground parking for residents. No to the supposed green building that look like they are put together with leftover scraps from other projects; no to 50s, 60s or 70s era styling - especially large scale. Houses in the area are having lots sold off and houses far too big for the neighborhood or the site put in. The new houses look larger than the largest existing houses and crammed into a partial lot, many with their "basement" at ground level - they are essentially 4 story houses in a neighborhood of 2 and 1-1/2 story houses.. Many of the mid-century houses were meant to have spacious yards and the ones which have sold the yards off might as well be torn down as usually huge houses are crammed in next door and it is extremely aesthetically displeasing.
- Find another fucking street already.
- no answer
- leave it alone
- no answer
- Parking, parking, parking. Did I mention parking? If more buildings go in, I'd like to see attractive, creative buildings like the one on 26th and Division. The recent buildings are ugly. The D Street village looks cheap and unreflective of the character of the neighborhood. No more than 3 stories (obviously). Retail space that is not just the same thing you'll see in any high-scale area of Portland. And parking.
- no answer
- **Small in size** with parking
- Arts & crafts, **no more than 3 story**
- "More buildings that reach to 4 stories would be welcome. inevitably some gaps would remain with lower buildings, but that's okay. I'd like to see overhangs, or more details at the tops of the buildings, instead of the flat top line you often see. More articulation in the face is desirable. Not just big notches, but articulation on a smaller scale (6 inches, one foot, etc), that adds a finer grain to the front of the building. The street frontage should be built up to the sidewalk, to create a pedestrian-oriented corridor.
- Parking lots should be eliminated. Any parking that is provided should be accessed from side streets, and narrow driveways.
- Style could be modern or traditional, as long as there is articulation of the facades, ground floor retail windows that are not blocked by planters or tables."
- 10-50 units no parking, 1-4 stories.
- Mixed use with shops, restaurants, service-based businesses. A variety of structures, not just raze the old, build new. More entertainment type businesses.
- I don't know much about building design, but I like when things are unique, and kept small, with lots of interesting details (like on craftsman style homes) and plants. I like dark wood accents, other natural elements like stone, and large windows. **Landscaping is very important. I like when things match the style of their surroundings but still have some unique character. I definitely appreciate when extra thought is clearly put into design and buildings aren't just slapped up as cheaply as possible. It's very noticeable when the new buildings are boring, generic, and cheap, and it makes the area around them seem sad. I definitely do**

**not like when they just look like a big four story box.** The new D-Street complex is interesting. I don't personally like the bright orange color they used but I appreciate that they at least did something unique. I like the vintage style.

- No high-rises. Residential at a variety of prices. Places for food carts (which are one of the things that make Portland so special). **Keep things funky--that's what we like.** Please, PLEASE no non-local chains. If we want chain restaurants/stores/etc., we can go to the suburbs. **Keep inner Portland interesting.**
- No more ultra-modern buildings. **The mixed-use buildings should respect the age of the neighborhood, i.e. brick facades, bay windows (no vinyl), cornices, no more than 3 stories.**
- **Maximum two-three story, traditional materials** (horizontal wood lap siding; double-hung windows, pitched roofs or flat, depending on what's nearby; traditional commercial entries (recessed, clipped corner, etc.) there is NOTHING creative about "mixed use" buildings - it is the city's choice for new development in every Portland neighborhood.
- no answer
- **3 stories or less to keep sun exposure.** Preserve sidewalks. Incorporate low income housing as well.
- None
- I prefer more windows at the ground level, and high quality, durable materials at the ground level. I strongly prefer that there not be one mandated style of building or building features, but rather a variety of building styles and sizes. **It's nice to see an occasional setback to provide a patio or other outdoor feature to provide a relief from the building mass.** I prefer to see more than one building per block with distinctive designs - but NOT one building designed to appear as multiple buildings - it never looks right! **3-5 stories seems appropriate for the street. As I mentioned above, setbacks for some of the upper stories would allow more light onto the street, and could be used for roof patios, which can help activate the street and provide more distinctive character.**
- No new multi story above 50th, and keep scale in that area primarily single-family. **Like the small homes between 43rd and 44th with gardens and interesting variations in design. Don't like most of the new multistory buildings which lack character.** Would like more setbacks from the street and plantings.
- no answer
- Perhaps a few indented courtyards (such as the one between Salt and Straw and St. Honore
- I think that a varied mix is of styles, and to a lesser degree scale. I do however, think that there should be some sort of uniqueness to any new projects. I think that any building beyond single family housing should have street level commercial along as much frontage as possible.
- **"I don't mind somewhat modern buildings but these huge glass and concrete things they been building are ugly and will look dated within 5 years.**
- **I'd like buildings no taller than 3 stories, medium sized, maybe with some vintage touches to match the surrounding locales"**
- **No taller than 2 stories, take style of neighboring buildings into account, and include parking -- it's just realistic.**
- I'm afraid it's a done deal...the **preposterous mix of facades along the stretch of new development (fly swatter metal grate building, bright orange faux tudorish, brick front, modern cube, industrial metal and glass) mixed in with the old buildings means that pretty much anything goes...and absolutely nothing goes together.** Perhaps that is the aesthetic defined?
- **Make them look like the buildings that are already there.**
- The current aesthetic resembles that of Ikea.
- "preferences are everything built previous to the past 6 months of rampant development.
- **preference is stop destroying what stands, just improve. why do you suppose the popular inner city neighborhood properties are the vintage 'old charm' PDX???"**
- no answer
- **Like the 3-4 floor building model for a main business street.**
- **Limit to 3 stories;** provide parking for both residents and customers (Zupan's on Belmont does this); the most local style, though hard to adapt to a multi-story building is bungalow style/Arts and Crafts. **It would be nice to see designs reflecting that style rather than glass boxes.**
- **make sure you keep accessible sidewalk & ramps please. So people on bikes and wheelchairs and who use walkers and other mobility devices can actually make their way through the neighborhood.**

- **Max of 50 units on four floors. Energy saving/generating features. Contemporary design.**
- no answer
- **Keeping the scale smaller would be more feasible for the area.**
- no answer
- The buildings should have parking for at least 75% of the residents. Currently the buildings that are going up look too similar, variety in design would help keep the unique character of Division Street. So get away from blocks of color on boxes.
- **Think about how new construction can fit in with the classic construction of the neighborhood. One or two level, brightly painted and individualized store fronts with large windows. Less metallic and glass structures. Room for seating on street.**
- Small to medium sized mixed use with parking. Interesting shapes and facades to add diversity to the mix. **D street have character and balance of scale. Not looming oversized apartment structures bearing down on you.**
- **"There should be a lot of well designed public space, with water features, with native plantings, a poetry post, that sort of thing.**
- Division has become a garish homage to the Portland restaurant, a farm-to-fork Disneyland. It's not a very interesting place and it's not worth the effort to navigate the traffic to get there. And once you get there, there's no place to park.
- Except for the media superstars like the overrated Ava Genes, I wonder how all those restaurants will survive?
- There should be more business diversity amongst all those restaurants."
- no answer
- Residential and commercial need to provide integrated parking. **Stay at 2 stories for buildings. Natural colors -- not the bright orange that's on one of the new apartments. Lower density with more of a mixture of old and new. Facades that fit with the older buildings. More trees and green space/plantings.**
- **"Limit high rise structures.**
- **Limit strip mall type/generic appearance.**
- Limit super modern designs that look like they belong downtown or the Pearl District and not in an eclectic neighborhood community.
- Provide parking lots to cut down on off street parking congestion."
- no answer
- I like the retail on the street with the residents above. Don't really have any concern as long as everything sustains itself. That is wouldn't want vacant apartments or stores. But if they fill up, not going to worry about size. I have ZERO concern about parking, and would be opposed to any parking requirements. The whole point is to get denser.
- **2-3 stories.** Pedestrian-friendly (no cement facades without windows or artwork or nature/water elements). More thought as to design and beauty.
- **taller, more colors , less plain concrete, more store fronts**
- **Limit building height;** provide off-street parking for residents and guests, try to preserve some of the "old Portland" or "Craftsman" style in architecture some of the time.
- Residential and Commercial uses in the same building with below grade parking makes sense. The current range of 4-6 stories makes sense since the surrounding residential areas are still very intact and their scale is smaller. **Taller buildings along Division are the way to go.** Single-family homes still on Division will eventually be moved, deconstructed or converted to commercial uses.
- no answer
- None. GO TO SE FOSTER!
- Division is already too built up with large mixed used buildings. **The street is tiny-the scale is wrong and dangerous to walk around. Socioeconomic and ethnic diversity should be more emphasized. A library branch and/or community center would be excellent. More public spaces for hanging out, which the food cart pod offered.**
- Affordable housing. single family homes, affordable apartments, no expensive condos.
- **It would be nice if you could tell which block you were on rather than everything on the major 'hood streets (ex, Alberta, Mississippi, Division, etc) looking so similar. Where's the character in that? They're**

**all starting to blend together. So, design that was influenced by the existing community, utilizing it's unique flavor.**

- "Newer development is aesthetically a detriment when the height is incongruent to the existing structure it may be placed beside on Southeast Division Street. **A district with buildings of like height - so as to not dwarf the older existing commercially zoned structures - upon the street would be preferable.** It would be nice to have more bicycle infrastructure as well, at the current time it is very difficult to locate adequate bicycle parking in certain blocks, due to the sidewalk tables and the construction."
- **Store fronts with lofts are fine, but anything over two, maybe three stories stands out. The cubist futuristic buildings are obnoxious.**
- **small, facade should blend in with period of building surrounding it**
- I like the idea of mixed-use but **no more than 3 stories tall. I would like those building types to be up to the sidewalk.**
- **no answer**
- **Prefer mixed use, modern or faux-vintage exteriors, up to 8 stories.** Up to one half block in size.
- I prefer mixed use buildings that front on Division. **They should all include ground-floor retail. On-site parking should be minimal. Max height of in the range of 6-10 stories. Style can be anything. Prefer mixed-income developments.**
- The sizes are probably about right. I would like to see more suitable landscaping, a bit more greenspace, a much less concrete/steel/aluminum. I want buildings to be pleasant from the street both individually and as as part of the streetscape.
- You are going to need huge parking structures!
- They should be urban, in nature and design, engaging the street, with parking incorporated into the designs (but not as open parking lots visible from the main street). Some of the terrible 60's through 90's apartment buildings, as well as some of the light industrial buildings of those eras are suburban in design and do not belong on a main street of an urban neighborhood.
- **Be respectful of what you build - you are part of a larger canvas, stop trying to make a personal statement - try to fit in.**
- **no answer**
- I think the current size and scale has been great. Encouraging public spaces, or breaks mid building would be even better. So instead of a whole block face there's a break, maybe a small indent where the main entrance is. They don't all have to have benches or fountains.
- **"Most important--no more than two or maybe three stories.**
- **Deeper set back with more interface spaces.**
- **Adapt to surrounding structures.**
- Don't build to property line.
- Stop pushing density."
- **no answer**
- **Again--look at D Street Village. I love almost every aspect of that concept.**
- residential and commercial is fine together, but fix the parking. Continue with the current types of new buildings in style.
- Any building form, any facade.... Street frontage ON Division. **Let's not make strip mall SoCal... 3 stories max.**
- Size: no bigger than what is present, both in height, depth and width. Frontages should not be all glass. No garish or all white color schemes.
- To leave Division alone. If it is to be touched **keep the style and building form in line with the neighborhood.** Provide parking for ANY apartment building that goes up-- COMPLETE Parking for every tenant. Make rent, building, and restaurants affordable so that Portland does not turn into NY.
- **no answer**
- **no answer**
- **A great example of terrible design is the "Division St. Penitentiary" next to the Whiskey Soda Lounge. A big white cube, covered with prison bars.** This is a great example of someone trying to make a building at the lowest cost possible. **I prefer building designs that break up the skyline, have a modern edge, but look like**



**well made structures of permanence. I fear that half the new apartment buildings on Division St. now will not age well, and look shabby within five years.**

- living walls, wood siding left the color of the real wood. Windows. The interior look of the wild oats building is nice. The orange color is a little annoying.
- Currently, there are rental houses from 34th and 36th and Division that fit the scale of Caruthers. I have a concern that the area between 34th and 36th and Division will be redeveloped into an MDU. When the houses get razed, I don't look forward to a view of the back of a three story building.
- **Smaller! Trying to max out a lot by putting X amount of condos in each building is too much. A population increase like this in one area is overwhelming.** I'm all for new businesses, though businesses had been doing just fine renting the structures that had already been standing. So knocking things down for the sake of building something bigger. If it ain't broke, don't fix it!
- **Smaller scale, less generic/modern, not too tall**
- **"Anything over 4 stories seems out of scale with the current neighborhood but it needn't be a hard and fast rule.**
- I believe the aesthetics should be dictated by people qualified to make such judgments (ie, city planners) who have the city's interests in mind (and not developers who are turning a quick buck) but I mistrust the design decision of the people who live in proximity and have the time to complain about it. These neighbors may have different objectives than I and although they may be organized, may not represent the neighborhood's view. Not everybody wants Division to stay the way that it was. I am excited about this new commercial strip, as I think many busy young people are.
- **I like the concrete commerical main floor with two floors of wood framing or masonry above. It gives a good feel to the street while what you see from farther away is more contextually matched to the residential. I think there should be lots of windows facing the street, but not lots of windows facing what used to be private back yards."**
- Any new buildings should provide parking
- Hmm. I think **keeping things at 3 stories will help keep the open feeling of the street.** I don't really have a modern/traditional design preference. The better made the new construction, the better. Also development that includes green space, energy efficiency, etc. are a plus.
- Style is one. The style of some buildings that are going up look ghetto and will not age well and assimilate into the neighborhood design. **Buildings should be thoughtful and also blend in well with the neighborhood or should be architecturally significant in their own right where they become a destination or add civic pride. Size should be big to maximize land and they should have street frontage and some business opportunities on the ground floor or a public space (or green space) that is inviting to the neighborhood.**
- How about some crosswalks between 50th and 42nd.
- I think it would be okay to have single use residential buildings as long as the ground floor has interest or elevated patio or stoop setback (for their privacy). I think it is impossible to always fill the ground floor with commercial or residential. Why not have quieter uses like offices, too? **We need some quieter segments on Division to make it a livable place. It can't be all glitzy and commercial the entire length of it.**
- I don't mind modernist design or retro knockoffs. **My main issue is that the building envelopes are mostly just giant cubes built out right to the lot line as much as possible. I would much rather see taller buildings with more varied setbacks, terraces, mews, or other design ideas to keep Division from becoming just a condo canyon. Also, I'm fine with building housing with no parking.** I'd be fine with it on my own block as well. Just put a parking district in place and direct the proceeds to local improvements. No one, not even long time residents, is owed a free space on the street to store a car.
- no answer
- **rehabilitating existing buildings and keeping them under 4 stories, but have a modern twist that reflects the northwest architectural style - perhaps reflecting the work of John Yeon or John Storrs or earlier architects such as Belluschi or Doyle. Nothing too pretentious.**
- "Any property zoned commercial should be required to have commercial on the ground level.
- Appropriate parking is needed especially with larger housing complexes.
- Have a small easement along the street to widen the sidewalk for use for dining or other appropriate use.
- More trees.
- **New buildings no more than 3 stories unless appropriate."**



- No more commercial unless replacing another one. Residential only or **very small I scale only, fitting in with previous non-gentrified look, practical basic services business only.**
- no answer
- retail+2, on-site parking (or under-site), architectural interest (no more eyesores like on 48th or across from Do It Best). redevelopments like the Victory Bar building are great. re-use!
- I would like to see tile designs envisioned by the local community adorning the outside facade of new development. This would help the community to feel invested in the place that they live and that they can help to further illustrate the identity of the Division corridor.
- **Less boxy, more artistic, more flora, colors, let the sunlight in to the street**
- Balconies, form to the structures, open areas in restaurants where the windows can at least open, lots of wood.
- Mixed use with parking.
- I would like them to have **step-downs. Not feel so visually massive.** It would also be nice if they were farther back from the sidewalk & had more greenery.
- no answer
- Mixed-use is fine, but need to incorporate parking. No more McCondos that all look the same! So gross.
- **2-3 story max, human scale, set back from sidewalk, buildings match older styles**
- **While I like some of the unique architecture of the newer construction, I would like to see preservation of older buildings. I would like to see new construction that has a more intimate, historic style.**
- **Low-rise (2-3 story), mixed-use OK, with some residences access at street level. Trees. Trees. Native landscaping at the street. Brick and historical materials, with a retro/modern feel. Pay homage to the old Portland style homes, and the light industrial feel of some of the old buildings. Green/eco materials and structure.**
- It would be nice if **trees and/or landscaping and/or art could be planned into the street scape.** Bicycle parking is sorely needed, as is a structure that has parking (even parking that is charged for). I get the feeling that the residential neighbors are losing all peace and/or parking.
- I've written on this already: **new development should respect the architecture of the surrounding neighborhood, incorporate sightlines that create safe and desirable public spaces** (witness the courtyard setback in the development that includes Salt and Straw, and the outdoor space maintained in the corner of D Street Village), allow for greater density but acknowledge the need for parking, are attractive for families at a variety of economic levels, and are sited to allow for walkable distances to businesses and schools.
- **Use more wood or metal in facades.** More underground parking.
- Just keep it mixed.
- **Smaller, lower, setbacks from residential properties, in keeping with early 20th century design of the neighborhood**
- The new buildings are all really blah. The ones torn down weren't very architecturally relevant, but seems like new ones could be! **The facades are very boring and the colors often glaringly bright and atrocious. And where are the green spaces? I have seen people from the new buildings lying on my lawn to get some green time!**
- **two story residential and commercial mixed use, energy efficient, with parking for visitors and residents.**
- no answer
- no answer
- Not sure
- Ground Floor Retail; Parking; **Live work; balconies/common meeting areas outside; less boxy in appearance**
- no answer
- I think it's a good idea to **hold the height down to four stories. The style can be anything as long as quality materials are used. Some of the new apartment buildings on Hawthorne look much better than any on Division.**
- I am partial to development meets the scale of the street. The antithesis of my likes would be a large, block-long, 4-story building with a straight facade. Providing variation in scale, form, and material prevent the space from feeling closed in.
- **"- No tall high rises.**
  - No more buildings without their own parking spaces.
  - No more low income, hippies and transients are plentiful in our neighborhood.

- **Keep fairly strict on maintaining 'Portland style' vintage character.** Enough modern in the mix for now..."

- **"up to four stories, maybe five with step-backs.**
- Covered outdoor spaces and sidewalks.
- More depth/texture to facades.
- Parking structures"
- Underground parking. **Colorful, creative facades and details that speak to the existing character of Division Street. 2-3 story buildings with the 3rd story set back, with beautiful balconies (not metal cages).**
- **Higher quality materials and design, more classic and less cheap modern style that will be outdated in 5 years.** The D Street Village sign is TACKY
- **No buildings taller than 2 stories. At least 12 foot setbacks.** Craft-style.
- **"No more than 3 stories high**
- **More landscaping and green spaces"**
- **"No more than 3 stories**
- **Upper story has set-back**
- Not too close to street
- **Consideration of neighboring houses** (don't destroy view from windows, etc)
- **Substantial landscaping (green space)"**
- **Some sort of design review...**Why do we have a building that looks like a jail?
- **Higher quality exterior materials. Some detailing and relief in the shell to give visual interest.** Parking required in the building or on the site - not necessarily to serve every visitor, but to relieve the movement into the residential neighborhood.
- **Stylistic integration with the existing structures would be nice, but more important is design so that new additions do not create impositions upon the already present residents.** So...in my estimation, there should be NO new residential development until the problem of providing adequate nearby recreational park space for ALL elements of the populace. Commercial development should be limited with the directive that such development will not indispose nearby residents with excess activity and parking.
- mixed use reduces crime and increases foot traffic. **most importantly is the feeling of "human scale" as a person walks on the sidewalk. greenery is important**
- keep it looking like old Portland and STOP cramming so much HIGH density on all the streets. WE DON'T NEED TO START LOOKING LIKE NEW YORK CITY. The filming of Portlandia and Grimm will go away and people will stop moving here. Then we'll be stuck with a bunch of ugly empty apartments. ENOUGH!
- You are making it impossible.
- no answer
- Mixed use buildings. **Varied scale in size and style of building. Incorporate public spaces along the street where people can gather.**
- Mixed use tree lined street. Whenever possible, use existing buildings rather than building new.
- **"2 story buildings** with warm colors, not cold metal and white.
- If residences and be in the back, rather than just upstairs, that would be nice.
- **Preferable to building new is the conversion of old houses or adding on to existing buildings to re-invent them."**
- any designs that foster neighborhood interaction and community gardens, public parks, or other green spaces.
- no answer
- **Definitely one to two story, maximum.** The taller building may have its place in industrial areas or downtown, but not a residential neighborhood. The cheap wood/barracks style have got to go. As an example, of what appears to be newer construction, the Roman Candle bakery and Townsends tea building is a more appealing facade. Lots of welcoming windows, stucco siding, smaller neighborhood friendly scale.
- "Again, I'd prefer good, aesthetic contemporary design.
- Check out Edgemar in Santa Monica, CA. Very artistic and humanistic."
- **Buildings designed like existing neighborhood, could give old house look, or brick and ivy fronts. Not too tall or creates canyon. A place between sidewalk and buildings for people to sit or hang out.**
- I would **prefer to see buildings that retain some green space rather than using every square inch of a lot. I would also like to see buildings that have more details that coincide with the architecture of the**

**neighborhood. The condos for the most part look to me like windowless boxes** and I don't understand why they are all beige. It would be nice to see some colors.

- "I would prefer no more.
- If you had of asked me 3 yrs ago I would say commercial on bottom floor and a total of **3-4 stories** with some parking."
- More courtyards along the way add interest and if more could provide cover from light rains it would be good for business and interaction. I'd like to see wider sidewalks all the way along.
- **"Reduce typical size** and ALWAYS include off-street parking as a requirement.
- Require all housing developers who receive subsidies to build 'transit-oriented' housing to actually assure that they meet that. Failing, they should be liable for returning the subsidies."
- **small and let's take a break for a while.**
- All of it!
- A huge fire would improve the corridor.
- Parking for shoppers.
- **Smaller mixed use is good..**6 to 10 units max with retail on first floor. Avoid monstrosities like those being built on Hawthorne e.g. like the new one next to 'Porque No' mexican food restaurant. My god! How did they get away with building that POS...similar to the monster between 44th and 45th.
- answered before
- **4-6 story, multi use buildings.** Mixed income residential in same buildings Minimum parking spots. Old Portland style. Not too much box residential or commercial design. Must have inviting fronts and gentle backs for residents behind any structures
- **Styles reminiscent of 1920s architecture. Probably no more than 4 stories.** Things that look inviting from the street.
- Mixed use would be nice but no new buildings - make use of what's already there.
- I would prefer some larger residential and commercial mixed use spaces. We need to provide housing and job opportunities and not push people out to the burbs.
- **More compact buildings,** affordable housing, parking for tenants, common spaces, garden areas for tenants, kid friendly businesses.
- No large stores. Keep them small, locally owned, and affordable for the business owners.

**Date** 15\_0827 Updated 30 September 2015 | **Project** Division Design Initiative Policy Framework  
**To** Linda, Heather | **From** Marcy McNelly | **Copy** Joseph Readdy, Joy Alise Davis

## DIVISION DESIGN INITIATIVE POLICY RECOMMENDATIONS

### PROPOSED TOP TEN LIST

(Marcy's)

1. Close the residential Floor Area Ratio (FAR) loophole
2. Fix Floor Area Ratio (FAR) to building height mismatch to get better urban form
3. Measure stories instead of height for more predictable building design
4. Adopt form based code regulations to achieve context sensitive design
5. Spread out land use intensity and share the burdens and benefits of density between main streets and neighborhoods
6. Improve notification and enable constructive community engagement about growth
7. Return SDC money to affected neighborhoods
8. Permit density transfer mechanism to encourage older better buildings to stay
9. Incorporate solar policy into zoning code amendments
10. Require tracking of and accountability for environmental impacts

# Richmond Neighborhood Association

## 3-Step Notification & Community Engagement Process

The following 3-step notification policy was approved by the Richmond Neighborhood Association (RNA) Board on March 14, 2016 in response to extensive neighborhood input about a desire for more notification and ability to have more meaningful and timely input about the future growth of the Richmond Neighborhood. For questions about meetings and notification contact the Richmond Neighborhood Association.

### 1 Notification for Proposed Projects

- a) **Projects  $\geq 5,000$  SF or  $\geq 5$  units proposed within the Richmond neighborhood should provide notice to the following potentially affected nearby stakeholders:** Business Association, Neighborhood Association, local historical society [if impacting any permanent structure built prior to 1940\*], and adjacent neighboring properties and residents (including rental apartments) within a 500 foot radius.

\*This date is defined as a threshold established because of the traditional quality building stock that exists in the Richmond neighborhood from this time period and earlier including Victorian, art deco, craftsman, early 20<sup>th</sup> century commercial main street mercantile architecture etc.

### 2 Neighborhood Association Visit(s)

**When to Come to the Neighborhood Association:** A minimum of one visit to the neighborhood association is encouraged (and is required if on Division Street per City policy) to present an overview of the project to area residents, businesses, and property owners. However two visits to the project's neighborhood association (NA) are encouraged as follows:

1. Suggested Courtesy Visit to the NA at the "Conceptual Design" stage: Visit to the NA to gather general feedback and give early notice. Timeframe: ideally within 90-180-days prior to submittal.
2. Pre-Permit Visit: Building applicants should make a presentation visit the Neighborhood Association not less than 60 days prior to building permit submittal.

#### What Project Materials to bring to NA meeting:

1. Site Plan & Proposed Building footprint/plan - Minimum of 25 - 8x11 copies denoted with scale, north arrow, existing trees (and size of DBH –depth at breast height), and showing adjacent surrounding development.
2. Building Façade Elevation Drawings showing proposed building in context with existing adjacent building and block development.
3. Solar Shading Analysis – illustration of solar shading impacts to adjacent development
4. Privacy & View Impact Analysis Drawing – showing how the placement of windows and balconies may or may not impact adjacent neighboring properties privacy and may impact any important public views.

### 3 Follow up: Applicant Comment & Response Form

An applicant should document and submit a list of comments received from the Neighborhood Association Meeting to the Neighborhood Association with a responding statement for each comment as to how each are being considered.

Neighborhood Association: Date of Visit:	Applicant: Owner:
<b>SAMPLE NEIGHBORHOOD COMMENTS</b> <ol style="list-style-type: none"><li>1. Preserve mature tree at NE corner</li><li>2. Prefer balconies at street</li><li>3. Vary window patterns – continuity with variation</li><li>4. More street entries desired</li><li>5. Step building height up and down</li><li>6. Vary rooflines</li><li>7. Commercial at the first floor, smaller affordable commercial spaces requested</li><li>8. More family-friendly unit sizes and amenities</li></ol>	<b>SAMPLE APPLICANT RESPONSE</b> <ol style="list-style-type: none"><li>1. Will relocate on-site to preserve</li><li>2. Now included on SE façade</li><li>3. Incorporated exist. neighborhood patterns for storefront window design</li><li>4. Added more frequent entries</li><li>5. Will consider this to maintain better solar access</li><li>6. Will discuss with architect</li><li>7. Cannot make this work with program without amenities bonus</li><li>8. Redesigning midblock of building to include shared courtyard with more green space and art, added several additional units</li></ol>



November 19, 2015

Dear Mayor and City Council members:

# ((D))VISION DESIGN INITIATIVE

3534 SE Main Street, Portland Oregon, 97214  
[www.DivisionDesignInitiative.org](http://www.DivisionDesignInitiative.org)  
[ilovedivision@gmail.com](mailto:ilovedivision@gmail.com)

## **DIVISION DESIGN COMMITTEE**

*An inter-neighborhood coalition collaborating  
to refine a shared vision for a growing Division*

### **Division/Clinton Business Association**

Sydney Mead, DCBA Chair

### **Hosford Abernethy Neighborhood District**

Linda Nettekoven, HAND Board

David Aulwes, Landscape Architect

### **Mount Tabor Neighborhood Association**

James Smith, Architect/MTNA Board

### **Richmond Neighborhood Association**

Heather Flint Chatto, Planner, RNA Board

Debby Hochhalter, Resident

Cyd Manro, Chair, RNA Board

### **South Tabor Neighborhood Association**

Sandra Hay Magdalena, STNA Board Chair

### **Southeast Uplift**

Bob Kellett, SEUL Staff

### **Sustainable Southeast**

Liz Potter, Community Representative

On behalf of the Division Design Initiative, we are submitting the attached Top Ten Policy Recommendations for the City of Portland. These policies have been endorsed by many community leadership organizations including: the Division Clinton Business Association (DCBA), the Hawthorne Boulevard Business Association (HBBA), the Richmond Neighborhood Association (RNA), the Mount Tabor Neighborhood Association (MTNA) and the Division Design Committee (DDC). The attached Top Ten policies represent a response to extensive community outreach, research, and stakeholder engagement over the past 18 months to create proactive approaches to engage community members in the planning and design of their neighborhoods.

The redevelopment of SE Division St can be viewed as a pilot effort or a prototype of what is being proposed in the Comprehensive Plan. Although the changes have brought benefits, our experience during the past three years of growth and change has led us to summarize the accompanying concerns of the community as follows.

### **Concerns Frequently Expressed by Division Neighborhood Residents, Property and Business Owners:**

- A reduction in safety on adjacent neighborhood streets due to increased traffic speeds and volumes, and increased congestion on Division and Powell
- New development that creates discontinuity with existing neighborhood patterns, style, materials and building form.
- Loss of solar access for nearby residents
- Decrease in availability of parking for residents and customers
- Lack of access to green space and public gathering spaces to serve residents
- Dramatic neighborhood socio-economic changes, gentrification, and increasing lack of affordability of housing and loss/lack of neighborhood-serving businesses
- Lack of adequate design standards, and planning/design review criteria to ensure compatibility
- Lack of information, notification, or meaningful ability to participate in the planning process

We would like to highlight that the attached Top Ten Policy Recommendations are applicable city-wide and are not intended to reduce overall density, but simply to advance quality urban infill density that is more compatible, with fewer development impacts. We believe that we can accommodate our increasing population and long-range planning and sustainability goals if the following are better analyzed and incorporated into our Comprehensive Plan Update.

### **Growth Scenarios are Incomplete & Need Additional Analysis & Refinement:**

We encourage the City Council not to approve the Draft Comprehensive Plan without directing further assessment of some important missing components not fully analyzed as part of the published Growth Scenarios Report. We respectfully request the City Council to direct the Bureau of Planning & Sustainability (BPS) staff to conduct the following additional analysis:

#### **1. Study Growth Scenario Alternatives for Increasing Infill Density with Fewer Development Impacts:**

- Higher density on wider streets, North-South corridors and major arterials, higher density at major intersection nodes to balance the reductions proposed below.
- Reduce/refine scale of development on narrower streets and older street-car era main streets with special character

Order 188177, Vol. 2.3.H, page 9765

2. **Evaluate a more comprehensive “Missing Middle” Neighborhood Infill Scenario** in addition to the “Centers & Corridors” growth scenario. This would mean further assessment of existing and potential increased neighborhood units achieved through additional Accessory Dwelling Units (ADU’s), conversions of existing houses into duplexes, and more small-medium infill housing types like courtyards, row houses, etc on major arterials and narrow streets that when balanced with the suggestions in item two below could achieve our density goals in a more context-sensitive manner.
3. **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 in order to:
  - Economic: retain existing economic value of residential and commercially developed properties.
  - Social: contribute to public health, well-being, and thermal comfort; and
  - Environmental: reduce costly energy consumption, generate alternative energy sources, and foster community resilience and sustainability.

## **Continue Portland’s Leadership in Sustainability with more aggressive goals, programs and incentives**

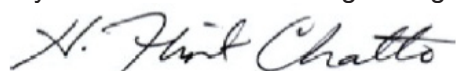
4. **Direct staff to research and return with a recommendation to Council for a set of further incentives and programs that support greater innovation, climate resiliency and sustainability including:**
  - a. Application of a “Green Factor” Program (used in Germany and Seattle) for the City of Portland or similar program that sets higher performance criteria and requirements for sustainable site and landscape requirements in new buildings. These programs help reduce urban heat island effect, advance resilient cool cities, and improved air quality benefits.
  - b. Assess impacts and value of tree preservation related to urban heat island protection, create recommendations and incentives for preserving large mature trees, and establish design goals and standards for maintaining spaces where large trees can be planted in the future.
  - c. Create relevant Incentive programs (Top 10 Policy #7,#8,#9) for:
    - “Zero Energy” verified buildings
    - Incentives for Beneficial Projects: waive transportation impact fees (SDC’s) for beneficial community uses such as affordable housing, senior housing, daycare, and alternative transit-oriented businesses.
    - Adaptive reuse of older commercial buildings with special character (see report by preservation Green Lab, “Older, Smaller, Better” on the key value that mixed vintage buildings bring to communities)

## **Close the Residential Floor Area Ratio Code Loophole in Mixed Use Buildings (Top 10 Policy #2)**

Community members have expressed extensive concerns about the overly built-out, boxy nature of recent developments, the creation of large blank walls, flat facades, the lack of context-sensitivity, and buildings with significant impacts on adjacent residents and neighboring buildings.

5. **Direct staff to come back with a recommendation for how to implement the residential FAR requirement now**, in an expedited manner that does require the community to wait for code improvements until 2017. The floor area ratio requirement will help restore a more reasonable building envelope and create better code consistency and parity for the residential development in mixed use buildings.

We encourage you to consider the concerns expressed in the nearly 300 Division Perceptions Survey responses (attached), as well as the goals and pro-active solutions presented by the Division Design Committee. A description of the work of the DDC is attached for reference as well as our policy recommendations. These highlight important policy opportunities that can help Portland to grow into a more compact, livable city through innovative design that is both dense and sensitive to community context. Thank you for the opportunity to comment and for your work to help the City of Portland balance long-term goals for increased density with current community priorities.



*Heather Flint Chatto, Planner & Urban Designer, LEED AP*

Richmond Neighborhood Association Board member, Division Design Committee member  
2121 SE 32<sup>nd</sup> Avenue, Portland OR 97214

## ATTACHMENT A

### About the Division Design Initiative

The Division Design Committee is the implementing committee of the Division Design Initiative (DDI), a community grassroots project to help give a greater voice in the future of design, planning and evolution of Division Street. This work began in December 2013 with the unanimous authorization by the Richmond Neighborhood Association to form an inter-neighborhood committee to a) respond to community design issues and concerns and to b) make further recommendations for implementation of the Division Green Street/Main Street Plan.

The Division Design Initiative maintains a Design Committee of elected and appointed members representing seven neighborhood and business associations including the Richmond Neighborhood Association, Hosford Abernethy Association, Mount Tabor, South Tabor, Southeast Uplift, Sustainable Southeast, and the Division Clinton Business Association. The boundaries of the project are the existing Division Green Street/Main Street Plan extents which span Division Street from 11<sup>th</sup> through 60<sup>th</sup> Street.

### How much effort has been put into the Division Design Initiative

- ***Extensive Community Engagement & Research:*** Listening to the community over 18 Division Design Committee meetings open to the public to discuss community goals and design priorities; through surveys, tabulating results and priorities and translating into DDI documents. The DDI has held large public events to map community priorities, organized public forums on infill and managing growth, and walking tours to engage neighbors and get feedback. In May 2015 the DDI also held a stakeholder workshop with City planning staff, City Bureau of Housing, neighborhood and business association leaders, affordable housing buildings, Division property owners, architecture and real estate professionals, local developers, and building efficiency nonprofits to discuss strategies to address affordable, green and adaptive reuse.
- ***Development of Tools including a Working Draft of Division Design Guidelines + Draft Toolkit for Neighborhood Design:*** DDI products are intended to guide policy makers, developers, and give the community specific tools, strategies and, importantly, language that allows them to describe the issues and be constructively involved in the ongoing discussions about development on Division.
- ***Policy Recommendations:*** DDI work has not only clearly identified the issues, but most importantly, has proposed solutions, through Design Guidelines and now a Policy Framework including:
  - a. Community Notification & Engagement Recommendations (supported by RNA, DCBA, HAND, HBBA, Laurelhurst NA, and others)
  - b. Top Ten Policy Recommendations – Community-wide application (Endorsement of all 10 received by the Division Clinton Business Association, Richmond Neighborhood Association and the Hawthorne Area Business Association).
  - c. Comprehensive Plan Recommendations
  - d. Mixed Use Zoning Recommendations - City-wide and specific to Division
  - e. Division Perception Survey - <http://divisiondesigninitiative.org/division-perceptions-survey>

These recommendations for additional clear and objective development standards improve upon Portland's current system by establishing a finer level of control over shape and size of buildings and are tailored, in a sensible way, to the context of main street environments like Division.

***(Excerpt from the Draft Division Design Guidelines)***

***Background & Current Conditions***

"Since 2012, the Division corridor has undergone a rapid transformation unparalleled in the history of Eastside development and well beyond what was envisioned in the Green Street Main Plan. The area between SE 30th and 50th Avenues has seen the arrival of close to 400 new residential units with accompanying commercial spaces. On one hand, the street has become a vibrant commercial corridor attracting visitors from other parts of the city and the region. However, for many long-residents, the dramatic transformation of the corridor represents a tsunami of growth that has been quite traumatic, causing a deep sense of loss for the small, locally-serving, "village-like" atmosphere, special streetcar/main street character, eclectic street identity that has shifted seemingly overnight to serve a higher-end level of business and rental market, making it less affordable to local businesses. This loss of affordability has also impacted the housing rental prices, making the new developments out of reach for many renters and causing concerns about gentrification, increased traffic congestion on traditionally quiet residential streets, parking problems and other impacts such as loss of solar access, privacy and displacement of residents. Of great concern is that the majority of this private development of eight blocks of the Division corridor is in direct contradiction to broad community concern expressed in the media, in public testimony and in neighborhood surveys responses. With few avenues to help shape the changes occurring all around them, there is a good deal of anger and frustration in the Division community, some of it perhaps masking a sense of grief and loss, even of despair. Citizens have deep connections to their neighborhoods and "psychology of place" is important consideration for planners and designers when areas of our city are experiencing rapid growth and change.

For Division, some of the breaks in our civic fabric may have happened with the Mt Hood Freeway project that, when ultimately abandoned, led to a fragmentation, displacement, and later disinvestment of public and private improvements for next 40 years. The impacts of this legacy of disinvestment further led to ongoing decline of street and land conditions. It should also be recognized that this history has also contributed to the identity of Division as a small scale, affordable, funky and eclectic, blue collar "maker" street with a collection of scattered historic buildings. With the rapid redevelopment of Division from both public investments in the Division Streetscape project and extensive new private large development projects over the span of 18-24 months, the long-standing neighborhood character and identity as well as social fabric of the neighborhood has been significantly altered. This has left many residents without either the policy or political framework to have a voice in the evolution of their neighborhood. This has caused a crisis within the local Division community that some may paint as growth/no growth, density/anti-density. We see this same crisis reflected citywide.

By creating design guidelines that help us connect to our history, sense of place, and unique identity we hope to help heal some of these impacts and collectively shape a common vision for the future evolution of Division."

\*\*\*\*\*End of Excerpt\*\*\*\*\*

The Division Design Initiative has actively worked to help shift the dialogue away from complexities that polarize communities when discussing issues of density to the fundamental importance of DESIGN, ideally focusing less on where we may be divided towards what we can agree upon as shared goals. The attached Top Ten Policy Recommendations for the City of Portland help represent these shared goals and have the endorsements from many leadership organizations as evidence of a **collective desire for future density with less impacts**, and community involvement in neighborhood planning to ensure more **context-sensitive design**.



# Division Design Initiative

## TOP TEN POLICY RECOMMENDATIONS FOR PORTLAND

*The following are proactive solutions based on broad community input to fix current planning and zoning policies. The intent is a no net density loss approach to encourage additional infill density with fewer impacts.*

**Background:** Recent development on Division is a sharp contrast to its traditional small-scale main street character and form. We have seen a great deal of new development that often feature flat facades and rooflines, large blank walls, inconsistency in quality of materials, as well as privacy, light, noise, parking, and traffic impacts that have caused significant community design concerns. Much of this development has occurred despite more than 2-years of community outcry expressed in the media, public testimony, letters, surveys and neighborhood meetings. As we plan our growth strategy in the Comprehensive Plan and new Mixed Use Zone changes proposed by the City's MUZ Advisory Committee, **we can - through more context sensitive design - encourage compact density and infill that meet our population goals within our urban corridors in a more unifying, intentional manner that preserves what is special and character-defining while allowing us to grow into a more compact city.**



**1 Improve notification and enable constructive community engagement about growth** Eight large buildings in 18-24 months is major redevelopment, yet the neighborhood had no meaningful opportunity for real input. (See [DDI Notification and Community Engagement Policy Recommendations](#))

**2 Close the Residential Floor Area Ratio Code Gap Now** - There is currently no Floor Area Ratio (FAR) requirement for the residential portion of mixed use buildings which results in overly boxy, bulky buildings as projects build to the maximum envelope allowed. The City (through their Mixed Use Zones Proposal) is recommending this be fixed as part of the Comprehensive Plan adoption but it would not take effect until 2017. We recommend this be a top priority for the City to take immediate action to fix now.



**3 Add Permit Review Criteria for Assessing Compatibility with Neighborhood Context** (see draft *Division Design guidelines Compatibility section & comment letter to the City of Portland Hearings Examiner re: land use appeal by Brentwood Darlington Neighborhood*). Request additional permit submittal requirements be added including:

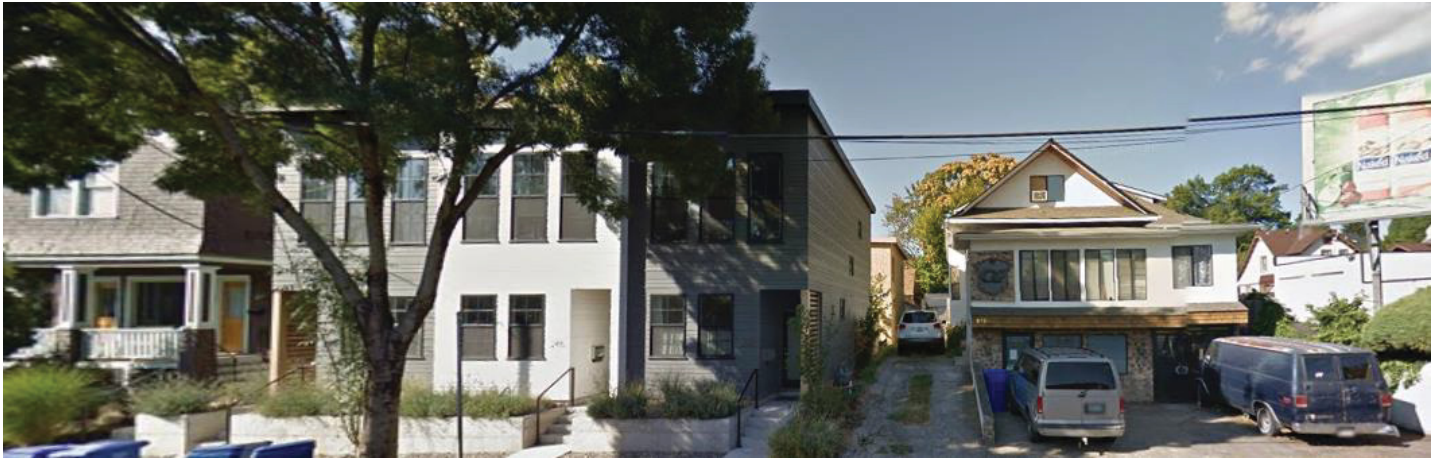
- Elevations showing proposed development in context of adjacent building/block development,
- Solar shading analysis, privacy and view impact drawing
- Statement of features/approaches used to demonstrate alignment with community design goals and preferences if formal guidelines exist
- If no parking is required, provide a transportation demand management plan for mitigation of impacts (this could include annual bus passes for residents, shared/conjunctive use parking, on site car or bike-share options, etc.)



Older, smaller neighborhoods with more traditional main street character and buildings of one and two stories need better review requirements to assess compatibility with neighborhood context and adjacent residential. Good transitions in scale, screening, articulated massing and design features make the difference. The best projects are innovative in design, of durable quality materials, and show respect for the neighborhood by reflecting design preferences and desired features (note: "reflect" does not =replicate), rather than rejecting existing neighborhood architectural patterns.



- ④ **Develop Density Transition Zones & Foster the “Missing Middle”** – The Current Comp Plan Growth Strategy focuses on corridors and centers but leaves out small-medium “plexes”, town/rowhouses, and courtyard style housing (promoted in the past with the City’s “Courtyard housing design competition”). These building types may blend better within the existing neighborhood fabric and could help relieve some of the development pressure on older commercial corridors with special character like Division, Hawthorne, etc. *(See Eli Spevak proposal, and Metro Innovative Design & Development Codes – Transitions Section)*



*Missing Middle - Good Example of medium-scale sensitive infill designed increased density at 25<sup>th</sup> & Division: Three new modern rowhouses blend in with neighborhood scale, details and simple variation of windows and patterns without being overly repetitious.*

- ⑤ **Create Incentives for Reuse & Preservation of Existing Buildings with Special Community character** - Are there some areas where we don’t want the zoning to transfer automatically? As shown in the study noted below, retaining a mix of diverse building vintages and sizes has been proven to encourage economic vitality, more diversity, a greater number of jobs, less chain stores, and more affordability for small businesses and tenants. We may need other incentives that support adaptive reuse of these such as waivers of SDC, transfer of development rights (not just for historic properties), etc. *(See Report on “Older, Smaller, Better: Measuring how the character of buildings and blocks influences urban vitality”, by Preservation Green Lab, National Trust for Historic Preservation, May 2014)*



Older buildings with streetcar era main street character are scattered along our East-West Portland corridors. These often have been in disuse or disrepair but may be important buildings of quality materials and significant character that when preserved create areas of distinction and identity. Many feature common design characteristics such as recessed entries, raised sills, large storefront windows with small clerestory windows above, articulated rooflines, deco or craftsman details, brick or wood exteriors, and often angled cut façade entrances on corner buildings. Let’s preserve these special buildings and make it easier to do so with good incentives. The greenest building is the one you aren’t building...but perhaps the one you are adapting.

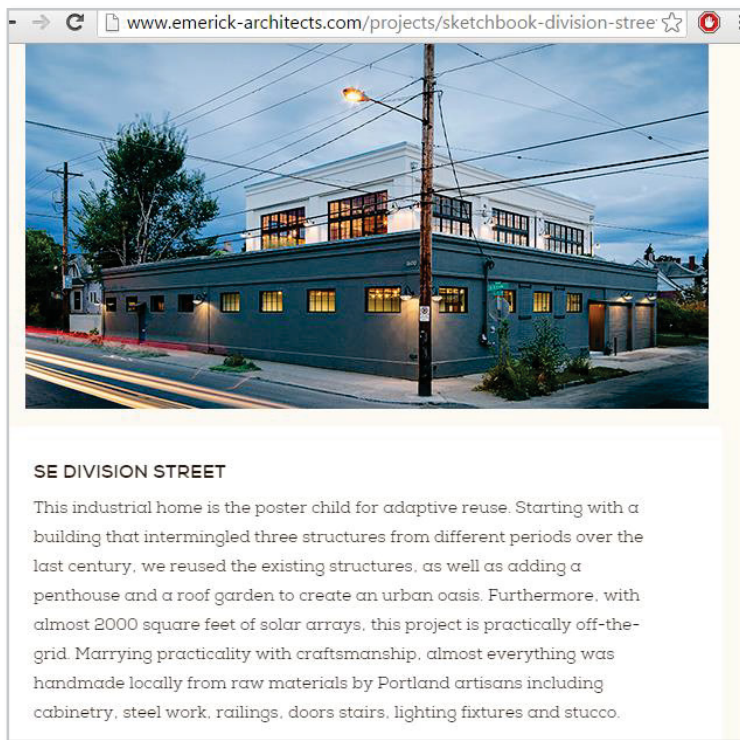




*"Pearl on the String" Commercial Node- Cluster of Commercial at 20<sup>th</sup>-22<sup>nd</sup> & SE Division Street, including Bar Avignon, Mirador, New Seasons, and multiple eateries.*

## 6 Relate Building Height to Street Width & Consider Nodal Focus.

Set different goals for narrow vs. wider streets and focus some density into nodes – visualize a “Pearls on a String” concept with the pearls as the commercial focus with residential or lower scale development as the string. This was a priority expressed for future development in the Division Green Street Main Street Plan. (See *Urbsworks Policy Recommendations, Division Green Street Main Street Plan*)



**7 Consider Incentives in new Mixed Use Proposal for community amenities, including:** high performance buildings/zero energy buildings, preservation and adaptive reuse of older buildings, provision of reasonably priced housing, and alternative transit-oriented or other community beneficial uses (daycare, small corner grocery stores, affordable/senior housing). Incentives may include waivers of SDC's, fast track permitting, bonus in square footage, or other benefits.

**8 Incorporate solar policy into zoning code amendments to support more high performance buildings and minimize/mitigate solar shading of adjacent infill** – Encourage further study of more N/S corridor density which has less shading impacts than on E/W corridors. (See *New Buildings Institute Policy, state solar access policy OR 227.190, and other Oregon community solar policies such as Ashland, Jackson County, et al*).

*Adaptive Reuse of older structure with*

## POSITIVE EXAMPLES



Good example of adaptive reuse with new construction that is both modern and uses traditional materials of wood and metal, balconies, generous storefronts and stepped roofs. Residential above turns inward to a central open air courtyard that helps avoid privacy impacts and maintains access to air and light.



Move the House Project: Example of positive building form in newer construction, sustainable design elements including:

- breaking up building massing into sections with 4<sup>th</sup> floor upper roof stepbacks, balconies, and articulation,
- creating transparency with glass skybridge and pedestrian paseos,
- references similar storefront window patterns in nearby older blocks
- incorporation of art and education through sculpture and interpretive signage
- Green features such as living roofs, bioswales at rear, and preservation and design around a mature tree, and mov-

**9 Enhance/maintain community livability through access to sun, air, light, privacy and public views for current and new residents/businesses.** Address privacy issues via increased requirements for placement of and side setbacks to maintain air and light (e.g. varied rooflines, lightwells, stepbacks and stepdowns in heights), minimize privacy impacts (i.e. increased rear landscape screening requirements, sensitive location of balconies), protection of important viewsheds (e.g. reduction of large blank walls, maintain public view of community monuments such as the Hollywood Theater, Bagdad Theater, SE Hills). *(These issues influence mixed use zoning requirements in development; also see Urbsworks research on lightwells and consideration of upper level skyplane context in NY Code; DDI Comment Letter to the City of Portland Re: Comp Plan & Mixed Use Zones)*

**10 The City should employ broader tracking of and accountability for development impacts.** Portland, and state of Oregon do not require documentation nor impacts analysis resulting from a new development beyond fee impacts to traffic, sewer and parks. However most states require this. Critical issues could be documented during permit submittal and review. Recommended issues to be tracked should include impacts to:

- Health (e.g., noise, air quality, safety)
- Environment (e.g., loss of habitat, mature trees/heat island effect, climate change)
- Community (e.g., loss of historic resources, important public viewsheds)
- Economy (e.g., loss of affordable residential and commercial spaces, loss of solar access for energy generation, food production, etc.)

***“What gets measured, gets managed.  
What doesn’t get measured gets lost.”***

***Let’s not lose track of the things that matter most.***

## Want to take action?

- Comment on these draft recommendations** – email [ilovedivision@gmail.com](mailto:ilovedivision@gmail.com) with specific edits.
- Ask your Neighborhood or Business Association to take a position on these recommendations.** Contact: *Richmond NA* - [richmondpx@gmail.com](mailto:richmondpx@gmail.com); *Division/Clinton Business Assoc.* - [dcbakatie@gmail.com](mailto:dcbakatie@gmail.com)
- Write a letter to the City expressing your support for any or all of these recommendations** Contact: [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov), *note, for testimony it must include your name and address!*



## Opinion of New Construction on Division

**Note on Privacy of Survey Respondents:** Every attempt to remove any personally identifiable information has been made to the extent feasible without removing any content (example: references to location of residence or business, specific business name or type, etc.)

**Key:**

Study Area = Division Street & back side of blocks North and South between 11-60th

Adjacent Residential = 1-10 blocks on either side of Division

Occupation = Coded by category

Age = Range

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
1	Most of the new development is too big and boxy and perhaps one story higher than appropriate for this narrow of a street between 30-39th these buildings don't match the existing main street architectural character, scale, context of the area. Materials seem cheap and none of the buildings are affordable. character is local neighborhood serving businesses.	700	Y	4	Adjacent Residential	N			40-49	Architecture, Engineering, & Urban Planning Occupations
2	no answer	710	Y	Million years	no answer	no answer			no answer	No Answer
3	I hate hate hate the way that the sidewalks have been blocked off. And I think some of the buildings are unspeakably ugly. But in general, I like that the street feels more enclosed.	1012	Y	no answer	Y	N			30-39	Unemployed
4	Too much, too fast, out of scale with street size and surrounding area. Not sure what it will look like in 2 years. Does not conform to "aging in place" models. Is not service-oriented.	1015	Y	20	Adjacent Residential	Y	16	Y	50-59	Homemaker
5	Big oversight error in not making provisions for parking. By designing the buildings so closely in time, I hope they don't end up looking too similar.	1026	Y	69	Adjacent Residential	N			60-69	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3 H, page 9773

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
6	I like all of the new restaurants and other businesses but I think the apartment buildings are oppressive and for the most part ugly. I think the developers could have done a much better job of fitting the developments into the neighborhood. A good example of design is the building on 26th and Division. Construction has been non-stop for over a year now and it could have been spread out over a longer period of time. I don't even attempt to drive up Division anymore - it is super dangerous and a total cluster with pedestrians not having adequate access to real cross-walks.	1036	Y	8	Adjacent Residential	N			30-39	Consultant
7	They are terrible -- ugly boxes filled with people who park in the spaces in front of our houses, speed down the back streets imperiling our children, leave their trash on our lawns, block our sunlight and stars, invade our privacy.	1037	Y	1.5	Y	N			no answer	Education, Training, and Library Occupations
8	HORRIBLE shoddy construction no regard for the neighborhood glitz without aesthetic developers getting rich	1054	Y	20	Y	N			60-69	Healthcare Practitioners and Technical Occupations
9	The construction is difficult. As someone who has traditionally supported local business, I find myself shopping outside the area as easier to park/drive other areas. We use New Seasons and Safeway, not Kruegers as dislike his politics and holding neighbors hostage by some printed statements and attitude when i shopped at his stand.	1055	Y	36	Adjacent Residential	N	N	N	50-59	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9774



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
10	Glad for development. The narrow street with 3-story+ condos makes a depressing canyon. The design of new buildings doesn't really fit with the historic architecture in the area, but I'd be happy to see a consistent new trend, based around a unified architectural theme, even if it's not related to what was built there 50+ years ago. But the general theme should be consistent.	1058	Y	1	Adjacent Residential	Y	9	N	30-39	Computer and Mathematical Occupations
11	I hate them. They're way out of scale. and they're ugly in a way that I have looked at some ugly '60s and '70s buildings and wondered "what were they thinking"? It's weirder to be helpless in the middle of it.	1059	Y	15	Y	N			40-49	Education, Training, and Library Occupations
12	HORRIBLE no aesthetic planning or concerns for the neighborhood. Too many buildings, one after another, a tunnel of boxes, with no sidewalk clearance, no parking, no trees, a mass of glass windows looking out on TRAFFIC.	1072	Y	more than 20	Y				60-69	Arts, Design, Entertainment, Sports, and Media Occupations
13	Some are nice. Like the condos with retail below, new spaces like St. Honore, Bollywood, etc. Then some structures seem to completely block the light to the nearby neighborhood.	1073	Y	15	N	N			no answer	Management Occupations
14	no answer	1075	no answer	no answer	no answer	no answer			30-39	No Answer
15	Great for the area - but too much at once.	1077	Y	2	N	N			no answer	Other
16	happy for it, wish it was a little slower	1080	Y	14	Y	N			30-39	Architecture, Engineering, & Urban Planning Occupations

Ord. 188177, Vol. 2.3 B, page 9775

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
17	Division is an east/west street so the four story buildings will block sunshine in the summer (probably cooler streets) as well as the winter (probably icy streets). they also have little visual appeal and not enough parking	1084	Y	36	Adjacent Residential	Y	26	N	no answer	Business and Financial Operations Occupations
18	I HATE THEM. I knew such development was coming to the street--was bound to happen, needed to happen--and I welcome that part. What I hate is the brutality of the architecture. The buildings are too big and they are some of the ugliest apartment blocs in the city--Stalinist brutality. Ugh.	1101	Y	30	Adjacent Residential	Y	19	N	50-59	Arts, Design, Entertainment, Sports, and Media Occupations
19	How many latest-greatest, designed-for-the-New-York-Times restaurants does Division really need? Will anything be left that serves the needs of the current residents? Also, I fear that cheap multi-story wood construction will not age well. Some of these apartment buildings will look like crap in 15 years.	1119	Y	8.5	Y	N			40-49	Architecture, Engineering, & Urban Planning Occupations
20	they suck, they are tenements, no parking, they will have section 8 renters tracking their goo up and down the street.	1124	Y	21	Adjacent Residential	Y	3	N	40-49	Computer and Mathematical Occupations
21	the absolute incoherence; It's as if nobody cares how long the #4 Division bus takes? put bioswales on other streets, where you could get the same bang for the buck. The only rational response is to go down Bike Boulevards and the parking on Clinton corner to corner means that it's really hard to see when turning on to Clinton now, My understanding is that Clay's which was the only decent restaurant around here for years, will have to move because they can't afford the rent.	1132	no answer	no answer	no answer	no answer			50-59	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3.H, page 9776

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
22	Reflecting only greed with no concern for protecting the character of the community. The city should be ashamed of itself.	1149	Y	5	Adjacent Residential	N			no answer	No Answer
23	TACKY and too much. Division is now a narrow corridor and congested.	1152	Y	35	Y	N			60-69	Sales and Related Occupations
24	Horrid. They spew dust and dirt and chemicals in the air- you can feel the difference when you inhale (I am a vocalist).	1159	Y	no answer	N	no answer			no answer	Legal Occupations
25	As stated above I find the new apartment buildings not in keeping with the nature of the neighborhood. They are too large, too ugly, some completely unfriendly in design and will bring entirely too many vehicles and humans to the area. This is a traditional single family dwelling, blue collar neighborhood of modest houses and means. The upscale nature of Division includes the destruction and replacement of many of these modest homes by the same developers, with overly large very expensive and ugly structures.	1163	Y	35	Y	N			60-69	Life, Physical, and Social Science Occupations
26	Too many, too high and relatively unattractive. The corridor of buildings gives a closed I feeling. With the influx of many new eating places and taverns, more visitors are attracted to the locations compounding a street that has always had limited parking. This may be compounded in the future when apartments are full.	1165	Y	no answer	Adjacent Residential	N			60-69	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3.II, page 9777

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
27	Love the vibrancy and the density. I don't mind the lack of parking. I do mind the lack of retail on the ground floor. I do feel development on Division should be required to have retail. I do get concerned about leaving space for trees...some of the new developments have trees on the side of buildings, but not on Division. Trees on Division should be required. I also dislike strongly boxy designs. The white cube, or jail, should have never been allowed to be built.	1166	Y	18	Y	Y	under 1 year	Y	40-49	No Answer
28	too much too fast. city should have regulated the rapid change. we had an opportunity to build some really cool stuff though seems like it was just thrown up and not creative.	1167	Y	8	Adjacent Residential	Y	18	N	40-49	Construction and Extraction Occupations
29	thoughtless ( not enough crosswalks, no bike lanes but people should use Clinton but they are too arrogant ), biking should not be allowed on Division i like to bike but why not go over one block to Clinton)Greedy!!! Making out like bandits at our expense Quality of life is going down	1171	Y	44 & 38 [married couple individual years of residence]	Y	no answer			60-69	Healthcare Practitioners and Technical Occupations
30	Awful, dreadful, it makes me want to sell my home and move.	1173	Y	20	Y	N			no answer	Nonprofit
31	I welcome the new and interesting businesses, but really dislike the darker canyon effect caused by all this large blocky 4 story buildings that are going up, where once there were only two story buildings with space between them. Traffic has become terrible, with people searching for parking all the time.	1177	Y	16	Y	N			50-59	Computer and Mathematical Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
32	horrendous. One cannot walk down the street for more than a block without having to dangerously cross the street without marked crosswalks and people don't slow down. division street car traffic has become overwhelming and dangerous. People don't stop for pedestrians, who run out in the street anyway.	1181	Y	9	Y	N			50-59	Legal Occupations
33	While it is great to see new restaurants and businesses along Division, the city blew it by allowing all of the buildings without parking. Between the new construction and outsiders coming in for the restaurants, it is a nightmare to drive or walk on Division. Also, several of the buildings are just plain ugly.	1183	Y	10	Y	N			40-49	No Answer
34	Trying to keep an open mind, I still think they are pretty awful. The buildings have over occupied the narrow street, and completely blocked solar access (bldgs on the north side) and privacy for the neighbors directly behind. I REALLY feel for those people, and think they should get some sort of monetary reimbursement! Perhaps if we could limit it to one of those buildings every 2 blocks or so.....then at least we could have some low rise architecture to break up the canyon walls.	1184	Y	11 years and 11 years [different timeframes]	Adjacent Residential	N			40-49	Management Occupations
35	I like it.	1185	Y	18	Y	Y	8	Y	40-49	No Answer
36	See above. I don't like the apartment buildings- rather I see them as a failure and lesson for the rest of Portland. I don't like all the "reduction" in street capacity for autos, it will only move traffic to side streets.	1189	Y	12	Adjacent Residential	N			50-59	Life, Physical, and Social Science Occupations

Ord. 188177, Vol. 2, 3H, page 9779



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
37	New buildings are too high and big compared to the low buildings that were already there, and also for a street with just one lane each direction.	1190	Y	5	Y	N			70-79	Education, Training, and Library Occupations
38	overwhelming. today - I could step out of my car in the middle of SE Division and take a picture of red tail lights from 37th all the way as far as the eye can see toward downtown. I'd like to say thanks to the city of Portland - you rubber stamped every building project that came across your desk. Residents be damned - it's all in the name of growth, and now - we have gridlock. Great!	1191	Y	10	Adjacent Residential	N			40-49	Computer and Mathematical Occupations
39	They seem fairly well done, but it is irresponsible that builders are creating a need for parking spaces but not providing any which puts the burden of providing parking on existing homeowners.	1193	Y	6	Y	Y	13	Y	60-69	Nonprofit
40	Mixed. I support new apartments/condos, but don't like the lack of a parking requirement for large complexes (180 units and NO parking?). Lack of parking forces visitors onto SE Clinton St, a major bike corridor, making it more dangerous for bike commuters.	1194	Y	9	Adjacent Residential	N			30-39	Life, Physical, and Social Science Occupations
41	I wish they had been set back further from the sidewalk so as to have both parking strips and plantings in front. The buildings :loom."	1200	Y	10	N	N			70-79	Education, Training, and Library Occupations
42	Hideous for the most part, totally out of scale with no context. They could be built anywhere -- everywhere.	1201	Y	34	Adjacent Residential	N			other	Nonprofit

Ord. 188177, Vol. 2.3.H, page 9780

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
43	Densification is very important to sustainability, so I appreciate them in general. I do think they could have been executed more creatively. The charm of Division St is the funky and eclectic look. Its authentic and unique. That's what people want. That's what the new developers are promoting in their marketing materials, even though their buildings are not contributing to that character, for the most part.	1202	Y	over a year	Y	N			25-29	Other
44	Obliteration of a lovely neighborhood street. Poorly planned, badly designed apartment buildings with no parking. Why couldn't we have interesting buildings with views, balconies, and parking like the Pearl?	1203	Y	14	N	N			70-79	Architecture, Engineering, & Urban Planning Occupations
45	Not in favor of pace and scale. Get that development is going to happen and brings some good things to the area. But not sure if the infrastructure is in place to support the current scale and pace.	1208	Y	6.5	Y	N			no answer	No Answer
46	Some have questionable aesthetic character (what's up with the "jail cells", right?) but for the most part I'm just excited for the construction phase to be over so that I can move up and down the street exploring the new businesses with ease. All in all I'm pumped - hopefully I can still afford my apartment in a year...	1209	Y	10	Adjacent Residential	N			30-39	Community and Social Services Occupations
47	mixed. It has brought an influx of people and it seems that the city wants division to be a busy street but yet is limiting the amount of parking and eliminating car lanes which counters its role as an arterial.	1211	Y	10	Y	N			40-49	Healthcare Practitioners and Technical Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
48	Poorly planned, architecturally and transportationally. Major negative impacts on surrounding neighborhood, due to lack of dedicated parking for the new residential/commercial structures.	1214	Y	36	Y	N			70-79	Life, Physical, and Social Science Occupations
49	Some of the apartments seem to be inappropriately sized for the area and availability of street parking they require. We would have preferred to see more condos and fewer apartment complexes.	1215	Y	3	Y	Y	5	Y	40-49	Computer and Mathematical Occupations
50	I detest them! I am very worried about the changes to parking and overall "feeling" of my neighborhood when all those apartments are filled. I am also very disappointed with the lack of parking for the restaurants. People get tipsy/drunk and wander down my street after their meal, talking loudly. They wake me and my family up every weekend. It is as if they don't care that they have parked next to someone's home. I believe the restaurants need to remind patrons that they need to be quiet in the neighborhood at night.	1217	Y	15	Y	N			no answer	Healthcare Practitioners and Technical Occupations
51	Positive, however parking is needed. Even though I walk and bike everywhere I still own a car. So I imagine the same for those moving into the condos/apartments on Division. Even if people walk, bike or bus they typically still need a place to put their cars I imagine.	1218	Y	10	Y	N			no answer	Arts, Design, Entertainment, Sports, and Media Occupations
52	I think they are great! I can't wait to see what the higher density will allow in the way of new restaurants and business. With so much more foot traffic I am hoping that division can transition from a car centric street to an Bike Skate Ped street.	1233	Y	11	N	Y	10	N	30-39	Management Occupations

Ord. 188177, Vol. 2.3.H, page 9782

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
53	I think density is good. I think the developers are greedy. I think the City is corrupt.	1234	Y	17	Y	Y		Y	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
54	they're taking forever	1235	Y	6 months	Y	N			50-59	Unemployed
55	No objection to street construction. Deeply concerned about impact apartments will have and the unfair impact on existing residents. Semi-concerned about the impact restaurant traffic has(particularly those that draw from across the METRO area). Both apartments and restaurants are using a disproportional amount of amount of limited parking and infrastructure resources that have been paid for and maintained by existing residents. New street taxes based on square footage do not account for the real impact these types of activities have.	1238	Y	48	Y	Y	15	N	40-49	Architecture, Engineering, & Urban Planning Occupations
56	As you can already tell, they depress me.	1239	Y	37	Adjacent Residential	N			60-69	Education, Training, and Library Occupations
57	Negative. It has created a walking nightmare as well as congestion on the road. The buildings do not fit the period or the community being built in.	1241	Y	5	Y	no answer			30-39	No Answer
58	It feels like parts of Asia that I've visited. Too much , too fast. I'm all for mixed use buildings, but think there should have been more parking and green space provided!! Let's slow down on the new construction and catch our breath.	1246	Y	2	Y	no answer			50-59	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3.H, page 9783

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
59	Eh. Development isn't the worst thing to happen. I like the money it's bringing into Portland and keeping our people employed and our entrepreneurs busy. I'm worried it will get too corporate, but for now I think as long as the neighborhood character remains.	1249	Y	8 months	N	Y	4	N	25-29	Legal Occupations
60	Some of the buildings are ok looking, some are very boxy & boring, around 32nd looks like NW 23rd now	1250	Y	8	Adjacent Residential	N			no answer	No Answer
61	money grabbing unfriendly bad neighbors	1259	Y	5.5	no answer	no answer			70-79	Sales and Related Occupations
62	I like them but can see why people are afraid of making Division too vanilla. I also have fears of parking.	1261	Y	6	Y	N			40-49	Education, Training, and Library Occupations
63	Negative. I think wealthier outsiders who are unable to find units downtown are gentrifying SE.	1263	Y	5	Y	N			no answer	No Answer
64	nice	1265	Y	3	N	N			40-49	No Answer
65	It has gotten totally out of control. I think the tone was set when the beautiful home on 26th & Division (where Clay Rabbit used to be) was re-located and the existing building was put in. To go from a Victorian style home with a sweeping front porch to a high-rise that looks like it belongs in post-war Berlin was my first clue that the city was not going to be overly involved in aesthetics and how new construction would fit in the neighborhood. The re-purposing of the old Nature's grocery store was a successful collaboration of developer and intention.	1269	Y	31	N	no answer			50-59	No Answer

Ord. 188177, Vol. 2.3.H, page 9784



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
66	More housing is needed. There are not enough residences available in the city, especially smaller rentals, and it is hard to find a 2 bedroom without paying extra for a parking space	1271	N	no answer	N	N			30-39	Healthcare Practitioners and Technical Occupations
67	Too many large/dense rectangular buildings too close together. The street is nearly completely shaded on some blocks. Interesting, less-constructed greenspace has been replaced by a few dull concrete planters and generic plants. Turn-traffic signals at 11th/12th/39th and Division as well as 21st/26th and Powell and 26th and Clinton have not been updated to accommodate what feels like increased traffic.	1276	Y	14	N	N			40-49	Management Occupations
68	Too much!!!	1277	no answer	no answer	no answer	no answer			40-49	Education, Training, and Library Occupations
69	I HATE it. I hate looking out my windows to watch a sunset only to see an ugly apartment building.	1350	Y	30	Y	no answer			30-39	Other
70	I understand the need for infill. I wish more of the new apartment complexes provided adequate parking; I wish some of the new apartment buildings had more character	1366	Y	23	Y	N			50-59	Office and Administrative Support Occupations
71	Mixed --- exciting but it all feels rather over-sized and I'm worried (a little) about street parking.	1369	Y	24	Adjacent Residential	Y	20	N	50-59	Life, Physical, and Social Science Occupations

Ord. 188177, Vol. 2.3.H, page 9785

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
72	I think it's necessary as the city grows. I wish businesses would give incentives for not driving. I offer my clients \$3 off coupons if they arrive to my office by bike, bus, or foot.	1371	Y	22	Y	Y	20	N	50-59	Healthcare Practitioners and Technical Occupations
73	I wish there were far less	1380	Y	20	Y	Y	18	Y	50-59	Arts, Design, Entertainment, Sports, and Media Occupations
74	Absolutely horrible with no thought put into the future impact of this street, much less the city as a whole. This street is too narrow for the traffic it now brings. Parking is terrible and the homeless community is growing by the day. The city has caved to developers with no reward.	1382	Y	more than 20	Y	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations
75	I really like the changes but not the construction impacts and closures of sidewalks and side streets. Some buildings are not great and could use balcony's and awnings (and what is up with the one covered with prison fencing?), but most are MUCH better than some of the awful multifamily housing from the 70s and 80s which turn their backs on the street.	1383	Y	15	Adjacent Residential	N			40-49	Architecture, Engineering, & Urban Planning Occupations
76	See above. They were clearly done with no oversight. The Richmond neighborhood association clearly let them do whatever they wanted with no/little resistance. Clearly affordable house was in NO way a priority.	1394	Y	no answer	Adjacent Residential	N			40-49	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9786

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
77	really excessive and aggressive infill with high priced condos without adequate parking. Some of it is well done and attractive. much of it seem opportunistic, invasive and not respectful of the neighborhood	1402	Y	23	Y	N			50-59	Healthcare Practitioners and Technical Occupations
78	Each one is uglier than the next. Giant boxes with no aesthetic consideration at all. It's canyoning Division. I'm not totally against "progress"/development at all. I just think it should be in scale to the neighborhood and not so damn ugly.	1412	Y	5	Adjacent Residential	Y	8	N	no answer	No Answer
79	Bad! Wrong! No input from neighbors ever sought. Developers were given carte blanche to decimate the street! A few "right sized" apartments - 20-25 units with 20 parking places would have been welcomed. This development is all about profits for developers! It has nothing to do with good planning or community development!	1416	Y	22	Y	N			60-69	Healthcare Practitioners and Technical Occupations
80	A bit too much at once	1427	Y	13	Y	N			30-39	Healthcare Practitioners and Technical Occupations
81	Unfavorable. Developers are being given free reign to build without design review and without the (ultimately negligible) added expense of off street parking. It's short sighted and depressing.	1431	Y	no answer	Y	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations
82	Some are thoughtful and respectful of their surroundings. More could care less about design, materials and the neighborhood and are in it for the money.	1433	Y	24	N	N			no answer	No Answer

Ord. 188177, Vol. 2.3.H, page 9787

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
83	Many of the newly developed properties appear to be of low quality construction that may start to deteriorate in 10 years and look crummy now. There is no allowance for plantings or set asides for benches or wide walkways. For example, the former Lauro Kitchen building is solid and looks long lasting, has a wide walkway, benches and plants. In contrast, many of the new buildings seem to be made of poor materials, have narrow walkways and no room for plants or benches along the streets.	1458	Y	20	Y	N			no answer	Other
84	Out of scale. Disruptive to goals of neighborhood/ commerce objectives generated in the community in its past. Harmful to ecology even though claim to be green.	1459	Y	17	Adjacent Residential	Y	12	N	40-49	Business and Financial Operations Occupations
85	pissed off at the apartment building with no parking, no bike parking but admire the building with a car for renters to use.	1467	Y	6	Y	no answer			40-49	Healthcare Practitioners and Technical Occupations
86	very excited about it. 2 much at same time. like the over all idea of mixed use and close-in density. will be great when construction finished	1473	Y	27	N	Y	21	Y	50-59	Community and Social Services Occupations
87	It's great. More density means better mass transit. More retail, etc.	1475	Y	6	Y	N			30-39	Office and Administrative Support Occupations
88	Mixed views. Streets are a mess and congested. Pot holes and debris everywhere. No parking. Traffic spills into side streets and residential areas. I like all the new stuff though. Pretty interesting mix of amenities.	1483	Y	6 months	N	no answer			40-49	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9788

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
89	There are a lot all at once, so traffic is greatly disrupted. And I strongly believe that the builders of new multi-family properties should have to put underground parking for two cars per unit below ground. It will be a very long time before people stop driving in this city; the density is too low for widespread mass transit.	1489	Y	14	N	N			50-59	Arts, Design, Entertainment, Sports, and Media Occupations
90	I like what it's done for the street. Holgate and Foster should be next!	1491	Y	19	Adjacent Residential	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations
91	I hate it. I'm really angry that the city has allowed this low key somewhat sleepy street to become, overnight, a dense dark corridor of high rise buildings. It is a nightmare to drive down Division now, parking is a nightmare, and it has become overpopulated. Growth was a good thing, but this was too fast, and too much, and the city has done little to control the growth. The lack of parking is ABSURD. And I hate that everything is density, density, so that the high rises block out the sun, making it much less pleasant to walk down the sidewalk and just be in that area.	1495	Y	more than 12	Y	N			no answer	No Answer
92	There is certainly a sense of excitement at present. Some of the buildings seem well designed and well managed--with incentives like car sharing. I am sorry there are so many without even a small balcony--not to mention one building with a metal grill facade that must be rather jail-like inside. Could there be a design review? Could there be more pressure for car-free incentives?	1499	Y	20	Adjacent Residential	N			no answer	No Answer

Ord. 188177, Vol. 2.3.H, page 9789



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
93	I like the new businesses that they are drawing. Looking forward to the construction winding down.	1500	Y	11	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations
94	exciting, but maybe a little too much. also, it was kind of obnoxious that they were all at one time so pedestrians had to keep crossing the street.	1512	Y	2.5	Y	N			40-49	No Answer
95	They need dedicated parking within the footprint of the buildings.	1514	Y	less than a year	Y	N			30-39	Office and Administrative Support Occupations
96	we need better design guidelines. i promote density. i have no problem with height and large scale massing. i dont even have a problem with the lack of parking (despite living within 3 blocks of the densest block without parking). what i do take issue with is that the city isnt fighting to make sure our buildings are to a decent scale in how they address the street and pedestrian. no articulation in facades, no mixture in materials, and in some cases (like the prison building) what seems to be a complete disregard for current codes (a complete street frontage of metal panels with no visible windows and no other materials.	1515	Y	8	Y	Y	under 1 year	Y	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
97	A huge waste of money, no wonder a street tax, (it's not a fee) is being shoved down the throats of Portland Residents!	1521	Y	50	Adjacent Residential	N			60-69	Transportation and Material Moving Occupations

Ord. 188177, Vol. 2.3.H, page 9790

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
98	Well, they really are ugly. Why did they have to be so ugly? A few of them are less ugly. The one next to Sen Yai is hideous. The one next to Whiskey Soda Lounge is revolting, with its cheese-grater screen. OSU spent millions removing the cheese grater from its library, where ya been, designers?	1522	Y	12	Y	N			50-59	Education, Training, and Library Occupations
99	it has been a pain as a pedestrian, driver and transit passenger	1526	Y	9	Y	Y	1	Y	40-49	Computer and Mathematical Occupations
100	Hopefully it will end very soon. It has made my quite neighborhood a nice cut through for drivers. It has brought increased smash and grabs, robbery and petty theft.	1537	Y	8	Y	N			30-39	Healthcare Practitioners and Technical Occupations
101	Too many buildings, too fast. Too much density for such a tiny street. Rents are too expensive. No parking garages for new apartments is ridiculous. Many of the new buildings are too tall, creating a Manhattan-like canyon. Design of buildings seems to not take into consideration other nearby projects. Smaller businesses getting squeezed out.	1541	Y	7	N	N			30-39	Healthcare Practitioners and Technical Occupations
102	Fine for infrastructure needs and from previous Division/Vision Green Street as long as the much needed and previously promised resurfacing also happens.	1542	Y	15	Y	N			40-49	No Answer
103	Many are great, but there hasn't been a good transition between commercial and residential or a particular sensitivity to the Adjacent Residential uses when it comes to parking, traffic diversion onto neighborhood streets, building height, sunlight exposure, smoking employees from restaurants who loiter in front of houses (because the restaurants won't let them smoke nearby), noise etc.	1558	Y	18	Y	N			50-59	Architecture, Engineering, & Urban Planning Occupations

Ord. 18677, Vol. 33.H, page 9791

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
104	Not enough parking Too few family sized dwellings Will encourage transient community members rather than long term residents that take pride in their community	1559	Y	11	Y	Y	under 1 year	Y	40-49	Architecture, Engineering, & Urban Planning Occupations
105	I love the new restaurants, etc. I am in awe of the city's incompetence in choosing to remove what little parking there is for restaurant patrons by adding those little gardens.	1562	Y	12	Y	N			other	No Answer
106	I like the smaller ones with retail, don't like the really big multifamily buildings. I don't mind the more modern architecture as long as it provides character and interest and doesn't overwhelm the surrounding businesses. traffic is getting worse.	1566	Y	6	Adjacent Residential	N			30-39	Consultant
107	They are too big and out of scale with the area. They are poorly designed. The neighbors should have had more say about them before construction. They need offstreet parking for at least 25% of the units (in 10 or 20 years this may be made into more units). The area needs more parks and recreation if it is to be pedestrian friendly.	1568	Y	40	N	N			60-69	Retired
108	Total sh!t show! Very dangerous with all the new traffic to our area. What a mess! But will be good once its all done.	1570	Y	3	Y	N			30-39	Arts, Design, Entertainment, Sports, and Media Occupations
109	Too many, too fast, too big.	1574	no answer	no answer	no answer	no answer			no answer	No Answer

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
110	I am glad that Division is growing more dense. I don't like most of the buildings. I hate driving there and NEVER biked there. It's now also a drag to walk there. The increased density without added parking is going to really ruin the nearby residential quality. I am hugely disappointed in the City's zoning decisions.	1576	Y	24	N	Y	3	N	50-59	Architecture, Engineering, & Urban Planning Occupations
111	No offense meant, but isn't it a little late to ask our opinion? So, OK, here's our opinion: we resent anything that makes it harder for us to be left alone. And so, new construction without new parking spaces are something our household dislikes. Mandatory bioswales and city employees who don't communicate well about the city plans, plus the city's destruction of foliage we previously put into our easement (and we were taking perfectly good care of it) without any monetary compensation to us for the destruction, have left a really bad taste in our mouths. I've been a political liberal all my adult life but the city handled the bioswales so badly in our vicinity that I've started to see the sense of libertarianism.	1583	Y	19	Y	N			50-59	No Answer
112	it's pretty unconscionable that they were permitted without parking, but what's done is done. any changes that can be made to add parking should be implemented and new construction should be required to include parking. maybe try to not keep ELIMINATING even more parking with those ridiculous in-the-street seating areas for restaurants and the water-purifying swales.	1594	Y	no answer	N	N			60-69	Healthcare Practitioners and Technical Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
113	Mostly beneficial, but better balance of more affordable options still needed. Also the mix of businesses is somewhat unbalanced, with the number of high end restaurants not balanced with community amenities like retail options	1595	Y	4	Y	N			30-39	Architecture, Engineering, & Urban Planning Occupations
114	I'm glad someone is investing in the street. It will bring a lot more amenities to the neighborhood. It's sat blighted and unattended for a long time as other areas of town have blossomed.	1596	Y	2.5	N	N			30-39	No Answer
115	more drinking than dining very few remaining streets on which to make a left-hand turn from Division south without risking having to back up! to make room for an oncoming car with parked cars filling every space on both sides (gets especially frantic when it's the grill of a semi-truck you're facing...one planning to turn at the next, tight, corner on a neighborhood street) I now drive to cross Division to get to my community garden to avoid the smoke exposure drifting along the sidewalks from outside dining	1605	Y	4	Adjacent Residential	no answer			no answer	Retired
116	I like a few buildings; really dislike a few and feel no hum about the rest.	1611	Y	16	Y	N			60-69	Retired
117	Ambivalence. On the one hand I understand the desire to get all of the work done at once, but it has certainly made Division an unpleasant and often dangerous place to be as a pedestrian and driver. It has also led me and I'm sure others to drive on neighborhood streets which is also not ideal. I think the new bioswales are nice, but it is not clear to me what impact they will have on traffic going forward.	1623	Y	11	Y	N			40-49	Computer and Mathematical Occupations

Ord. 188167, Vol. 2.3.H, page 9794



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
118	Most are ugly, overpowering, not welcoming to a human dimension. Also represents greed on the parts of most of the developers that don't include any affordable housing opportunities in the area.	1630	Y	8	Adjacent Residential	N			60-69	Retired
119	It has grown very fast with limited parking in the most busy places. I am shocked that we are adding so much multi-family housing with limited or no parking and taking away street parking by adding bioswales at the same time. Also adding to the congestion on Division and Clinton. People now speed down Woodward.	1641	Y	19	Y	N			30-39	Business and Financial Operations Occupations
120	I like/appreciate/approve of the higher development on Division, though I wish there were more variety (seems like they were all designed by the same person who likes different colored boxes).	1656	Y	3	N	N			30-39	Community and Social Services Occupations
121	Way out of character and look of the street. Way to large for the size of street. It should be 3-story max. I like the new restaurants but size and look of these buildings is way out of character and places cost cutting over aesthetics.	1660	Y	34	Y	N			no answer	No Answer
122	I'm happy about increasing density in SE but it might be too much in too small an area. At least to all happen at once. I'll be happy when all of the construction is finished, though.	1669	Y	1.5	Y	Y	5	Y	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
123	There were too many, too fast. Division changed overnight.	1671	Y	5	Y	no answer			30-39	Nonprofit

Ord. 188977, Vol. 2.3.H, page 9795

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
124	Tacky and take too long to construct. Lack of planning for utilities so street torn up for years- and road repairs are terrible.entire street will need to be repaved.	1681	Y	64	N	N			60-69	Retired
125	TOO MUCH! I like the commercial development but the volume of residential construction is overwhelming. I struggle to see how all that new foot/bike/auto traffic is going to get along on such a confined roadway as Division. I am concerned about pedestrian and biker safety. The lack of clearly marked and visible crosswalks on Hawthorn for far too long makes me think Division will suffer from the same. And with only two lanes and on-street parking lining both sides, it will be very difficult to see somebody wanting to cross without some major rework. The removed crosswalk at 45th was a big mistake in my opinion - crossing to Stumptown or the bus stop can be a challenge. I hope the density of marked crosswalks on Division is high enough.	1683	Y	16	Y	N			30-39	Homemaker
126	In general they are ugly. It's also comical that they are at the same time building several versions of the basic giant ugly box with small apartments. The plan of not offering parking is laughable, too. People are still driving, they're just filling the surrounding streets. The side streets are now quite congested and it's a more dangerous place to walk. These developments are putting the cost of parking on the neighbors rather than paying for their own.	1684	Y	6	Y	N			40-49	Legal Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
127	They are important because we don't want to sprawl into the Gorge or farmland. Portland is growing in population quickly and we should do so in a way that doesn't induce sprawl and that creates workforce housing in our neighborhood.	1685	Y	12	N	N			40-49	Education, Training, and Library Occupations
128	they are awesome!	1691	no answer	no answer	no answer	no answer			no answer	No Answer
129	Some are better than others. Overall I think the scale is appropriate and I applaud the mixed use.	1695	Y	9 months	Y	N			40-49	Architecture, Engineering, & Urban Planning Occupations
130	I dislike most of it	1699	Y	8	N	N			40-49	Life, Physical, and Social Science Occupations
131	I think that they are poorly thought out and designed. I am local who works locally but most are not. Portland does not yet have the transit system necessary to serve no parking apartment development.	1705	Y	several years	no answer	Y			40-49	Management Occupations
132	no answer	1706	Y	8.5 months	N	N			25-29	No Answer

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
133	Our family has mixed feelings. We are located ["close to"] the new construction at SE 34th. Some aspects we enjoy: the new shops and restaurants, people watching from our porch, the overall vibe of the neighborhood. Some are troublesome: the lack of on-street parking, the litter associated with increased use, and most concerning the two four story apartment buildings that are within view ["location omitted"]. These two closest bldgs are still under construction/unoccupied and we are concerned they will change the feel of the neighborhood and increase the parking/litter problems.	1723	Y	1	Y	no answer			40-49	No Answer
134	Too, too much. Far too much. ["Personally identifiable information omitted"], if you want to view a residential neighborhood that became almost unbearable, study Noe Valley. Parking blocks away to use services and restaurants and stores. It is already passing the tipping point on Division and should be nipped now. It will be too much, but only seen when it is too late. Hawthorne, very vibrant, very active and viable does not have the density they are cramming into Division.	1724	Y	8	N	Y	7	N	60-69	Arts, Design, Entertainment, Sports, and Media Occupations
135	Extreme lack of consideration for the neighbors and neighborhood	1726	Y	38	N	N			60-69	Office and Administrative Support Occupations
136	Shoddy construction, overbuilt, too tall, too pricey. Far too generic.	1730	Y	no answer [the house owned has been in the family for 70 years]	Adjacent Residential	no answer			40-49	Computer and Mathematical Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
137	Terrible. I don't like the building trends in Portland to demolish historic properties and replace them with bland, contemporary, non-conforming structures. I don't like the increase caused to area density without providing for off-street parking.	1735	Y	26	N	N			50-59	Healthcare Practitioners and Technical Occupations
138	Awful - too large, ruining the character of the neighborhood by virtue of size, design (unfriendly, unwelcoming designs); architecturally don't fit in with the neighborhood, unappealing. Monstrosities, really. Like massive over-sized 50s to 70s buildings.	1740	Y	23	Adjacent Residential	Y	18	N	50-59	Legal Occupations
139	Absolutely ridiculous. No standards at all, no parking, no oversight. It's the wild west, anything goes, and the residents take it in the ass.	1743	Y	17	Y	N			50-59	Sales and Related Occupations
140	The new condos are ugly and do not fit in with the character of Division Street. I'm not against change, but I am against developers who plop ugly buildings into residential neighborhoods, with no regard for how the increase in residents will effect the neighborhood, i.e. parking, noise, traffic. These new buildings, with their sheer faces right on the sidewalk, don't fit in with Division Street's character. Did the architects (honestly, they look like they were designed by a machine) even bother to visit Portland, walk along Division street? Sure doesn't seem like it. The new buildings reek of smug arrogance. I honestly feel sick to my stomach every time I drive down Division Street and see a new condo/mixed use building. Especially nauseating are names like "D Street"—um, nobody in Portland actually refers to Division Street as "D Street."	1744	N	no answer	N	Y	2	N	40-49	Arts, Design, Entertainment, Sports, and Media Occupations

Ord. 188177, Vol. 2.3.H, page 9799



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
141	hate it growing up on division it was nice today you could not pay me to even visit that street the city and PDC have chopped it up and are destroying it	1746	Y	59	Y	N			50-59	Community and Social Services Occupations
142	They make it very difficult to be a pedestrian because the city doesn't require developers to keep sidewalks open during construction. On the bright side, it has been a great traffic calming measure, which makes the street much more pleasant to be on.	1749	Y	6	Adjacent Residential	N			25-29	No Answer
143	The recent construction projects look generic, cheap, and shoddy. They are not attractive. The ground-floor retail space is just like the rest of the upscale areas in Portland.	1755	Y	13	Y	N			40-49	Education, Training, and Library Occupations
144	It's turning into SE Pearl district, and I understand the city has a growing population but it seems a little uninspiring to repeat the approach.	1756	Y	2	Y	N			25-29	No Answer
145	They do not fit in this part of town. Traffic and parking are a nightmare. I just had my car towed and it cost me \$300. I should just add that in to my yearly expenses because it will happen again.	1759	Y	16	Y	N			no answer	No Answer
146	New construction lacks character and architectural appeal. It is idiotic that none of the new buildings have parking. You can't park in front of your own house anymore if you live in div. neighborhood getting too dense.	1761	Y	18	Y	Y	18	N	40-49	Sales and Related Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
147	In general, I like the new projects. I like the new building at 37th. It has a nice brick front, an overhanging eave, and balconies. The entrance along 37th is nice.  The new building at 38th is a very good addition to the street. The variation in the facade, with the balconies and the recessed 4th floor is pleasing to the eye.  The white stucco building at 33rd Place (the Salt and Straw location), is the best of the new buildings, with beautiful, smooth stucco work, as well as a lively facade with ins and outs. The little courtyards add interest.  The two buildings further west, at 32nd and at 31st on the south side look like they'll add a different style to the street.  The one really bad building is the one between 31st and 32nd with the silver screen covering all the upper floors. It looks that it's so bad that they couldn't even rent the ground floor, and leased it for a bargain rate to a real estate company.  The "swales" are not well done. They will take away sidewalk space that could have been used for sidewalk cafes, or for people to walk, or stand, to be public space.	1762	Y	27	Y	N			50-59	Sales and Related Occupations
148	We need more of it.	1764	Y	6	Y	N			30-39	Computer and Mathematical Occupations
149	See previous response. And for the love of all things holy, PLEASE STOP BUILDING APARTMENT BUILDINGS WITHOUT PARKING! That is ruining our neighborhood.	1770	Y	2	Y	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations

Ord. 188177 Vol. 2.3.H, page 9801

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
150	Some are nice, some are not. I greatly appreciate the developments that have interesting architecture and design. I like the buildings that are unique and take some risks with design. I like when there is retail/restaurant space on the ground floor of apartment buildings, and when there is green space. I appreciate the bioswales and any addition of plants and trees.	1773	Y	25	Y	N			30-39	Healthcare Practitioners and Technical Occupations
151	I'm curious to see what it looks like in a year or two--I think it will look completely different.	1777	Y	1.5	N	N			30-39	No Answer
152	See my answer above about the new apartment buildings.	1778	Y	20	Adjacent Residential	N			60-69	No Answer
153	Dreadful - - if I was brought blindfolded into "New division" I would truly not know where I am - - it is that different, and it could be anywhere, in any city.	1797	Y	34	N	N			50-59	Nonprofit
154	I enjoy the influx of new businesses (Imperial, Bollywood, Salt and Straw), but the developers have done a poor job of integrating new construction into the neighborhood. The look of new construction is modernist and ugly, the lack of off-street parking is naive and will lead to problems, and the timing - with multiple buildings on both sides of the street being built at once - has been unfortunate. The street has been difficult to navigate for too long now.	1802	Y	1	Adjacent Residential	N			40-49	Business and Financial Operations Occupations
155	The look fine. Needed density in the city. Construction is irritating , especially having to cross the street several times but not really all that bad.	1803	Y	7	Y	N			40-49	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9802

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
156	The city and TriMet want to pretend everyone rides the bus. In reality, TriMet's service has suffered due to their issues and as a result, ridership has probably fallen, when looked at as a percentage of overall metro population. SE Division St. was a somewhat-main thoroughfare, or at least an option from SE Powell Blvd., and reducing the capacity of Division is probably a poor long-term move. So, in essence, I think the new construction projects were short-sighted and ill-advised and will likely, in hindsight, be looked at as a planning failure.	1812	Y	3	N	N			other	Computer and Mathematical Occupations
157	There are more places to see, be seen, visit, shop, and eat now. Overall, it feels more like a community than before when destinations were more isolated and sporadic. There's more "there" there. In short, I like it.	1813	Y	6	N	N			30-39	Life, Physical, and Social Science Occupations
158	See above.	1814	Y	3	Y	N			60-69	Community and Social Services Occupations
159	It would be nice of some of the older business would step up and make some tenant improvements, painting etc.	1816	Y	8	Y	N			no answer	Arts, Design, Entertainment, Sports, and Media Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
160	I think the increased density is more good than bad. The greater the density, the more transit and viable local businesses will succeed. While this means there will be fewer on-street parking spots available, the tradeoffs make it worth it. As far as new construction on Division; I don't find the buildings particularly attractive, but I also don't find them overwhelming. I don't mind the new streetscape.	1817	Y	13	Adjacent Residential	N			50-59	Education, Training, and Library Occupations
161	While many of the new mixed use buildings are of high quality and design, there are several that are of poor construction, mediocre design, and are out of character with the eclectic nature of the neighborhood. I think on the whole, however, that much of the new commercial and residential development is a positive overall on the neighborhood. many vacant lots, and underutilized building stock have been demolished/renovated, and replaced/installed with thriving business.	1818	N	2 [lived in the past]	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations
162	I hate all the condos! They're ugly and too expensive for people here to afford so they bring a whole different crowd to the SE and are driving out business that we all love (we see this happening further north too, like the Belmont food carts being displaced for more condos). Why not include some low income housing too?	1832	Y	1	N	N			30-39	Education, Training, and Library Occupations
163	It is disruptive, and not well planned. It is a very narrow street; not including parking in the newly constructed buildings is ridiculous. The new buildings have no identity, and don't tie into any of the existing characteristics of the community.	1836	Y	3	N	N			30-39	Arts, Design, Entertainment, Sports, and Media Occupations

Ord. 188177, Vol. 2.33, page 9804



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
164	Ridiculous lack of parking: I get that the residents will not use cars daily; they will still likely OWN them and where they will put them is beyond me. Also, the narrowing of Division feels very unsafe. With the coming of the Street car and even further complications to turning left onto 11th, I'd imagine the traffic (which already backs up past 26th in the morning) will get worse. I'm also very concerned about the ability of emergency vehicles to move about our neighborhood.	1838	Y	21	N	N			50-59	Education, Training, and Library Occupations
165	I hate them. They stick out like those ugly new developments on Hawthorne that have ruined the character of that street. Please pass a zoning law now prohibiting building any new building higher than 3 stories.	1847	Y	8	N	N			no answer	No Answer
166	They should have sidewalk zones instead of forcing pedestrians to cross the street. I hope the street gets resurfaced after all the construction ends.	1857	Y	10	Adjacent Residential	N			25-29	No Answer
167	It is revolting is an understatement. it is a blatant parade of developer greed and in complete dissonance with the charm unique to this community streets like division are portlands latest eyesore and only stand to embarrass and shame us by their obvious void of thought, care and appreciation for the personality of portland	1861	Y	10	Y	N			60-69	Life, Physical, and Social Science Occupations
168	Not sure until they're finished but concerned the original charm will be lost. Although it's understandable changes need to be made for the area to grow.	1868	N	no answer	N	N			30-39	No Answer

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
169	Like it a lot.	1872	Y	22	N	Y	5	N	50-59	Computer and Mathematical Occupations
170	Overwhelming, unsightly, short-sighted (they can't help but cause parking nightmares).	1875	Y	no answer	N	no answer			60-69	Retired
171	We used to drive down Division to go to downtown Portland. Or even to the businesses on Division. We now actively avoid most of Division below 50th because it's such a pain in the neck to drive through. Parking is non-existent. Bike paths are non-existent. Even walking between 40th & 50th, I have to cross the street four times because construction has completely blocked sidewalk access. I wonder how people in wheelchairs are getting around down there. But hey, who cares, right?	1878	Y	6	N	N			40-49	Education, Training, and Library Occupations
172	Once they are finished, I think they will be attractive and useful.	1879	Y	3.5	N	Y	3	N	40-49	Consultant
173	I'm avoiding that for now	1883	Y	6	Adjacent Residential	N			50-59	Office and Administrative Support Occupations
174	It brings a new feel to the area that reflects the design of N Mississippi area.	1897	N	no answer	No	N			25-29	Healthcare Practitioners and Technical Occupations
175	A driving nightmare, best avoided, especially when heading South.	1902	Y	8	N	N			50-59	Management Occupations

Ord. 188177, Vol. 2.3.H, page 9806

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
176	Not sufficient parking for the units being built. Although there is good bus transportation available I doubt very much that all those residents will not have cars that will be added to the street parking in the neighborhoods. It will become a big problem.	1905	Y	5	Y	N			60-69	Other
177	I can understand the need for more housing options in inner SE but this needs to be done responsibly and NEEDS to include Parking. It has become impossible to find parking on Division street. I chose not to live in a neighborhood like NW 23rd where there is no parking. The current construction is a land grab to maximize the profit of a couple of construction companies with no concern for quality of life for the neighborhood and take away from Division Streets charm. The argument that these apartments are creating affordable housing is laughable. I've seen the rent on the apartments that have gone on the market and it is more than my mortgage on my house. The prices are driving out long term residents who used to be able to afford to live in our charming neighborhood.	1906	Y	6	Adjacent Residential	Y	under 1 year	N	30-39	Healthcare Practitioners and Technical Occupations
178	Hate those apartment buildings. Ugly character free, and not enough parking. I dread the day when they start renting.	1907	Y	25	N	N			50-59	Sales and Related Occupations
179	It's ugly and oversized, too close to the curb. Cramped. The boulevard is overbuilt. Not enough open space.	1909	Y	12	Y	N			50-59	Arts, Design, Entertainment, Sports, and Media Occupations
180	They are fine but they clash with the neighborhood and come off too pretentious.	1916	N	no answer	N	N			40-49	Healthcare Practitioners and Technical Occupations

Ord. 18177, Vol. 2.3.H, page 98

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
181	They don't fit the neighborhood or the space. Apartments are out of proportion and create a canyon that feels overwhelming and uninviting. There's too much, in too small an area. (See comments above.)	1917	Y	no answer	N	N			50-59	Education, Training, and Library Occupations
182	TOO MANY. TOO FAST.	1924	Y	11	Adjacent Residential	N			30-39	Healthcare Practitioners and Technical Occupations
183	Awful, it will destroy the neighborhoods around it.	1926	Y	40	N	N			60-69	Retired
184	I am thrilled by the increased density and development on division. Great for the environment and the economy. Have mixed feelings about the various designs of buildings, but don't think that is really a major concern, and appreciate that the developers have chosen unique designs rather than more generic buildings like the new giant condos on Hawthorne btw 27--30.	1930	Y	16	Adjacent Residential	Y	10	N	40-49	Legal Occupations
185	Many are too tall. They really stand out against the overall neighborhood and block sunlight. When they lack retail or local businesses on the first floor, they really fail to add value to the neighborhood. Visually and energetically they suck! I don't feel as safe walking on those blocks late at goth because no one is out and about there.	1931	Y	16	N	Y	13	Y	40-49	Legal Occupations
186	I think they are great, the added units will greatly improve the area as the low end businesses get bought out. The added value for taxes will support our schools and needed public services and the housing choices will be benefit to all , leading to improved transit.	1933	Y	40	Adjacent Residential	N			60-69	Retired

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
187	dislike them, because they are multi-story live/work developments with no parking for either tenants or shoppers. People park along adjoining cross-streets and side-streets, such as mine. Also, where the new buildings cluster there is a closed-in feeling at street level.	1935	Y	15	Y	N			60-69	Retired
188	I really like them. I am happy that there are more places for people live and that those people will be supporting all the new businesses. The new construction is exciting to see.	1936	Y	15	Adjacent Residential	Y	13	N	50-59	Sales and Related Occupations
189	tall but people will get used to it.	1938	Y	18	N	Y	18		no answer	Architecture, Engineering, & Urban Planning Occupations
190	deplorable	1939	Y	17	Y	Y	17		50-59	Arts, Design, Entertainment, Sports, and Media Occupations
197	Too huge too many too little diversity too catered to the wealthy	1961	Y	15	Adjacent Residential	no answer			40-49	Farming, Fishing, and Forestry Occupations
198	I hate it - it has made housing so much less affordable, and has caused the eviction and demolition of the cooperative house I helped to start.	1972	N	2.5 [used to live]	N	N			no answer	Community and Social Services Occupations



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
193	I'm less interested in spending time on Division & don't patronize many establishments on Division. It seems unnecessary & it's making the area less affordable as well.	1978	Y	6 months	N	N			no answer	No Answer
194	Difficult and annoying	1984	Y	5	N	N			40-49	Computer and Mathematical Occupations
195	I think they will overall harm the integrity of the neighborhood, but it is inevitable as the city expands. I will miss reasonably priced mom & pop establishments like Kappaya (replaced by Sen Yai) as the street scales up.	1990	N	grew up in SE	N	N			25-29	Food Preparation and Serving Related Occupations
196	see above...poor planning...too concentrated with apartment living that will bring too many people to an area not designed for this many people	1995	Y	2	Y	no answer			60-69, 50-59	No Answer
197	I liked them at first but it seems to be getting to be a bit much.	2004	Y	38	Adjacent Residential	N			30-39	Computer and Mathematical Occupations
198	They seem good but it seems like there is more car traffic than the infrastructure can handle.	2006	Y	5	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations
199	Positive. Change and influx of new people and money into the neighborhood. Denser urban core is important to me. Hope to have enough people for a streetcar line one day. The people on-site parking should not act like they own the street in front of their houses. More high-rises and density are positives for me.	2009	Y	20	N	N			50-59	Computer and Mathematical Occupations

Ord. 188177, Vol. 2, 3H, page 9810

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
200	They add value to the neighborhood and improve the quality of life. There are many more destinations I can walk to now than there were even a few years ago. The more people that can live on the street, the more businesses that can open and stay open. While parking can be a minor issue on a few streets and at a few times of day, the new construction has a very minor impact on nearby residents.	2010	Y	3	Adjacent Residential	N			25-29	Other
201	Not at all positive. The buildings don't reflect the predominant aesthetic. Some of them are very off-putting from street level.	2019	Y	21	N	N			50-59	Computer and Mathematical Occupations
202	Living units without parking, totally crazy!	2034	Y	48	Y	N			60-69	No Answer
203	I am fine with many of the new buildings, however am extremely concerned about the lack of parking. The new designs should be required to include parking, in my opinion. The curb extensions, "greenstreet" infrastructure, etc. are my pet peeve. Removing street parking is incredibly short sighted and an extreme disservice to those of us who have lived and worked on Division St. for decades. Our business has already been negatively impacted by the lack of parking which is only going to get MUCH worse. Also the fact that buses will no longer be able to pull over because of the curb bump outs is idiotic. The traffic is already bad with 2 lanes each direction. Now we will have only one lane each way with everything backed up behind the buses.	2035	Y	25	Adjacent Residential	Y	16	Y	no answer	Arts, Design, Entertainment, Sports, and Media Occupations

Ord. 188177, Vol. 2.3.H, page 9811

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
204	Doing a good job in a difficult, busy area.	2048	Y	1	Y	N			50-59	Healthcare Practitioners and Technical Occupations
205	Deplorable and without character, put up the cheapest way possible with no view towards synching with neighborhood and causing widespread bad will with new retail and resident vehicles parking in adjacent neighborhoods. City nearly unresponsive to neighborhood associations' complaints.	2058	Y	25	Y	N			no answer	No Answer
206	I'm a fan. I think this is an appropriate location for high density development. I'll be even happier when it's completed but that's the nature of living in the city. I also wish there was some kind of parking requirement or incentive for new buildings.	2061	Y	8	Y	N			no answer	No Answer
207	too much too fast, way too little city oversight and attention, land grab by developers, violation of city codes in spirit if not in practice, destructive of communities that existed prior to new construction--many neighbors are leaving or dissatisfied with changes	2063	Y	20	Y	N			no answer	No Answer

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
208	Some of it is fine. New restaurants are walkable and good additions. Some of the apartments are too large to fit with Division. An 80 unit apartment complex would work on Hawthorne or Powell, but those are 4 lane roads. The size, traffic and lack of parking do not fit the scale of Division and distract from the character as a mixture of retail. For example, I need to rebuild ["a"] support structure ["personally identifiable information omitted"]. My choice would be to buy the materials from Division Hardware. However, because I cannot carry 10 foot long steel pipes on foot or bike, I can only purchase them if I can park nearby and that has become increasingly difficult. To the degree the new buildings force me to go outside of my neighborhood for things I have always purchased locally, it is a step backwards from the mixed retail that has made Division a wonderful street.	2064	Y	19	N	N			50-59	Other
209	The architecture is beyond horrible. With all the money coming into SE Division, we would HOPE for beautiful new architecture--and saving beautiful existing buildings. But neither is happening. The increased density is great, and I LOVE mixed-use buildings, but they have GOT to have a better design! The heights are generally fine; I like 3-4-story buildings in urban areas. That's the correct height. But the squat, almost featureless aspects of some of these buildings is just deplorable. Greedy developers will ALWAYS choose the biggest, ugliest, cheapest design possible. It's up to us, city requirements/codes, zoning and very strict architectural design review to FORCE these soul-less developers to create more beautiful and well-functioning buildings!	2065	Y	13	N	no answer			40-49	Computer and Mathematical Occupations

Ord. 188177, Vol. 2.3.H, page 9813

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
210	Horrible. They are piling up people on top of people. It is foolish to expect EVERYONE who shops or visits there to NOT use a car. I won't shop there if I can't park.	2147	Y	33	N	N			60-69	Retired
211	In favor of first floor business and 2nd and 3rd floor residential. 4 floors is too tall adjacent to single family homes. AND GIVING DEVELOPERS A FREE PASS TO NEGLECT THE IMPACT THEIR TENANTS' CARS WILL HAVE ON SURROUNDING STREETS IS ABSURD. If they can't afford to build with parking, they won't. AND THAT'S FINE!!!	2174	Y	11 [rented for 5, own house for 6]	Adjacent Residential	Y		N	40-49	Arts, Design, Entertainment, Sports, and Media Occupations
212	Too many are incredibly ugly and don't seem to add anything to the flavor of the neighborhood.	2192	Y	8.5	Adjacent Residential	no answer			40-49	Education, Training, and Library Occupations
213	Not very high. There has been too much growth in too short a period of time with very little to offer the larger neighborhood. The buildings are atrocious, have done little to try and fit in with the community, and as a general whole do not create the neighborhood feel that has been prevalent through SE.	2193	Y	8	N	N			30-39	Construction and Extraction Occupations
214	Generally, I like the new development on Division. It adds more options for walking to a business district in the neighborhood. I do think the parking is becoming a problem, however, and condo/apartment developers should have to provide parking of some sort for residents.	2196	Y	9	N	N			40-49	No Answer
215	Wish the buildings were smaller. They tower over existing structures.	2197	Y	6	Y	N			no answer	No Answer

Ord. 188177 Vol. 2.3.H, page 9814



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
216	They're taking too long. All the "busy-ness" of Division St. would be greatly improved by opening up all the sidewalks. People have to cross the street multiple times to get anywhere, and it makes the traffic even worse. I like having all the new restaurants and shops, and popularity of the street is doing wonders for my house value. The downside is we don't have off-street parking, so we are quickly losing the ability to park in front of our house. We're planning on cutting out a driveway on our property to address it.	2204	Y	6	Y	N			30-39	Healthcare Practitioners and Technical Occupations
217	They aren't very nice. I have to say we were hoping they would look cool and have neat architecture, but overall its been disappointing. The giant white cube is unsightly. The D-street village is a really dumb name, we always laugh at it. But those buildings look alright - I really like the old wild oats building using the salvaged material. The building on 33rd/Division isn't too interesting. It would be nice if the new buildings blended in better, but sadly most are just blocky and unattractive. The bio-swails will look nice but more trees and living walls as seen in the Little Big Burger building.	2205	Y	10	Y	N			40-49	Education, Training, and Library Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
218	Much of the architecture is boring, very little color. Currently only one building is occupied and is very close to 34th, thus we have folks parking on our little dead end street (including restaurant visitors). It will be hellish once the buildings are finished and occupied. I am very disappointed that the City of Portland didn't require these developers to provide some off street parking for the future residents. They can say Division is a "transit corridor", but I know TriMet doesn't provide bus service to Mt Hood or the Oregon coast, or Salem, Albany, Pendleton, etc. A very cynical decision by the City to allow this to happen.	2206	Y	36	Y	N			60-69	Retired
219	I'm all for progress, but this is insane! Too much all at once. Too many mistakes are being made without thought. The people that have made this a wonderful neighborhood for so long are suffering while builders line their pockets. It is maddening to try to drive on division. I avoid it at all costs now.	2210	Y	27	Adjacent Residential	N			30-39	Education, Training, and Library Occupations
220	Many of the buildings don't fit character of neighborhood, rents/property values are too high (feels very targeted to Californians), to have condos or mixed use retail built with no parking is infuriating!!! While I think it is crazy to wait in line for ice cream for 2 hours, I don't begrudge the business owners-- I blame the developers for cheap looking generic design, poor community involvement and no parking.	2211	Y	9	N	N			30-39	Office and Administrative Support Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
221	They are bringing in new restaurants and shops that I am excited about, and providing residences for the people to support those businesses. I believe as a city we should grow up, not out, and although we're experiencing some serious growing pains from overlapping construction projects, overall I feel very positive about this growth. Except the one across from Division Hardware, which is ugly, and except for the one with the odd white screen in front of the windows, they are well-designed, well-developed, and bringing in great local businesses. I'm glad there are no Banana Republics etc (national chain stores) coming in, and that we are keeping our local character. It is making our area much more walkable. I can now walk or bicycle to get just about anything I need within my quadrant.	2213	Y	7	N	Y	5	N	30-39, 30-39	No Answer
222	Some are better than others, but they will reduce light on the street and bright colors will not disguise bad design	2216	Y	36	Adjacent Residential	Y	30	N	no answer	No Answer

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
223	I'm looking forward to the street being clear again - it's kind of a pain to get around these days. I'm also a little nervous about what the traffic and parking situation will be like when/if all the new apartments and condos are filled. I'm a little curious about who is going to move in, and more importantly, what they're going to do here. I'm not convinced that Portland's current job market is going to be able to support the influx of people that all the new construction implies is coming. I hope the job market responds, it would be fantastic to have more available jobs. I'm a little worried that the new popularity boom Portland is experiencing might create a more stratified community - where new people moving here have a lot of \$, and most of the jobs that are created in response are in the service industry. I really hope that Portland doesn't lose the quality of life and relative accessibility (affordable housing, affordable food) that currently exists.	2218	Y	7	Y	N			30-39	Management Occupations
224	I love it. It's making the neighborhood denser and allowing for more businesses on the ground level of many of these new condo buildings which increases the worth of the neighborhood. Being from ["a major W. coast city"] and having live in ["another major W. coast city"] before I moved here people don't realize that without smart growth like this people will continue to build housing in the suburbs which will eventually make Portland and Salem one mega city. You're not going to be able to stop growth so you have to be smart in how you implement it as a city or else you get traffic and urban sprawl.	2220	Y	3	Y	N			30-39	Business and Financial Operations Occupations

Op. 188177, Vol. 2.3.H, page 9818

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
225	Tragedy that so little of the development was required to provide parking. This has driven parking into the neighborhood. Reducing Division down to one lane has slowed traffic such that car traffic has increased significantly on parallel biking streets such as Clinton and Lincoln.	2242	Y	22	Y	no answer			50-59	Architecture, Engineering, & Urban Planning Occupations
226	I like that there is new housing being added. However, I am an urban designer and landscape designer by profession. I think the facade materials and windows on most of the new construction projects are flimsy and will not age well in our climate. Simply put, the building facades do not have enough articulation. The windows are simply holes in the side of building with no inset or sill. These are expensive features to build, but they make the building immensely more attractive.	2251	Y	2.5	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations
227	In general I like it, although many of the newer buildings are built too close to the streetface. Let the buildings go up a floor in exchange for a little breathing room for pedestrians on the sidewalk.	2261	Y	more than 9	N	no answer			30-39	No Answer
228	Intense, I am disappointed in the backing off of the no-parking necessary near transit lines requirement. Also I love the way that the off-set streets have created sunny breaks (the little plaza by Salt and Straw gets sun because of this kind of break)	2267	Y	8	N	N			30-39	Life, Physical, and Social Science Occupations



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
229	disruptive, some are well-designed and fit within the character of the neighborhood (especially those that are rehabilitations of existing buildings), some seem bland and anonymous (which tend to be more of the new construction, but not all)	2269	N	no answer	N	N			40-49	Architecture, Engineering, & Urban Planning Occupations
230	They were done without sufficient review and change by the neighborhoods and nearby residents. I don't believe any in the area thought it would be developed like this. It was not predicted in the Division/Vision work of the past 5+ years.	2275	Y	40	N	N			60-69	Retired
231	See previous characterizations. Too many, too big and too ugly with respect to apt./condos, and too many uppity restaurants/boutiques and such.	2276	Y	30	Adjacent Residential	no answer			50-59	Education, Training, and Library Occupations
232	I like the streets ape project! Too many apartments not enough larking for them. Some are nice. The one WOTH the gray grid front has got to change its facade. UGLY. And how can the people see out of their windows. Well they can but with little grids! Love the bio swales!	2277	Y	no answer	Adjacent Residential	Y	1	Y	50-59	Healthcare Practitioners and Technical Occupations
233	much of it is architecturally undistinguished and oversized. retail + 2 would have been more appropriate. let the mid 30s/upper 20's be a mistake we never repeat. require underground or other parking. the housing complex under construction on SE Ankeny is much better scaled, even for a commercial artery like Division, given its restricted width.	2281	Y	no answer	Adjacent Residential	N			40-49	Education, Training, and Library Occupations

Ord. 188177 Vol. 2.3.H, page 9820

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
234	Some of the development has been good, adding density while preserving or improving the character of the neighborhood. Some of the development has been unfortunate, detracting from the beauty and interactivity of the neighborhood, like the development on SE 34th and Division.	2290	Y	9	Y	Y	4	Y	30-39	Computer and Mathematical Occupations
235	Too much all at once Happy for the paving, though	2291	Y	more than 15	N	Y	3	N	40-49	No Answer
236	I'm optimistic about new buildings and the addition of places to stay for increasing populations drawn to this part of town and the city. However, they tend to be closed off to me. Where are the balconies? Do the windows even open? There's no interaction between the residential part of those buildings and the street level and the shops are also in enclosed boxes. They seem shut off, closed out, and cold.	2293	Y	5	N	Y	12	N	50-59	Arts, Design, Entertainment, Sports, and Media Occupations
237	Parking has become a huge problem on my street as condos and businesses have no parking available.	2298	Y	20	Y	N			50-59	Office and Administrative Support Occupations
238	They are a little overwhelming in mass and underwhelming in design. Wish they had more interesting architecture and variations in height.	2300	Y	a little over 2	N	N			no answer	No Answer
239	Necessary.	2303	Y	12	Adjacent Residential	N			no answer	No Answer
240	It will be nice when the re-paving and bioswales are finished. Right now I avoid driving on Division, when possible, because it's like a nightmare.	2304	Y	2.5	N	N			40-49	Business and Financial Operations Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
241	they are out of scale and generally suck. more parking needed	2305	Y	30	N	N			70-79	Education, Training, and Library Occupations
242	I believe having more left turn lanes or 'no left turns', and areas for busses to stop completely out of the flow of traffic would have been more appropriate to keep traffic flowing. I like the overall plan, and believe it will provide a more attractive roadway.	2306	Y	5	N	N			40-49	Healthcare Practitioners and Technical Occupations
243	I have been disappointed to see so much of the new tall overpowering large buildings come in and replace the low profile, friendly, accessible, funky buildings with old trees that have given SE Division its character and charm. I sincerely hope that this type of building does not continue here.	2307	Y	15	N	N			50-59	Business and Financial Operations Occupations
244	I understand the need for high density living, but the buildings seem to hulk over the street	2310	Y	12	Adjacent Residential	N			40-49	Healthcare Practitioners and Technical Occupations
245	I approve of higher density construction, but believe it is vitally important that these projects are respectful of neighborhood architecture and sightlines, provide community public spaces, and provide adequate parking for the residents and businesses contained within them. Recent construction has only been partially successful on these areas of concern, with real problems when it comes to parking and incorporation into the neighborhood architectural style. As communal spaces they have been slightly more successful.	2312	Y	39	Y	N			40-49	Computer and Mathematical Occupations

Ord. 188177, Vol. 2.3.H, page 9822

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
246	Too many new highrises that do not fit in with character of the neighborhood and block the sky. It feels too closed in now. Not enough parking!!	2319	Y	35	Adjacent Residential	Y	25	N	60-69	Business and Financial Operations Occupations
247	Not bad yet.	2321	N	no answer	N	N			50-59	Computer and Mathematical Occupations
248	Hate them and want to move.	2347	Y	23	N	Y	18	N	no answer	Legal Occupations
249	It completely changed the nature of the neighborhood. We are shocked at how different things are from when we moved in ["5-9"] years ago. Who stole my neighborhood? Who decided that we needed all these apartment buildings and salt and straw and tourist destination restaurants? And who believed that there would be enough room for all the cars involved?	2349	Y	7	Y	N		no answer	60-69	Healthcare Practitioners and Technical Occupations
250	I am alarmed at the scale of this construction with the corridor of apartments on Division, their lack of parking and the McMansions taking over the residential streets. They are packed in so tight, with almost no yard and I do not like how different they are from the 'flavor' of the neighboring homes. I would hate to see Division become a playground for the rich or out of town visitors only. Additionally, they need to have parking for residents so existing neighbors are not impacted so negatively.	2358	Y	22	Y	Y	19		60-69	Healthcare Practitioners and Technical Occupations

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
251	It doesn't feel like the developers of most of the new buildings understood (or cared to know) anything about the neighborhood. Especially since they didn't provide ANY parking for their 60 + unit buildings, with the unrealistic answer that most of their tenants won't own cars. Sorry - no matter how green we would like to appear, there's almost one car per person in this town. My fear is that it what used to be a laid back quiet neighborhood center, is becoming a mini-downtown or NW pdx. there's been talk of both parking meters and/or parking permits like NW has...and there seems to be a lot of pretentiousness added with all the fanfare.	2362	Y	7	N	Y	4	Y	30-39	Healthcare Practitioners and Technical Occupations
252	gentrifying our neighborhood so that no one who is unemployed, underemployed or living on a fixed income will be able to afford to live there.	2363	Y	25	N	N		no answer	no answer	No Answer
253	The new construction lacks green spaces, like gardens and space for sitting outdoors - the condos are built right up to the sidewalk and there are no provisions for parking because the assumption is that the tenants will not own cars, or as many cars - we'll see if this holds true. I've noticed lots more visitors from other areas of the city coming to SE Division to dine. It has added to the traffic congestion and poorer air quality of	2368	Y	16	Y	N		no answer	60-69	Community and Social Services Occupations
254	SE Division Unfavorable	2434	Y	20	Y	Y	10	Y	50-59	Legal Occupations

Ord. 188177, Vol. 3.H, page 9824



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
255	It looks like the PDX version of a strip mall, reminds VERY much of the development at North Mississippi & Alberta. The condos going in are out of proportion & character with the neighborhood... pushing a contrived "upscale urban" image onto neighborhoods that used to be affordable and unassuming.	2781	Y	6	Y	N		no answer	no answer	No Answer
256	I dislike them immensely. They already look ghetto-like which means that in just a few short years they will look really bad. It seems that when developers realized they didn't have to provide parking, due to ancient codes, they jumped on the projects as quickly as possible before the codes might be changed. Profit overtook any design consideration. They cheapen the entire street.	2782	Y	25	Y	N		no answer	60-69	No Answer
257	My ["spouse"] and I bought our house in large part due to the location, and a big part of that is the growth of Division St. It provides us with an abundance of evening-entertainment options within walking distance. Stylistically, I think there are beautiful buildings and not-so-appealing buildings that have been recently developed. Style aside, maintaining/establishing the "feel" of the street will cross multiple projects. One large facade on a narrow street is okay, but too many and the area may begin to feel canyon-like.	2786	Y	1	N	N		no answer	25-29	Architecture, Engineering, & Urban Planning Occupations
258	For the most part the improvements are welcome and on most blocks the construction looks updated, clean and modern.	2789	Y	19	Y	no answer		no answer	40-49	Arts, Design, Entertainment, Sports, and Media Occupations

Ord. 188177, Vol. 2.381, page 9825

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
259	They have certainly changed the demographics of the neighborhood which seem to be skewing even more to affluent white residents who are new to Portland. The "foodie" blocks between 21st and Chavez become very congested in the evenings with crowds driving in from other parts of town. I'm waiting to see if the architecture of these new buildings grows on me. There are some nice spaces, particularly where the public space is extended into the property. However the stark contrast between the cubist form of the new designs in relation to the existing low/mid-rise commercial buildings feels like a cultural invasion from L.A. that shows little regard for the existing urban fabric or neighborhood character. Gentrification is great until it happens to your neighborhood for the benefit of someone else.	2806	Y	7	Y	N		no answer	30-39	No Answer
260	I think they lack the unique character that Division Street had prior to all the new, large construction projects.  I find most of the new apartment buildings (without bottom floor retail) bland and do not give back to the surrounding neighborhoods.	2807	N	no answer	no answer	Y	2.5	N	no answer	No Answer
261	Disorganized and inconvenient. Simultaneous private construction and city construction/street work. Thankful it seems to be over for now, but the changes made will only increase traffic and parking difficulties. ["Personal name omitted"] stepped on a nail that punctured ["pronoun omitted"] shoe when the D Street Village crew failed to clean up areas adjacent to their construction properly.	2846	Y	2.5	Y	no answer		no answer	30-39	Legal Occupations
262	Mostly horrible. Where are the "green spaces" and "community services"?	2847	Y	2	Y	N		no answer	no answer	No Answer

Ord. 188177, Vol. 2.3.H, page 9826

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
263	Too many of them, too tall, too big, too boxy, sterile looking, crowding adjacent buildings, blocking sky and sunlight, taking away open spaces, creating a crowded feeling, creating a parking and driving nightmare, mostly uninteresting architecturally. These new buildings do not fit in with the existing neighborhood.	2852	Y	33	Y	N		no answer	60-69	No Answer
264	It's very sad. Interesting houses (like at 26th and Div) have been replaced by giant concrete boxes. The lack of design review requirements is obvious. Large buildings are built so close to the property lines that they destroy the access to light and view of their neighbors.	2853	no answer	no answer	no answer	Y	no answer	no answer	60-69	Other
265	too much of the same	2862	Y	7	Y	N		no answer	40-49	No Answer
266	I think the street improvements are fine, but combined with the density, the visiting nature of the businesses, and the lack of parking in the new developments, I avoid the district as much as possible now. It's just too hard to navigate.	2865	Y	28	N	Y	3	N	50-59	Architecture, Engineering, & Urban Planning Occupations

Ord. 188177, Vol. 2.3.H, page 9827

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
267	I am not impressed. There has been absolutely inadequate consideration of the transitory impacts upon the surrounding neighborhood, particularly with regards to off-street parking. The number of multiple-family units, most without ANY associated parking has degraded the livability of the neighborhood by choking the streets with too many parked cars which are "not supposed to be there". Property developers have basically lied to the neighborhood to line their own pockets. Amenities for livability, like parks, for which Richmond has been designated as a 'park deficient neighborhood' have been entirely ignored. This has been even further complicated by the excessive number of 'toney' restaurants which bring excessive numbers of 'out of district' autos in to choke the streets in the evenings....Nearby residents are being adversely impacted by the ill-considered and poorly executed new building and then the city complicates the whole situation by destroying on-street parking. FUBAR.	2866	Y	30	Adjacent Residential	N		no answer	60-69	Education, Training, and Library Occupations
268	condo/apartment buildings have missed opportunities to relate to the character of the neighborhood. also, they have negatively impacted the parking situation in the residential areas adjoining Division	2868	Y	8	Y	N		no answer	60-69	Architecture, Engineering, & Urban Planning Occupations
269	HORRIBLE! Who okayed this design?	2869	Y	25	N	no answer		no answer	50-59	No Answer
270	Horrid. Clogging up an already clogged two-lane street.	2872	Y	3	Y	N		no answer	90+	Retired

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
271	Externalizes costs to the neighborhoods while making a profit for a few: noise, less parking for residents, busier streets, loss of solar access to tall buildings, lack of privacy to taller buildings, imposing building styles and sizes without meaningful neighborhood process,...	2873	Y	20	Y	N		no answer	no answer	No Answer
272	The development of new housing should have a required component of affordability so that our neighborhood can serve the needs for many people.	2879	Y	7	no answer	N		no answer	60-69	Retired
273	I like that Division Street is being fixed-up but I don't like the new construction. In my opinion, the large mixed-use buildings east of Bollywood Theater negatively change the look and feel of the neighborhood. Too urban.	2939	Y	3	Y	N		no answer	40-49	Business and Financial Operations Occupations
274	I dislike all of it. I feel it, and the new construction on Clinton, is contributing to a decline of culture in this community. One way is visually. The buildings are not aesthetically congruent with the existing neighborhood. Another is car traffic, which has greatly increased. This traffic spills over to Clinton, a residential street, and creates parking problems for the neighborhood. Yet another is cost. New development like this is expensive. It is attracting higher end and hip businesses, which in turn is driving up rent prices. This is forcing out the working class and bohemian element.	2941	Y	3.5	Y	N		no answer	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
275	not enough green space, community open spaces. nothing to foster interaction with other people or with urban nature. high priced and inaccessible for old-school mom-and-pops.	2944	Y	22	N	N		no answer	40-49	No Answer



#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
276	looks tacky, no businesses that i would ever go to or be able to afford.	2947	Y	13	N	N		no answer	no answer	No Answer
277	As a Portland and SE native, my opinion is that it resembles a gulag of industrial, sun-blotting "urban menhirs", overly crammed, with pedestrians taking their life into their hands. I honestly feel like I am in a poorly designed urban downtown, but without the parking. The buildings have no distinctive character, are made of cheap materials, painted in drab, dark, (gray, brown, army green) depressing colors, the architects/builders took absolutely no time to study the character of the neighborhood. They obviously superimposed bad design to make a instant profit.	2961	Y	15	Y	N		no answer	40-49	Business and Financial Operations Occupations
278	If the contemporary designs are good, I like to see them replace the older buildings.  Architecture is about now, not then.	2976	Y	1	N	N		no answer	no answer	Architecture, Engineering, & Urban Planning Occupations
279	too close to sidewalk. too cookie cutter, too much blank glass, no human warmth, too much loss of parking spaces	3009	Y	9	N	N		no answer	60-69	Business and Financial Operations Occupations
280	They are ugly and don't fit in with the neighborhood. They are also very expensive to live in and are changing the economic demographic of the neighborhood. I have lived in the neighborhood for ["5-9 years"], but I could not afford to move to it now.	3350	Y	8	Y	N		no answer	40-49	Arts, Design, Entertainment, Sports, and Media Occupations
281	Mostly negative. I do like the restaurants, but wish they had some parking. Some of the shops are unique, but some are very overpriced like \$200 shirts and sweater.  I'm concerned about bioswales causing accidents at night	3591	Y	30	Y	N		no answer	no answer	Healthcare Practitioners and Technical Occupations

Ord. 18877, Vol. 2.3.H page 9830

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
282	I like them, especially the zowie colors the've added to the landscape. I like the increased eyes on the street, more vibrant street life too, despite the hassle of more cars everywhere.	3675	Y	7	Y	no answer		no answer	60-69	Retired
283	I think most of them are bad planning incamate. Crap.	3676	Y	30	Adjacent Residential	N		no answer	60-69	Education, Training, and Library Occupations
284	I like the bioswales. We should have a moratorium on new construction for a while.	3678	Y	1.5	Y	Y	5	no answer	50-59	Education, Training, and Library Occupations
285	Ahawsome!	3680	Y	68	Y	Y	25	Y	no answer	Other
286	Making a bad situation worse (in terms of crowdedness, traffic, overpriced, bourgeois, etc.)	3681	Y	4	N	Y	2	N	no answer	No Answer
287	It's fine. Way better than before. We need more public gathering places. Somewhere to eat ice cream cone that is not on a resident's steps.	3683	Y	18	Y	N		no answer	40-49	No Answer
288	If I lived in the 'study' area I would have mixed feelings. I would like the added vibrancy to the neighborhood that presumably would raise my home's value but would be extremely annoyed with the huge influx of vehicles needing parking spaces especially if I did NOT have off street parking.	3684	Y	21	Adjacent Residential	N		no answer	70-79	Retired
289	Adds life and opportunity to the street. Also, changing it from somewhat trashy and rundown (oregon theater, for example) into more respectable and up to date	3687	Y	4	N	N		no answer	no answer	No Answer

Ord. 18877, Vol. 2.3.H, page 9831

#	What is your opinion of the recent new construction projects on Division Street?	Survey ID #	South-east area resident	Duration of residency (years)	Division study area resident	Business owner	Duration of business ownership	Business in Division study area	Age	Occupation
290	seems a healthier more vibrant area	3690	Y	45	N	Y	15		no answer	Arts, Design, Entertainment, Sports, and Media Occupations
291	I feel mostly OK with them, but I'm a little nervous about how "new" and boxy they look, and also about how much density they have dropped on the area all at once.	3692	Y	19	Y	Y	8	Y	40-49	No Answer
292	I think it's exciting to have growth and modern development but the planning seems short-sighted. The parking issue is a big one! Also, the light at 39th and Division absolutely needs to have a left hand turn signal.	3701	Y	8	Y	N		no answer	30-39	Community and Social Services Occupations
293	It's awesome. Love the style and the mixed use design. It's great that housing and storefronts work together. A nice amount of small office space too.	3708	Y	2	Adjacent Residential	Y	2	Y	40-49	Business and Financial Operations Occupations
294	Between SE 30th and 34th, the new MDU's are taller than any other original structure on the street. I am fortunate that my backyard is still private and no tall buildings with tennants can look into my backyard. Also, no tall buildings take away my sunlight. Also, the impact on sunlight between SE 30th and 32nd is apparent. For someone who walks in that area frequently, depending on the time of day, you go from sunlight to shadow for two blocks. As more of these MDUs are built, it will affect larger stretches of Division.	3710	Y	36	Adjacent Residential	N		no answer	60-69	Retired
295	It sucks. They look like mini-box stores. Stop with the concrete and glass. More smaller sq.ft stores need to be made available for the beginning business person that offers lower rent.	3712	Y	9 months	Adjacent Residential	N		no answer	40-49	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3.H, page 9832

## Positive/Negative Feelings About Recent Division Development

**Note on Privacy of Survey Respondents:** Every attempt to remove any personally identifiable information has been made to the extent feasible without removing any content (example: references to location of residence or business, specific business name or type, etc.)

### Key:

Study Area = Division Street & back side of blocks North and South between 11-60th

Adjacent Residential = 1-10 blocks on either side of Division

Occupation = Coded by category

Age = Range

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
1	Mix of positive and negative. Like the new businesses and vitality, architecture is soul-less and lacks a connection to the areas context and character. Feel very negatively about large blank walls, and canyon-like feeling that is resulting from such intensity of development.	700	Y	4	Adjacent Residential	N			40-49	Architecture, Engineering, & Urban Planning Occupations
2	no answer	710	Y	Million years	no answer	no answer			no answer	No Answer
3	I feel fairly positively about it. I think it's great to increase the population density, which means we can bring even more great small businesses to the area. I am concerned about some of the residential development in the area that is removing more affordable housing and replacing it with expensive housing, with no change in density.	1012	Y	no answer	Y	N			30-39	Unemployed
4	energy( both economic and psychic)is being brought into the neighborhood. I don't like the design so prevalent in the construction. like a bunch of flat-topped boxes. very concerned about pedestrian safety. Congestion in the corridor is causing a lot of driving frustration. There has been a slow "creep" of cars parked on side streets, which was unheard of 2 years ago. It feels that we have lost our "neighborhood". I am concerned that the apartments being built will not get filled, and we will be stuck with empty structures. I am very concerned about recent "tear-downs"	1015	Y	20	Adjacent Residential	Y	16	Y	50-59	Homemaker

Ord. 188177, Vol. 2.3.H, page 9833

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
5	Positively. New restaurants and shops. SMALL businesses.  On the negative side, I would have to say the presence of too much car traffic. It would be great to get more cars onto Powell between 11th & 60th. Add dedicated turn signals on all 4 lights at 39th.	1026	Y	69	Adjacent Residential	N			60-69	Education, Training, and Library Occupations
6	Ultimately I think it will benefit our property values. But there have been so many issues with parking and now just the crazy amount of development all at once. I am also really concerned about increasing rents. I just heard the other day that one of my favorite yoga studios at 26th and Division is going to be looking for another location because the building is raising rents by \$25 per square foot. We are going to start losing the rest of the smaller time businesses and they will be replaced with higher end businesses that are way out of our price range.	1036	Y	8	Adjacent Residential	N			30-39	Consultant
Ord. 188177, Vol. 2.3.H, page 9834	Extremely negative! Loss of houses with lawns. Ugly apartments and condos. Noise. Garbage.  NEGATIVE live ["one block away from Division"] cannot park in front of my home sometimes even 2 blocks away too many apartment boxes shoddy construction no trees no parking too many restaurants not enough green space or small stores overly built	1037	Y	1.5	Y	N			no answer	Education, Training, and Library Occupations
8		1054	Y	20	Y	N			60-69	Healthcare Practitioners and Technical Occupations



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
9	Negative. Too many storefronts which look the same, tearing down some diversity which was in neighborhood. Sadly very little racial diversity and very little ability to maintain any financial/social diversity with housing costs and no push for low income housing in all the construction occurring in the area. This while still having a large homeless community traversing the neighborhood with the homeless living near rail line and down by river. People living in cars near waterfront who can't afford housing due to costs.	1055	Y	36	Adjacent Residential	N	N	N	50-59	Healthcare Practitioners and Technical Occupations
10	Mostly positive. Glad for the redistributing and positive business development it has caused. Very glad to see so many excellent restaurants making Division their home. I hope the area becomes the premiere Portland destination for fine cuisine. Only slightly negative of the condo canyon mentioned above.	1058	Y	1	Adjacent Residential	Y	9	N	30-39	Computer and Mathematical Occupations
11	Negative about the last two years, largely positive about the previous 20. #1. Out-sized #2. Ugly #3. parking	1059	Y	15	Y	N			40-49	Education, Training, and Library Occupations
12	NEGATIVE the entire lack of planning and concern for liveability and people. One structure after another lining Division without any regard for scale of the neighborhood. Division is a NIGHTMARE.	1072	Y	more than 20	Y				60-69	Arts, Design, Entertainment, Sports, and Media Occupations
13	Both positive and negative. I love that the area thrives. I'm concerned about the parking, congestion, and	1073	Y	15	N	N			no answer	Management Occupations
14	no answer	1075	no answer	no answer	no answer	no answer			30-39	No Answer

Ord. 88177, Vol. 2.3.H, page 9835

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
15	Positive - Traffic calming and sidewalks!	1077	Y	2	N	N			no answer	Other
16	positive, additional businesses, increased density, underutilized properties being cleaned up and put ot better use	1080	Y	14	Y	N			30-39	Architecture, Engineering, & Urban Planning Occupations
17	New construction not locally owned Lack of parking for customers/residents Lack of crosswalks to serve expanded residential base	1084	Y	36	Adjacent Residential	Y	26	N	no answer	Business and Financial Operations Occupations
18	Negative: nothing but restaurants on the street. Property tax hikes. Ugly architecture. Influx of the privileged/upper middle class pushing out the regular old middle class. Positive: density, preservation of farmland, economic opportunity for businesses (though dammit we don't need more restaurants and bars!), slowing of traffic.	1101	Y	30	Adjacent Residential	Y	19	N	50-59	Arts, Design, Entertainment, Sports, and Media Occupations
19	positive and negative	1119	Y	8.5	Y	N			40-49	Architecture, Engineering, & Urban Planning Occupations
20	negatively. they are building tenements that will be filled up with 20 something party animals and section 8 holder who will trash the place and sell drugs. No respectable person with a decent job rents a place they can't park a car	1124	Y	21	Adjacent Residential	Y	3	N	40-49	Computer and Mathematical Occupations

Ord. 188177, Vol. 2.3.H, page 9836

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
21	Negatively; see above. You've orchestrated all the benefits to the commercial property owners, squeezed out the local businesses that made it a nice place to live, and made it a tourist destination (I never saw a Mercedes around here, now people are popping in and out of them on a regular basis). If this was normal market dynamics that would be a shame, but it's government connivance to bring it about, which is really disheartening.	1132	no answer	no answer	no answer	no answer			50-59	Education, Training, and Library Occupations
22	Negative. Division Street is no longer inviting. The scale of the cookie cutter apartments is inappropriate. They will be slums in 10 years.	1149	Y	5	Adjacent Residential	N			no answer	No Answer
23	A few of the restaurants are nice, but way more than the neighborhood needs or can support, thus we are now a regional draw. Too many cars drawn to the residential streets around Division. It is also harder to drive up division.	1152	Y	35	Y	N			60-69	Sales and Related Occupations
24	The issues are that PSU planning regime is oppressive. Anytime a planner or developer sees negative space or a small wood building it must immediately be replaced by a box. Less vibrancy, less diversity has followed the ugly new developments. Tired of "street seats" I WANT PARKING.	1159	Y	no answer	N	no answer			no answer	Legal Occupations

Ord. 18817, Vol. 2.3.H, page 9837

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
25	I find the new developments negative. The biggest issue is the lack of responsiveness from the city and the developers they have allowed into the neighborhoods. There are many different avenues for increasing density without destruction of an existing lifestyle and I do not feel we living in the area have any input into how this should be done. Few renters currently in the area will be able to afford the new apartments and certainly not the new consistently ugly replacement homes in a tear down situation	1163	Y	35	Y	N			60-69	Life, Physical, and Social Science Occupations
26	Division was rather rough in some spots with some neglected buildings, it would have been nice to have one or two new apt buildings to give diversity to the neighborhood. The over development has been nothing short of over-kill that means we don't saunter along division and stop and talk with the owners or our neighbors. It really has altered the character of this once leisurely location that was home to young families and artists where folks stopped and talked with one another. This is not as environment that promotes community and good health.	1165	Y	no answer	Adjacent Residential	N			60-69	Education, Training, and Library Occupations
27	Mostly positive. Again, the white cube or jail should never been allowed. I would like to see development set back a little from the street to allow courtyards (like St. Honore's) and informal gathering spots. I do not like large blank walls and become concerned about residents being able to interact with the neighborhood if they do not have windows that open to the streets.	1166	Y	18	Y	Y	under 1 year	Y	40-49	No Answer
28	I like the courtyard just east of division hardware(res. bldg. with stores below). parking issues will ruin the closest blocks.	1167	Y	8	Adjacent Residential	Y	18	N	40-49	Construction and Extraction Occupations

Ord. 18-177, Vol. 2.3.H, page 38

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
29	Described in detail above	1171	Y	44 & 38 [married couple individual years of residence]	Y	no answer			60-69	Healthcare Practitioners and Technical Occupations
30	Very negative on the multiple large building projects. Also negative on the street "improvement" project that will narrow an already crowded east-west thoroughfare. Guess I'll be cutting through Ladd's Addition more often.	1173	Y	20	Y	N			no answer	Nonprofit
31	I like the addition of bioswales, and more crosswalks, where there are more crosswalks--so far it just seems like crosswalks where the popular businesses are (I'd like at corner of 24th for instance, so my [child] could cross street to visit friends!) I'm hoping cross walks will start appearing in our section of the street! I like some of the newer, creative businesses. I dislike the new patterns of traffic--people zooming through our section on their way to the restaurant zone. I dislike the giant blocky buildings going up. I dislike that the street has become much less bike friendly.	1177	Y	16	Y	N			50-59	Computer and Mathematical Occupations

Ord. 188177, Vol. 2.3.H, page 9839



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
32	negative. highly negative. too much too fast and it has drastically changed the tenor and vibe of the neighborhood. People park cars blocking resident driveways, drunk people stumble loudly all over the sidestreets, and there is more trash on the streets and in resident yards. people speed down narrow side streets where children used to play. used to be able to get a meal for \$5-\$10. that is no longer possible, and the crowd at the new restaurants is a demographic that doesn't seem to mind paying premium for mediocre food, leaving the locals no local affordable food.	1181	Y	9	Y	N			50-59	Legal Occupations
33	Mostly negative. Parking and traffic are terrible on Division. Traffic has been pushed to the bike routes on Clinton and Harrison. Our food carts are being pushed out by apartment buildings. The city has prioritized people who rent one-bedroom apartments over homeowners with children. I worry that the big apartment buildings will look shoddy in a couple of years.	1183	Y	10	Y	N			40-49	No Answer
34	Negative. It's brought people to the neighborhood don't care anything about the livability that we once had here. They don't care that they are blocking driveways, going too fast on Clinton (bike boulevard) or texting while driving to the latest and greatest hippest new restaurant. Seems to me these restaurants could be in a more commercial area, as they are really not for the neighborhood residents, they are for those who are driving to get here.	1184	Y	11 years and 11 years [different timeframes]	Adjacent Residential	N			40-49	Management Occupations

Ord. 18177, Vol. 2.3.H, page 9840

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
35	Mostly positive. All the new storefronts are a wonderful addition to the neighborhood. One thing is that some of them should have more courtyards, like the one in the Salt & Straw building. Another is I hear that a lot of the apartments are tiny... living space should not be a shoebox.	1185	Y	18	Y	Y	8	Y	40-49	No Answer
36	Negatively. I wish it could be otherwise. If the apartments included parking, and if there was not a reduction in street parking, I'd feel a lot more positively. I like the new restaurants. Biggest problems are 1) Increased competition for parking 2) no-notice building demolition 3) increased traffic congestion 4) loss of historic character I do not see any benefit as far as "density" is concerned. I only see more stress, more competition for everything, including green space (parks). I have lived in ["three major E. coast cities"] I know what it's like. I moved here to get AWAY from that.	1189	Y	12	Adjacent Residential	N			50-59	Life, Physical, and Social Science Occupations
37	Negative: Apts w/ no parking. Bldgs too high. Ugly bldgs & too close to sidewalk. Bldg & stormwater planter construction at same time makes walking & driving dangerous & hard. Positive: More eating places & shops. Planters & sidewalk areas.	1190	Y	5	Y	N			70-79	Education, Training, and Library Occupations
38	see above.	1191	Y	10	Adjacent Residential	N			40-49	Computer and Mathematical Occupations

Ord 188177, Vol. 2.3.H, page 3841

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
39	both The development seems good in that the quality of buildings and businesses seems good, but the lack of parking is destructive.	1193	Y	6	Y	Y	13	Y	60-69	Nonprofit
40	Mixed. Restaurants and mixed use residences are positive. Vehicle traffic and congestion very negative.	1194	Y	9	Adjacent Residential	N			30-39	Life, Physical, and Social Science Occupations
41	Positive: more small businesses and more people to live and be happy here. Negative: the buildings "loom" in a heavy way.	1200	Y	10	N	N			70-79	Education, Training, and Library Occupations
42	Negative. Too tall, too bulky, too plain, no context, no distinguishing design character, block light, insufficient or no parking.	1201	Y	34	Adjacent Residential	N			other	Nonprofit
43	Positive - the densification is important. Negative - the buildings could engage with their context more effectively.	1202	Y	over a year	Y	N			25-29	Other
44	+ Many new interesting restaurants and shops. - Completely overwhelmed by the hundreds of shit box, ugly, poorly designed apartments and condos.	1203	Y	14	N	N			70-79	Architecture, Engineering, & Urban Planning Occupations
45	Mixed. Lack of diversity in building types and businesses is a problem that exacerbates the parking issue.	1208	Y	6.5	Y	N			no answer	No Answer
46	Positive. See last question. I am curious to see how things flow once construction/streetscape is finished.	1209	Y	10	Adjacent Residential	N			30-39	Community and Social Services Occupations

Ord. 88177, Vol. 23.H, page 9842

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
47	Mixed. Love seeing the new buisnesses but feel like the city is not adjusting to the influx of people and not including issues of parking and public transit in their views.	1211	Y	10	Y	N			40-49	Healthcare Practitioners and Technical Occupations
48	Negatively, because of unattractive architectural design of several of the new structures, and because of the likely plague of parked cars on our narrow side streets.	1214	Y	36	Y	N			70-79	Life, Physical, and Social Science Occupations
49	We aren't big fans of the multiple street crossings required to walk just a few blocks, way too many potholes on the road, and an underlying question of where these new residents are going to park their cars.	1215	Y	3	Y	Y	5	Y	40-49	Computer and Mathematical Occupations
50	As stated earlier- I am feeling very frustrated by the new development, the lack of parking and the very rude and inconsiderate "dinner tourists" that flock to my neighborhood every evening.	1217	Y	15	Y	N			no answer	Healthcare Practitioners and Technical Occupations
51	no answer	1218	Y	10	Y	N			no answer	Arts, Design, Entertainment, Sports, and Media Occupations
52	I feel positive about the building. I see the interesting walkable human scale neighborhood being built as the ultimate counter to urban sprawl. If you don't build dense neighborhoods the only alternative is more tract housing in suburban areas which reinforces a car centric lifestyle. Who needs parking when there are 1000 housing units within a few blocks?	1233	Y	11	N	Y	10	N	30-39	Management Occupations

Ord. 188177, Vol. 2.3.H, page 9843

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
53	I feel fine. Again, I think developers are greedy and the City ignores the call of the people because they stand to make money from the development. I think progress and change are hard but it would be nice to have a City that actually chose the people over profit (profit that goes into pockets as inflated salaries rather than into the community where it should be).	1234	Y	17	Y	Y		Y	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
54	positive: lots of new restaurants negative: noisy, endless construction	1235	Y	6 months	Y	N			50-59	Unemployed
55	Mixed. Development that strengthens the neighborhood is a plus. Development that places a burden on existing residents for the sake of commercial interests is a minus. Dense apartments with no parking and high end restaurants/bars with no parking (ie. the Woodsman, etc.) that draw from across the City and dramatically change the demographic or lifestyle for surrounding area have a negative affect	1238	Y	48	Y	Y	15	N	40-49	Architecture, Engineering, & Urban Planning Occupations
56	Too much, too big. Biggest problem by FAR is the cars. The bozos who proclaimed that the new denizens would not have cars have their heads up their assholes if they are sincere, but does anyone think they are? Nope. They are developers. They don't give a shit about the surrounding streets being parked wall-to-wall with cars. Even those condo denizens who make most of their trips by bus will still own cars for when they are needed. And where will they be stashed? Not in the non-existent parking places at the condos, that's for sure. I do like the planned bioswales and trees.	1239	Y	37	Adjacent Residential	N			60-69	Education, Training, and Library Occupations

On 11/18/2017, Vol. 2.3.H, page 9844



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
57	Negative. What happened to the city I loved and grew up in? The biggest problems I have include the congestion (sidewalk and road), noise, littering, limited/no adequate parking, gentrification, high-rise condo's and apartments.	1241	Y	5	Y	no answer			30-39	No Answer
58	Mixed feelings. Enjoy some of the new restaurants, flower shop, magazine stand. Don't think we need anymore bars or pizza joints. Apt. dwellers are already parking in front of our house 2 1/2 blocks from Division. Hmmm- where will they all park when they finally move in??	1246	Y	2	Y	no answer			50-59	Education, Training, and Library Occupations
59	no answer	1249	Y	8 months	N	Y	4	N	25-29	Legal Occupations
60	Positive - I am generally in favor of having designated streets for development with improved public transport and bike lanes/high density  Negative - the sheer amount of condo/apt units is amazing - and the feel of the neighborhood is more upscale now - I feel out of place instead of comfortable	1250	Y	8	Adjacent Residential	N			no answer	No Answer
61	negative impinging on neighborhood feel and parking	1259	Y	5.5	no answer	no answer			70-79	Sales and Related Occupations
62	Positively! I love watching new places pop up. It's exciting and makes my home feel vibrant and active. I like seeing new things and people on my walks and bike rides. I know my house value is rising because of it and that matters a lot to me.	1261	Y	6	Y	N			40-49	Education, Training, and Library Occupations

Ord. 188177 Vol. 2.32, page 9845

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
63	Negative. The new developments will gentrify the neighborhood rapidly displacing long time and low income households.	1263	Y	5	Y	N			no answer	No Answer
64	I like that it was reduced to two lanes around 80th and bike lanes improved. Its confusing at 82nd though and needs improvement because cars are messy there.	1265	Y	3	N	N			40-49	No Answer
65	None of these apartments will even begin to fall into the category of affordable house, and the lack of on-site parking required is a joke. These new tenants are not all going to be bike riders. As it is now, it takes a good 3 - 5 minutes in the morning to turn out of my neighborhood onto Division going west due to the LONG line of traffic that backs up on this single lane street. Adding upwards of 300 - 500 people in the neighborhood is NOT going to make this situation any easier. In fact, combined with the number of new restaurants opening up, the traffic will probably double.	1269	Y	31	N	no answer			50-59	No Answer
66	Positive: Some new buildings without parking, many with ground-level retail, feels more urban Negative: Boring architecture	1271	N	no answer	N	N			30-39	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9846

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
67	More negative than positive. The large expensive-to-live-in buildings with no parking that shade the street, removed interesting greenspace and lined the street with haute cuisine just feels tired and dull. The huge infill houses replacing single story homes (not to house more people, but to house wealthier people) and removing interesting greenspace make me want to move. Traffic has become awful and turn signals not installed at busy intersections. Police stings targeting everyone, not just dangerous drivers have unfairly penalized local residents.	1276	Y	14	N	N			40-49	Management Occupations
68	Negatively. New restaurants are great, but the number doesn't mix well with the limitations of the neighborhood in terms of size, parking, width of Division. The construction, especially the apartments, aren't visually appealing. Cheaply constructed for profit.	1277	no answer	no answer	no answer	no answer			40-49	Education, Training, and Library Occupations
69	Very negatively. It's destroying the community feel that we used to have and enjoy.	1350	Y	30	Y	no answer			30-39	Other
70	Mostly positive; I like that the neighborhood has become a "hot spot" instead of languishing but I fear that the area will become overcrowded. I fear that the average middle class family may no longer be able to afford to live in the neighborhood.	1366	Y	23	Y	N			50-59	Office and Administrative Support Occupations

Ord. 18677, Vol. 2.3.H, page 9847

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
71	As I said, I have mixed feelings. It's exciting -- as a long time resident, being close to Division was always considered a detriment and lowered property value -- now there is so much perceived value to being near Division -- restaurant row. I also like being able to walk to great eateries! Concerns are the flip side of those very same pros -- higher rent if my kids want to live in the area, lots more traffic.	1369	Y	24	Adjacent Residential	Y	20	N	50-59	Life, Physical, and Social Science Occupations
72	Positively in that it is planned growth with a focus on pedestrian traffic. Negatively in that change is hard and congestion can feel claustrophobic.	1371	Y	22	Y	Y	20	N	50-59	Healthcare Practitioners and Technical Occupations
73	negatively: Too many condos and apartments being built. It looks like a dark canyon over a narrow street with no allowances for parking	1380	Y	20	Y	Y	18	Y	50-59	Arts, Design, Entertainment, Sports, and Media Occupations
74	Absolutely negative. Way, way too many condos being built. Too many people are going to impact this portion of SE. Also it's total bullshit - the city wants us to rely less on cars, but a pedestrian can't even walk a half a block without having to zig zag out of the way of competing construction. No thought has been put into the quality of life of the current residents.	1382	Y	more than 20	Y	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations
75	positive - I like the activity and restaurants. negative - construction impacts and sidewalk closures	1383	Y	15	Adjacent Residential	N			40-49	Architecture, Engineering, & Urban Planning Occupations

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
76	Negative- -No affordable housing or even a dialogue about it. -Too many expensive restaurants, nothing to serve the residents of the neighborhood. -ugly architecture with no oversight -too high end, not a vibrant urban neighborhood	1394	Y	no answer	Adjacent Residential	N			40-49	Healthcare Practitioners and Technical Occupations
77	for the most part I feel negatively about it being too dense. Easing in a couple of these developments every couple of years could work to grow the neighborhood but it seems that there is too much happening all at once without sensitive planning and response to neighborhood concerns	1402	Y	23	Y	N			50-59	Healthcare Practitioners and Technical Occupations
78	see above	1412	Y	5	Adjacent Residential	Y	8	N	no answer	No Answer
79	Negative! Biggest issues - not enough parking, buildings too big, too close together. Neighbors have no input on this development. No real planning was done. Very negative about Bio Swales!	1416	Y	22	Y	N			60-69	Healthcare Practitioners and Technical Occupations
80	Positive to see energy, Negative to have it happen so fast and a bit recklessly	1427	Y	13	Y	N			30-39	Healthcare Practitioners and Technical Occupations
81	Developers are being given free reign to build without design review and without the (ultimately negligible) added expense of off street parking. It's short sighted and depressing.	1431	Y	no answer	Y	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
82	It is good to see some hazardous sites being restored but not so good to see the bad design taking its place. Good to see locally owned businesses thriving, but not so good to have increased noise and traffic. Good to see the bioswales add some greenery and stormwater control to the street and it's good that the street is getting repaved. Narrow sidewalks are a problem especially when restaurants place large tables and umbrellas outdoors, making the walkability hazardous at times and just not inviting	1433	Y	24	N	N			no answer	No Answer
83	VERY NEGATIVE. The combination of restaurants and new apartments means increased parking in neighborhoods. We have had increased cars broken into and other crimes take place. Also, the low quality buildings could be a problem 10 - 15 years down the road. My biggest complaint is the lack of planning and impact on the people living in the neighborhood. The same amount of new construction could have occurred with a more positive outcome had the plan been more intentional and a design review process included to preclude many hideous buildings.	1458	Y	20	Y	N			no answer	Other
84	Negative mostly. Cross walks and pedestrian issues denied for TOOOOO LONG. As homeowner I am tugged toward coping as house values elevated, but as business owner very bitter. Will hold judgement on what will be my view once the construction clears and I can start to see the final product.	1459	Y	17	Adjacent Residential	Y	12	N	40-49	Business and Financial Operations Occupations

Ord. 188177, Vol. 2.3.H, page 9850

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
85	yes except for apartment building built on faulty data that people would not own cars. Please see richmond neighborhood fight with Dennis Sackhoff	1467	Y	6	Y	no answer			40-49	Healthcare Practitioners and Technical Occupations
86	positive!~	1473	Y	27	N	Y	21	Y	50-59	Community and Social Services Occupations
87	Positive. More opportunities for shops, restaurants, and other attractions.	1475	Y	6	Y	N			30-39	Office and Administrative Support Occupations
88	I like the development as a whole. Traffic and street conditions are terrible. Narrowing of road due to construction.	1483	Y	6 months	N	no answer			40-49	Healthcare Practitioners and Technical Occupations
89	Designs of new buildings are elegant, but there seem to be too many of the same type of building quite imposingly close to a street that is only two lanes wide.	1489	Y	14	N	N			50-59	Arts, Design, Entertainment, Sports, and Media Occupations

Ord. 18819, Vol. 2.3.H, page 9851

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
90	positive. You should have seen Division ["10-19"] years ago when we moved here! Who knew it could be so chic. Parking is a problem for the residents but honestly, I'm guessing many of these people have never lived in a big city. Change is hard - from car centered to not - or from 2 cars to 1. We moved here from ["a major E. coast city"] where we had 1 car, walked, took train/metro. It puts you in touch with your neighborhood when you experience it without a car.	1491	Y	19	Adjacent Residential	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations
91	I am positive about some of the new restaurants. I am positive about SOME new housing. But it is double what it should be. Everyone I know who lives nearby feels failed by the city who allowed such overdevelopment, so quickly, and without parking. The parking situation is a nightmare.	1495	Y	more than 12	Y	N			no answer	No Answer
92	For the most part I am trying to feel positive about all of the new energy and construction. I'm sad that the Waverly block could not have been developed in to a park to serve the new urban apartment dwellers--and their dogs and kids. Quality of life is better with open space! I'm optimistic that Division will grow into more than an upscale "restaurant row" that people drive to from other neighborhoods. And as a 60-something resident, I'm grumpy when I have to	1499	Y	20	Adjacent Residential	N			no answer	No Answer
93	Positive	1500	Y	11	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations

CS. 188177, Vol. 2.3.H, page 9852

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
94	mostly positive. I like the new dining options. But we need more other retail. we have no banks, and could use a lot more retail.	1512	Y	2.5	Y	N			40-49	No Answer
95	Positive. Brings life and vibrance to the neighborhood.	1514	Y	less than a year	Y	N			30-39	Office and Administrative Support Occupations
96	density is good. new businesses are good, the curb projections and bioswells are good. the architecture is bad (some horrible). It seems that in an attempt to keep development moving ahead the city has been afraid to hold developers accountable to decent design that makes our streets walkable and approachable (vs dark, windy and with nothing but tall vertical walls that make you feel like youre walking down a valley (or a NY alleyway) density is good. allowing bad development/architecture is a mistake that lasts for and haunts us for generations.	1515	Y	8	Y	Y	under 1 year	Y	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
97	Negative, mass congestion, misuse of funds, misuse of a street, parking is already a nightmare, and the worst is yet to come, who ever thought up the idea of not providing parking at the new units should be sent to Vancouver!	1521	Y	50	Adjacent Residential	N			60-69	Transportation and Material Moving Occupations
98	I have both, believe it or not. I am proud of Division's food rep, it is seriously world-class. This area was a depressed, sleepy part of Portland for a long time. I dislike the closed-in feeling it is getting. The parking problems are not going to go away, that's for sure. It is becoming way unaffordable, there is no way we could buy a house in this area today.	1522	Y	12	Y	N			50-59	Education, Training, and Library Occupations

Ed. 188177, Vol 2.3.H, page 9853

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
99	positively. the installation of traffic calming and bioswales make it a more pedestrian friendly development	1526	Y	9	Y	Y	1	Y	40-49	Computer and Mathematical Occupations
100	Negative. As I mentioned my concerns before. Explosion of population without services to take care it. There are tons of cars now everywhere, especially on my bike route.	1537	Y	8	Y	N			30-39	Healthcare Practitioners and Technical Occupations
101	Unfortunately these days I mainly feel negative. I have very much enjoyed the new restaurants. But those don't outweigh the sudden transformation (for the worse) of the skyline, the lack of affordable housing, or the excessive density beyond what the street & neighborhood can handle.	1541	Y	7	N	N			30-39	Healthcare Practitioners and Technical Occupations
102	Positive, it is vibrant, attractive to people and good for property values.	1542	Y	15	Y	N			40-49	No Answer
103	In general positive, because the new businesses add vitality to the area. At the same time, I think some of the adjacent homeowners have seen a decline in their quality of life, particularly if they are on the north side of Division and in the shadow of tall buildings.	1558	Y	18	Y	N			50-59	Architecture, Engineering, & Urban Planning Occupations
104	Negatively. Not enough parking. The new housing tenants all have at least one car and will park in neighboring streets, making it very difficult for residents there to park. Businesses will also suffer for less accessible parking for clients. .	1559	Y	11	Y	Y	under 1 year	Y	40-49	Architecture, Engineering, & Urban Planning Occupations

Op. 188177, Vol. 2, 2014, page 9854



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
105	As above: I love the new restaurants, etc. I am in awe of the city's incompetence in choosing to remove what little parking there is for restaurant patrons by adding those little gardens/ bioswales.	1562	Y	12	Y	N			other	No Answer
106	positive about the restaurants coming in, negative about the traffic and parking. I want it to be a busy pedestrian thoroughfare, but want to minimize car use. don't want to lose all the older buildings, would like to keep the old-portland look to some extent.	1566	Y	6	Adjacent Residential	N			30-39	Consultant
107	Generally negative. It is development that will be good 20 years from now. But now it does not fit in with the area for the reasons I have previously mentioned.	1568	Y	40	N	N			60-69	Retired
108	Both. I hate that you cant walk more than a block without putting your life in danger and walking among the cars, or cross the street again and again. Looking forward to being able to enjoy the shops and restaurants and walk around without construction mess. Worried about over population with all the new housing.	1570	Y	3	Y	N			30-39	Arts, Design, Entertainment, Sports, and Media Occupations
109	Negative. Too many older structures demolished to make way for new ones of dubious design.	1574	no answer	no answer	no answer	no answer			no answer	No Answer

Ord. 188177, Vol. 2.3-1, page 9855

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
110	I think I answered this above. Primarily I think the increased density has been poorly done and will cause major problems for the nearby neighborhood. I also think that because of traffic calming/stormwater planters the street is very frustrating to drive at all. The density and the through street to neighborhoods further east are a rough combination with the street design.	1576	Y	24	N	Y	3	N	50-59	Architecture, Engineering, & Urban Planning Occupations
111	Negatively. (1) We feel negatively toward the mandatory bioswales that removed perfectly healthy foliage homeowners bought with our own post-tax dollars. (2) We feel negatively toward new developments that don't provide parking spaces, thus making it harder for personal visitors to come to our homes. (3) We don't like the increase in graffiti.	1583	Y	19	Y	N			50-59	No Answer
112	as stated above, VERY negatively - it's great to have increased housing but absolutely unforgivable to not have parking included. 3 spaces per 4 units should be the minimum.	1594	Y	no answer	N	N			60-69	Healthcare Practitioners and Technical Occupations
113	I feel positively, since it's such a great neighborhood to live in and has been somewhat underutilized considering its proximity to downtown and its many assets like transit, Mt Tabor and good businesses. I think the negative backlash against the development based on parking is short-sighted and will eventually dissipate as the new neighbors settle into the fabric of the street	1595	Y	4	Y	N			30-39	Architecture, Engineering, & Urban Planning Occupations

Ord. 188173, Vol. 2.3.H, page 9856

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
114	I feel very positive about the development. If I had to pick a negative, I'd say the new city requirement for parking that flies in the face of our sustainability goals. I have hope that property owners can come together to share some of the surface parking lots that are so prevalent on the street.	1596	Y	2.5	N	N			30-39	No Answer
115	It seems Division has been marketed to the masses, and they are moving in to "have" it, too. It's like the difference between a group of people intentionally deciding to build an intentional community vs. those who respond to a realtor's offer to come and 'share housing.' Those who determined the foundational agreements create a quality that cannot be acquired later. This challenge to the character of Division and its close community is palpable on the street now. I discourage friends from meeting here since the restaurants are too loud for visiting, and the walk to them is blocked by closed streets & sidewalks.  At the start of the building surge, Division, both lanes, was already at carrying capacity. Now that there is more, the carrying capacity of the street isn't as noticeable as is the "weight" of the built environment surrounding it, feeling like a barrier between one resident, me, and the sun & the breeze, and the integrated feel with the quiet residences surrounding it.	1605	Y	4	Adjacent Residential	no answer			no answer	Retired

Ord. 188177, Vol. 2.3.H, page 9857

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
116	Although there are a few buildings I truly dislike, many are okay to good. I am more concerned about the scale and massing on the corridor as a whole. Ild like to see a mix of heights, more 2 and 3 story bldgs. Too many people have described the street as feeling like a canyon and I am concerned about the lack of access to sunlight, also what seems like poor workmanship and/ or materials and an inadequate pedestrian environment when outdoor seating is squeezed onto sidewalks of minimal width.	1611	Y	16	Y	N			60-69	Retired
117	Generally positive, but the pace is kind of breath-taking. I am more supportive of the projects with architectural interest. There are a few of new buildings that look cheaply made and are kind of eye-sores. But most of them either blend in or have a well-developed aesthetic. I feel that the amount of development paired with road construction has made crossing the street dangerous and with all of the restaurants, that has been poorly managed. I like that some buildings are offering their own car-sharing.	1623	Y	11	Y	N			40-49	Computer and Mathematical Occupations
118	My negative reflects the unidimensional way it's been developed, towering apartment blocks which have been build to maximize rent potential, leaving out what can be given back to the community, and lack of affordable housing in the area.	1630	Y	8	Adjacent Residential	N			60-69	Retired
119	Positive for all the new bars/restaurants. Negative about the maximum multi-family complexes with no parking. And the walking is trecherous on Division as well with all of the construction.	1641	Y	19	Y	N			30-39	Business and Financial Operations Occupations

Ord. 188477, Vol. 2.3.H, page 9858

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
120	I feel positively about the development going on and think it will be great when the dust settles. That said, I have negative feelings about how the multiple construction projects have been coordinated, especially regarding sidewalk closures.	1656	Y	3	N	N			30-39	Community and Social Services Occupations
121	Mostly negative as to the look of the buildings, their size, their lack of sufficient parking. Positive about the great new restaurants.	1660	Y	34	Y	N			no answer	No Answer
122	Both. Positively in increasing density, creating jobs and adding new restaurants/businesses to what used to be a pretty quiet street. Negatively in unending construction, increased rent and the likelihood of the demolition of more old houses.	1669	Y	1.5	Y	Y	5	Y	30-39	Arts, Design, Entertainment, Sports, and Media Occupations
123	The food options are great - I do like the mix that's developed. But what happens when mail-type stores start buying up space and booting out the small dress shops, wine stores and diner type places? What is the street going to look like then?  Biking on Clinton is getting more dangerous, because cars are using it more and more due to the congestion on Division. It makes a bike commute much less enjoyable.	1671	Y	5	Y	no answer			30-39	Nonprofit
124	Done that.	1681	Y	64	N	N			60-69	Retired
125	Positive - commerce, land value and walkability Negative - safety, congestion, claustrophobic	1683	Y	16	Y	N			30-39	Homemaker



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
126	There are positive elements and it's nice to have four world class bakeries within a short walk. But it clearly the new construction hasn't been well-planned or thought through more than a few months in advance. It seems more like, "the bank will lend us money to build, so we'll build."	1684	Y	6	Y	N			40-49	Legal Occupations
127	Positively. Way more choices for visiting small business and restaurants, more people walking, more chance of having enough housing stock to make affordable places for the young people who work in our neighborhood to be able to live in our neighborhood.	1685	Y	12	N	N			40-49	Education, Training, and Library Occupations
128	Positive. This is revitalizing the street which was run down, higher in crime, and with few destinations	1691	no answer	no answer	no answer	no answer			no answer	No Answer
129	Mostly positive. It is always hard to accept change, especially for longer-term residents, but I think it is a good example of appropriate infill and densification. I am happy to have more bioswales. I am happy to see the street narrowed. My biggest objection is that there was no coordinated effort to clean up/organize/bury the power and communication lines.	1695	Y	9 months	Y	N			40-49	Architecture, Engineering, & Urban Planning Occupations
130	Negative. It's a giant canyon of condos. Also where do all these people park? Why have the two lane parts been decreased to one? Do we need giant swimming pool sized drainage culverts? The division bus is one of the busiest in town and now division is a one lane road. Have you tried driving home on division between 11 and 52? The bus stops every thirty feet. I like the bus but I want to be able to get around it.	1699	Y	8	N	N			40-49	Life, Physical, and Social Science Occupations

Ord. 188177 Vol. 2.3.H, page 9860

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
131	I feel somewhat negative about it. I think that developers got special and unwarranted treatment in zoning. The biggest problem is that the street is being made narrower by installing useless (IMHO) 'green' spaces that just into an already narrow thoroughfare and the advent of a bunch of new no parking apartments is going to be a real problem as the apartments fill up and most people have cars. It is only serving the developers to have this no parking exception to building permits. It will come back to haunt but then the culprits will be long gone.	1705	Y	several years	no answer	Y			40-49	Management Occupations
132	no answer	1706	Y	8.5 months	N	N			25-29	No Answer
133	Mixed. Four & five story apartment buildings are too big in my opinion and ruin the view/sun exposure of houses immediately adjacent. We don't know what it will feel like once they occupied, but fear it may change the currently very family friendly neighborhood.	1723	Y	1	Y	no answer			40-49	No Answer
134	Quite negative. Half of the development would have been enough to inject new businesses, new energy, and so on, but it is almost unattractive now.	1724	Y	8	N	Y	7	N	60-69	Arts, Design, Entertainment, Sports, and Media Occupations
135	Negative: congestion, lack of charm or sensitivity for the neighborhood, Monolithic feel on the street	1726	Y	38	N	N			60-69	Office and Administrative Support Occupations
136	Negatively.	1730	Y	no answer [the house owned has been in the family for 70 years]	Adjacent Residential	no answer			40-49	Computer and Mathematical Occupations

Ord. 188177 Vol. 2.3.H, page 9861

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
137	Negatively. Density, erosion of off-street parking and loss of identity are issues.	1735	Y	26	N	N			50-59	Healthcare Practitioners and Technical Occupations
138	Extremely negatively. Too many people, torn up roads because of developers (who are the ones who need to pay to fix them), huge buildings with an overall dark feeling from overhangs, big shadows, rudeness, nowhere to park so people are now parking in the neighborhoods (and many of the houses don't have driveways). As it is going, I am rapidly becoming disenchanted with living in this neighborhood.	1740	Y	23	Adjacent Residential	Y	18	N	50-59	Legal Occupations
139	I think I have covered that. The only positive is now my friends know where Division Street is and most avoid it because of the traffic.	1743	Y	17	Y	N			50-59	Sales and Related Occupations
140	Negatively. See my comments above.	1744	N	no answer	N	Y	2	N	40-49	Arts, Design, Entertainment, Sports, and Media Occupations
141	negative leave it alone	1746	Y	59	Y	N			50-59	Community and Social Services Occupations
142	positively. Lots of new businesses are opening and desperately needed multifamily housing is being added to the inner eastside.	1749	Y	6	Adjacent Residential	N			25-29	No Answer

Ord. 188177 Vol. 2.3.H, page 9862

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
143	On the positive side, I love food, and so selfishly I like being near so much great food. On the negative side, there is no parking, people constantly park in front of my driveway, and the new retail space is not reflective of the people who have lived her for some time.	1755	Y	13	Y	N			40-49	Education, Training, and Library Occupations
144	It seems we had an opportunity to monitor the growth of residential units, and I know there was a concerned effort to make them provide parking, yet that's only part of the transportation issue. Division can't take the load of traffic being a two lane road, added with pedestrians who unfortunately cross the street wherever. I think we could use another stoplight.	1756	Y	2	Y	N			25-29	No Answer
145	The restaurants are great but parking is the main issue.	1759	Y	16	Y	N			no answer	No Answer
146	New construction lacks character and architectural appeal. It is idiotic that none of the new buildings have parking. You can't park in front of your own house anymore if you live in div. neighborhood getting too dense.	1761	Y	18	Y	Y	18	N	40-49	Sales and Related Occupations
147	Definately positively. As mentioned above, the new apartments bring more, and more varied people to Division. The new restaurants bring more life to the street. There are constantly lines outside Salt and Straw. The intersection of 33rd Place is a really exciting place to be. Looking north on 33rd Place, it is a destination that you look at down the street past the low houses, with the buildings rising at the end of the street. It is an exciting destination, and place to be.	1762	Y	27	Y	N			50-59	Sales and Related Occupations

Ord. 187177, Vol. 2.3.H, page 9863

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
148	Positively. Climate change is the preeminent consideration of people in my age group 20-35. We also need affordable housing. Multifamily developments without parking supply this. Older generations, who have the privilege of being able to afford single family house and a car, are afraid of change and having to walk 2-3 blocks to get to their cars.	1764	Y	6	Y	N			30-39	Computer and Mathematical Occupations
149	I feel both. Positive: More dining options, the streetscaping will make the neighborhood look less trashy. Negative: See previous answers. Parking is a huge problem. Being priced out of our neighborhood is a problem. There aren't enough grocery stores or varied business types. Just restaurants, it seems.	1770	Y	2	Y	N			40-49	Arts, Design, Entertainment, Sports, and Media Occupations
150	Mostly positive. I recently bought a house in the area mainly due to all the restaurants and things to do around Division. I like feeling like I live in an active part of the city. I've lived in various parts of SE Portland for 30 years, and never would have wanted to live in my current location before all of the recent development. It's a vibrant part of the city that people want to come visit, and I like being able to walk from my house and see a lot of people around. The downside to the development as I see it is that it has driven up prices for rent/houses and the area has become unaffordable for so many people. Also, some of the new construction is very unattractive and generic. I'd prefer large, multi story buildings to stay as close in to downtown as possible, preferably not East of 39th, as the area East of 39th feels more like a residential neighborhood and I like that.	1773	Y	25	Y	N			30-39	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9864



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
151	Mixed: right now the construction is really annoying, but I am cautiously optimistic about the changes. I look forward to seeing good development, but am concerned the development will price even more people out of the area.	1777	Y	1.5	N	N			30-39	No Answer
152	The apartments are too big. Parking has already become a problem, even on streets that are 2 to 3 blocks away. That modern thing with the grating on it should have NEVER been built. Don't let Division street become a "canyon" of high rise buildings.	1778	Y	20	Adjacent Residential	N			60-69	No Answer
153	Extremely negative. I'm left with the sickening feeling that "it's time to get out; this is only going to get worse, and creep south and north into the rest of the neighborhood. The lack of off-street parking for the new apartments is another negative sign of car-creep into the neighborhood. The city already knows that many of these apartment renters do have cars.	1797	Y	34	N	N			50-59	Nonprofit
154	Mixed feelings, but so far I'm trying to stay positive overall. The timing of the permits and construction has been unfortunate and should have been handled better by the city dept. that issues permits. Unfortunately, city agencies seem to do very little planning when it comes to development. I think the extra retail space is good, but would have preferred rehab of existing buildings where possible. I think single family homes on major arteries like Division are headed for extinction, which will be a shame where the homes are older and contribute to the character of the neighborhood.	1802	Y	1	Adjacent Residential	N			40-49	Business and Financial Operations Occupations

Ord 188177, Vol. 2.3.H, page 9865

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
155	Positive - New stores and restaurants.	1803	Y	7	Y	N			40-49	Healthcare Practitioners and Technical Occupations
156	Negative. The city's recent transportation developments decreased access to the area. Then the city added more people to the area via non-traditional (to this neighborhood) residents types (condos, etc.). Then they added more businesses, who's maximum potential will not be reached due to said transportation projects. This really looks like it was unorganized and there was not a long-term planning plan.	1812	Y	3	N	N			other	Computer and Mathematical Occupations
157	Very positive. I like the street edge being filled in with buildings that house shops, restaurants, and apartments which gives the street a more cozy and walkable vibe. Would be nice if some of the residential units being added were condos so more residents could own affordable properties. Single-family homes are too expensive in inner eastside, so condos are the only way to afford buying in the area.	1813	Y	6	N	N			30-39	Life, Physical, and Social Science Occupations
158	Mostly positive b/c it seems to be creating a more vibrant community.	1814	Y	3	Y	N			60-69	Community and Social Services Occupations
159	positive, for now!	1816	Y	8	Y	N			no answer	Arts, Design, Entertainment, Sports, and Media Occupations
160	I am generally positive about the developments on Division. Auto traffic feels slower and pedestrian traffic feels greater.	1817	Y	13	Adjacent Residential	N			50-59	Education, Training, and Library Occupations

Ord 88177, Vol 2.3.H, page 8866

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
161	I feel positively on the whole about the changes on Division, I believe that progress is generally a good thing. That said, however, The speed at which development is happening gives me pause in regards to the foresight or potential lack thereof. In addition, the seemingly total absence of any affordable housing is endemic not only on division but in nearly every neighborhood close to downtown.	1818	N	2 [lived in the past]	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations
162	There are positive elements to it (hell, I think Pok Pok is delicious) but it needs to be tempered with a sense of the neighborhood and thought to how to control increased traffic in the area as well as including rent control to protect long-time residents and businesses.	1832	Y	1	N	N			30-39	Education, Training, and Library Occupations
163	Negatively. The fact that there appears to be no consideration for the current residents of this neighborhood.	1836	Y	3	N	N			30-39	Arts, Design, Entertainment, Sports, and Media Occupations
164	Mixed. I think that the development is too geared to an economy with a lot of disposable income. I see fewer and fewer places that are essential to the functioning of a community. I also think that the haphazard architecture of the apartments going in has done a GREAT disservice to the feeling of a 'neighborhood.' It feels entirely like a developer-by-developer project.	1838	Y	21	N	N			50-59	Education, Training, and Library Occupations
165	Negative. They just don't fit in stylistically. Plus the idea that they'd build these huge monoliths with no parking for the kind of people who'd live in them....it's just WRONG!	1847	Y	8	N	N			no answer	No Answer
166	Negative. The new places are all expensive and close at 10. Traffic and parking is worse.	1857	Y	10	Adjacent Residential	N			25-29	No Answer

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
167	everyone I have spoke to is utterly appalled at what the city has allowed to happen. look out the window and its hard to figure what city/state you are in=no character whatsoever.	1861	Y	10	Y	N			60-69	Life, Physical, and Social Science Occupations
168	I guess I'm somewhere in the middle. I like that some things will be improved, but worry that the area could lose its charm and become too shiny and hip. A lot of the draw of places like that is the unique character and style that has developed over time.	1868	N	no answer	N	N			30-39	No Answer
169	Like the ground floor retail, like the multi floor residential above. Like that Division is serviced by frequent Trimet buses and that a designated neighborhood greenway is available for bicycles only two blocks away. Don't like the whining about limited parking.	1872	Y	22	N	Y	5	N	50-59	Computer and Mathematical Occupations
170	Negatively. There is such a building boom in all areas of the city that when stauration is reached, the large-scale multi-unit projects hold the potential for becoming slums and run-down shells.	1875	Y	no answer	N	no answer			60-69	Retired
171	I'm all for the spiffy new businesses. Well, some of them. Some I couldn't care less about. I'm not excited about the housing developments. Did the owners/developers/whomever get tax exemptions for making these? I would really like to hear that they're putting money back into the community as well. Especially given how underfunded the schools are in this area.	1878	Y	6	N	N			40-49	Education, Training, and Library Occupations
172	Positively. Aesthetic, density, retail offerings.	1879	Y	3.5	N	Y	3	N	40-49	Consultant
173	no answer	1883	Y	6	Adjacent Residential	N			50-59	Office and Administrative Support Occupations

Ord. 188177, Vol. 2.3.11, page 1868

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
174	Positive. Just like the other areas in Portland that have a signature feel to them, this one will too. And it doesn't revolve around being ghetto like how I picture SE now.	1897	N	no answer	No	N			25-29	Healthcare Practitioners and Technical Occupations
175	Negative. Not only is it a driving nightmare now, but the end result is soulless and not at all an enjoyable walkaround experience. For instance, I love Petit Provence. I visit their Alberta location often and we enjoy walking around Alberta and shopping after. I have only visited the Division location once and probably won't again, because there is nothing worth walking to after.	1902	Y	8	N	N			50-59	Management Occupations
176	Elements of both. There is energy that comes with the new businesses, however, the multiple large apartment/condo buildings ( 27th to 39th) which do not have sufficient parking space I fear the consequences when they are completed.	1905	Y	5	Y	N			60-69	Other
177	Negative for the reasons stated above: Lack of parking, lack of affordable rental pricing in new apartment buildings, lack of cohesive design, lack of walk ability during construction. Division now seems like a street that is less for the local people in the area and more a destination for others to come and stand in long lines at Pok Pok and Salt & Straw. I know I sound cranky, but I grew up in this neighborhood and some of these changes make me sad.	1906	Y	6	Adjacent Residential	Y	under 1 year	N	30-39	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9869



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
178	I like the street scape although it has taken parking spaces, I think its worth the trade off for a more livable walkable street with drainage. Parking is an issue. People use cars, just look at the traffic on D. Those cars need to park somewhere. Portland property taxes are exorbitantly high. Even to live in a hovel. Homeowners should be able to expect some street parking near their homes. Many of these homeowners have lived here for decades. Now all their parking is to be given to apartment building owners. It is not fair.	1907	Y	25	N	N			50-59	Sales and Related Occupations
179	Negatively. No pocket parks. There should be green spaces for residents to relax -- and to break up all the commercialism.	1909	Y	12	Y	N			50-59	Arts, Design, Entertainment, Sports, and Media Occupations
180	NA	1916	N	no answer	N	N			40-49	Healthcare Practitioners and Technical Occupations
181	Mostly negative. I like the way businesses like Little t Bakery fit into the neighborhood among the houses, rather than the way the new businesses and apartments form a solid strip of commercial denseness further up the street. It's gone from an organic harmony between houses and businesses to a dense commercial strip of businesses imposed on the neighborhood.	1917	Y	no answer	N	N			50-59	Education, Training, and Library Occupations

Ord. 188175, Vol. 2.3.H, page 9870

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
182	Negative. Too many new businesses and housing being built up too quickly without any thought of traffic conditions, parking, congestion. No consideration for current residents and no concern for character of neighborhood. Division is 1 lane in either direction! I avoid it at all cost. It's a sad day when I will gladly choose driving down Hawthorne over Division!	1924	Y	11	Adjacent Residential	N			30-39	Healthcare Practitioners and Technical Occupations
183	It will kill out most retail business because of congestion. Parking for existing neighborhoods will become a nightmare. City planners are living in a fantasy that it won't increase parking problems. I know because I've talked to them.	1926	Y	40	N	N			60-69	Retired
184	Super positive. I didn't move into the neighborhood because it had good parking. I moved into an inner city neighborhood because I like urban living, it had a good public transportation options and was a vibrant area. Division was a bit of a disappointment compared to Hawthorne and Clinton, but you could see even 16 years ago that it was prime for growth. The increase in density is welcomed. It will drive more public transportation use and support more local business.	1930	Y	16	Adjacent Residential	Y	10	N	40-49	Legal Occupations
185	Generally, yes. I love that Division Street is now a place to spend a whole day or evening. I love having my ["work"] so close to my home. However, it is difficult and sometimes downright scary, to cross Division, biking or walking due to the street repairs, closed sidewalks every other block, and lack of lights/marked crosswalks anymore.	1931	Y	16	N	Y	13	Y	40-49	Legal Occupations

Ord. 188177, Vol.

183.H, page 9871

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
186	positive, very much so. See my answer above as well as my belief that what is happening on Division is also in a small, local way one thing that will cut carbon use.  If all the new residents were forced to live further out they would have to drive cars, probably down Division and we would have more traffic and more emissions.	1933	Y	40	Adjacent Residential	N			60-69	Retired
187	More negative than positive, because of density issues mentioned in previous responses. Also, between building and street repairs, sidewalks are closed every couple of blocks, which makes me avoid the street.	1935	Y	15	Y	N			60-69	Retired
188	Positive: new construction employs people, the new spaces house people and the retail areas employ people and hopefully make money for the business owners. I am very happy that more property taxes will be paid to support services.	1936	Y	15	Adjacent Residential	Y	13	N	50-59	Sales and Related Occupations
189	I like most of the new construction, some new construction is not a good neighbor (building with metal screen is not a good neighbor) parking is a problem.	1938	Y	18	N	Y	18		no answer	Architecture, Engineering, & Urban Planning Occupations
190	Negative Developers destroying perfectly good properties, parking issues, tourists, garbage	1939	Y	17	Y	Y	17		50-59	Arts, Design, Entertainment, Sports, and Media Occupations
191	Negatively. Very negatively. Overdeveloped, not diverse, dumb development for people who have no history or long-term investment in PDX (at least that is how it feels).	1961	Y	15	Adjacent Residential	no answer			40-49	Farming, Fishing, and Forestry Occupations

Ord. 188179, Vol. 2.3.H, page 9872

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
192	I hate it - it has made housing so much less affordable, and has caused the eviction and demolition of the cooperative house I helped to start. It's just another part of the gentrification of the city, pushing out more affordable housing in favor of condos that make more rent.	1972	N	2.5 [used to live]	N	N			no answer	Community and Social Services Occupations
193	Since I choose not to spend time on Division, I can't say that there isn't anything positive about the new construction & change.	1978	Y	6 months	N	N			no answer	No Answer
194	Negative. The Bioswales are great, but really? Where is the bicycle parking that should be provided on Southeast Division Street?	1984	Y	5	N	N			40-49	Computer and Mathematical Occupations
195	Pretty negative. I moved away to North Portland because of it. It's just simple gentrification. Division is going the way of Mississippi, Williams, Belmont and others. These are the same things that happened on Hawthorne years ago. The biggest problem is the mark-up on things. All the new businesses create their items and menus based on people that use Division as a destination, and the people that live and shop and eat there every day suffer for it.	1990	N	grew up in SE	N	N			25-29	Food Preparation and Serving Related Occupations
196	positive: bollywood b/c it is reasonably priced, not like pok pok, for value. negative: apartment buildings that will cause the area to be overrun with people	1995	Y	2	Y	no answer			60-69, 50-59	No Answer
197	I liked it at first but it seems to be getting bigger and bigger.	2004	Y	38	Adjacent Residential	N			30-39	Computer and Mathematical Occupations
198	Positive: more options for business to visit. Negative: not enough off street parking to support the influx of residents to the area. Increase in prices/cost of living for the area.	2006	Y	5	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations

Ord. 18177, Vol. 23, H, page 9873

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
199	Positive. Sidewalks alive with pedestrians, Bicyclists all around. Cute apartments. More youth and creativity in the neighborhood. It used to be scary at night and the tattered, under-utilized buildings were getting stale.	2009	Y	20	N	N			50-59	Computer and Mathematical Occupations
200	Positively. More people = more businesses = more opportunities/greater accessibility for me. Parking is not a problem. The greater accessibility means that car ownership is even less necessary for existing and new residents.	2010	Y	3	Adjacent Residential	N			25-29	Other
201	While I accept the goals of densification, I feel that it's important to maintain high aesthetic values, so that the business strip fits in with the neighborhood. Recent development barely seems to even try to match that ideal. You get the feeling that developers are putting up the cheapest buildings they can, with the greatest possible income per square foot. That may make good business sense, but it's a violation of the implicit social contract of a neighborhood business.	2019	Y	21	N	N			50-59	Computer and Mathematical Occupations
202	Congestion, parking problems, a real disaster in the making, N.E. Alberta Street on steroids!	2034	Y	48	Y	N			60-69	No Answer

Ord. 188177, Vol. 203.H, page 9874



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
203	I like some of the architecture (although the new developments with residential units should be REQUIRED to include parking in the designs. I like the increase in density. Even though I am an activist for the environment, I absolutely ABHOR the swales. They are TERRIBLY DESIGNED and have no place on a main street in an urban neighborhood. They look like they belong in a sub-suburban industrial park. There are so many other design solutions to the run-off problem that would have no impact on parking, traffic flow, etc. Also the curb bump-outs have the same problem. There could have been an increase in crosswalks without removing any street parking, and without preventing the buses from pulling over.	2035	Y	25	Adjacent Residential	Y	16	Y	no answer	Arts, Design, Entertainment, Sports, and Media Occupations
204	Positive. I like the street enhancements, including the removal of parking spaces. I bike and walk in my neighborhood, my home as off street parking.	2048	Y	1	Y	N			50-59	Healthcare Practitioners and Technical Occupations
205	Very negative. See above.	2058	Y	25	Y	N			no answer	No Answer
206	Positive. I love the influx of new mixed use.	2061	Y	8	Y	N			no answer	No Answer
207	negative--new buildings are imposing and unpleasant. construction process has been disrespectful and destructive of existing property and community. the city has been indifferent to the needs and concerns of residents.	2063	Y	20	Y	N			no answer	No Answer
208	I like the new dining options. I think the apartments are too large, and the lack of parking will degrade the neighborhood. Finally the size, scale and duration of the deconstruction/reconstruction has made Division an unsafe an unpleasant part of the neighborhood.	2064	Y	19	N	N			50-59	Other

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
209	Again, I really like D Street Village. But I cannot stand the increased presence of chain stores and especially the appalling, totally embarrassing and downright criminal *design* of the buildings.	2065	Y	13	N	no answer			40-49	Computer and Mathematical Occupations
210	Positive about the new shops and restos. Very attractive and welcoming feeling. I won't go if I can't park.	2147	Y	33	N	N			60-69	Retired
211	Ambivalent. See above.	2174	Y	11 [rented for 5, own house for 6]	Adjacent Residential	Y		N	40-49	Arts, Design, Entertainment, Sports, and Media Occupations
212	Positive about raising property values and more access to various stores, restaurants, etc. Negatives are the speed of traffic especially between 30th and 26th but pretty bad all up and down Division, and poor condition and marking of crosswalks.	2192	Y	8.5	Adjacent Residential	no answer			40-49	Education, Training, and Library Occupations
213	Negative. The city has picked a street that has one of the worst bus lines and created a corridor where 6 large apartment buildings with no parking have been built. There was no consideration for the neighborhood or what it would do to the surrounding areas. As a general whole all of Division street needs to be repaved--from 82nd to 12th.	2193	Y	8	N	N			30-39	Construction and Extraction Occupations
214	Generally positive. I like all the new eating establishments. I will be really disappointed if a bunch of chain stores (e.g lululemon) move in. I like the local stores and local chains (e.g. Salt and Straw)	2196	Y	9	N	N			40-49	No Answer

On 188177, Vol. 2.3.1, page 9876

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
215	A bit of both. Happy to see energy and creativity of the new businesses. But CURSE on the developers who brazenly built all this stuff with no parking. The developers have no connection to the neighborhood and don't care what happens to the atmosphere. It's all \$\$\$ and I find their approach to be shameless-- trying to maximize profits by jacking up rent and lease prices. Overall positively, because I feel like the walkability in my neighborhood has improved greatly and my home value is greatly improved. The density and sustainability are big concerns, but time will tell. Driving up and down Division is a pain in the ass; it reminds me of driving in a third world country, wrecking my suspension every minute of the way.	2197	Y	6	Y	N			no answer	No Answer
216		2204	Y	6	Y	N			30-39	Healthcare Practitioners and Technical Occupations
217	I feel positive about most of it - I like the cool new shops and restaurants. Obviously will increase our house value which I like, but it is possible that if it becomes a really big happening location, I may want to move to a quieter location.	2205	Y	10	Y	N			40-49	Education, Training, and Library Occupations
218	See above for positive and negative issues. Regarding parking, it has already begun to affect the street. For instance, partially blocking driveways or parking so close to your car, that you can't move it. Several of my neighbors don't have off street parking. In the future, they may have to park somewhere else than our block and I think that's wrong!	2206	Y	36	Y	N			60-69	Retired

Ord. 18817, Vol. 2.3.H, page 9877

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
219	It's pretty clear by now that I see this as a negative thing...mostly because of poor planning and lack of time put into the end product. People and businesses that have resided in this neighborhood for years or decades are going to be forced out, if they haven't already, due to the costs. Parking and driving have already become a huge problem, and the buildings aren't complete or filled with tenants or businesses yet.	2210	Y	27	Adjacent Residential	N			30-39	Education, Training, and Library Occupations
220	I enjoy that many of the businesses are locally owned, I don't mind the food scene even if I think it's kinda ridiculous. What I hate, hate is the speed at which these changes have taken place, the lack of cohesion with the older neighborhood, the disruption to foot and car traffic and the condos.	2211	Y	9	N	N			30-39	Office and Administrative Support Occupations
221	Positively. As answered above: walkability, diversity, street life, having lots of services (grocery, stores, etc). And the food! The food is so good.	2213	Y	7	N	Y	5	N	30-39, 30-39	No Answer
222	Positive More small commercial spaces More variety of goods and services Negative Difficulty crossing the street very limited parking and no parking structures available	2216	Y	36	Adjacent Residential	Y	30	N	no answer	No Answer
223	Both. I feel positive b/c I like experiencing the opportunities for eating out. Negatively b/c I'm worried about the impending parking disaster that has been created by developers not including parking spaces with the new buildings (I think over time this will make those buildings unattractive to live in).	2218	Y	7	Y	N			30-39	Management Occupations

Ord. 188177, Vol. 23, H, page 9878

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
224	Positively because it is adding value to the neighborhood by increasing density and also business options. Negatively because Division street in its current state is unable to handle the influx of traffic for cars, bikes, and public transit. I don't know the solution. Also making a BRT on Division is ridiculous being that there is only one lane in each direction for traffic. BRT's have to have lanes to be effective that way they are not stuck in traffic. However that being said this is the nature of the beast. Traffic has to become so bad that riding public transit becomes a worthwhile and effective mode of commuting otherwise you'll never get people out of their cars.	2220	Y	3	Y	N			30-39	Business and Financial Operations Occupations
225	Both - positive about the new business, negative that traffic has significantly worsened.	2242	Y	22	Y	no answer			50-59	Architecture, Engineering, & Urban Planning Occupations
226	I generally feel positive, but I think the developers of the buildings are getting through the design review process much too easily. These buildings are going to exist for the next 40-50 years. The materials used on them look like they might start degrading within 3-5 years. I'm	2251	Y	2.5	N	N			30-39	Architecture, Engineering, & Urban Planning Occupations
227	In general I feel positive about it, with one major caveat. The Clinton bike boulevard is seriously compromised by cut through traffic. There needs to be a significant investment in enforcement, narrowing the streets, and installing barriers to improve the bike environment.	2261	Y	more than 9	N	no answer			30-39	No Answer
228	positive, this area (by fluke of timing) has captured the need for much more high-density housing in SE. I think the new buildings are attractive.	2267	Y	8	N	N			30-39	Life, Physical, and Social Science Occupations

Ord. 18877, Vol. 2.3.H, page 9279



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
229	positively for the most part because I like the businesses that are opening up shops there. however, the impact of all this development in a short period of time is causing issues in terms of transportation and connections to the area and through it. i'm concerned that less of the existing buildings and urban fabric will continue to be lost.	2269	N	no answer	N	N			40-49	Architecture, Engineering, & Urban Planning Occupations
230	Negative for now, but it will grow to be better in the future. I don't think this is the best place for density. Bldg. heights should not be higher than three stories. There will be more traffic on Division because of it. It needs better bus service and more primary business functions making walking and biking more efficient.	2275	Y	40	N	N			60-69	Retired
231	Mostly negative, see previous answers. For positive, mostly for some additional eatery options, not that I really need them, given all the choices relatively nearby.	2276	Y	30	Adjacent Residential	no answer			50-59	Education, Training, and Library Occupations
232	See above.	2277	Y	no answer	Adjacent Residential	Y	1	Y	50-59	Healthcare Practitioners and Technical Occupations
233	highly mixed. much of the development is oversized and drab, while transportation infrastructure is woefully inadequate given the levels of density we're now approaching. the new real estate brings in bars and restaurants and touristy retail, of which we already have plenty. i'd be despondent if development like in the mid 30s/upper 20's crossed 39th... like? density is good, if sensible. restaurants are nice, if one can afford them...	2281	Y	no answer	Adjacent Residential	N			40-49	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3.H, page 9880

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
234	The increased density along the transit corridor is positive. Some of the shoddy materials used, the lack of visibility into the buildings created by poor design, the lack of pedestrian amenities, and the lack of affordable housing is negative.	2290	Y	9	Y	Y	4	Y	30-39	Computer and Mathematical Occupations
235	Positive -- I love visiting the new businesses and supporting them Negative -- too much traffic; not easily accessible from other neighborhoods via public transport; parking is becoming a nuisance	2291	Y	more than 15	N	Y	3	N	40-49	No Answer
236	I feel positive. Despite my criticisms (above) about the closed off nature of the buildings, they are somewhat in tune with what a progressive vibe for the area should look like. I'm torn about the no parking. It's ludicrous to think that people will not have cars. But there must be some form of convenient transportation through the area for people to not need to drive. Finally, the sidewalk are way, way, way too narrow and dark. Narrow sidewalks are uninviting for walking traffic.	2293	Y	5	N	Y	12	N	50-59	Arts, Design, Entertainment, Sports, and Media Occupations
237	Positive about the street and sewer improvements, but betrayed by City Planning for allowing such density with no parking. They are foolish to think people will move here without cars. Cars are now showing up on neighborhood streets for days.	2298	Y	20	Y	N			50-59	Office and Administrative Support Occupations
238	Mixed. I have no problem with density, but I wish some of the new housing units were affordable. I also wish that all the new buildings weren't just large boxes.	2300	Y	a little over 2	N	N			no answer	No Answer
239	Generally, positive improvements in terms of new businesses; construction has been a hassle because of impacts on neighborhood (noise, dirt, parking, congestion), but hopeful that short-term pain will result in long-term gain.	2303	Y	12	Adjacent Residential	N			no answer	No Answer

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
240	See my last answer.	2304	Y	2.5	N	N			40-49	Business and Financial Operations Occupations
241	negative. See above.	2305	Y	30	N	N			70-79	Education, Training, and Library Occupations
242	Positive: I like the increased number of restaurants and new construction. Negative: I would like to see fewer tiny apartments and more larger condo projects. This will increase longterm residents and neighborhood stability. I'd like to see more small retail and commercial businesses that would support the livability of the surrounding neighborhoods.	2306	Y	5	N	N			40-49	Healthcare Practitioners and Technical Occupations
243	I feel negatively, but optimistic. Traffic has gotten more congested. Driving, walking, and biking feel less safe. I see an influx of visitors from out of the area for dining, which is great for the local economy, but I fear that it will push out the locals-dining-and-shopping-local aspect that has given the area so much charm. However, some of the new dining and drinking options are exciting and add spunk.	2307	Y	15	N	N			50-59	Business and Financial Operations Occupations
244	I like better dining within walking distance, but especially around 34th or so the traffic is congested, there is little parking, and people who I assume are not from the area seem to be driving fast and are oblivious to foot traffic.	2310	Y	12	Adjacent Residential	N			40-49	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2, H, page 9882

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
245	I have both strong positive and strong negative feelings about recent development. I like to see new businesses that serve folks from a variety of economic levels. I enjoy walking to the range of restaurants and shops within a mile of my home. But I also find the side streets crowded with traffic from outside the neighborhood and worry that many businesses will only survive if they can rely on wealthier customers coming by car from other neighborhoods.	2312	Y	39	Y	N			40-49	Computer and Mathematical Occupations
246	I have mixed feelings. I like the development of new buildings that incorporate wood into their facade but I hate the new high rises that look very generic. I do not agree with all of the new apartments being built without room for underground parking!!! And now that the curb extensions are being put in there is even less parking. Someone should have coordinated this better.	2319	Y	35	Adjacent Residential	Y	25	N	60-69	Business and Financial Operations Occupations
247	no answer	2321	N	no answer	N	N			50-59	Computer and Mathematical Occupations
248	Negative. Lack of parking, leading to visitors parking throughout the neighborhood, noise, pedestrians crossing Division wily-nily, noise, unfriendly newcomers, houses that don't fit in with the neighborhood. The neighborhood was one of the friendliest in Portland (lived on the east side all of my life) and that is rapidly disappearing. The constant construction has had a negative impact - dirt, dust, noise, inconvenience.	2347	Y	23	N	Y	18	N	no answer	Legal Occupations

Ord. 18847, Vol. 2.3.H, page 9883

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
249	I am really sorry to see this street become so upscale, a destination spot for all kinds of tourists. date nights etc. It used to be so low key, pleasant, great thrift store shopping etc. I can also see how young hipsters from all over the country would decide to settle here. (I have seen license plates from all 50 states!) They seem to be nice people. But it is a huge upheaval for us native Portlanders. We don't really like it at all.	2349	Y	7	Y	N		no answer	60-69	Healthcare Practitioners and Technical Occupations
250	Negatively, mostly. It's scary to see such a rapid change with little regard for limits on giant, towering single family homes taking over our neighborhood. Environmentally, we should be encouraging small homes, not one or two massive ones on a lot. Parking is a huge problem.	2358	Y	22	Y	Y	19		60-69	Healthcare Practitioners and Technical Occupations
251	both. I think the buildings are tastefully done aesthetically -- I just wish there were less of them, and thought out in terms of how to peacefully blend in with the neighborhood (i.e. offering parking - not cramming a bazillion buildings offering expensive 'efficiencies' into 20 blocks, etc.) Also, the fact that these spaces are still renting for about \$900/mo, means that SE div will stay and possibly become even more homogenous - no thought to providing lower income housing to the folks that really don't have cars, or the money to take public transport to work everyday, who could really benefit by being close enough in to walk or bike. Again, this seems due to the developers having their main objective be \$\$\$\$\$\$\$\$ and the sad reality of gentrification.	2362	Y	7	N	Y	4	Y	30-39	Healthcare Practitioners and Technical Occupations

Ord. 188177, Vol. 2.3.H, page 9884



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
252	family owned businesses are the backbone of the neighborhood. when you replace those with cookie-cutter micro apartments you are sending a message that the existing community is not important, and that a more moneyed segment has a higher priority. affordability is important for everyone, as is a sense of community. developers don't give a rat's ass about the people who live in the neighborhood as long as they can come in and make their money.	2363	Y	25	N	N		no answer	no answer	No Answer
253	At this point with all of the traffic congestion on SE Division I feel negatively about the recent development. I am disappointed that the development has not incorporated green spaces in/around the new condo buildings. Plus I fear that the development will lead to gentrification in my neighborhood.	2368	Y	16	Y	N		no answer	60-69	Community and Social Services Occupations
254	Negative. Destruction of retail business; no parking for new residences; upscale residential is pushing out local working class residents and businesses	2434	Y	20	Y	Y	10	Y	50-59	Legal Occupations
255	Both... I like and patronize a lot of the businesses that have gone in, but I am disappointed that the construction has been so generic looking.	2781	Y	6	Y	N		no answer	no answer	No Answer
256	Overall I feel negatively about it. The fact that little if any parking was provided is a big negative but even worse than that is how they look. Positive would be all the new retail on the street.	2782	Y	25	Y	N		no answer	60-69	No Answer
257	Positive. It has provided an abundance of walkable options for dining in particular. Hopefully other types of businesses will follow. At our location, we are unaffected by any parking or crowding issues.	2786	Y	1	N	N		no answer	25-29	Architecture, Engineering, & Urban Planning Occupations

[Order 188177, Page 9885](#)  
[Order 2.3.H, Page 9885](#)

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
258	For the most part the improvements are welcome, except for the complete lack of enough planned parking for all the new condos, shops and restaurants. That makes all of us long time residents extremely angry with the city for allowing that.	2789	Y	19	Y	no answer		no answer	40-49	Arts, Design, Entertainment, Sports, and Media Occupations
259	negative: increased congestion compounded by poor pedestrian crossing control, Gentrification/pricing out of the businesses I like which are replaced by businesses that are too expensive.  The intersections at Seven Corners and Division and 11th are almost insufferable at times. There really should be a dedicated left turn lane that allows west bound through traffic past at 11th even if it means losing a few parking spots.  positive: new food cart pod, good examples of more sustainable buildings	2806	Y	7	Y	N		no answer	30-39	No Answer
260	I have mixed feelings about the recent development.  I like the developments that provide retail space below and apartments above. I also like when the architecture of the building fits the existing funky character of Division St. I like when there is underground parking for the apartments.  I don't like the bland, tall (over 3 stories) box buildings that lack color and character and do not provide outdoor gathering or seating areas or landscaped areas around the foundation of the building.	2807	N	no answer	no answer	Y	2.5	N	no answer	No Answer
261	Negative in how generic everything looks and worsening of parking/traffic conditions	2846	Y	2.5	Y	no answer		no answer	30-39	Legal Occupations

Ord. 188177, Vol. 2.3.H, page 2686

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
262	Extremely negative. Noise, pollution, speeding cars, people leaving trash, parking, blocking access to sky, blocking sunlight from neighborhood gardens, no real green spaces added (a couple of apt. building courtyards).	2847	Y	2	Y	N		no answer	no answer	No Answer
263	Mainly feel negative--crowded feeling created by the large 4 story buildings taking up all their land and so much light and space due to boxy style. Exponential increase in cars, driving on Division St and nearby streets and filling all street parking spaces. Adjacent streets have become essentially one lane streets with all the cars parked on both sides.	2852	Y	33	Y	N		no answer	60-69	No Answer
264	Negative: Division is starting to look like a street in any urban are anywhere. Lack of access to sun and views. Gentrification (many families priced out of market).	2853	no answer	no answer	no answer	Y	no answer	no answer	60-69	Other
265	neutral. Wish the developments were more geared towards families versus hipsters. Also the cost of house rentals have gone up so families can't afford them, so most our neighbors are now houses full of 20 somethings (who act like they still live on a college campus)	2862	Y	7	Y	N		no answer	40-49	No Answer
266	I think I've already established my negative feelings and why. Nothing new to say. I think the biggest issue is that cars don't work here and I often don't go to restaurants by bike. The street no longer offers neighborhood services. I really hate it now.	2865	Y	28	N	Y	3	N	50-59	Architecture, Engineering, & Urban Planning Occupations
267	Negatively. Very negatively.	2866	Y	30	Adjacent Residential	N		no answer	60-69	Education, Training, and Library Occupations

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
268	negative - addition of many housing units without consideration of parking. developers holding meetings with the neighborhood, but not listening - just pushing their agenda	2868	Y	8	Y	N		no answer	60-69	Architecture, Engineering, & Urban Planning Occupations
269	VERY negative. The boxy over designed buildings that are just square and tall are tacky and close feeling. The level of people coming into the street really don't care about the quality of Division. There is NOTHING unique about Division anymore. Other than it looks cheap and ugly. And it's hard to travel in that area.	2869	Y	25	N	no answer		no answer	50-59	No Answer
270	Negative. Ugliness. Lack of conformity to character of neighborhood. Rude visitors who leave their trash on our streets. Speed. Take up our parking.	2872	Y	3	Y	N		no answer	90+	Retired
271	See above.	2873	Y	20	Y	N		no answer	no answer	No Answer
272	somewhat negative due to lack of affordability of housing, and lack of diversity of businesses.	2879	Y	7	no answer	N		no answer	60-69	Retired
273	The Division Street development has spurred a 30% increase in my rent within 3 months. I've enjoyed renting in this neighborhood but cannot justify the amount I'm now paying to live here. I'll be purchasing a home in a more interesting and diverse neighborhood within a year.	2939	Y	3	Y	N		no answer	40-49	Business and Financial Operations Occupations
274	Negatively. The main issue is the changing class dynamic. This is seen in skyrocketing rents and a shortage of rentals that are not vacation rentals. My own rent went up \$145 in the past 6 months, whereas it had never been raised in 3 years.	2941	Y	3.5	Y	N		no answer	30-39	Arts, Design, Entertainment, Sports, and Media Occupations

Ord 88177, Vol. 2.3.174 page 9888

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
275	negative: pricing long-term residents out, and pricing long-term businesses out.	2944	Y	22	N	N		no answer	40-49	No Answer
276	negative. too much congestion, looks like a generic city instead of what made portland unique	2947	Y	13	N	N		no answer	no answer	No Answer
277	Very negative. This development is atrocious. I feel like moving, as does half the neighborhood. Aside from the traffic jams, the way it changes the "vibe of the neighborhood", the general uniform "barracks"ugliness, I feel it is pushing out low-to-middle-income folks, in favor of becoming a playground for those who can afford the high rent condos. We made it cool--so developers want to build here, and then the cool people will have to leave!	2961	Y	15	Y	N		no answer	40-49	Business and Financial Operations Occupations
278	Positive--A city has to modernize and grow or it dies, essentially. Growth should be intelligent.	2976	Y	1	N	N		no answer	no answer	Architecture, Engineering, & Urban Planning Occupations
279	Negative. Lego building styles, no open space like a small park, things too close to sidewalks. Ugly Swales that take away parking and will be trash filled.	3009	Y	9	N	N		no answer	60-69	Business and Financial Operations Occupations
280	Negatively. My sense is that the neighborhood has become a destination rather than a neighborhood that the people who live in it enjoy. This means that parking is difficult (and driveways are often blocked) and that the visitors are not always respectful of the neighbors (I have heard stories of people peeing in yards).	3350	Y	8	Y	N		no answer	40-49	Arts, Design, Entertainment, Sports, and Media Occupations

Order 88177, Version 2.3.H, page 9889



#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
281	Feel mostly negative. Neighborhood is no longer affordable for most lower to middle class people Congestion. Lack of parking in apts and condos. That was a huge mistake. People have cars and if they can't park them where they live they will park in someone else's spot. Lots of older homes have no garage or driveway. No green spaces and parks in development	3591	Y	30	Y	N		no answer	no answer	Healthcare Practitioners and Technical Occupations
282	positive, see above	3675	Y	7	Y	no answer		no answer	60-69	Retired
283	Negative. Excessive parking problems for the surrounding neighborhood for two reasons: Multifamily housing units allowed to be constructed without ANY off-street parking and the proliferation of regionally-oriented 'high-end' trendy restaurants which attract shiploads of out of community auto traffic which then creates parking problems.	3676	Y	30	Adjacent Residential	N		no answer	60-69	Education, Training, and Library Occupations
284	mostly negatively. the new construction has come with little parking for new units. this should never have been allowed.	3678	Y	1.5	Y	Y	5	no answer	50-59	Education, Training, and Library Occupations
285	Positive	3680	Y	68	Y	Y	25	Y	no answer	Other
286	Negative -- city planners and developers made sure to ruin all that was good about the neighborhood by concentrating on exactly that which it didn't need (overpriced trendy restaurants and shops, expensive apartments for people with no sense of taste, narrow streets with limited parking, etc.)	3681	Y	4	N	Y	2	N	no answer	No Answer
287	Positive. Newness.	3683	Y	18	Y	N		no answer	40-49	No Answer

Ord. 188157, Vol. 2.3.H, page 986

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business in Division study area	Age	Occupation
288	It's a toss up.. I like the activity all the new stores bring but regret the parking hassles that the nearby homes have to contend with. Also, would like to see more variety in store offerings, i.e. too many restaurants and bars (with no live music!).	3684	Y	21	Adjacent Residential	N		no answer	70-79	Retired
289	Positive, see above. biggest problem is speed limit is too high for street. like the re-done street design but needs more signals/crossings to control car speeds.	3687	Y	4	N	N		no answer	no answer	No Answer
290	Our Division Street needed a face lift and a bunch of vitality added. I love more housing and retail coming in. Problems are Boring street design building wise which causes a lack of "wanting to stay and explore what is offered in the retail spaces". Lack of pedestrian crossings at the end of each bloc and sometimes mid block hurts because it makes j-walking inevitable and dangerous. I think more diverse business will come in as construction settles and more folks pay attention to what is needed and what there is already enough or too much of.	3690	Y	45	N	Y	15		no answer	Arts, Design, Entertainment, Sports, and Media Occupations
291	See above. Some of each. It felt pretty sleepy before, so I like the revitalization. But I wouldn't want to see it get too much more "revitalized" if that means lots more people and traffic, boring-looking buildings, higher rents that force out local businesses (and residents), more meat-centric and expensive restaurants... etc.	3692	Y	19	Y	Y	8	Y	40-49	No Answer
292	I feel mostly positively - love many of the new shops and restaurants, worry about what things will look like once all the new apartments are occupied. Too many cars!	3701	Y	8	Y	N		no answer	30-39	Community and Social Services Occupations

Ord. 18877, Vol. 2.3.H, page 9891

#	Do you feel positively or negatively about recent development on Division? If positive, what are the elements you like? If negative, what are the biggest issues or problems?	Survey ID #	South-east area resident	Duration of residence (years)	Division study area resident	Business owner	Duration of business owner-ship	Business Division study area	Age	Occupation
293	Positive. I love the growth and renewal. This area was really run down years ago. I like that it's not being redeveloped with national chains - but local successful businesses.	3708	Y	2	Adjacent Residential	Y	2	Y	40-49	Business and Financial Operations Occupations
294	I can't say that I feel positive about the recent development. However, I believe it is necessary to build MDUs in inner city Portland and, I guess, it's our turn.  However, I feel it is very cynical of the Bureau of Development Services to allow MDUs to be built without any or minimal parking spots available to tenants. Just because Division has been designated a transit corridor, doesn't mean people won't have cars. I don't believe Tri Met goes to Mt Hood for skiing and hiking or the Oregon coast, etc.  The consequence of that policy is streets over run with cars parked on our, once upon a time, open spaces in front of our houses. I have had people block 6" of my narrow driveway making it very dicey trying to park my car in my narrow driveway. There are no useable garages on my neighborhood street that can be used to park resident's cars. Therefore, my neighbors that have two cars need their driveway and the spot in front of their house for parking their cars.	3710	Y	36	Adjacent Residential	N		no answer	60-69	Retired
295	Negatively. All the building store-fronts look the same. They lack any personality.	3712	Y	9 months	Adjacent Residential	N		no answer	40-49	Education, Training, and Library Occupations

Ord. 188177, Vol. 2.3, page 9892

Dear Planning & Sustainability Commissioners,  
Attached is a letter of testimony the Division Design Committee (DDC) submitted in March of 2015 (cc'd to the Planning Commission), regarding comments on the Comp Plan and Mixed Use Zoning. We would like to request this also be considered as part of your deliberations on the new MUZ proposal.

As evidenced by multiple letters of testimony from the DDC at past key points in the process of the development of the Comprehensive Plan and Mixed Use Zoning, we have been bringing to you a consistent message regarding development concerns that to date have not been well addressed including:

- 1) Need for Increased Community Input and Notification
- 2) Desire for Increased Design Review requirements and policies to preserve character, context, and quality
- 3) Preservation of Important Visual & Cultural Resources
- 4) Need for Impact Analysis for new development proposals to fully assess and mitigate significant impacts

We have now created recommendations for Community Input & Notification that have been adopted by the Richmond Neighborhood Association that addresses #1 above and the compatibility and context issues in #2 above - (see attached Richmond Policy). We have also proposed a solution for #3 above on Preservation (waiver of SDC for adding density and upgrading through adaptive reuse of older buildings) and to City Staff for a "Sustainability Scorecard" to address issue #4 above (See Response to Staff Matrix on DDI Top Ten Policy Recommendations).

We hope our recommendations can be a starting point for further creative solutions. As an example, if the low-rise vintage proposal (which we support) does not meet with approval, it does not negate the issue that we need better tools for preservation. so we ask you to consider our detailed recommendations carefully as they represent many of the key issues that neighborhoods feel related to priorities around compatibility, context and design.

Given our extensive research, two year community engagement effort and creative policy solutions recommended, we would welcome an opportunity to better brief the PSC on the real on-the ground community concerns and priorities we hear expressed by citizens broadly in Southeast and echoed frequently by citizens across the City.

Thank you for your consideration,  
Heather Flint Chatto, Urban Planner & Designer  
RNA Board Member, Division Design Committee Member  
2121 SE 32nd Avenue, Portland OR 97214

March 13, 2015

Portland Planning & Sustainability Commission  
1900 SW Fourth Avenue, Suite 7100  
Portland, Oregon 97201

RE: Division Design Committee Comprehensive Plan Comment Letter

Planning & Sustainability Commissioners:

On behalf of the Division Design Initiative we respectfully submit this letter to provide comments on the Comprehensive Plan Update. The Division Design Initiative (DDI) is a grassroots inter-neighborhood coalition of neighborhood, business and community organizations formed in late 2013 to respond to wide community concerns about design issues and the lack of meaningful community involvement in the major redevelopment of the Division Corridor in Southeast Portland. The mission of this group includes creating design, planning, education and engagement tools that many neighborhoods can use to help shape the growth and change they are facing.

As a sustainability-minded coalition, we fully understand that to accommodate the growth that is projected to come, it will need to happen as infill within our existing urban areas, with more compact development a part of this tradeoff to maintain our Urban Growth Boundary. However, as neighbors who are living through this dramatic transformation we have a unique perspective into what is working and what is not working. We hope that our experience can help to guide you to focus on areas that need improvement so that both our main street and other areas of the city that are slated for growth in the Comprehensive Plan can grow in a way that is broadly supported.

Attached is a proposal for increased notification and community involvement for your consideration. We have also attached community responses from the Division Perceptions Survey developed by Portland State University in partnership with the Division Design Initiative. This represents only one of the questions, and we would be happy to share further data. We have been analyzing survey results with a technical consultant and will continue to share further research reports. In the meantime, we have provided these comments verbatim as evidence of the broad community concerns identified.

At the neighborhood level we hear strong interest in needed changes, specifically in the Comp Plan, to address lack of opportunity for meaningful input, design concerns, and impacts from larger new development projects including loss of community character, solar access, affordability, and increased gentrification and displacement. Others have spoken about the need for more family-friendly housing and affordable residential and commercial units, so we would like to focus our testimony on the following:

- 1) Need for Increased Community Input and Notification (see attachment)
- 2) Desire for Increased Design review requirements and policies to preserve character, context, and quality
- 3) Preservation of Important Visual & Cultural Resources
- 4) Need for Impact Analysis for new development proposals to fully assess and mitigate significant impacts

The Division community has witnessed a rapid transformation of our main street and there is real concern that the new construction that is occurring along Division fails to recognize the existing character of the neighborhood.

Portland neighborhoods are known and loved for their village-like main streets, small local businesses, and unique identity that make them special and desirable. However, the current trend of development that is occurring in the city has been noted by many as a distinct contrast to the existing character, pattern, and architecture of many neighborhoods. The Comp. Plan falls short when it comes to promoting new development that respects a neighborhood's context. Currently, new population growth is almost



exclusively being accommodated through multi-family and mixed use buildings that are significantly bigger than what previously existed along Division. Concerns about lack of context, uneven quality, poor scale relationships to the narrowness of the street, loss of solar access, lack of landscaping and green space, and increasingly homogeneous design are frequently heard in survey results and public meetings and are in direct contrast to community design goals and priorities. We recommend the following to address these issues:

**1) Adopt policies that support increased design review, consideration of quadrant design commissions, and new context-sensitive design standards that respond to neighborhood patterns and priorities.**

Many community members have expressed concern and surprise that neighborhoods do not have the benefit of formal design review and there is increasing concern by residents about the limited ability for any meaningful input in the quite dramatic changes taking place. How can we support well-designed compact development that also respects existing community character and identity? This is an identified goal in many City policies yet is ineffectual in practice without any design review requirements or more neighborhood specific guidelines that can help provide necessary design context and clarification of community priorities.

The strong expansion of Portland's urban network from the central city necessitates extension of other policies and procedures that have helped re-shape our downtown into a walkable and livable place, most critically the need for a design review process. Of particular interest is the idea of quadrant level design commissions. The scale and character of new development is in sharp contrast to that of the existing neighborhood and more akin to development one would expect to see in the central city yet most neighborhoods are left without the tools needed to effectively guide these new large scale redevelopments in practice. In response, many have expressed an interest in design guidelines that will help articulate the community design preferences and the Division Design Committee is now working with technical consultants to develop design guidelines for a 50-block segment of the Division Corridor. Other neighborhoods such as Boise have done the same. This is a heavy lift even for communities that do have the organizational and technical resources and an incredible challenge for those that do not have these tools needed to manage such dramatic growth. Without the benefit of design review, there is little recourse for communities to have a say in the dramatic changes taking place overnight. We ask you to help shape a broadened design review process that meets the needs for community members and stake holders throughout the city where these urban corridors are envisioned to provide new density and amenities for livability. We urge you not to eliminate our main street overlays which do provide the limited character specific guidelines for some neighborhoods that should frankly be augmented to support more neighborhood-sensitive context and design. We need buildings that are designed better to blend within the fabric of our neighborhoods and tools and processes that allow for more input into the design of buildings. Increased design review, broader notification and neighborhood input processes for such large scale changes are needed and not addressed in the Comp Plan.

**2) Improved Notification Requirements & Neighborhood Involvement Policies**

Change is never easy, but the pace of the change has been especially challenging for many of us. What can be done to make this easier to digest? One area we would like for you to focus on is community involvement. For years you have been hearing how neighbors don't feel like they are given adequate notice of new development. This is your opportunity to fix that. Attached is a Notification Proposal that is a summary of recommendations heard throughout our planning and research efforts over the last 18 months. The DDC has voted to recommend the City consider this proposal and integrate these recommendations into a new public involvement and notification process. Broadly, these encourage further enhancements such as requiring letters of support from Neighborhood Associations and Business Districts, a courtesy visit early in the process to the neighborhood association before designs are set in stone and when opportunities for impacts to be identified and minimized, and a required follow up form for addressing how community comments are being addressed or not rather than simply a letter stating the community has been given a presentation and here was the feedback with no required format or process to respond or address neighborhood concerns. Notice alone will not solve neighborhood discontent, but it can go a long way to ease the transitions that are going to take place if the Comprehensive Plan's visions are realized.

**3) Update City inventories of important visual, cultural, and historic resources & promote incentives for preservation.**

The Division Design Committee supports an update to the city's visual and cultural resources inventory as well as the historic resources inventory. Currently, the Visual Resources Inventory does not extend beyond SE 12<sup>th</sup> Street. Some important visual resources need enhanced protection. They provide a connection to sense of place and character defining community cultural and historic resources. When we block important monuments such as the Hollywood Theater with new development, we impact neighborhood visual and cultural treasures that contribute to neighborhood identity and community history. We understand that private views are not protected, however when we build so tall in SE that we block public views of the West Hills we lose our connection to sense of place. Studies like Preservation Green Lab's recent report, "Older, Smaller, Better", reinforce that mixed vintage neighborhoods have stronger economic vitality, more jobs, and provide more cultural diversity and income diversity. These buildings also contribute to the unique identity that defines Portland's neighborhoods. A growth strategy should provide more incentives for preservation and adaptive reuse of Portland's older viable historic buildings.

**4) Need for Impact Analysis for new development proposals to fully assess and mitigate significant impacts**

Significant impacts to the neighborhood and adjacent properties from new development are not fully assessed or considered when determining approval of new developments. Community members have expressed concerns about loss of solar access, increased congestion and traffic impacts, loss of historic resources, loss of affordable housing, and privacy and visual impacts. To balance goals for increased density in the Comprehensive Plan with the potential development impacts, the City should consider City and State support for required impact analysis and mitigation of any significant impacts.

Lastly, we'd like to emphasize Division Design Initiative is a direct response to some of the gaps that currently exist in our systems. This effort came about, in part, because community members felt strongly that there has been little response to very vocal design concerns expressed in frequent testimony in 2012, 2013, and 2014 on the design impacts and concerns by neighbors across the City. This group is not only citizens, residents, and activists, but also business owners, architects, planners, designers, lawyers, and other professionals. We are not an anti-development or anti-density group, we are an advocacy group for increased community input and design that fits the community goals and preferences. We understand the budget realities facing the city, but we also know that we are not the only neighborhoods that are concerned with these issues. Changes to the mixed use zones is one step but increased notification requirements, enhanced community involvement and design review process that help support community character and context are necessary requirements to help better ease the transition of our city as it grows in such a rapid manner.

Thank you for the opportunity to comment and for your work to help the City of Portland balance long-term goals for increased density with current resident goals and priorities for livable neighborhoods and more participation in the planning and design process.

Sincerely,



Heather Flint Chatto, Urban Planner & Designer, Richmond Resident & RNA Board Member, DDC Member

Submitted on behalf of the Division Design Initiative & the Division Design Committee\*  
Division Design Initiative | 3534 Main Street, Portland Oregon 97214 | [www.divisiondesigninitiative.org](http://www.divisiondesigninitiative.org)  
[ilovedivision@gmail.com](mailto:ilovedivision@gmail.com)

*\*Membership of the DDC includes appointed and elected members from the following organizations: Richmond Neighborhood Association, Hosford-Abernethy Neighborhood District, South Tabor Neighborhood Association, SE Uplift, Sustainable Southeast & the Division-Clinton Business Association*

# Richmond Neighborhood Association

## 3-Step Notification & Community Engagement Process

The following 3-step notification policy was approved by the Richmond Neighborhood Association (RNA) Board on March 14, 2016 in response to extensive neighborhood input about a desire for more notification and ability to have more meaningful and timely input about the future growth of the Richmond Neighborhood. For questions about meetings and notification contact the Richmond Neighborhood Association.

### 1 Notification for Proposed Projects

- a) **Projects  $\geq 5,000$  SF or  $\geq 5$  units proposed within the Richmond neighborhood should provide notice to the following potentially affected nearby stakeholders:** Business Association, Neighborhood Association, local historical society [if impacting any permanent structure built prior to 1940\*], and adjacent neighboring properties and residents (including rental apartments) within a 500 foot radius.

\*This date is defined as a threshold established because of the traditional quality building stock that exists in the Richmond neighborhood from this time period and earlier including Victorian, art deco, craftsman, early 20<sup>th</sup> century commercial main street mercantile architecture etc.

### 2 Neighborhood Association Visit(s)

**When to Come to the Neighborhood Association:** A minimum of one visit to the neighborhood association is encouraged (and is required if on Division Street per City policy) to present an overview of the project to area residents, businesses, and property owners. However two visits to the project's neighborhood association (NA) are encouraged as follows:

1. Suggested Courtesy Visit to the NA at the "Conceptual Design" stage: Visit to the NA to gather general feedback and give early notice. Timeframe: ideally within 90-180-days prior to submittal.
2. Pre-Permit Visit: Building applicants should make a presentation visit the Neighborhood Association not less than 60 days prior to building permit submittal.

#### What Project Materials to bring to NA meeting:

1. Site Plan & Proposed Building footprint/plan - Minimum of 25 - 8x11 copies denoted with scale, north arrow, existing trees (and size of DBH –depth at breast height), and showing adjacent surrounding development.
2. Building Façade Elevation Drawings showing proposed building in context with existing adjacent building and block development.
3. Solar Shading Analysis – illustration of solar shading impacts to adjacent development
4. Privacy & View Impact Analysis Drawing – showing how the placement of windows and balconies may or may not impact adjacent neighboring properties privacy and may impact any important public views.

### 3 Follow up: Applicant Comment & Response Form

An applicant should document and submit a list of comments received from the Neighborhood Association Meeting to the Neighborhood Association with a responding statement for each comment as to how each are being considered.

Neighborhood Association: Date of Visit:	Applicant: Owner:
<b>SAMPLE NEIGHBORHOOD COMMENTS</b> <ol style="list-style-type: none"><li>1. Preserve mature tree at NE corner</li><li>2. Prefer balconies at street</li><li>3. Vary window patterns – continuity with variation</li><li>4. More street entries desired</li><li>5. Step building height up and down</li><li>6. Vary rooflines</li><li>7. Commercial at the first floor, smaller affordable commercial spaces requested</li><li>8. More family-friendly unit sizes and amenities</li></ol>	<b>SAMPLE APPLICANT RESPONSE</b> <ol style="list-style-type: none"><li>1. Will relocate on-site to preserve</li><li>2. Now included on SE façade</li><li>3. Incorporated exist. neighborhood patterns for storefront window design</li><li>4. Added more frequent entries</li><li>5. Will consider this to maintain better solar access</li><li>6. Will discuss with architect</li><li>7. Cannot make this work with program without amenities bonus</li><li>8. Redesigning midblock of building to include shared courtyard with more green space and art, added several additional units</li></ol>

**Angie Even (17973)**

**Map App Address: 4410-4416 SE Woodstock**

This zoning is inconsistent with neighboring commercial property and should be zones CM2 along with the rest of the district.

**Gerald Lindsay (17974)**

**Map App Address: 3786 N Melrose Dr.**

To: The City of Portland Planning and Sustainability Commission

We write to ask the commission to consider the CM3 zone for the addresses (please see below) along N Killingsworth between N Borthwick and N Mississippi. As property owners at the intersection of N Albina and N Killingsworth, we have a strong community and personal interest in zoning decisions. In general terms, we believe that the CM3 designation is the most appropriate of those available within the 2035 comprehensive plan. Our perspective is based upon 2 primary considerations. One, such designation best suits the needs of both the neighborhood and the adjacent Portland Community College-Cascade campus, as this intersection and the blocks extending along N Killingsworth serve not only as a Center Main Street for the neighborhood, but also as a sort of campus City Center. Two, the unique transit accessibility of the intersection of N Albina and Killingsworth clearly supports higher density development.

Portland Community College-Cascade already exists as a vibrant hub of activity and acts as a major draw of citizens to this Center Main Street. As a home to well over 20,000 students and a campus development plan that has recently seen major additions, the college benefits greatly from local dense commercial opportunities and, we think, would benefit from more, denser housing opportunities. The CM3 zoning would strike the right balance between maximizing the ability of local properties ability to meet the needs of both the neighborhood and the student populations, while retaining the neighborhood center feel. While we think that a similar Center Main street would usually be best served by the CM2 zoning, the dual service as neighborhood and college Main Street, leads us to believe that a small section of higher density would best serve the current and future local development needs.

Transit is an important consideration, particularly when considering any increase in density. With regards to the addresses at hand, they are served by two high frequency bus lines and are 5 city blocks from yellow line max stations. In addition, Interstate 5, N Interstate Ave., and Martin Luther King Jr. Blvd. are in close proximity. Few intersections on the East side can boast more robust transit connectivity. We think this fact serves to mitigate the potential parking impact of future increased density. Additionally, allowing for greater density proximate to PCC-Cascade dovetails well with that institution's Transit Demand Management Plan. This plan specifically calls for an increase in the number of students walking to campus. Dense mixed-use development placed adjacent to campus properties options could hardly better serve this goal.

Other considerations that inform our testimony are as follows. None of the addresses that we propose for CM3 zoning about current low-density usage or zoning. The Piedmont conservation district will serve to prevent losses of important structures that contribute to the historic character of this vibrant Main Street.

Thank you for your consideration,

Gerald and Anita Lindsay



Addresses: 831-839 N Killingsworth, 832-838 N Killingsworth, 820-828 N Killingsworth N Killingsworth, 825 N Killingsworth, 819-823 N Killingsworth, 811-815 N Killingsworth, 805 N Killingsworth, 800 N Killingsworth, 722-740 N Killingsworth, 720-740 N Killingsworth, 710-718 N Killingsworth, and 700-708 N Killingsworth

**Jennafer Furniss (17975)**

**Map App Address: 1534 SE Rex St**

A beautiful mid century Duplex, this is ideal middle housing for this neighborhood. Much needed family housing that houses families, one with a young daughter who is adorable and their family hopes she grows up in this neighborhood. This should be zoned r2.5 realistically but at the very least should be CS1 as it is part of a low rise residential neighborhood and a step down from the commercial district.

**Jennafer Furniss (17976)**

**Map App Address: 1534 SE Rex St**

This is was originally an R5 lot and developed as such, it is in the middle of a residential neighborhood on a narrow street. This should be zoned R5, but at the very least R2.5 to provide future middle housing, CS2 is clearly inappropriate to be in the middle of a residential block on a narrow street.

**Jennafer Furniss (17977)**

**Map App Address: 1534 SE Rex St**

This is a single family residence in the middle of a residential block on a narrow street. At most it should be zoned r2.5 to provide future middle housing. There is not as yet adequate support in transit to support commercial dipping so deep into these narrow residential neighborhoods. CS2 is far to large a building for such a narrow street in the middle of a residential neighborhood.

**Jennafer Furniss (17978)**

**Map App Address: 1534 SE Rex St**

This is a single family home in the middle of a residential neighborhood on a narrow street. This is does not support CS2 development in the middle of a residential street. At best it should be r2.5 housing to support middle housing, triplex even, but not a four story building in the middle of a neighborhood. Even CS1 would be more acceptable, perhaps a fourplex, but CS2 is not supported here.

**Jennafer Furniss (17979)**

**Map App Address: 1534 SE Rex St**

This is a single family home in the middle of a residential neighborhood on a narrow street. This is does not support CS2 development in the middle of a residential street. At best it should be r2.5 housing to support middle housing, triplex even, but not a four story building in the middle of a neighborhood. Even CS1 would be more acceptable, perhaps a fourplex, but CS2 is not supported here.

**Jennafer Furniss (17980)**

**Map App Address: 1534 SE Rex St**

This is a single family home in the middle of a residential neighborhood on a narrow street. This is does not support CS2 development in the middle of a residential street. At best it should be r2.5 housing to support middle housing, triplex even, but not a four story building in the middle of a neighborhood. Even CS1 would be more acceptable, perhaps a fourplex, but CS2 is not supported here.



**Jennafer Furniss (17981)**

**Map App Address: 1534 SE Rex St**

This is a single family home in the middle of a residential neighborhood on a narrow street. This does not support CS2 development in the middle of a residential street. At best it should be r2.5 housing to support middle housing, triplex even, but not a four story building in the middle of a neighborhood. Even CS1 would be more acceptable, perhaps a fourplex, but CS2 is not supported here.

**Jennafer Furniss (17982)**

**Map App Address: 1534 SE Rex St**

This is a wonderful triplex, great middle housing for families. This should be zoned r2.5 or CS1 to support this excellent use of land. It is in the middle of a residential neighborhood on a narrow street and CS2 is not supported here.

**Jennafer Furniss (17983)**

**Map App Address: 1534 SE Rex St**

This is an ideal triplex, wonderful middle housing for families. This use should be supported with an r2.5 or CS1 designation, It is in the middle of a residential neighborhood on a narrow street on a narrow lot. It does not support CS2 designation.

**Nathan King (17991)**

**Map App Address: 6901 N Buchanan Ave**

Hello, my name is Nathan King. On May 9th I shared testimony expressing my concern for the changes proposed to small-scale zone CM1. Since sharing that testimony, I have had the opportunity to become more familiar with the details of the the Mixed Use Zones Project's proposal. Specifically, I believe I now have a more accurate understanding of the proposed changes to the FAR calculation. I now understand that in the proposal "All uses, including residential, are counted in floor area, which is a change from current practice which excludes residential from the calculation." If my understanding is correct, it is possible that the proposed characteristics of the new small-scale zone, CM1, much more closely reflect the same intent of the existing zones and therefore is much more likely to be viewed as acceptable. My apologies for any confusion my testimony may be causing.

**Denise Hare (18062)**

**Map App Address: 2536 SE 33rd Place**

I support designation of the blocks along Division St. from 35th to 38th Avenues to be preserved as vintage low-rise commercial areas. This is a great response to citizen input, helping to maintain the most attractive and desirable features of the commercial nodes, while still allowing for the development/density needed for future growth. The community appreciates that our voices are heard, and listened to, by the planning bureau. Thank you.

**David Mihm (18102)**

**Map App Address: 1982 SE 30th Ave**

I learned about the ongoing zoning revisions being proposed at the Richmond Neighborhood Association meeting last night. Doug Klotz of the RNA did an excellent job laying out the impact and implications of the proposed changes.

I was surprised and disappointed to see that there are still large swaths of red-colored areas along SE Powell between the Ross Island Bridge and 35th that this plan proposes to leave as "general commercial."

SE Powell is one of the widest/largest corridors in the entire inner eastside, soon to be served by a bus rapid transit system. It's one of the most natural places for large-scale residential building projects to happen outside the downtown core. And certainly is a more natural place for these kinds of projects than a number of locations where Mayor Hales' administration has already allowed them to occur (N. Williams is the most glaring example).

I had thought that Mayor Hales' embarrassingly-belated declaration of a housing emergency in Portland several months ago was designed to allow for all options to be on the table when it comes to zoning for more housing. Especially for more affordable housing, and especially for more affordable housing close to transit hubs.

This section of SE Powell seems like a perfect place for that to happen, and I strongly suggest it be considered more thoroughly to *\*at least\** be zoned as Mixed-Use as part of this process.

Sincerely,

David Mihm

**Blythe Olson (18331)**

**Map App Address: 2719 SW Old Orchard Rd**

This property in the heart of our old residential neighborhood is subject to usage restrictions enacted into law in 1984 under Ordinance No. 155609. Any proposed development must comply with this ordinance or be negotiated in detail with adjacent property owners and neighbors to maintain the livability of our neighborhood.

Jeff Cole  
4343 SE Madison St.  
Portland, OR 97215

tjeffcole@gmail.com

Tuesday, May 17, 2016

Attn: Mixed Use Zones testimony  
Planning and Sustainability Commission  
City of Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, Suite 7100, Portland, OR 97201

cc: Marty Stockton / Barry Manning

This testimony is response to the March 2016 draft of Portland's Mixed Use Zones Project (MUZ). I am co-chair of the Sunnyside Neighborhood Association Land Use Advisory Committee and a Southeast Uplift at-large board member. This letter represents my own opinion.

**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. "Development Bonuses - Incentive to provide public benefits" (Section 33.130.212) should be removed.

In particular, the new CM2 zone does a good job of replacing the CS zone in continuing a 45' height limit while reducing and (reimplementing for residential) FAR to address concerns about boxy, massive infill on corridors. **However, the proposed MUZ Development Bonuses completely reverse the benefits of the new FAR and other MUZ improvements (setbacks, articulation, etc.)**

Overall, the proposed bonus incentives are complicated and appear to deliver little certain public benefit in exchange for **a marked up-zoning with greater massing and height**. The language opens the door to future reinterpretations of the "public benefit" clause and reduces confidence that new development will be of predictable impact. During the course of the MUZ project, the nature and scope of bonuses have varied widely, illustrating the difficulty of trading increased density for "public benefits." **Considerable MUZ testimony to date has raised serious questions regarding the MUZ bonus program from multiple perspectives.**

Most importantly, recently passed Oregon law SB1533 authorizes several new tools to mandate and/or incentivize affordable housing **that would not require bonus heights or density** and these need to be analyzed before bonuses are devised.

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 (updated January, 2016). Before 2016 a developer could pay \$40,000 per required unit to opt out. As of 2016 the opt-out fee was increased to \$100,000.

Figure 1:  
Evanston

- (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

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.

**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.

Figure 2:  
Sacramento

**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.

By comparison, the public benefit program in Portland's proposed MUZ program is quite 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.

Figure 3:  
Portland MUZ

	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

**Prior to passage of SB1533 a density bonus was for all practical purposes Portland's only tool to voluntarily incentivize affordable units. Passage of SB1533 changes this dynamic and one questions whether the "public benefits" in the bonus program is at all commiserate with the density bonuses within MUZ.**

Bonus incentives would be better developed outside the Comprehensive Process. Each incentive should be carefully calibrated for each benefit and sunset/renewal dates set for re-evaluation.

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.

**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.

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 downzoned low-rise properties should be provided with transferable density benefits, tax abatements, and other support.

**Ground Floor Commercial Space: 33.415.200**

**Increase the minimum in 33.415.200 to require 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 and 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.

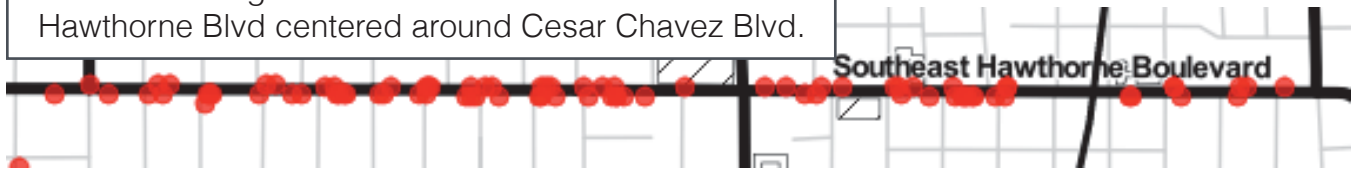
Further new Commercial Space is correctly defined as "Active Space" - meaning they represent an invaluable asset in urban fabric whereas previously these might have been housed in separate (non mixed-use) structures.

In areas slightly outside 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/active uses. Traditional ground floor commercial units often facilitated larger spaces in the 5000-10,000 square foot range. On Hawthorne Blvd think Powells, The Red Light, The Gold Door, or even the relatively new spaces of Dosha and American Apparel – primarily housed in warehouse style storefront spaces. Indeed the newly expanded Powell's on Hawthorne will approach 15,000 Sq. Ft.; something impossible in almost any mixed-used project built recently.



Figure 4: Storefront Clusters  
Hawthorne Blvd centered around Cesar Chavez Blvd.



Representation of the remarkable concentration of small businesses is showcased in Joe Cortright's recent **Storefront Index**; Figure 4. The depicted storefronts represent a working infrastructure supporting 20 minute neighborhoods - **today**. The pressures of new mixed-use construction in terms of reduced commercial space, higher rents, and insufficient parking needs to be addressed so as not to damage this existing storefront success.

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.)

**Good idea: Step Down Heights (33.130.210.B.2)**

Combined with the restoration of FAR limits, this is a good measure to help reduce the impact of CM zones on adjacent R zones.

**Good idea: New base point related standard for measuring height. (33.930.050)**

This will help prevent buildings vastly exceeding in effect the maximum height due to topology; see Figure 5.

Figure 5: current slope adjustment for height  
Hawthorne 26



## **Conclusion**

Portland is blessed by an amazing array of vibrant, historic close-in neighborhoods. 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 the corridors while improving all forms of transit, is the key to future livability.

Thank you for your consideration of my testimony.

Jeff Cole

**From:** Jeff Cole [mailto:tjeffcole@gmail.com]

**Sent:** Tuesday, May 17, 2016 11:23 AM

**To:** BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>; Planning and Sustainability Commission <pssc@portlandoregon.gov>

**Cc:** Commissioner Fritz <amanda@portlandoregon.gov>; Manning, Barry <Barry.Manning@portlandoregon.gov>; Stockton, Marty <Marty.Stockton@portlandoregon.gov>; jdollard@pps.net; sking1@pps.net

**Subject:** Mixed Use Zones Testimony: PPS Request to Change Zoning for R150599 Near SE 14th and SE Morrison

To: The City of Portland Planning and Sustainability Commission

This email is in response to testimony submitted by Justin Dollard on behalf of Sara King / Portland Public Schools on May 10th, 2016 which states:

"Portland Public Schools (PPS) requests a legislative zoning change for its property (R150599) near SE 14th and SE Morrison from High-Density Residential (HR) to Commercial Mixed Use 3 (CM3) through the Mixed-Use Zones Project."

I am writing to express firm opposition to this request. **Parcel R150599 has been publicly owned for decades and should remain so.** The purpose of this up-zoning request is clearly to facilitate handing over this property to private ownership.

Southeast Uplift, of which I am a board member of, has voted in favor of a motion calling for the City of Portland (COP) to purchase parcel R150599 from Portland Public Schools (PPS) to supplement the COP holding R562970 for purposes of hosting the long planned Community Center as well as providing much needed open space for an area that will significantly urbanize in coming years.

Ordinance 185561 refers to an IGA whereby COP has an option to purchase property R150599 good until next year. In the meantime, parks director Mike Abbate has informed SE Uplift he would welcome a private-public partnership in regards to funding a new community center.

In light of the above, please reject the request by PPS to rezone parcel R150599.

Kind regards,

Jeff Cole  
4343 SE Madison St.  
Portland, OR 97215

**From:** BJ Cefola [mailto:bcefola@gmail.com]  
**Sent:** Tuesday, May 17, 2016 11:46 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Planning and Sustainability Chair Katherine Schultz,

I'm writing to express opposition to the potential down-zoning of Low-Rise Commercial Storefront areas, from CM-2 to CM-1. This down-zoning would restrict development in neighborhood commercial centers to 3 stories, instead of 4. I think this would significantly restrict new development, particularly of housing. Projects that are viable with 4 stories may not be at 3. At a time when the city suffers from a desperate housing shortage we should be expanding opportunities for new housing, not restricting them. Plus, I think the aesthetic difference between a 3 story building and a 4 story building is nil.

Thanks for your consideration,  
Brian Cefola  
3244 NE Schuyler Street  
Portland OR 97212

**From:** Patricia Cain [mailto:[patriciacaindpm@gmail.com](mailto:patriciacaindpm@gmail.com)]  
**Sent:** Tuesday, May 17, 2016 4:48 PM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** Zoning change of PPS property adjacent to Washington High School

Dear Commissioners:

I am requesting that you deny the zoning change to the PPS property near the corner of SE 12th and Morrison.

This green space must be preserved. As Portland's density increases, these spaces will be invaluable maintaining livability for the neighborhood. Buckman has absorbed much development in a short period of time the consequences of which have yet to be entirely ascertained. However, it is clear that open space is now at a premium.

Please, help us preserve this spot.

Thank you,

Patricia Cain  
1414 SE Oak Street  
Portland, OR 97214



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

From: Susan Lindsay [mailto:lindsays@pdx.edu]

Sent: Tuesday, May 17, 2016 8:56 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: MUZ Testimony

Dear Chair Baugh and fellow commissioners of the Planning and Sustainability Commission.

Buckman neighbors oppose the upzoning of the residentially zoned area along SE Morrison and SE Belmont between 15th and 19th.

This area is the heart and bridge of our residential area between our Park (Colonel Summers) and our elementary school. We wish it to remain residential and to retain the current zoning (combination of R1, R2 and R5) so that it may be developed residentially with alternatives to small, expensive studio apartments to accommodate families and especially children.

We believe that the allowable and increased mixed use zones all along Belmont further east or west, as well as along 12th and 11th Avenues, provide ample opportunities for the continuation of more multi-unit ( in other words, studio..) apartment dwellings....and ask for this small area to be preserved, to protect the existing historic structures and ability to create other types of housing units to encourage and support families.

Thank you very much,

Susan Lindsay  
625 SE 17th Avenue  
Portland, OR 97214

**From:** jackbookwalter@yahoo.com [mailto:jackbookwalter@yahoo.com]  
**Sent:** Tuesday, May 17, 2016 5:33 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zoning Testimony

Planning Commission members,

My name is Jack Bookwalter. I am the land use chair of the Beaumont-Wilshire Neighborhood Assn. I and the Board of the B-WNA urge you to adopt the Mixed Use Zoning draft as submitted. The staff has listened to our ideas on the zoning of the Fremont neighborhood corridor and through much discussion and effort has produced a mixed use zoning proposal that, we feel, satisfies the City's need for denser land use and our own wishes that the neighborhood retain much of its small town "main st." feel. The staff has clustered the higher density CM-2 zoning near the frequent service #75 busline, and left the remainder of the Fremont corridor in the less intensive -- though still quite urban -- CM-1 classification. We support these zoning designations and appreciate staff's willingness to listen to our concerns. Thank you.

JACK BOOKWALTER  
4110 NE KLINKITAT ST.  
PORTLAND, OR 9721  
[jackbookwalter@yahoo.com](mailto:jackbookwalter@yahoo.com)

T-Mobile. America's First Nationwide 4G Network.

Hello,

I'm writing in opposition to the down zoning of 35<sup>th</sup> through 38<sup>th</sup> of Hawthorne Blvd. I'm a small business owner who has been in business for six years at 3562 SE Hawthorne Blvd. CM1 zoning limits retail. In a business district this is odd. Also it makes WHOLESale not allowed. That caught me off guard because this is a small business district. If I want to start my own jewelry line I wouldn't be allowed to sell it wholesale to other stores in Portland. If I wanted to open a brewery I wouldn't be allowed to sell my beer anywhere in Portland. This does not make sense. On top of these, office space is limited. There's office space in almost all of these buildings. Also the building I'm in is 30' and TWO stories. Three stories and 35' is not reasonable. The downgrading from a CS to a CM1 will HARM small business and most certainly HARM the long term small business district of Hawthorne.

Please, please, please leave Hawthorne out of this zoning change!

Best,

Sarah Balzer

Cassidy Jewelry

3562 SE Hawthorne Blvd

Portland, OR 97214

Sarah SE Balzer <cassidyjewelry@gmail.com>

May 17, 2016

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for the Safeway Store located at 4515 SE Woodstock**  
**Boulevard**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc., and am also responsible for real estate matters pertaining to Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Safeway store at 4515 SE Woodstock Boulevard as Commercial/Mixed Use 2 ("CM2"), subject to the Centers Main Street Overlay Zone ("CMSO"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE") and not be subject to the proposed CMSO. We request this revision because the proposed zoning would make this store substantially more nonconforming, and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph and site plan of this store is attached. **Exhibits 1 and 2.** Its access and vehicle circulation areas front SE Woodstock Boulevard, which is designated as a Transit Street. As is evident from the attachments, this store relies on convenient vehicle access and circulation to accommodate its customers, most of whom arrive by automobile.

Applying the CM2 zone and CMSO to this site is especially problematic for the following reasons:

- It would prohibit vehicle areas along 50% of transit street frontages.
- It would impose a minimum FAR of 0.5:1.
- It would require ground floor windows along 60% of its transit street frontages.
- It would require one transit street entrance for every 100 feet of building wall.

This store does not comply with these requirements and it is not economically feasible to remodel or replace it with a store that would comply. Note also that this store, at 54,689 sq. ft., does not qualify for the proposed alternative maximum setback standard for large retailers, which only applies to buildings with at least 60,000 sq. ft. of retail sales and service uses.

Application of the CM2 zone and CMSO will cause significant nonconformity on this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell, and makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE, with no CMSO overlay, will be necessary to avoid excessive nonconformity.

Working together to be the *favorite local supermarket*



This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 3.** None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking, and main entrance locations) contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate it doing so in the foreseeable future.

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current commercial zoning code and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no essential difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

Yours truly,

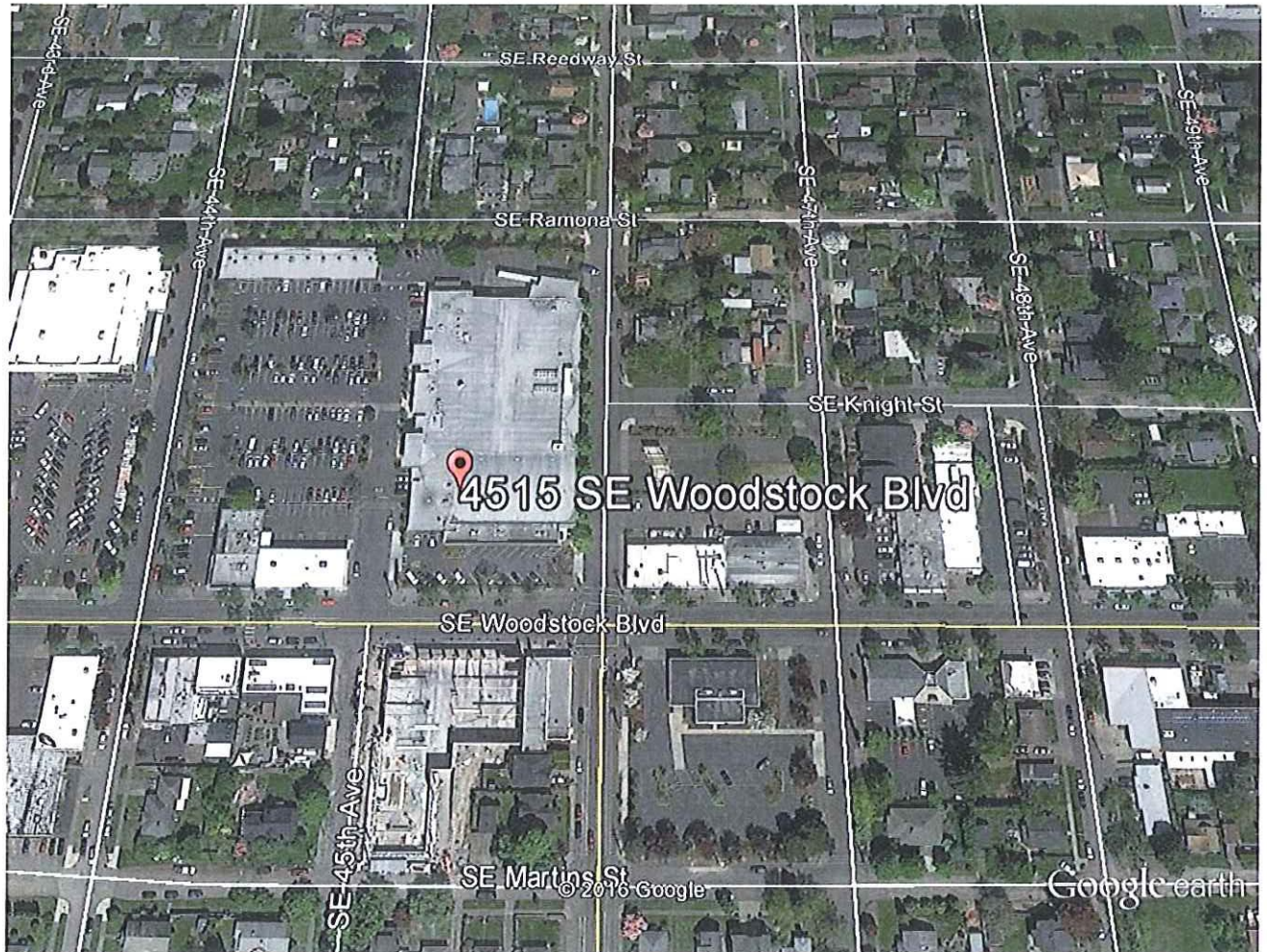


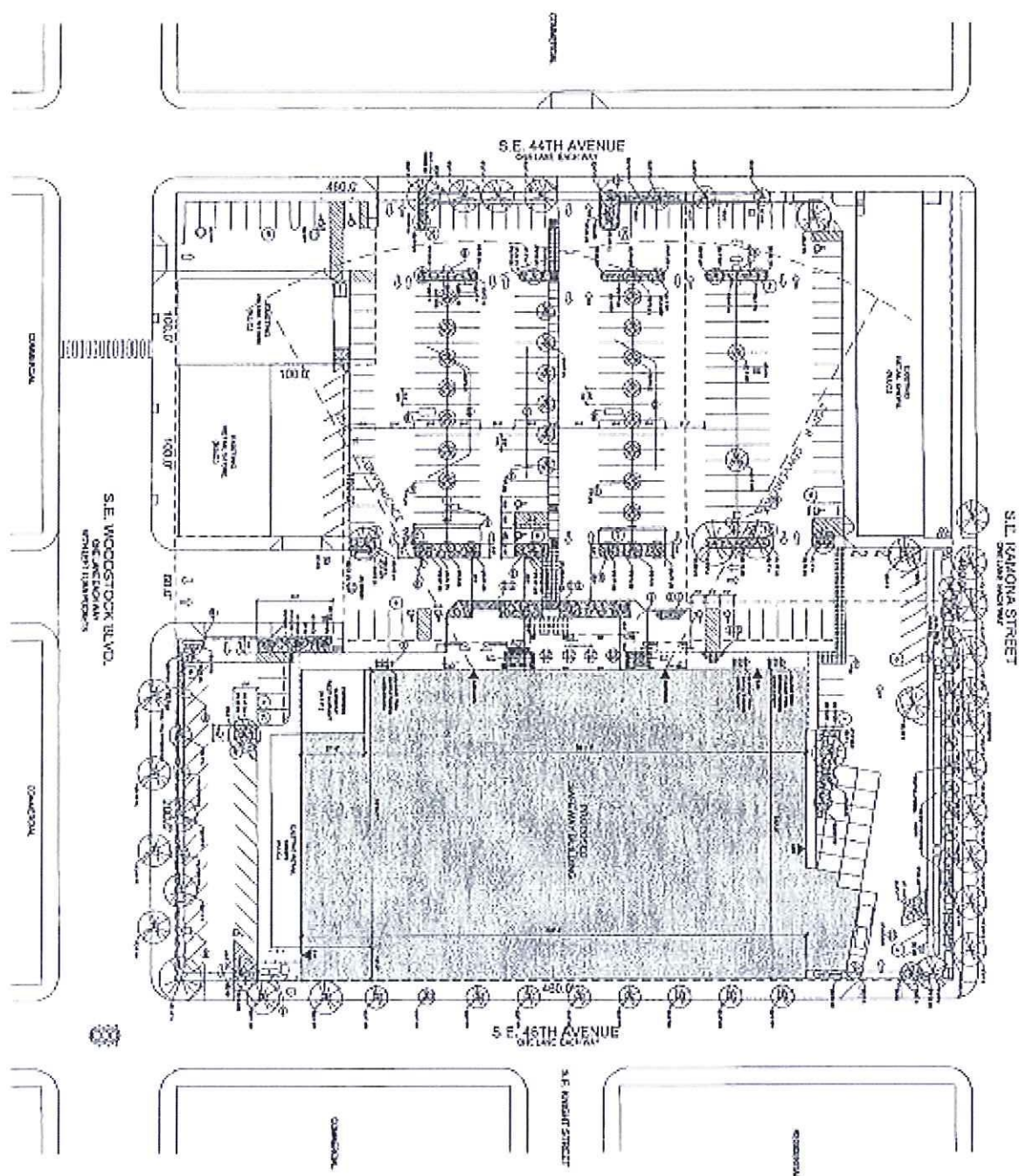
Eric Holzer

Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)









**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site. See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that



May 17, 2016

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for the Safeway Store located at 6901 NE Sandy Boulevard**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc., and am also responsible for real estate matters pertaining to Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Safeway store at 6901 NE Sandy Boulevard as Commercial/Mixed Use 2 ("CM2"), subject to the Centers Main Street Overlay Zone ("CMSO"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE") and not be subject to the proposed CMSO. We request this revision because the proposed zoning would make this store substantially more nonconforming, and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph and site plan of this store is attached. **Exhibits 1 and 2.** Its access and vehicle circulation areas front NE Sandy Boulevard and NE Fremont Street, which are both designated as Transit Streets. As is evident from the attachments, this store relies on convenient vehicle access and circulation to accommodate its customers, most of whom arrive by automobile.

Applying the CM2 zone and CMSO to this site is especially problematic for the following reasons:

- It would prohibit vehicle areas along 50% of transit street frontages.
- It would impose a minimum FAR of 0.5:1.
- It would require ground floor windows along 60% of its transit street frontages.
- It would require one transit street entrance for every 100 feet of building wall.

This store does not comply with these requirements and it is not economically feasible to remodel or replace it with a store that would comply. Note also that this store, at 51,602 sq. ft., does not qualify for the proposed alternative maximum setback standard for large retailers, which only applies to buildings with at least 60,000 sq. ft. of retail sales and service uses.

Application of the CM2 zone and CMSO will cause significant nonconformity on this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell, and makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE, with no CMSO overlay, will be necessary to avoid excessive nonconformity.

Working together to be the *favorite local supermarket*

This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 3.** None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking, and main entrance locations) contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate it doing so in the foreseeable future.

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current commercial zoning code and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no essential difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

Yours truly,

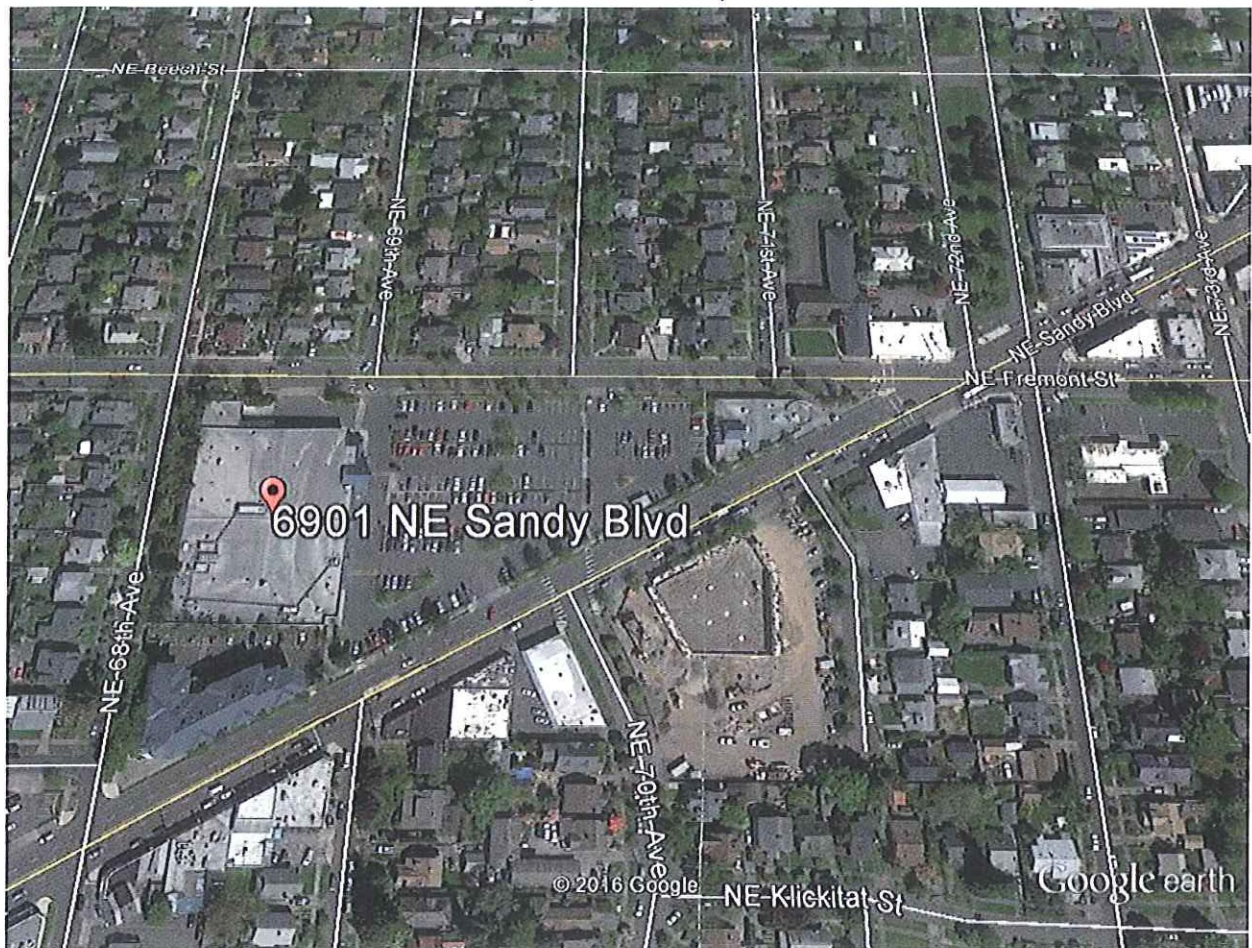


Eric Holzer

Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)









**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site.  
See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that



May 17, 2016

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for the Albertsons Store located at 5850 NE Prescott Street**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc., and am also responsible for real estate matters pertaining to Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Albertsons store at 5850 NE Prescott Street as Commercial/Mixed Use 2 ("CM2"), subject to the Centers Main Street Overlay Zone ("CMSO"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE") and not be subject to the proposed CMSO. We request this revision because the proposed zoning would make this store substantially more nonconforming, and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph of this store is attached. **Exhibit 1.** Its access and vehicle circulation areas front NE Prescott Street and NE Cully Boulevard, which are both designated as Transit Streets. As is evident from the aerial photograph, this store relies on convenient vehicle access and circulation to accommodate its customers, most of whom arrive by automobile.

Applying the CM2 zone and CMSO to this site is especially problematic for the following reasons:

- It would prohibit vehicle areas along 50% of transit street frontages.
- It would impose a minimum FAR of 0.5:1.
- It would require ground floor windows along 60% of its transit street frontages.
- It would require one transit street entrance for every 100 feet of building wall.

This store does not comply with these requirements and it is not economically feasible to remodel or replace it with a store that would comply. Note also that this store, at 48,754 sq. ft., does not qualify for the proposed alternative maximum setback standard for large retailers, which only applies to buildings with at least 60,000 sq. ft. of retail sales and service uses.

Application of the CM2 zone and CMSO will cause significant nonconformity on this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell, and makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE, with no CMSO overlay, will be necessary to avoid excessive nonconformity.

This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 2.** None of the proposed mixed use zones provide

Working together to be the *favorite local supermarket™*

development standards which are as auto-accommodating as the development standards (for access, parking, and main entrance locations) contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate it doing so in the foreseeable future.

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current commercial zoning code and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no essential difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

Yours truly,



Eric Holzer

Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)







**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site. See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that

May 17, 2015

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for the Safeway Store located at 3930 SE Powell Boulevard**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc., and am also responsible for real estate matters pertaining to Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Safeway store at 3930 SE Powell Boulevard as Commercial/Mixed Use 2 ("CM2"), subject to the Centers Main Street Overlay Zone ("CMSO"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE") and not be subject to the proposed CMSO. We request this revision because the proposed zoning would make this store substantially more nonconforming, and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph and site plan of this store is attached. **Exhibits 1 and 2.** Its access and vehicle circulation areas front SE Powell Boulevard, which is designated as a Transit Street. As is evident from the attachments, this store relies on convenient vehicle access and circulation to accommodate its customers, most of whom arrive by automobile.

Applying the CM2 zone and CMSO to this site is especially problematic for the following reasons:

- It would impose a minimum FAR of 0.5:1.
- It would require ground floor windows along 60% of its transit street frontages.

This store does not comply with these requirements and it is not economically feasible to remodel or replace it with a store that would comply. Note also that this store, at 47,248 sq. ft., does not qualify for the proposed alternative maximum setback standard for large retailers, which only applies to buildings with at least 60,000 sq. ft. of retail sales and service uses.

Application of the CM2 zone and CMSO will cause significant nonconformity on this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell, and makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE, with no CMSO overlay, will be necessary to avoid excessive nonconformity.

This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 3.** None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking, and main entrance locations) contained in the definition, but the CE zone comes

Working together to be the *favorite local supermarket*



closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate it doing so in the foreseeable future.

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current commercial zoning code and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no essential difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

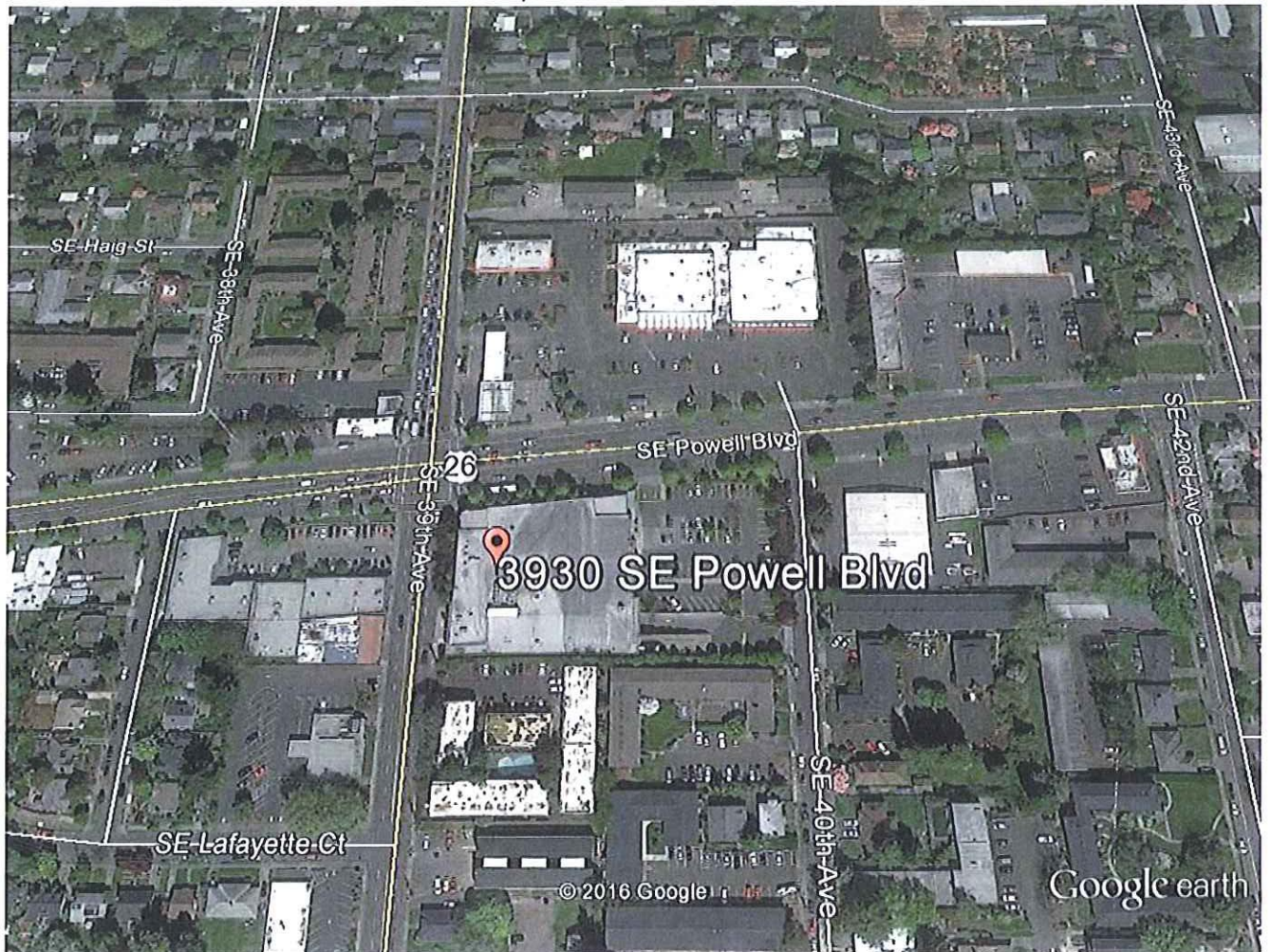
Yours truly,



Eric Holzer

Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)







**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site.  
See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that



May 17, 2016

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for the Safeway Store located at 221 NE 122nd Avenue**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc., and am also responsible for real estate matters pertaining to Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Safeway store at 221 NE 122nd Avenue as Commercial/Mixed Use 3 ("CM3"), subject to the Centers Main Street Overlay Zone ("CMSO"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE") and not be subject to the proposed CMSO. We request this revision because the proposed zoning would make this store substantially more nonconforming, and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph and site plan of this store is attached. **Exhibits 1 and 2.** Its access and vehicle circulation areas front NE 122nd Avenue and NE Glisan Street, which are both designated as Transit Streets. As is evident from the attachments, this store relies on convenient vehicle access and circulation to accommodate its customers, most of whom arrive by automobile.

Applying the CM3 zone and CMSO to this site is especially problematic for the following reasons:

- It would prohibit vehicle areas along 50% of transit street frontages.
- It would impose a minimum FAR of 0.5:1.
- It would require ground floor windows along 60% of its transit street frontages.
- It would require one transit street entrance for every 100 feet of building wall.

This store does not comply with these requirements and it is not economically feasible to remodel or replace it with a store that would comply. Note also that this store, at 52,568 sq. ft., does not qualify for the proposed alternative maximum setback standard for large retailers, which only applies to buildings with at least 60,000 sq. ft. of retail sales and service uses.

Application of the CM3 zone and CMSO will cause significant nonconformity on this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell, and makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE, with no CMSO overlay, will be necessary to avoid excessive nonconformity.

Working together to be the *favorite local supermarket*

This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 3.** None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking, and main entrance locations) contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate it doing so in the foreseeable future.

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current commercial zoning code and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no essential difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

Yours truly,

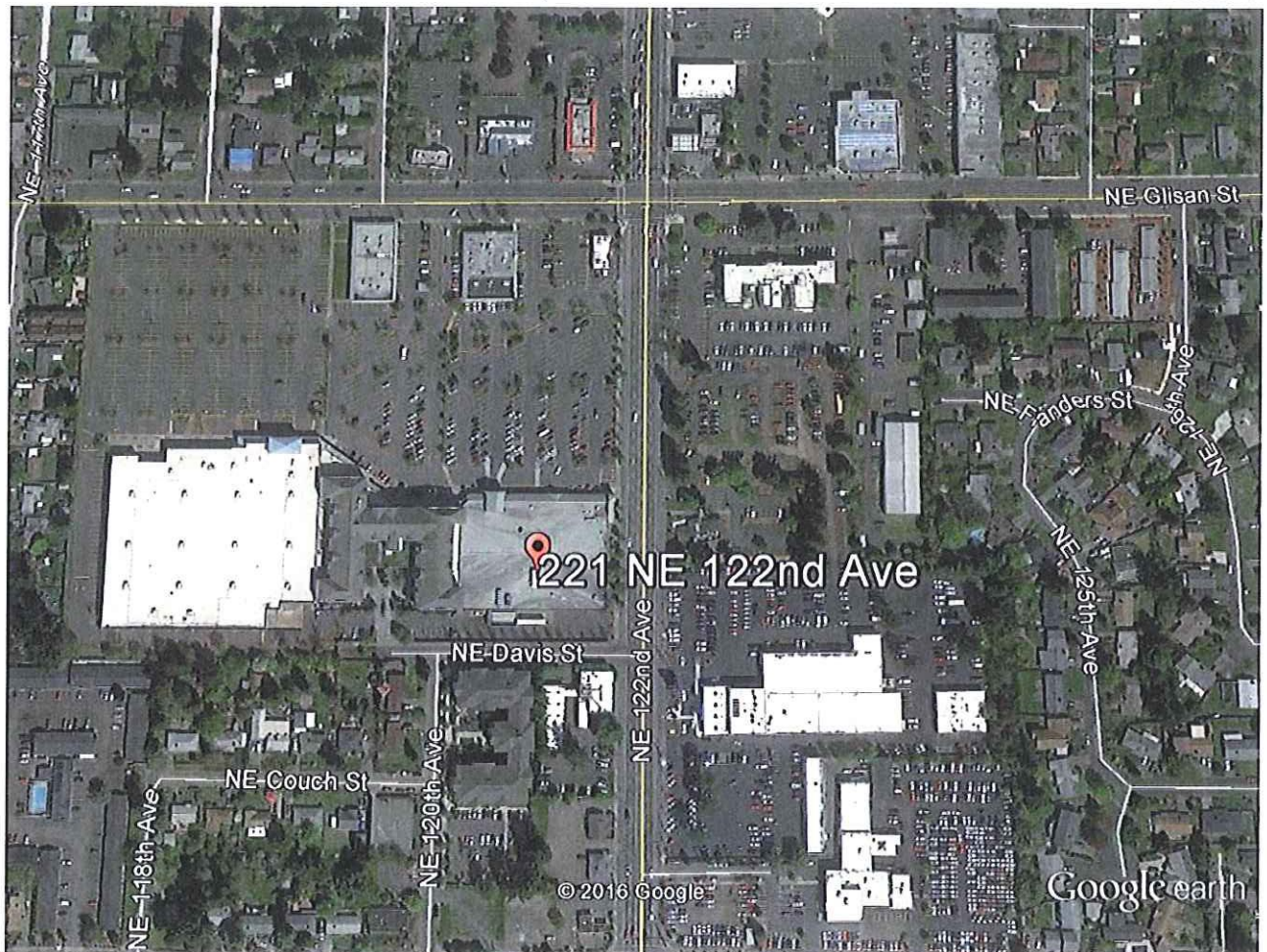


Eric Holzer

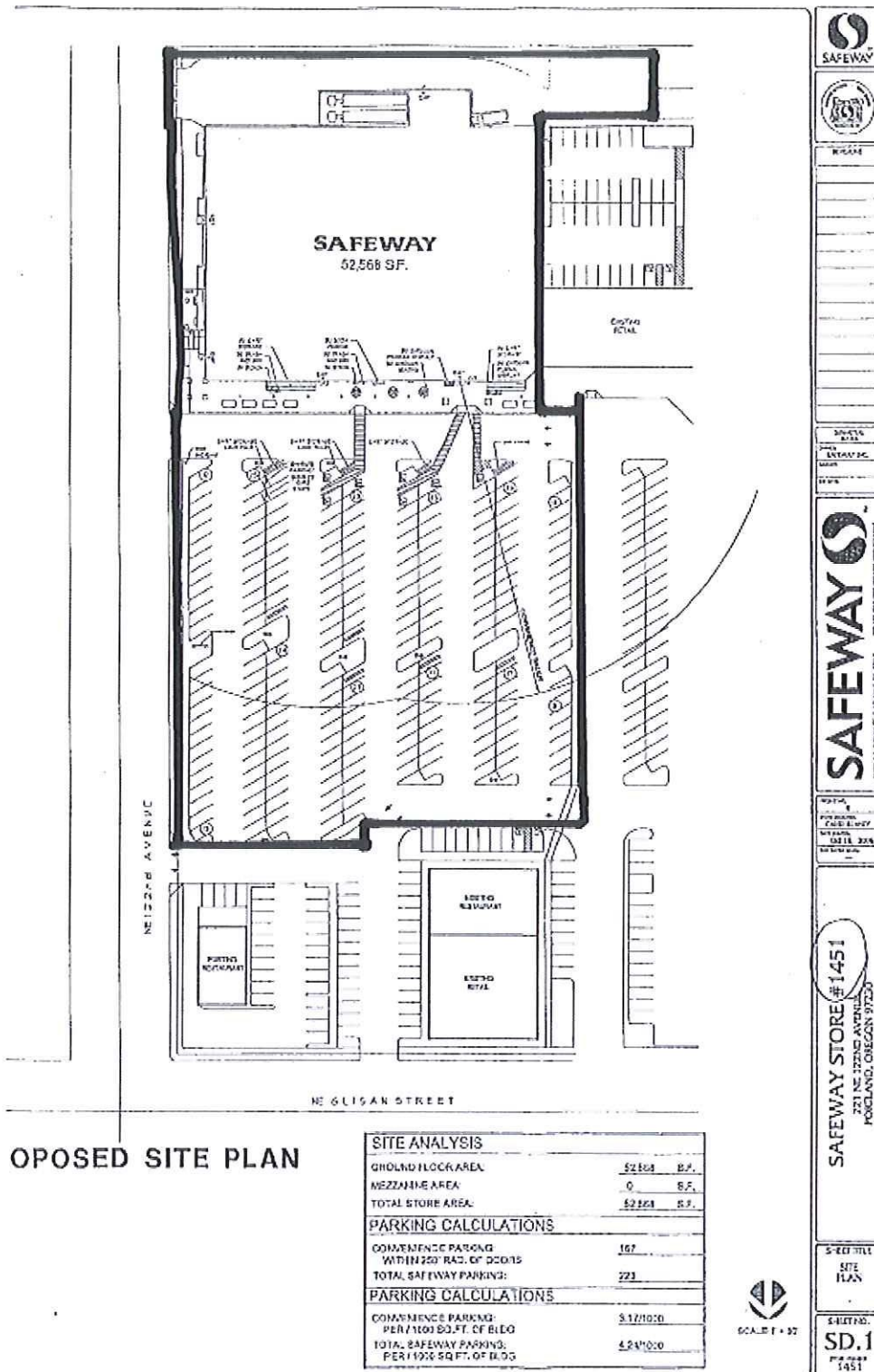
Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)









**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site.  
See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that



May 17, 2016

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

**Re: Mixed Use Zones Project**  
**Request for CE Zoning for the Safeway Store located at 5920 NE Martin Luther King Jr. Boulevard**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc., and also manage real estate matters for Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Safeway store at 5920 NE Martin Luther King Jr. Boulevard as Commercial/Mixed Use 2 ("CM2"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE"). We request this revision because the proposed zoning would make this store more nonconforming and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph and site plan of this store is attached. **Exhibits 1 and 2.** Its access and vehicle circulation areas front NE Martin Luther King Jr. Boulevard, which is designated as a Transit Street. As is evident from the attachments, this store relies on convenient vehicle access and circulation to accommodate its customers, the bulk of which arrive by automobile.

Application of the CM2 zone will cause significant nonconformity of this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell and, finally, makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE will be necessary to avoid excess nonconformity.

This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 3.** None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking and main entrance locations) contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate them doing so in the foreseeable future.

Working together to be the *favorite local supermarket*

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone's development standards to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current CG zone, and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no practical difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

Yours truly,

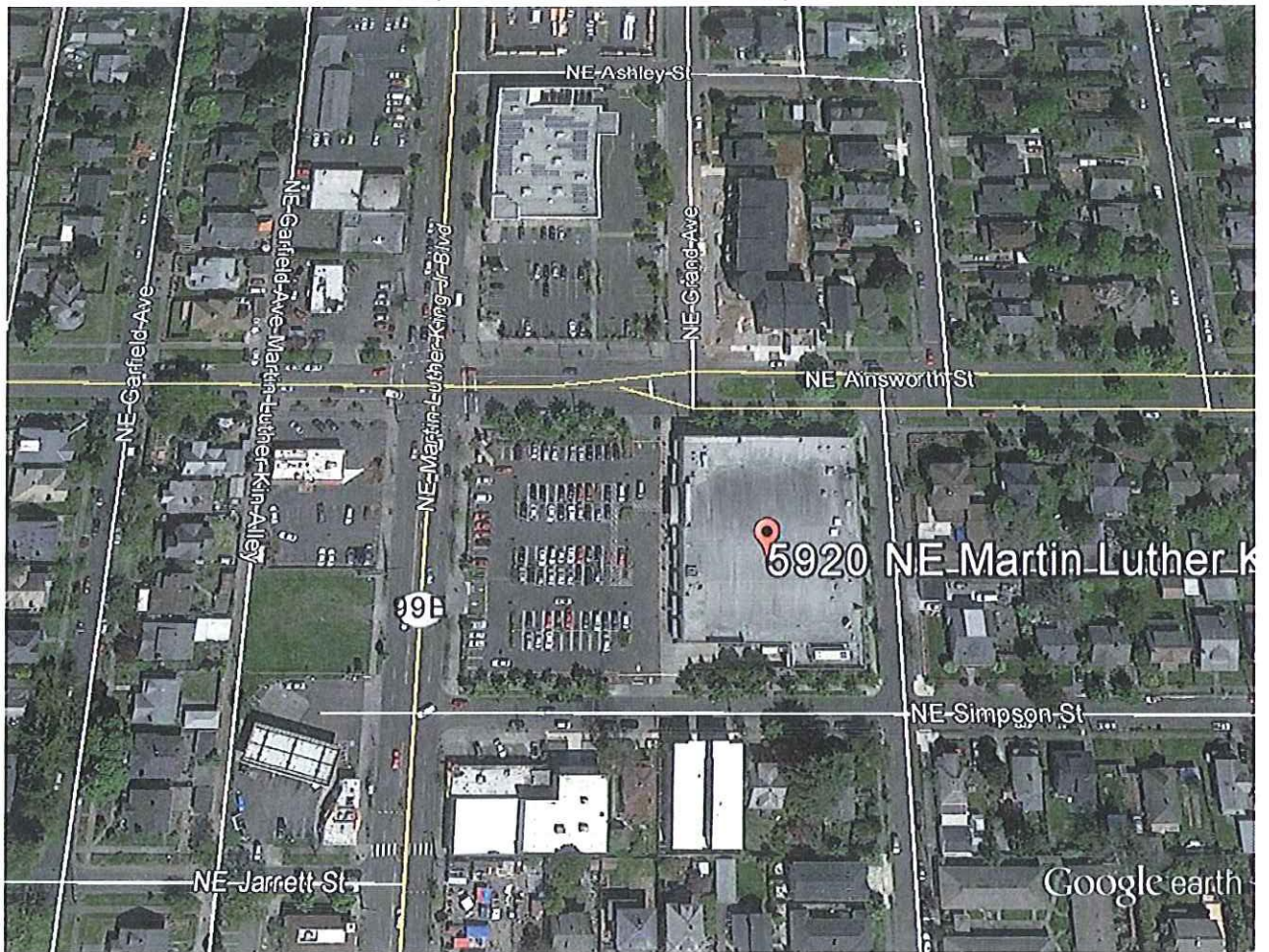


Eric Holzer

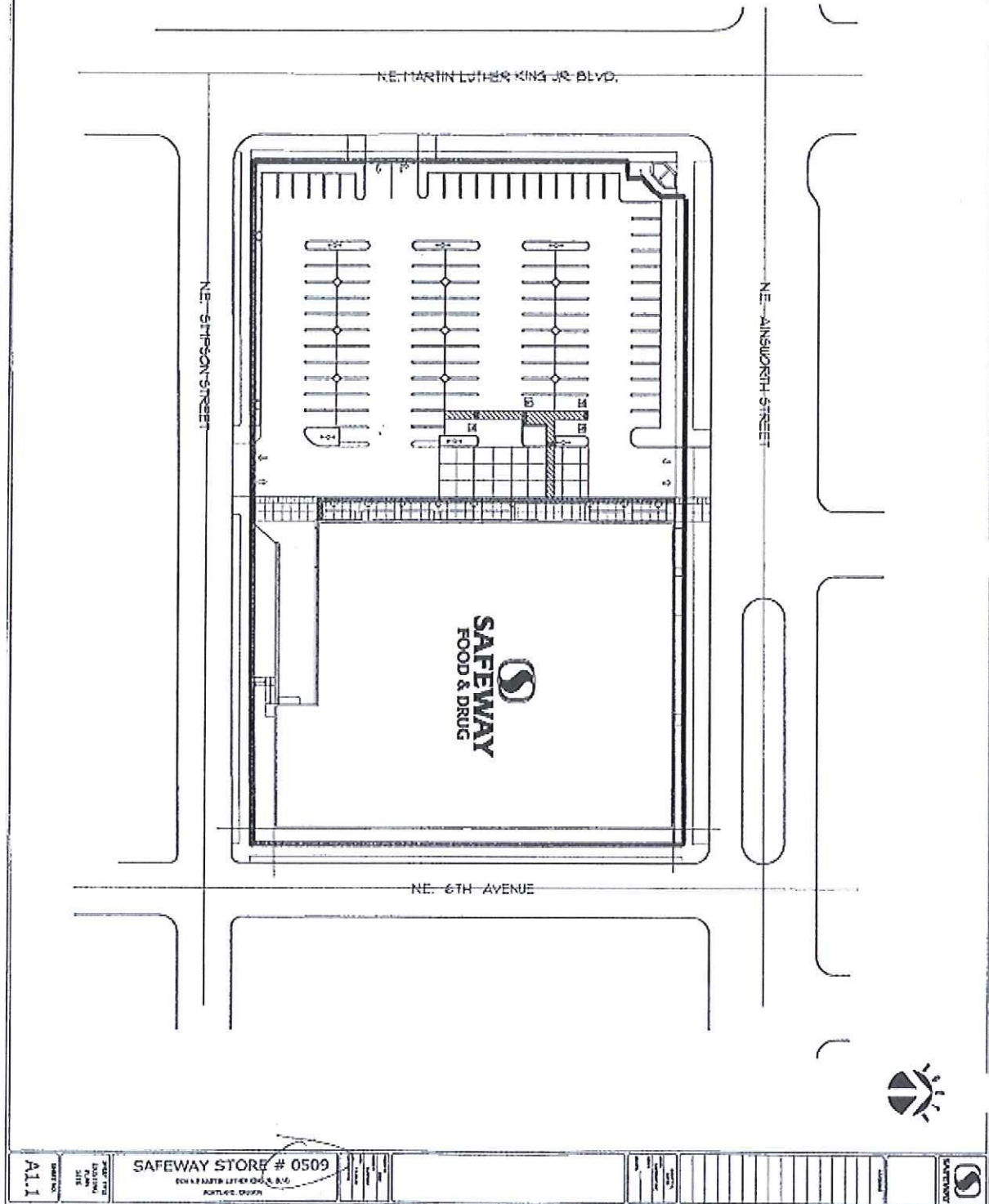
Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)+









**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site. See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that



May 17, 2016

Katherine Schultz, Chair  
Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: **Mixed Use Zones Project**  
**Request for CE Zoning for the Safeway Store located at 3930 N Ivanhoe Street**

Dear Chair Schultz and Members of the Commission:

I am the Senior Real Estate Manager for Albertsons Companies, Inc, and also manage real estate matters for Portland's Safeway stores. The Proposed Draft of the Portland Mixed-Use Zoning Code would designate our Safeway store at 3930 N Ivanhoe Street as Commercial/Mixed Use 2 ("CM2"). This letter is respectfully submitted to request that this store be zoned Commercial Employment ("CE"). We request this revision because the proposed zoning would make this store more nonconforming and because the CE zone is the most appropriate zone for this site and the surrounding area, which is already committed to auto-accommodating development.

An aerial photograph and site plan of this store is attached. **Exhibits 1 and 2.** Its access and vehicle circulation areas front N Ivanhoe Street and N Richmond Avenue, which are both designated Transit Streets. As is evident from the attachments, this store relies on convenient vehicle access and circulation to accommodate its customers, the bulk of which arrive by automobile.

Application of the CM2 zone will cause significant nonconformity of this site. Nonconforming status lowers market value, makes it more difficult to obtain financing and to sell and, finally, makes it difficult if not impossible to maintain and upgrade the store. Zoning this site to CE will be necessary to avoid excess nonconformity.

This store, like all other Safeway and Albertsons stores in Portland, is "auto-accommodating" as defined in the Portland Zoning Code. **Exhibit 3.** None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking and main entrance locations) contained in the definition, but the CE zone comes closest. It is also the only new zone that does not prohibit drive-through facilities, which are often part of our grocery operations.

We need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. Applying the CE zone to this site is appropriate because it is outside of the Central City and already committed to auto-accommodating development. The CE zone description in the Proposed Draft provides that such sites are appropriately zoned CE: "[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 the one around our site are slow to redevelop and we do not anticipate them doing so in the foreseeable future.

Working together to be the *favorite local supermarket*

Although the CE zone is the least problematic from our perspective, it is not truly "auto-accommodating." Accordingly, we also request that the Commission request that staff soften the main entrance and glazing requirements of the CE zone's development standards to be consistent with the Code's definition of "auto-accommodating." For example, the ground-floor window standard should remain as it is under the current CG zone, and only one transit street entrance for each building should be required.

Finally, we request that the 60,000 sq. ft. threshold for the alternative maximum setback for large retailers, set forth in PCC 33.130.215.E, be reduced to 45,000 sq. ft. This is appropriate because there is no practical difference between how our 45,000 sq. ft. and 60,000 sq. ft. stores function. This will still only apply to a large site, as 45,000 sq. ft. exceeds the typical 40,000 sq. ft. block size generally used in Portland.

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

Yours truly,

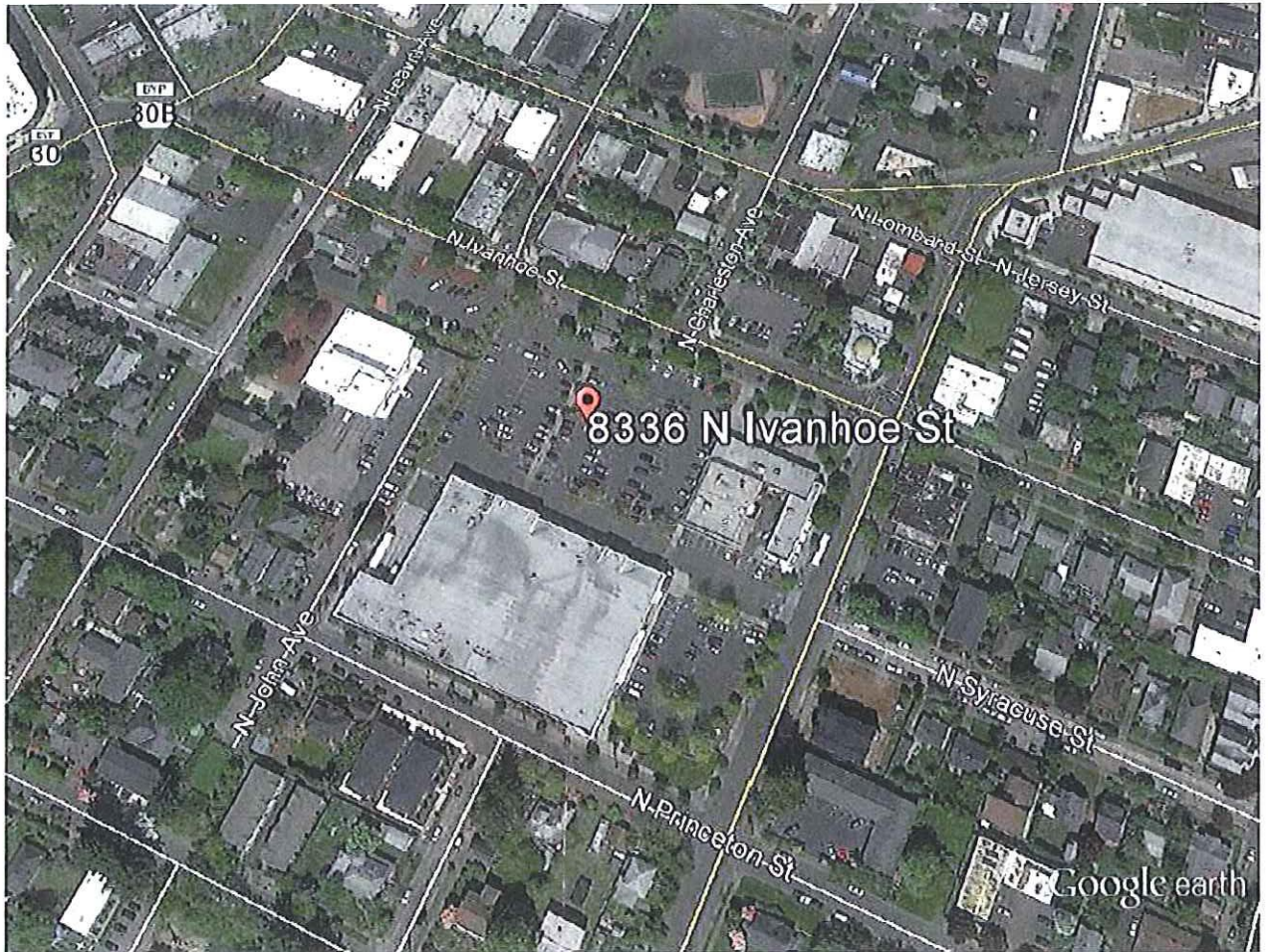


Eric Holzer

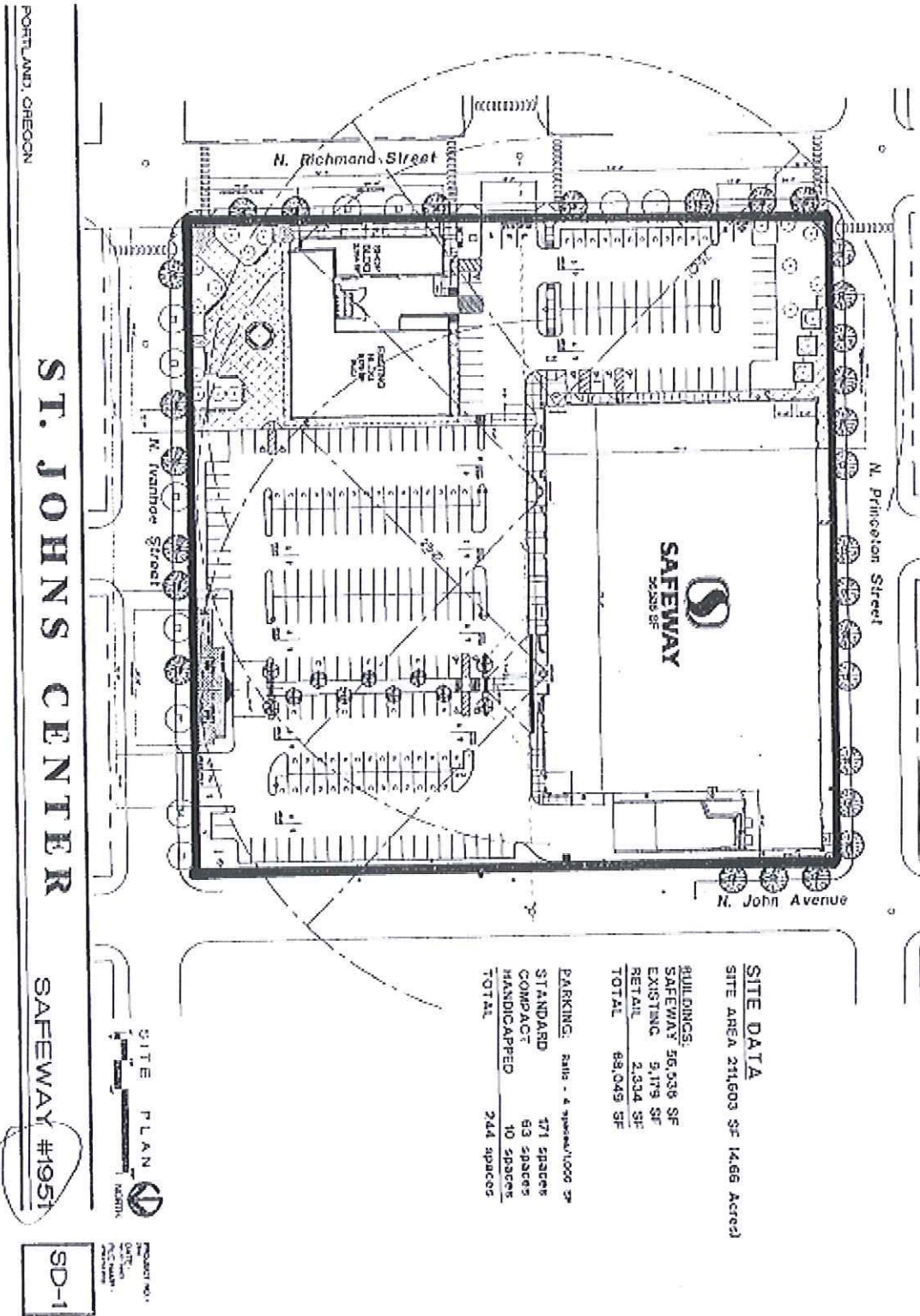
Enclosures

cc: Ms. Natacha Epley (via email) (w/encl.)  
Mr. Kevin Angstenberger (via email) (w/encl.)  
Mr. Garrett Stephenson (via email) (w/encl.)









**Development, New.** Development of a site that was previously unimproved or that has had previously existing buildings demolished.

**Development Types**

- **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. See also Pedestrian-Oriented Development.
- **Pedestrian-Oriented Development.** Development which is designed with an emphasis primarily on the street sidewalk and on pedestrian access to the site and building, rather than on auto access and parking areas. The building is generally placed close to the street and the main entrance is oriented to the street sidewalk. There are generally windows or display cases along building facades which face the street. Typically, buildings cover a large portion of the site. Although parking areas may be provided, they are generally limited in size and they are not emphasized by the design of the site. See also Auto-Accommodating Development.

**Director of BDS.** The Director of the City of Portland Bureau of Development Services, or the Director's designee.

**Disabled Person.** For the purposes of Chapter 33.229, Elderly and Disabled High Density Housing, a disabled person is a person who has a condition of physical or mental disability which substantially limits one or more major life activities as stated in Section 504 of the Federal Rehabilitation Act of 1973 and state law.

**Disturbance.** An action that causes an alteration to soil or vegetation. The action may create temporary or permanent disturbance. Examples include development, exterior alterations, exterior improvements, demolition and removal of structures and paved areas, cutting, clearing, damaging, or removing native vegetation.

**Disturbance Area.** The area where all temporary and permanent disturbance occurs. For new development the disturbance area must be contiguous. Native vegetation planted for resource enhancement, mitigation, remediation, and agricultural and pasture lands is not included. The disturbance area may contain two subareas, the permanent disturbance area and the temporary disturbance area:

- **Permanent Disturbance Area.** The permanent disturbance area includes all areas occupied by existing or proposed structures or exterior improvements. The permanent disturbance area also includes areas where vegetation must be managed to accommodate overhead utilities, existing or proposed non-native planting areas, and roadside areas subject to regular vegetation management to maintain safe visual or vehicle clearance.
- **Temporary Disturbance Area.** The temporary disturbance area is the portion of the site to be disturbed for the proposed development but that will not be permanently occupied by structures or exterior improvements. It includes staging and storage areas used during construction and all areas graded to facilitate proposed development on the site, but that

**From:** Christine Yun [mailto:cpypdx@gmail.com]

**Sent:** Monday, May 16, 2016 9:20 PM

**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>

**Cc:** lindsays@pdx.edu; Chris Smith <chris@chrissmith.us>; Jeff Cole <tjeffcole@gmail.com>; Don M. <mcat@teleport.com>; McCullough, Robert <Robert@mresearch.com>; Rick Johnson <rickjohnson77@comcast.net>; Patsy Bonar <peatsgarden@hotmail.com>; Nancy Oberschmidt <nancyoberschmidt@gmail.com>; ken Diener <kend@kjdarch.com>; Patricia Cain <patriciacaindpm@gmail.com>

**Subject:** PPS request to change zoning of 1.33 acres at 14th & Morrison

I understand that PPS has requested at the 11th hour for the zoning of this property to be changed from Rh to CM3.

While the argument they have presented for reducing the impacts of future development appears to be neighborhood-friendly, ideally this space needs to be reserved as open space in this rapidly densifying part of Portland. Inner SE is parks-deficient, and this parcel of property is adjacent to a proposed community center. The neighborhood has already lost the open space at St. Francis Park.

I also take issue with their representation of what could be built on the site. The height limit for Rh is 75 feet, which is not substantially taller than the height limit for CM3 at 65 feet. Their (mis) representation shows that a CM3 buildout is about half the height of the Rh buildout. In addition the housing bonus for CM3 would increase what would be allowed on the site substantially beyond what is currently allowed by RH. Again, their representation is misleading. Adjacent context is 1-story commercial and small storefronts. What they are proposing will not fit in with the neighborhood, and will put pressure on an area that is already seeing large-scale development just 2 blocks to the SW and 2 blocks to the NW.

Please deny this change. We need to think ahead and build in places for people to recreate as well as to live.

Sincerely,  
Christine Yun  
1915 SE Alder St.  
Portland, OR 97214



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

From: Megan Light [mailto:lightmeg2008@gmail.com]

Sent: Monday, May 16, 2016 11:57 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Mixed Use Zones Testimony

Hello Planning and Sustainability Commission.

Thank you for all the work and effort you have put in to the Mixed Use Zones Project thus far. Please consider my following testimony as you moved toward a final recommendation.

1. Please DO NOT change the zoning of small neighborhood commercial sites such as People's Food Co-op, Clinton Market, and Palio (Ladd's addition circle) to CM1 zoning. Each one of these sites has a unique and interesting building on it, and they are currently an asset to the surrounding residential neighborhood. But it just would not be appropriate to change these sites to CM1 zoning, as it would only encourage the removal of not only the business, but replacement of the buildings. If the buildings on these sites are ever destroyed, they should either be replaced with a replica, or developed to the standards of the surrounding residential zoning.

2. Please DO restore the Residential FAR requirement for mixed-use buildings. We are tired of the boxes!! Please do what you need to do to change this NOW, and not wait for the Comprehensive Plan approval timeline of 2018.

3. I like the idea of the "Vintage" Low-Rise Commercial Areas, so if that is my only choice for these pre-1920's buildings, I would support it. But I don't think it goes far enough to protect some of the best buildings in Portland. With a building height potential of 35', that is still a lot of dollar signs for developer! Is there some other way we can make sure these buildings don't get knocked down?

4. I strongly support adding the Division Plan District, as well as the Design Review overlays where it is being proposed. (Hawthorne, Belmont, Division)

Thanks for your time and consideration. After having lived in Portland (Sunnyside, Overlook, Mt. Tabor, and Richmond neighborhoods) since 1987, I have recently moved on. But I still have 5 rentals in the SE neighborhoods, and I care deeply about the future of the neighborhoods and their development.

Sincerely,

Megan Light  
Richmond Neighborhood Association Board Member  
33609 Se 27th St  
Washougal, WA 98671  
503-704-3751

**From:** Robert Kowalski [mailto:Robert@Clintonstpub.Com]  
**Sent:** Monday, May 16, 2016 5:18 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony

Planning and Sustainability Commission  
City of Portland Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Ave, Suite 7100, Portland, OR 97201

Dear Commissioners,

We are writing you in reference to the proposed down-zoning of commercial properties on Woodstock Blvd. For the record, we would like to state that we are opposed to the mixed-use down-zoning proposal.

Since 2011, when we purchased the property located at 4625-4639 SE Woodstock Blvd, we have witnessed a resurgence in the vitality of the neighborhood. A number of new stores, and a few new buildings, have come to Woodstock energizing the district. We are proud to be a part of the enhancements occurring in the neighborhood not only as property owners, but as owner/operators of the Lutz Tavern located at 4639 SE Woodstock Blvd. We have on a number of occasions overheard the residents of the neighborhood express their enthusiasm around the changes and positive direction their Woodstock is taking. We are extremely concerned that placing additional zoning restrictions on our buildings will deter investment and stifle the neighborhood revitalization we have worked so hard to achieve.

On a personal note, our building has been selected to receive the harshest of zoning down-grades - CM1. We are located on the NW corner of 46<sup>th</sup> and Woodstock and are the only building selected for down-grade on the intersection. It feels very discriminatory to have our property rights reduced, and incur the resulting economic impact, while the properties located on all three corners adjacent to our property will have a CM2 zoning designation and maintain their current property rights. We would like our proposed zone changed to closer reflect our current property rights - CM2.

We understand the residents of Multnomah Village gathered a petition and spearheaded the proposed low-rise commercial storefront designation. Please remove Woodstock from the list of districts effected by the residents of Multnomah Village. We are not Multnomah Village, we are Woodstock.

Thank you for taking the time to read this testimony,

Robert Kowalski  
Jayson Criswell  
4639 SE Woodstock Blvd  
Portland OR 97206  
503-806-1593



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

From: Rick Johnson [mailto:rickjohnson77@comcast.net]

Sent: Monday, May 16, 2016 6:18 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PPS PROPERTY SE 14 and Morrison. Mixed use zone testony

Please do not rezone the Portland Public School property at 14th and Morrison. Inner SE is already zoned for tremendous density increases. This property should be retained as open space and added to the adjacent park. It will be much more valuable as open space when the proposed density increases are completed.

While density is needed so is open space to create a great central core.

Thanks

Rick Johnson

1414 SE. Oak St.,

Portland, OR 97214

Sent from my iPhone

# KENNETH S. EILER, P.C

*Receiver*

*Attorney at Law*

*Bankruptcy Panel Trustee*

---

PMB 810  
515 NW Saltzman Rd.  
Portland, Oregon 97229

kenneth.eiler7@gmail.com  
Phone 503.292.6020  
Fax 503.297.9402

May 16, 2016

PORTLAND PLANNING AND SUSTAINABILITY COMMISSION  
BY EMAIL ONLY: [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

RE: MIXED USE ZONE PROJECT  
PROPOSED ZONE CHANGE TO CM1 ON SE HAWTHORNE BLVD

Greetings,

This letter is intended to follow up on the letter I hand delivered on May 10<sup>th</sup> in support of my testimony in opposition to the proposal to downzone a four(4) block section of SE Hawthorne Blvd. between 34<sup>th</sup> and 38<sup>th</sup> to CM1. This 'spot zoning' is inconsistent with proposed zone changes along the remainder of SE Hawthorne Blvd., is not supported by the criteria development by the Planning Staff for imposing a CM1 zone, and would render 'non conforming' several buildings and businesses in the affected area.

As noted in testimony on May 10<sup>th</sup>, the CM1 zone would restrict or prohibit wholesale sales and wholesale production. We are aware of at least two existing retail businesses in the affected area that have a 'wholesale' component. In addition, I have been approached by a brew pub to be located on our property that would also include a 'wholesale' component. Rendering these small businesses 'non conforming' will dramatically impact their ability to grow in the future and raise capital to support existing operations.

As noted in my letter of May 10<sup>th</sup>, the CM1 zone would purport to limit building height in a 4 block area to three stories, or 35 feet. Not only is this inconsistent with building heights elsewhere in the Hawthorne business district, it is internally inconsistent with its own provisions. Our two story building is nearly 29 feet tall. A third story, though permissible, could not be accommodated within the remaining 6 feet. Ironically, the proposed zoning criteria for CM2 recognizes a preference in retail businesses for high ceilings, and for architectural features on building that might extend above the height limitation. The CM2 zone allows for extending a building height to accommodate these preferences. The CM1 zone does not.

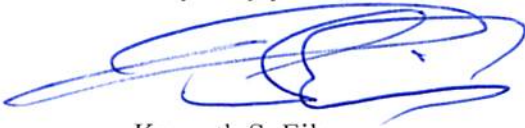
Finally, the CM1 zone purports to limit itself to building that were constructed 'prewar'. However, most of the buildings in the area were constructed well after that era. Those that were not,

have had substantial improvements made since their prewar construction.

My daughter has contacted business operators and building owners in the affected area. She has found that neither were contacted directly about the proposed spot zoning of their business and/or property, and that none were advised of the limitations that the CM1 zone would impose on their existing operation and future growth. They have all voiced opposition, and she understands that several have taken time to mail in their objections.

After listening to testimony from other small business districts impacted by the spot zoning of their property to CM1, it appears that our opposition to the downzoning of four blocks of property along SE Hawthorne Blvd. is consistent with the opposition voiced by other small businesses and property owners. We would urge you to abandon imposing a CM1 zone in the Hawthorne Business district, and elsewhere. Thank you for your considerations.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Kenneth S. Eiler', with a stylized, looping flourish extending from the end of the signature.

Kenneth S. Eiler



GUARANTEED TO SATISFY

May 16, 2016

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

**Re: Portland Mixed Use Zones Project**

Dear Chair Schultz and Commission Members:

I am the General Counsel for DB Franchising USA, LLC ("Dutch Bros. Coffee") and wish to comment on the proposed zoning for the Dutch Bros. Coffee outlets located within the City of Portland. Dutch Bros. Coffee submits this letter requesting that the proposed zoning for all of Dutch Bros.'s existing stores subject to the mixed use zones project be CE.

We are first concerned that the proposed mixed use zones greatly reduce our ability to maintain, modernize and develop new drive-through facilities. As you could reasonably expect, our business model is almost exclusively the operation of the drive-through coffee kiosks. Without drive-through friendly zoning, our company could not develop and grow. The only proposed mixed use zone in the proposed 2035 Comprehensive Plan which does not expressly prohibit drive-through facilities is the new CE zone. For that reason alone, we hereby request that all existing Dutch Bros. stores be zoned CE. These locations include the Dutch Bros. Coffee outlets located at 5710 Foster Rd., Portland, OR and 13640 SE Division St., Portland, OR 97236. These were developed as drive-throughs in auto-oriented areas and would not be sustainable as part of an expensive mixed-use project.

Even if these Dutch Bros. outlets 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.

In addition, I am concerned that existing drive-through facilities will become nonconforming and thus unable to be updated or remodeled in accordance with obligations in long-term leases and franchise agreements. Therefore, I also request that all existing drive-throughs as of the effective date of the 2035 Comprehensive Plan that are placed into zoning that prohibits further drive-through development nevertheless be deemed a conforming use. In addition to the addresses above, additional drive-through Dutch Bros. outlets that are at risk of becoming nonconforming are located at: 430 NE Lloyd Blvd., Portland, OR; 514 SE Belmont St., Portland, OR 97214; 5482 SW Beaverton Hillsdale Hwy, Portland, OR (due to new residential set-back requirement). These locations will need to be able to remodel and update to comply with evolving system standards aimed at improving the look and function of the location. In the absence of a policy establishing existing drive-throughs as conforming uses, operators of Dutch Bros. outlets will be stuck between their legal obligations with their landlord and franchisor, and the City's stringent nonconforming development standards.

Yours truly,

Joshua L. Lute | General Counsel | Dutch Mafia, Inc.  
Dutch Bros. Coffee | 300 North Valley Dr. | Grants Pass, OR 97526  
o: (541) 955-4700 | c: (541) 373-3254 | f: (541) 471-0330  
[jlute@dutchbros.com](mailto:jlute@dutchbros.com)

Cc: RTF/ICSC GR Committee



**From:** Mark Bello [<mailto:markrichardbello@gmail.com>]  
**Sent:** Monday, May 16, 2016 7:01 PM  
**To:** Manning, Barry <[Barry.Manning@portlandoregon.gov](mailto:Barry.Manning@portlandoregon.gov)>  
**Cc:** Cairo, Jenn <[Jenn.Cairo@portlandoregon.gov](mailto:Jenn.Cairo@portlandoregon.gov)>; Redisch, Meryl <[merylaredisch@gmail.com](mailto:merylaredisch@gmail.com)>  
**Subject:** UFC Testimony Regarding the Mixed Use Zone Project

~~Mr. Manning,~~ Barry,

The Urban Forestry Commission expected to be able to meet with BPS. Unfortunately, we were unable to coordinate with you. I am not authorized to speak on behalf of the Urban Forestry Commission formally but here is my personal testimony:

The MUZ project needs “further baking”. That is, I am concerned that city staff may expect Title 11 to be revised to conform with MUZ project goals rather than implement the new Comprehensive Plan or the adopted Urban Forest Management Plan. Making Title 11 secondary to T33 is not warranted by the Municipal Code. Here are some fundamental questions:

- How are you anticipating that Title 11 is affected by proposed changes to the zoning code?
- Are you prioritizing trees over other landscaping requirements?
- Why exempt sites from tree regulations based on zoning rather than site characteristics?
- Does all this prejudice the outcome of future changes to Title 11?

I hope that staff is willing to enter into a dialogue with the Urban Forestry Commission soon.

Regards,

Mark R. Bello

[markrichardbello@gmail.com](mailto:markrichardbello@gmail.com)  
503.810.1852

2146 NE 9<sup>th</sup> Avenue  
Portland, OR 97212

**From:** Mitch Thomas [mailto:mitch.thomas@gmail.com]

**Sent:** Sunday, May 15, 2016 10:03 PM

**To:** Cunningham, Bill <Bill.Cunningham@portlandoregon.gov>; Planning and Sustainability Commission <psc@portlandoregon.gov>

**Cc:** Julie Perko <julieperko@yahoo.com>

**Subject:** Requested Mixed Use Zoning report ammendments

To whom it may concern,

My family and I live at 2606 NE 16th Ave, in Portland Oregon and have done so since the summer of 2000.

We are concerned about the proposed zoning changes in the PSC Mixed Use Zoning Report. We would like to see Section 33.130.100 B2 (c) to be amended to 15,000 sq. ft as we feel this would preserve the historical intention and aesthetics of the property at 15th and Brazee and our surrounding neighborhood (Irvington). Furthermore, we feel the preservation of historical aspects of this property (its dimensions etc.) are in keeping with the intention of the Irvington Historic District which we supported and continue to support.

If for some reason this amendment is not possible, as an alternative I would like to see the property at 15th and Brazee be eliminated from the Comp Plan map so that its zoning remains R-5, much like the adjoining property for the same reasons cited above.

Sincerely, Mitchell J. Thomas and Julie M. Perko

**From:** p.mcgilltrees@gmail.com [mailto:p.mcgilltrees@gmail.com] **On Behalf Of** Pete McGill  
**Sent:** Sunday, May 15, 2016 3:03 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony

As the owner / manager of a commercial property at 5128 SE Woodstock I appreciate your considering our concerns about the proposed zone changes. Our area is unique and I believe the rezoning is not appropriate.

I think that leaving Woodstock out of the rezoning plans is the best thing to do.

Thank you

Peter K McGill  
PKM Properties LLC

27929 SE Haley Road  
Boring Oregon 97709

--

Pete McGill

**From:** Doug X [<mailto:dougurb@gmail.com>]  
**Sent:** Sunday, May 15, 2016 7:16 PM  
**To:** [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)  
**Subject:** PSC Mixed Use Zones Testimony

Doug Klotz  
1908 SE 35th Place  
Portland, OR 97214  
April 15, 2016

To Planning and Sustainability Commission  
Chair Schultz, and Commissioners:

Here are my comments on just one of the 13 proposed Low Rise Commercial Storefront areas throughout the city, slated for downzoning from CM-2 to CM-1 in the Mixed Use Zones Project draft.

## **Comments on Mixed Use zones Hawthorne Low Rise Commercial area**

The Low-rise Commercial Storefront “downzonings” are a bad idea in all 13 sites throughout the city, reducing housing capacity in the very place where the most housing should be built, in the heart of services, shopping and transit access. But, I will lay out as an example, why this downzoning is not a good idea nor is it needed, along Hawthorne Blvd. between 35<sup>th</sup> and 38<sup>th</sup> Ave. The downzone area is outlined in blue on this modified city map.

### **1. Key redevelopment sites are thwarted from reaching full potential.**

Two spots stand out as likely redevelopment sites within the 35<sup>th</sup> to 38<sup>th</sup>. One is that large parking lot, and the building associated with it, at 3557 SE Hawthorne. This 23,5000 sq.ft. site contains one building, with new exterior walls and one back wall from 1910. It is not a streetcar era building any more. 120 units could be built here in CM-2, but not in CM-1. (A smaller site across 36th has a 1957 building that does not fit the “streetcar” district, and the apartment house east of it, while old, does not contribute to the Storefront character.)



The other site is a row of plain storefronts, built 1948-1956, stretching from 38th west on the north side. While they are "storefronts", these do not have the detailing to fit the era, and could be replaced by a much larger, mixed use building, with storefronts at the same scale, but with 3 floors of needed housing above.



## 2. Significant Streetcar Era Historic buildings are already protected from removal.

The 1927 Bagdad Theater is on the National Register, but not part of the district. However, within the district, four buildings are on the National Register of Historic Places:



The 1929 Douglas Building:



The 1909 Henry Sensel Building:



The 1911 Frances Building



and the one-story 1929 Charles Piper Building.



Because they are all on the National Register (not just the City of Portland inventory), the downzoning will give less protection than these buildings already have with the national listing and associated federal law. But the downzoning will be detrimental to many other sites in this area.

### 3. The district is not continuous Streetcar Era Storefronts

This map shows the properties that were built after WW II, in **black**, and the properties that are not storefront buildings, in **blue**.



I realize that 3557 Hawthorne is listed as 1910, but having seen the last rebuild, the only intact wall from that date is the west side party wall. The rest is a remodel from about 1998. The adjoining parking lot is obviously not a storefront.

Of the three properties east of 36<sup>th</sup>, north side, they are: "too new, not a storefront, and too new".

The four properties west of 38th, north side, are all post-WW II storefronts.

The properties on Clay St are older houses, not storefronts.

So as far as intact 400' long sections, the south side from 35th Ave. to 37th and half a block east, qualifies, but no north side block face meets the conditions described.

Again, though, with the historic protections in place, and opportunities for more housing on several sites, this example shows that even well-known "vintage" districts are not necessarily appropriate for this Low-Rise Commercial Storefront downzoning scheme. There are opportunities to get needed density in this area without destroying any pre-war buildings, and which could actually enhance the district with needed residential vitality. The proposed downzoning is not needed and would be detrimental to many Comp Plan goals

Thank you.

Doug Klotz

**From:** Doug X [mailto:dougurb@gmail.com]  
**Sent:** Sunday, May 15, 2016 7:16 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Doug Klotz  
1908 SE 35th Place  
Portland, OR 97214  
April 15, 2016

To Planning and Sustainability Commission  
Chair Schultz, and Commissioners:

Here are my comments on just one of the 13 proposed Low Rise Commercial Storefront areas throughout the city, slated for downzoning from CM-2 to CM-1 in the Mixed Use Zones Project draft.

### **Comments on Mixed Use zones Hawthorne Low Rise Commercial area**

The Low-rise Commercial Storefront “downzonings” are a bad idea in all 13 sites throughout the city, reducing housing capacity in the very place where the most housing should be built, in the heart of services, shopping and transit access. But, I will lay out as an example, why this downzoning is not a good idea nor is it needed, along Hawthorne Blvd. between 35<sup>th</sup> and 38<sup>th</sup> Ave. The downzone area is outlined in blue on this modified city map.

#### **1. Key redevelopment sites are thwarted from reaching full potential.**

Two spots stand out as likely redevelopment sites within the 35<sup>th</sup> to 38<sup>th</sup>. One is that large parking lot, and the building associated with it, at 3557 SE Hawthorne. This 23,5000 sq.ft. site contains one building, with new exterior walls and one back wall from 1910. It is not a streetcar era building any more. 120 units could be built here in CM-2, but not in CM-1. (A smaller site across 36th has a 1957 building that does not fit the “streetcar” district, and the apartment house east of it, while old, does not contribute to the Storefront character.)





The other site is a row of plain storefronts, built 1948-1956, stretching from 38th west on the north side. While they are "storefronts", these do not have the detailing to fit the era, and could be replaced by a much larger, mixed use building, with storefronts at the same scale, but with 3 floors of needed housing above.



## 2. Significant Streetcar Era Historic buildings are already protected from removal.

The 1927 Bagdad Theater is on the National Register, but not part of the district. However, within the district, four buildings are on the National Register of Historic Places:

The 1929 Douglas Building:





The 1909 Henry Sensel Building:



The 1911 Frances Building



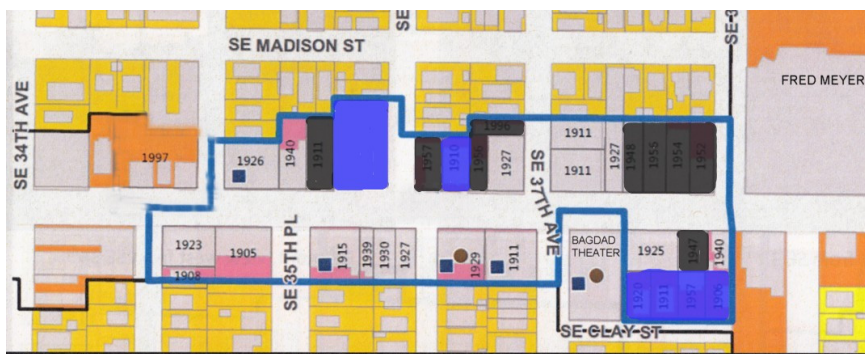
and the one-story 1929 Charles Piper Building.



Because they are all on the National Register (not just the City of Portland inventory), the downzoning will give less protection than these buildings already have with the national listing and associated federal law. But the downzoning will be detrimental to many other sites in this area.

### 3. The district is not continuous Streetcar Era Storefronts

This map shows the properties that were built after WW II, in **black**, and the properties that are not storefront buildings, in **blue**.



I realize that 3557 Hawthorne is listed as 1910, but having seen the last rebuild, the only intact wall from that date is the west side party wall. The rest is a remodel from about 1998. The adjoining parking lot is obviously not a storefront.

Of the three properties east of 36<sup>th</sup>, north side, they are: "too new, not a storefront, and too new".

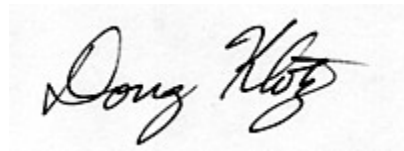
The four properties west of 38<sup>th</sup>, north side, are all post-WW II storefronts.

The properties on Clay St are older houses, not storefronts.

So as far as intact 400' long sections, the south side from 35th Ave. to 37th and half a block east, qualifies, but no north side block face meets the conditions described.

Again, though, with the historic protections in place, and opportunities for more housing on several sites, this example shows that even well-known "vintage" districts are not necessarily appropriate for this Low-Rise Commercial Storefront downzoning scheme. There are opportunities to get needed density in this area without destroying any pre-war buildings, and which could actually enhance the district with needed residential vitality. The proposed downzoning is not needed and would be detrimental to many Comp Plan goals

Thank you.

A handwritten signature in black ink, reading "Doug Klotz". The signature is written in a cursive, flowing style. The first name "Doug" is written with a large, looped 'D' and a small 'u'. The last name "Klotz" is written with a large, looped 'K' and a small 't'.

Doug Klotz

**From:** Doug X [mailto:dougurb@gmail.com]  
**Sent:** Sunday, May 15, 2016 10:26 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Doug Klotz  
1908 SE 35th Place  
Portland, OR 97214

May 14, 2016

## Testimony on Mixed Use Zones Low Rise Commercial Storefronts - Division St.

To: Planning and Sustainability Commission  
Chair Schultz and Commissioners:

As I have noted, the idea of the Low Rise Commercial Storefront downzoning across the city is the wrong way to achieve so many other the Comp Plan goals, but chief among them is the desire to concentrate dwellings in and around Neighborhood Centers, so residents can walk, bike and use transit for many of their daily trips. This concept of Low Rise areas, is the opposite of this, "hollowing out" the core of the Centers.

In this letter, I will point out some flaws in even following the standards laid out for these areas, with SE Division Street, from 35th to 37th as the example. Here is the area, outlined in blue, where CM-2 zoning will be replaced with CM-1, and a four-story limit replaced with 3-story.



### 1. Streetcar era storefronts not continuous on north side of street.

The Emerson House Alzheimers facility, built in 2000, is not really storefront, and much too new. The small storefront east of it is from 2005, and also not Streetcar era.





This building covers much of the block between 35th Pl. and 37th.

A few houses are added to the area as well, and are not storefronts.  
On this map, sites that are post-war are marked in blue, and those that are not storefronts are marked in black.



**2. Significant building sites with older buildings on them are removed from the pool of Zoning capacity.** The 10,000 s.f. sites at each end of this district, at 35th Place and Division (NW corner), and at 37th and Division (SE corner), are one-story buildings in single ownership, and would allow a property owner to feasibly add much needed housing along this stretch of Division St.

The bigger picture, though, is that Portland's housing crisis, as well as sound land use planning, call for greater density in Neighborhood Centers. If a few significant buildings should be preserved, (like the Oregon Theater), then the city should provide assistance in getting National Register protection for these buildings, and let needed development occur on less significant sites.

Thank you.

Doug Klotz



**From:** Doug X [mailto:dougurb@gmail.com]  
**Sent:** Sunday, May 15, 2016 12:05 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones testimony

Doug Klotz  
1908 SE 35<sup>th</sup> Place

Portland, OR 97214

May 15, 2016

Testimony to Planning and Sustainability Commission

**RE: Mixed Use Zones:**

**Remove the "Minimum 10' Setback on selected Civic Corridors" in 33.130.215 (B)**

May 15, 2016

Portland Planning Commission

Chair Schultz and Commissioners:

As part of an effort to respond to the five Pattern Areas, the Mixed Use zones plan includes a requirements that storefront buildings be set back 10 feet behind the public sidewalk (behind the property line) on SW Barbur, SE/NE 122<sup>nd</sup>, SE Division east of I-205, and SE Stark east of I-205.

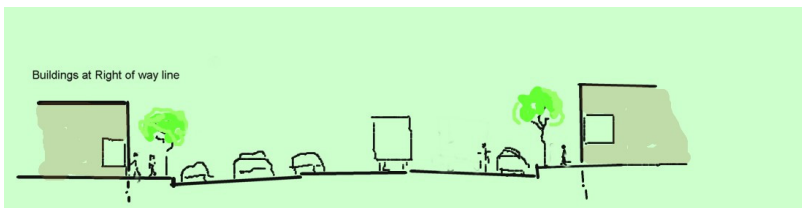
A century of planning thought has led to the conclusion that commercial buildings right at the back of the sidewalks, with Ground Floor Windows, create a more pleasant and interesting pedestrian environment. Portland's Zoning code has required this along all Transit Streets for decades.



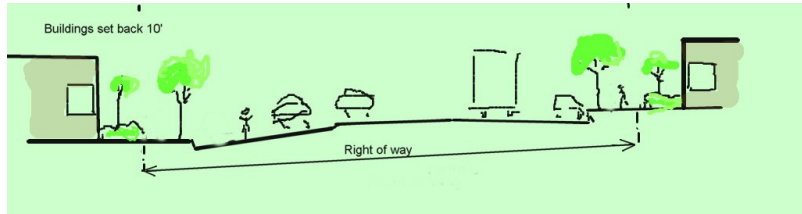
Commercial buildings set back behind landscaping, as is often the case in suburban jurisdictions, do not contribute to street life



A sufficiently wide sidewalk (Increase that standard to 15' or so) on Civic Corridor-designated streets like SE 122<sup>nd</sup>, and SW Barbur, with wide street trees near the curb, and buildings built up to the back of the sidewalk, are first steps toward a good walking environment. Having the sidewalk abut commercial building frontages and having entrances off that sidewalk is key.



Setting the buildings back only increases the visual "size" of the street.



It exacerbates the overly large distance from buildings on one side of the street to those on the other side. The narrower the street "room" is, the more it feels like a pedestrian environment. This standard seems to only reinforce the auto-orientation of these corridors. Instead of setting buildings back, we should be removing lanes, like on Division and soon on Foster Road.

This 10' setback is proposed for all Civic Corridors in the Eastern and Western Pattern Areas, which are too wide to feel comfortable already. While staff supposes they are getting a wider "sidewalk", in reality by allowing landscaping and other construction, the result is that the pedestrian must stay on the public sidewalk portion to travel anyway. Here is an example of such a required 10' sidewalk on Powell Blvd.



A better pedestrian path could be gotten if PBOT would require dedication to get an actual wider sidewalk (say, 15') instead of using a private property strip where access could and will often be blocked.

The 10' Minimum setback should be dropped for all non-residential uses, especially commercial storefronts.. The 10' setback could be required where the building or portion of the building is

residential, with the only paving necessary being for the walkway to the building entrance. There still need to be windows on the residential units facing the street.

Residential Only:



The 10' minimum front setback on Civic Corridors in Eastern and Western pattern areas in 33.130.215 (B) should be removed. Such a minimum setback could be required for buildings that have residential uses on their ground floor facing the corridor, but should never be for Commercial or Office uses.

Thank you.

Doug Klotz



Woo Choi

2323 NE 165th Drive

Portland, Oregon 97230

May 14, 2016

Planning and Sustainability Commission

1900 SW 4th Ave, Suite 7100

Portland, Oregon 97201

RE: 16955 SE Division Street, Portland, Oregon 97236

Comprehensive Plan

Dear Planning and Sustainability Commission,

I am the owner of hte property located at 16955 SE Division Street, Portland, Oregon 97236. The property has had a business on it for more than the previous 40 years via grand fatrher clause. I wanted to change the zoning to commercial. Any assistance is appreciated. Thank you.

Very Truly Yours,

Woo Y. Choi



Danny Ngo and Lan Anh Pham

---

2733 NE 57th Avenue, Portland, OR 97213 | (503) 512-0570 | dannyphanh@yahoo.com

May 13, 2016

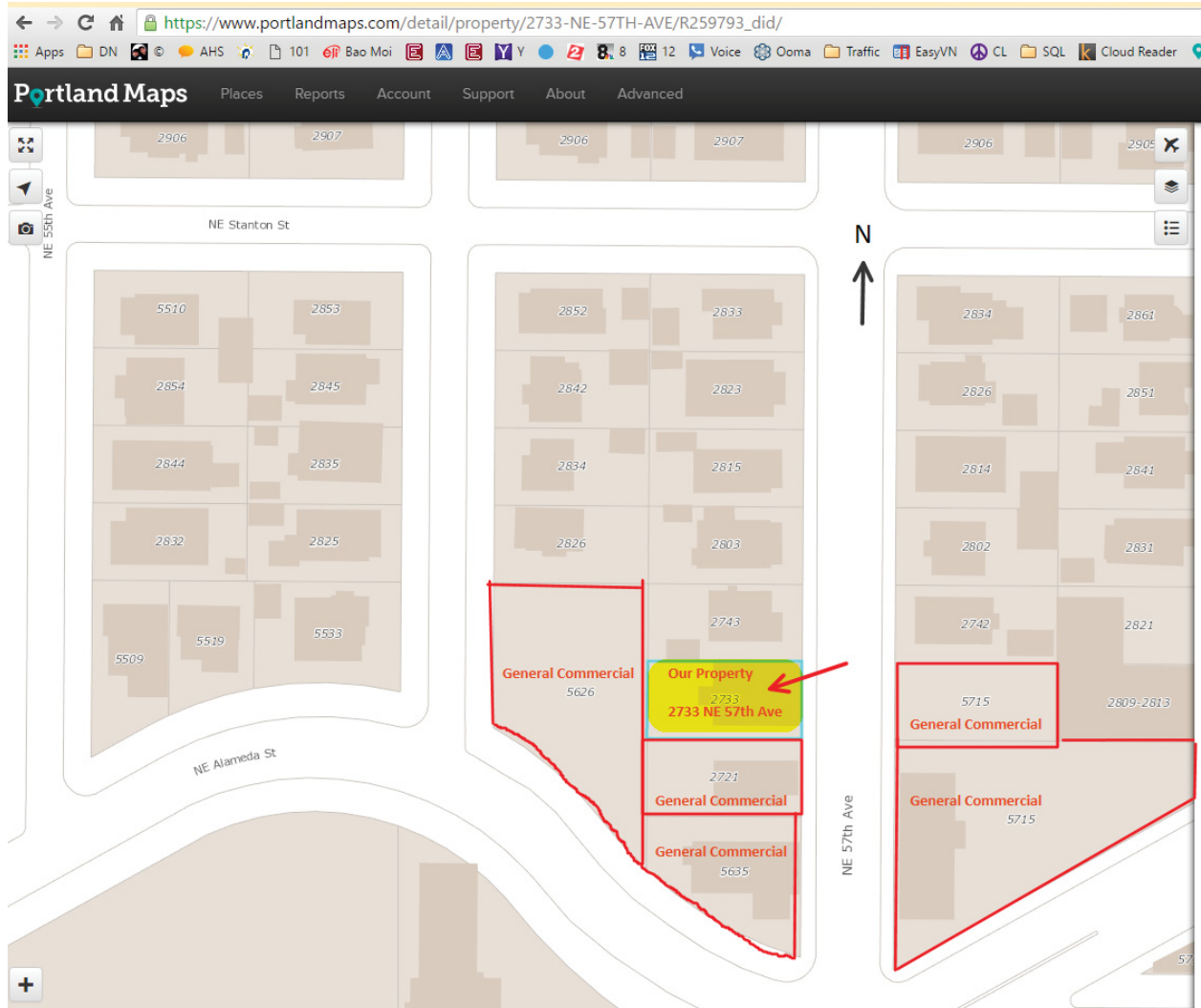
Planning and Sustainability Commission (PSC)  
1900 SW 4th Avenue, Suite 7100,  
Portland, Oregon 97201

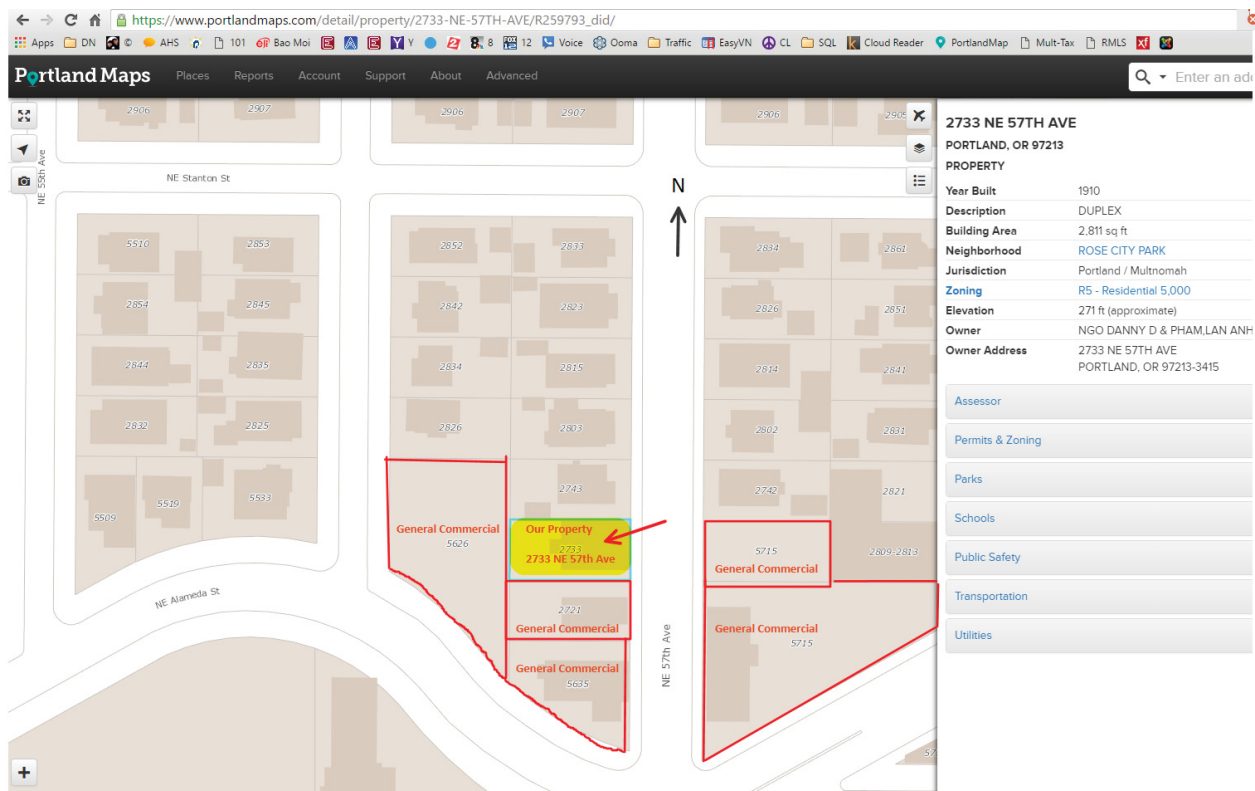
**Dear Commissioners:**

We are Danny Ngo and Lan Anh Pham reside at property address 2733 NE 57<sup>th</sup> Avenue, Portland, OR 97213. We are writing this letter to ask for your consideration of changing our property current zoning (R5) to General Commercial (CG) zoning. Our property is surrounding with three commercial properties (please see illustration below), therefore, we think that we have a compelling reason to be zoned as General Commercial (CG). The General Commercial (CG) zoning will help us establish a small retail/services to serve our neighborhood.

Please let us know if you need any further information to consider our request as you are working on finalized zoning project.

Illustration of our property and neighbor properties:





Sincerely,

Danny Ngo and Lan Anh Pham

**From:** Erin Telford [mailto:[erinleben@gmail.com](mailto:erinleben@gmail.com)]  
**Sent:** Thursday, May 12, 2016 11:56 AM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>;  
[fosterpowellneighborhood@gmail.com](mailto:fosterpowellneighborhood@gmail.com)  
**Subject:** Foster Powell Mixed Use Zones

I am a resident of the Foster-Powell neighborhood. I have lived here for over three years, and my husband has been here for over a decade. I have worked in the architectural field in Portland for many years.

In response to this email sent out by the Foster-Powell Neighborhood Association:

As discussed at Monday's Neighborhood Association meeting, there is a "low-rise commercial" proposal of Commercial Mixed Use 1 (CM1) on both the north and south sides of Foster Rd. between 63rd Ave. and 68th Ave. This designation will cap building height requirements to two stories as opposed to the previous CM2 designation, which allowed for up to 4 stories. This is to acknowledge the existing character of one to two-story "street car era" buildings.

I am very much AGAINST a low-rise commercial proposal.

The city so desperately needs apartment units, and additional rental space. While some neighborhoods (Division as an example) have been overwhelmed by 4-story development, Foster-Powell is one neighborhood with the space, wide commercial streets and scale to actually benefit from the added building height. And as a rapidly gentrifying neighborhood, we have a change to fit in more affordable housing and also help improve the neighborhood with new development and retail.

While I am all for the preservation of our historic building on the commercial strip on Foster and elsewhere, to limit the new building height to 2-stories, simply to acknowledge the older street-car era buildings, greatly limits the neighborhood's potential, and disregards some wide open spaces on Foster that are more suitable to higher buildings than most lots in the city.

Thank you,

Erin Telford

> -----Original Message-----  
> From: Noah Peterson [<mailto:noah@noahpeterson.com>]  
> Sent: Thursday, May 12, 2016 11:12 AM  
> To: Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
> Subject: Comments for PSC Public Hearing: Tuesday, May 17th  
>  
>  
> Hello,  
>  
> These comments are regarding a mixed-use proposal for the  
> Foster-Powell neighborhood between 63rd and 68th.  
>  
> I own a home on 64th between and Boise and Center.  
>  
> I think limiting the height of the buildings on Foster is a mistake.  
> I think the height restrictions should be set for the maximum height  
> allowed. As Portland and the F-P neighborhood has been growing and  
> developing my home value has done nothing but increase. The  
> neighborhood has become safer, more desirable, and better neighbors  
> have been moving in. This is a close-in neighborhood. Part of the  
> attraction of this neighborhood is being a part of the city. I am  
> thrilled to see all of the development on the East side. I think it's  
> long overdue. The multi-level mixed use buildings along Hawthorne,  
> Division, and Cesar Chavez look great, work great, and adds value to the neighborhoods.  
>  
> Furthermore, I'd rather see the city build up rather than sprawl out.  
> The further out we go the more roads, light rail, and bus lines we  
> need. If we go up, there's not that infrastructure to be added.  
> Sprawl bad, high rise good.  
>  
> Just one home owner's opinion.  
>  
> Noah  
>  
> Noah Peterson  
> 503-703-9516  
> 4050 SE 64th Ave, Portland, OR 97206



**From:** Nanci Snyder [mailto:carricou@comcast.net]  
**Sent:** Wednesday, May 11, 2016 4:49 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

I am submitting this testimony for the Westmoreland/Sellwood neighborhood recommending design overlay protection for our community. In particular, I would recommend SE Milwaukie and SE 13<sup>th</sup> Avenues for the overlay protection, as well as SE 17<sup>th</sup> Avenue and SE Bybee Blvd. These streets represent the core of our connected neighborhoods.

This protection is needed to retain the livability and historic character of the area. SE Milwaukie Avenue still retains its old streetcar rails under the pavement – alluding to the historical nature of the neighborhood.

Sadly, we are seeing ugly and huge multi-story apartment buildings – many without parking - sprouting up throughout our neighborhood that tower over the existing bungalows. These buildings are abominations. The developers appear to be out of control with no concern for the future of our community.

As a longtime resident of the Westmoreland neighborhood, I whole heartedly recommend a design overlay for our community. Other neighborhoods such as St. Johns, Kenton, Mississippi have a design overlay; I believe SE 13th and SE Milwaukie Avenues have earned the same respect.

I hope you take my testimony into consideration.

Respectfully submitted,

Nanci M. Snyder, P.E.  
5915 SE 21<sup>st</sup> Avenue  
Portland Oregon 97202

**From:** Breah Pike-Salas [mailto:captaincork@gmail.com]  
**Sent:** Wednesday, May 11, 2016 8:21 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony - CM2 zone

Hello PSC - I am looking at the specific uses allowed in the proposed CM2 zone, and know of a situation proposed in which the CM2 zone will immediately abut a single family zone (on SE 17th and Clatsop St.) In this scenario, the uses allowed in the CM2 zone should be reduced to only Office or School immediately adjacent to a residential zone. Otherwise, there could be a restaurant/bar adjacent to a single family house (loud due to music), or vehicle repair adjacent to a single family house (super loud and potential fumes), or manufacturing and production adjacent to a single family house (loud, fumes, and potential smells), etc.

As a rule for the bigger picture- CM2 zones should not be allowed to abut immediately adjacent to single family zones - but rather abut multi-family zones. And the multi-family zones abut single family zones. This allows for all uses to live adjacent to each other harmoniously.

Thank you for taking the time to work on such a difficult project. I'm happy to answer any questions you may have.

Breah

Breah Pike-Salas  
1745 SE Clatsop Street  
Portland, Oregon 97202  
503.260.5440

**From:** Linda Lee [mailto:llee1954@gmail.com]  
**Sent:** Wednesday, May 11, 2016 3:34 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Design Overlay

My husband and I are new residents to Sellwood. We searched for a long time to find our forever home and we choose Sellwood for many reasons but primarily for the small town, quaint and friendly feel of the neighborhoods. We deserve a Design Overlay to keep Sellwood as it is.

Thank you,  
Linda and Jonathan Lee  
1404 SE Miller St  
Portland 97202



**City of  
Portland, Oregon**  
**Bureau of Development Services**  
FROM CONCEPT TO CONSTRUCTION

Dan Saltzman, Commissioner  
Paul L. Scarlett, Director  
Phone: (503) 823-7300  
Fax: (503) 823-6983  
TTY: (503) 823-6868  
[www.portlandoregon.gov/bds](http://www.portlandoregon.gov/bds)

**Date:** May 11, 2016  
**To:** Barry Manning and Bill Cunningham, BPS  
**From:** Gina Tynan, Bureau of Development Services  
**CC:** Paul Scarlett, Susan Anderson, Joe Zehnder, Eric Engstrom, Rebecca Esau, Stephanie Beckman, Douglas Hardy, Kimberly Tallant, Jill Grenda, Kara Fioravanti  
**Re:** BDS Comments on Mixed Use Zone (MUZ) Project Proposed Draft

Thank you for the opportunity to review and comment on the Mixed Use Zones (MUZ) Project Proposed Draft. This important project will shape the future of commercial and mixed-use development and our ability to meet the goals of the Comprehensive Plan to manage growth and to create and maintain healthy, vibrant centers and corridors, as well as neighborhoods, outside of Portland's Central City. We appreciate the chance to participate in informing this critical re-write of the Zoning Code's development regulations.

The comments below highlight our primary areas of concern and also provide detailed comments on the proposal. We appreciate the meetings we've had to begin going over these concerns. We look forward to working with you on the test run of the proposed regulations on several real projects in the coming days, as well as working with you to address the concerns outlined below. We are also committed to participating in the upcoming work sessions with the Planning and Sustainability Commission (PSC) as we collaboratively strive to achieve the PSC's policy direction while ensuring the regulations are as clear and simple as possible, for the public and our administration of the regulations. Again, thank you for the opportunity to work with you on this important project.

**Primary Areas of Concern**

- 1. Uncertain and/or Unintended Impacts of proposed Development Standards.** There is concern that the revised development standards, bonus incentives, and new and expanded Overlay zones and Plan Districts of the MUZ Project have not been sufficiently evaluated to understand the implications on administration, economics and design that may result from their implementation. With any massive overhaul of a set of regulations, it is challenging to catch all of the details regarding how things would apply to a variety of situations and how it will all fit together. We are interested in working with you as you do the trial run of the regulations on several real projects to identify areas of code that are unclear, or conflict, or need additional refinement to get the desired results. We are also interested in working with you at the PSC Work Session. And we understand that BPS will do a "clean-up" package after the MUZ and other Title 33 amendments are adopted to make sure they all "synch up" with each other, prior to the effective date in late 2017 or early 2018. That is a very important step, given the number of moving parts being considered in the different active legislative projects.

2. **Prescriptive Nature of the Regulations.** We understand that one of the goals of the code is to be responsive to the context of the development. However, many of the development standards are prescriptive in nature and will limit the ability of property owners to create unique projects that truly address the historical context, neighborhood character and evolving nature of the city. Developers tend to design to meet, but not exceed, the base zone standards within the zoning code in order to ensure a timely review and to minimize uncertainty in the permit review process. As such, the detailed, prescriptive nature of the standards proposed could result in both an unintended down-zoning and in uniform and homogenous design characteristics for commercial, multi-dwelling and mixed-use development projects in the MUZ.
3. **Complexity of Development Standards.** BDS staff needs to be able to quickly and easily answer customer questions about the development standards allowed in each zone. As proposed, the development standards of the MUZ are not straightforward and instead rely on the context of the site and considerations more typical of a discretionary review. They are redundant with many existing Community Design Standards and send mixed signals in combination so that it is very difficult to determine basic development standards such as height and setbacks. These standards will not be clear to the average property owner without code language refinements, additional illustrations, and mapping made available to the public as part of the code and through publicly accessible mapping resources such as portlandmaps.com.
- **The proposed height standards are difficult to apply.** The proposed changes to the measurement of building height in the MUZ are contained within the revised Chapter 33.130 and would be unique from other zones. In the interest of providing clear standards that can be understood and applied by the city as well as property owners and developers, clarifications and consistency within the zoning code are critical. It is important that the revised height measurement works in concert with the standard being developed for single dwelling zones through the Residential Infill Project and that it be applied consistently throughout the code and defined in the Zoning Code Section 33.930.050, Measuring Height. We recommend against establishing different methodologies for height measurement that vary depending on the zoning. The concept of having a fixed point to measure from is needed in all situations and zones, so it is our hope we can develop a single methodology that will apply regardless of the zoning. Perhaps another City has a good method we can use.

The proposed changes are also complex and difficult to understand. That said, we understand the concept of what is proposed. However, if the proposed height measurement standard is not revisited as part of the MUZ Project, it will be vital to include figures within the code to illustrate height measurements in multiple development situations, applicable in all zones. Further, Adjustments to height standards should not be prohibited; there are too many instances of site-specific constraints that would otherwise hinder development.

- **The proposed setback standards are reliant on too many factors.** The proposed setback standards are difficult to understand and are reliant on a multitude of varying site and context factors including width of street and adjacent zoning that make verification of the applicable setback standard too complex for most applicants and property owners to determine without assistance from BDS staff. They are identified in the base zone development standards, overlays, Plan Districts, and the Community Design standards – and vary from code section to section – making it challenging to identify the applicable standard on any given site. We ask that these standards be examined in totality for what they are trying to accomplish and



then be refined and limited to the most important components to address the purpose of these standards.

**4. Code Language Clarifications to Defined Terms are Critical to application of the proposed Development Standards.**

- **Clarification of floor area.** With the inclusion of residential floor area in the calculation of floor area ratio (FAR) and reduction to the overall allowed floor area, this become a more significant development standard within the code. The code should be revised to specifically address what is and is not considered floor area. The current code is challenging to administer even in the limited circumstances where floor area limits come into play (relatively flat lots with high rise development downtown) and the existing code language will not be sufficient to address these changes to the MUZ. Please clarify whether the following are included in FAR: covered balconies, enclosed parking, lobbies, mechanical rooms, elevators and stairways, rooftop amenities such as partially covered deck and elevator alcoves. Figures to illustrate examples of building area that is and is not counted as floor area are strongly recommended. This is also a priority coming out of the Residential Infill Project.
- **Ground floor windows standards.** With increased area requirements for ground floor window standards, clarification of applicability is essential to achieve the intended design and character objectives of this standard to activate ground floor areas. The existing code language presents challenges to application of the ground floor window standards that will be exacerbated by this increased requirement in concert with other new development standards. Specifically, the following issues should be thoroughly addressed:
  - Please clarify window areas that do not count toward meeting the ground floor windows standard, such as those with views into bike parking, loading spaces and mechanical equipment.
  - Please identify a minimum depth for display window areas of at least 24 inches to allow for more ample and engaging displays that will meet this standard.
  - Please address whether or not the openings/entrances to structured parking count in the area that is subject to the ground floor window standards. Currently we tell applicants that openings to structured parking are counted, and for 100% residential development with a garage door opening to structured parking, it precludes them being able to ever meet the standard.
  - Please provide figures illustrating how the ground floor window standard applies on sloped sites (i.e., areas subject to these standards on a given façade) and on sites with street frontage on one, two and three or more sides.

**5. Clarification is needed to address applicability of Adjustment Review and/or Modifications and their Criteria for Approval.** Additional code language revisions are needed to address approval criteria for Adjustment Review and Modifications. Specifically, the purpose statements must adequately address the proposed development standards. In many cases, the proposed code language is unclear if Modifications are allowed. Further, prohibiting Adjustments to qualifying situations would undermine organization of the code and require similar notes for all qualifying situations.

**6. Many standards identified in Plan Districts are duplicative as they are already addressed by the Base Zone standards, Community Design Standards or through applicable Approval Criteria of land use review.** There continues to be a lack of clarification on how the MUZ development standards, associated overlay zones and plan districts relate to the Community Design

Standards. In many instances, multiple levels of regulations apply, but it seems that they identify the same level of specificity of standards as provided within the base zone, which is not necessary. Many of the regulations in the proposed new plan districts are also similar enough to the base zone or overlay zone requirements that they are not necessary. The inclusion of this redundant code language speaks to the particular challenges of developing and reviewing the overhaul of an entire chapter of code.

7. **Use of the Planned Development process to allow bonus options needs to be more thoroughly and consistently incorporated into the existing Planned Development regulations per Chapter 33.270.** The existing planned development process should be unchanged when used in MUZ when there is no bonus earned. Clarification within the proposed revisions of this code section is needed to confirm that some Planned Development regulations will apply only when using the bonus options for MUZ. The approval criteria should be clear and more specific in terms of what the development should look like – reference to the entirety of the Community Design Guidelines is not appropriate.
8. **Some of the proposed Development Standards will create new Code Enforcement issues.** The code language includes use limitations and development standards related to hours of operation, covenant requirements and occupancy of structures. These standards and provisions cannot currently be enforced by BDS and are likely to set up false expectations by the public of what will occur in their neighborhoods. These items are too prescriptive and should not be codified within the zoning code.
9. **Expansion of Landscape Requirements.** It is our understanding that all MUZs except the CX zone will be subject to Title 11, the city's Tree Code. However, tree planting to meet on-site tree density standards typically cannot be accommodated in rooftop gardens and other alternative landscape areas due to minimum required area and dimensions, required minimum soil depth and resulting impacts of structural building load requirements. It is anticipated that these standards will require applicants to pay in lieu fees to address Title 11 standards for trees rather than resulting in a greening affect.

The code calls for landscaping to meet the L2 (low screen) landscaping standard per Chapter 33.248 on sites in the MUZ across from R zoning; this landscape standard, which requires trees, shrubs and groundcover plantings at a minimum setback width, is not an urban landscape model, but more suburban in nature. There will be street trees in place, which provides some visual separation. The proposed landscape screening should be reevaluated to address the intent and character of buffering between sites with different zoning designations and the provision of appropriate greenspaces. In addition, please provide specific language to clarify how the L3 (high screen) landscaping standard works in the setback with high-screen shrubs required along the property line to form a continuous screen. Specify if pedestrian connections, bike parking, outdoor area, trash enclosures and mechanical equipment can be in the setback where L3 is required. Also, please consider the practical problems created by planting trees too close to foundations.

#### **Detailed Comments**

We offer the following additional detailed comments as Appendix A, attached.

## Appendix A

Page	Code Section	Comment
21 & 62	Comp. Plan Policy 10.1 – Land Use Comp. Plan Policy 10.1 – Land Use Designations	The corresponding zones identified for the Mixed Use designations are repeated under multiple designations. What is intended by this? Does BPS intend to allow up-zonings from the less intense zones to the more intense if mapped with a more “intense/urban” designation? If so, the report should include a proposed Comprehensive Plan Map and should evaluate the Zoning Map Amendment approval criteria—Adequacy of Services.
63	33.130.010	<p>Please delete the reference in purpose statement, “The zones implement the vision, guiding principles, and goals and policies of the Comprehensive Plan.” If left in, it would require addressing the entire Comprehensive Plan when doing an Adjustment Review, given Approval Criterion 33.805.040 B and C require demonstrating the purpose of the zone is met.</p> <p>In the last paragraph of the purpose statement, 2<sup>nd</sup> line, replace the vague term “intent” with the term “characteristics,” as “characteristics” are described in 33.130.030.</p>
63	33.130.030.A.	It will be extremely difficult to enforce hours of operation so broadly in the Zoning Code. Can the impacts of these uses instead be addressed by the size of the use and whether and where exterior development is allowed? If hours of operation are going to be used more broadly in the base zone, they should be defined and it should be clear if employees can be present on the site outside these hours of operation (people cleaning up inside the building vs. doors open for business).
65	33.130.030.C.	Is language that says “not appropriate for sites where adjacent properties have single-dwelling residential zoning” meant to inform quasi-judicial comprehensive plan amendments? If so, is this the right place to put it? Is it not covered by the other criteria?
67	33.130.050.B.2.	<p>Five units seems like a low threshold for requiring Neighborhood Contact in commercial zones. For example, TDM will only be required for 10 or more units. These are areas that we have designated for the most intense development in the City. Why are we doing that if five dwelling units is going to impact the neighborhood enough to warrant contact prior to permit application?</p> <p>Currently, the Community Design Standards require that projects with more than <u>3</u> units (i.e., 4 or more) are subject to Neighborhood Contact. With expansion of the “d” overlay will there be any MUZ sites</p>

Page	Code Section	Comment
		to which this would not apply and supersede 33.130.050.B.2?
69	33.130.100.B.2.c.	<p>It is extremely difficult to enforce hours of operation for Retail Sales and Services uses. Are there alternative ways to regulate impacts other than hours of operation to achieve the same result? No exterior development?</p> <p>What commercially-zoned sites have “all” the abutting properties in a single-dwelling zone? Probably less than a handful.</p> <p>The size limitation, as well as other code provisions (convenience stores, off-site impacts, etc.), should be sufficient to attract mostly small-scale tenants and preserve neighborhood character.</p>
71	33.130.100.B.3	Are area limitations identified in 3a - 3d of this subsection intended to apply to Utility Scale Energy Production uses? These are a Manufacturing and Production use and therefore require a CU.
73	33.130.100.B.9	<p>With Commercial Parking allowed by right, can someone add additional parking spaces up to the maximum allowed? Identifying that surface parking exists on a site does not necessarily mean that the number of spaces on the site were legally constructed. Can this language be clarified?</p> <p>Has PBOT/BPS looked at the required CU for commercial parking in the CX zone? Why require a CU for sites in the CX zone but allow in the CM2 and CM3 zones?</p>
77	Table 130-1	Manufacturing & Production should be identified as “CU/L” in all zones as Utility Scale Energy Production is a Manufacturing & Production use that requires a CU.
79	33.130.205	<p>With increased applicability of FAR maximums, how FAR is measured is going to become critical. Please clarify whether the following are included in FAR: covered balconies, enclosed parking, lobbies, mechanical rooms, elevators and stairways, rooftop amenities such as partially covered deck and elevator alcoves.</p> <p>We respectfully disagree with BPS’s March 31, 2016 response to this same request in the Discussion Draft of: BPS staff believe that the floor area definitions are sufficient to explain what contributes to floor area. Unclear which specific items might especially need to be illustrated. Additional clarity is critical.</p> <p>Also, should the term “accessory parking” in B be replaced with</p>

Page	Code Section	Comment
		"structured parking"?
80	33.130.210	The changes to height and measuring height add a huge amount of complexity compared with how we measure building height under current code. The 5-story building in a zone with a 45-foot height limit is often a result of packing building area in a gable rather than manipulating grade.
81	33.130.205.C.4	Clarify if Adjustments and Modifications are allowed or if changes to development standards are prohibited.
81	33.130.205.C.5	Some sites are listed as "unclaimed" and some are in two neighborhoods. Wouldn't it make more sense to have a distance requirement only, rather than requiring the receiving and sending sites are in the same neighborhood? No other zoning code regulations are based on neighborhood.
81	33.130.210.A	Include the following sentence in the 1 <sup>st</sup> paragraph of the purpose statement, before the last sentence: "Light, air and the potential for privacy are intended to be preserved in adjacent residential zones."
82	33.130.210.B	<p>This language is difficult to follow. Reference should be to the sidewalk along the frontage adjacent to the façade. Why is the 25 foot distance used? This measurement should be coordinated with the Residential Infill project and definitions should be located in 33.930 rather than in 33.130.</p> <p>Please don't have a separate methodology for measuring height in these zones than the methodology used in all other zones.</p> <p>The 25-foot provision should be replaced with the existing "within a 5 foot horizontal distance" language from 33.930.050.</p> <p>At minimum, include a figure that graphically represents the complex measurement method that is proposed.</p> <p>This proposed height measurement is very confusing and will be challenging for applicants and/or developers to measuring correctly - this will result in the need for BDS staff to tell them how high they can build because they won't know the width of the street and will have to be instructed how to measure height with every project.</p>
83	33.130.210.C.1.b	We understand that there is concern people would opt for a height adjustment rather than use bonus options. However, prohibiting height adjustments could make certain sites undevelopable in ways you haven't considered. For instance some sites have unusual topography (6400 SW Canyon Court). By prohibiting height adjustments in this situation, the applicant would be forced to do a great deal of grading and construction of retaining walls. In other instances, additional height is proposed because the site is required to give an exceptional



Page	Code Section	Comment
		dedication for a public project (8124 SW Barbur Boulevard and the Barbur light rail). In other instances, additional height may be requested because the applicant is proposing to preserve a resource and construct a project with a smaller footprint and a greater height. Rather than prohibiting height Adjustments over 10 percent, a statement could be included in either the purpose statement or the standards that says “Adjustments to height are not allowed and are discouraged before bonus options are exhausted”. Adjustments to base zone height are prohibited; are Modifications allowed?
83	33.130.210.C.2	Do you really appreciate benefits from a step down that occurs 55 feet above the street on a narrow street?  On sites with more than one street lot line, it would seem you would want the step down along the lower transit (i.e., the secondary) street as opposed to the higher transit street. Why allow the bulk on the secondary street as opposed to the more significant transit street?  Narrow street is defined as one that is less than 70 feet wide. Is this before or after dedications are taken?
85	33.130.210.C.2.b	In combination with a 10 foot setback, reduced height for 25 feet is significant – what if the lot is 25 feet wide?  The stepdown should occur only where the site is adjacent to an R-zoned lot line. We have had instances where a commercially-zoned lot only touches at the back corner with an R-zoned lot and it makes for an odd arch of height limit when the standard is “within 25 feet”.
85	Figure 130-2	Show the required setback in both scenarios.
85	33.130.210.C.2.b and c	What if both step downs apply on a smaller site? The application of an appropriate zone should be the tool for addressing the impacts rather than applying a zone and then stepping it back from all sides.  Have you mapped the CM2, CM3, CX and CE zones to see if any of the sites are not within 100 feet of a transit street?
87	33.130.210.D.5	This states that the antennas are exempt from height limits; it would be helpful to state that the “ <u>antennas and mounting devices</u> ” are exempt from the height limits.
89	Table 130-2 Min. Landscaped Areas	Unless Title 11 is amended, all the C zones (except CX) will now be subject to Tree Density. However, green roofs and other features with 30” of soil cannot accommodate many trees. How will the density

Page	Code Section	Comment
		standards reasonably be met without paying in lieu?
91	Example illustration	Where is the street? Is the site 100 feet deep? Is it realistic to show a whole block frontage – how does it work and what does it look like on a smaller site?
93	33.130.212..B.3	Are Modifications also prohibited?
93	33.130.212.B.5.b	<p>Why would you not want the maximum height by the transit street instead of the side street if you are requiring step-downs? Again, on sites with more than one street lot line, it would seem you would want the step down along the lower transit (i.e., the secondary) street as opposed to the higher transit street. Why allow the bulk on the secondary street as opposed to the more significant transit street?</p> <p>Would this encourage buildings constructed 10 feet from the street lot line so they could be built straight up with no step down?</p>
95	33.130.212.C	Could the back of retail on the first floor be one big affordable unit? No minimum number or percentage of the units need to be affordable?
95	33.130.212.C	What Bureau is going to require/review/enforce the covenant requirement? BDS or PHB? BDS would not have the ability to do this enforcement.
97	33.130.212.D	Why the need for both a covenant AND a long-term lease with PDC? Isn't that duplicative? Who will require and enforce the covenant? Very problematic for BDS to enforce.
99	33.130.215.B.1	Would be clearer to read, Unless as specified below, there is no <u>minimum</u> required setback...”
99	33.130.215.B.1.b	<p>The concept of the 5' and 10' setbacks required is overly prescriptive, fussy, and less than urban. Given the width of the ROW between the C zoned lot and the RF-R1 lots, there is already adequate separation.</p> <p>The “within 100' of a transit street” will result in only portions of sites being held to the standard; potentially have the standard apply to sites located within 100' of a transit street. It will be challenging to verify and implement a variety of setbacks on a site based upon portions of the site that are or are not within 100' of a transit street. This may also create some unintended design challenges.</p> <p>“... on the portion of a site” that is across a local service street ...”</p>

Page	Code Section	Comment
		<p>“... the CM1 zone, or “on or” within 100 feet of a transit street”</p> <p>Light rail on Barbur is already taking a 20-foot dedication from a site. This would require the site lose an additional 10 feet of frontage, an excessive amount that would likely discourage development.</p>
99	33.130.215.B.1.b(1) and (2)	<p>Is there a maximum dimension for the bicycle and pedestrian access?</p> <p>This is borrowed from the Community Design Standards. Have you looked to see if it is successful? Sometimes only half the frontage is across the street from RF-R1 which plays out with weird landscaping patterns. See 16-106345 AD.</p>
101	33.130.215.B.1.b	<p>L2 landscaping is unworkable in the first 5 feet from the street lot line, in many circumstances, since it conflicts with the required street trees. Also, not a very urban form. Why not just rezone the residential on the other side of the street to R2.5 or a more urban residential zone?</p>
103	33.130.215.B.2.b	<p>Explain how L3 works in the setback – L3 with shrubs on the property line? Specify if pedestrian connection, bike parking, outdoor area, trash enclosure and mechanical equipment can be in this setback given no setback for lower structures.</p> <p>The standard should clearly state, “Buildings that are 15 feet or less in height, with fully enclosed walls are...”</p> <p>Reword last sentence of 2b to read, “...must be landscaped to at least the L3 standard at a width of 10 feet.”</p>
103	33.130.215.B.2.c	<p>Please delete this standard. The Zoning Code should not be regulating side windows. It is a building code issue and a marketing decision.</p>
105	33.130.215.B.3	<p>Include provision clarifying that stormwater planters are allowed in the required setback from an adjacent R-zone. Perhaps replicate language from 33.130.225.B.1.a?</p> <p>In B.3.b.1 and 2, clarify whether railings are allow to exceed the 2.5’ height.</p>
105	33.130.215.B.3.b(3)	<p>This means a 100% residential project could have a 10-foot deep canopy. This conflicts with the landscaping requirement.</p>
109	33.130.215.D.2	<p>Stormwater planters should be allowed within these areas – where are they supposed to be located?</p>

Page	Code Section	Comment
113	Figure 130-7	<p>Show a scenario where the front building meets the setback and a detached building is proposed completely behind the front building. Is that allowed?</p> <p>Is a building with the ground floor entirely in retail with residential uses above considered a “residential building” for purposes of this standard?</p>
119	33.130.220.B	Very concerned that we are encouraging less intense and undesirable development by removing the minimum building coverage requirements for small sites in inner pattern area.
121	33.130.222.C	<p>This is overly prescriptive and unnecessary with all the other standards that are manipulating the envelope and facades of the building. Where will we see these buildings with that large a façade area outside areas where design standards or design review are required?</p> <p>If retaining this standard, please reword C.1.c to read, “Portions of building facades that are vertically separated by a gap of 10 feet in width or more and...” In C.2 second line, is this supposed to be 2 feet “in depth”?</p> <p>Please provide examples of new development that doesn’t include street-facing articulation. By including a standard for façade articulation, you could be setting the bar lower on articulation and buildings would be designed to meet this requirement rather than exceed it.</p> <p>What about a building that has stepped back the upper floor due to other requirements, does that count as façade articulation?</p>
123	33.130.225.B.1.a and b	Can the conjunction between these subsections be changed to “or” to avoid conflicts with the Stormwater Management Manual?
123	33.130.225.B.2.b	<p>The L1 standard requires trees and groundcover plants. By requiring L1 beneath the large trees, additional trees will be required to be planted beneath the canopy of large trees to meet this standard. In addition, sometimes ground cover doesn’t grow well when shaded or in conflict with large tree roots; this could create enforcement issues.</p> <p>Please clarify the language to address the intended result to require L1 landscaping within the 30’ x 30’ area. If only groundcover plantings are required in addition to the large tree to be preserved, this alternative should be clearly stated.</p>
125	33.130.225.2.c	Can these areas be on the decks of underground parking? How is

Page	Code Section	Comment
		ground level defined?  30 inches deep is far too shallow to allow for trees to grow.
125	33.130.228.A	...“opportunities for outdoor living opportunities” is redundant.
125	33.130.228.B.1	48 square feet per unit is a lot - none is required today.  A minimum sill height should be noted [4’ maximum]. Otherwise the 40% GFW requirement could be met for a 5’+ tall sill.
125	33.130.228.B.2.a	How are required outdoor areas that extend into the front setback private, for the use of an individual unit, if contiguous with the street or sidewalk?  Have you checked with PBOT about this allowance? They are becoming more reluctant to grant right-of-way encroachments.
125	33.130.228.2.b(2)	Are mailbox areas considered part of the lobby or should they be included here?  Is this an exhaustive list of items that cannot be used to meet the requirements or just examples?
129	33.130.230.B.2.c	How is “secondary street frontage” defined?
131	33.130.230.C	Include window areas that do NOT count into bike parking, loading spaces and mechanical equipment.  Display window areas should have a minimum depth requirement to avoid the typical 1inch deep display cabinet [think Walgreens 25’ long transit street fronting display window cabinets with thumb tacked posters for the latest sales on toothpaste]. A proper minimum depth of 24 inches would at least allow for more ample and engaging displays.  Please address whether or not the openings to structured parking count in the area that is subject to the ground floor window standards. Currently we tell applicants that it IS counted, and for 100% residential buildings that have only units, plus a garage door opening, it precludes them being able to ever meet the standard.
131	33.130.230.D	The title of this section seems inaccurate as it regulates height, interior volume, and street facing entrances [see below], and should be changed to read “Ground Floor Active Use standard”, and/or designated as its own standard.



Page	Code Section	Comment
131	Figure 130-11	It might be helpful to have a second figure showing a sloped lot and/or a building with stormwater planters along the front. How does the standard work in those circumstances?
131	33.130.230.D	This standard – specifically D.2 and D.3 – needs to require street facing entrances. Whether setback and landscaped or raised above ground level, without a direct pedestrian connection to the street, the frontage will not activate the street edge. This was specifically cited by the Design Commission as critical to this active ground floor standard activating ground floor residential frontages.
131	33.130.230.D.1.c	For flexibility, and to encourage stoops, why not allow the front entrance to be up to 2' above the level of the finished grade?  Successful stoops should be a minimum of 2' and require entrances from the street. This was specifically cited by the Design Commission as critical to this active ground floor standard, and 3' was preferred.
131	33.130.230.D.d.2.a	How does this work with 33.130.215.B.1.b(1)? Is L1 or L2 required?
133	33.130.230.D.3	Why a raised ground floor? This makes ADA access difficult and further restricts the height of buildings that contain residential uses—especially in the areas that need a lower height limit.
133	33.130.230.E	How often is the public art exception used outside the Central City? Limiting it to ½ the requirements may ensure it is never used.
135	33.130.235.C	Wall-mounted mechanical equipment should not be allowed on street-facing facades and should be painted to match or otherwise screened from adjacent properties.
137	33.130.240.B.1.a.(1) first bullet	What happens if you have a building behind another building? How is the straight line connection requirement to be met? Why not only require the straight line connection for buildings that are proximate to the street (within a specified number of feet), with all other entrances interconnected via an internal pedestrian circulation path?
137	33.130.240.B.1.a.(1) second bullet	Why is Household Living only required to provide a direct connection to one unit? It would make sense if it were to a lobby, but otherwise it does not make sense.
139	33.130.240.B.2.a	Consider allowing narrower connection to a smaller number of units as in multi-dwelling zone. Also consider allowing it to be part of vehicle area if a different paving material as in multi-dwelling zone.

Page	Code Section	Comment
140	33.130.242	The commentary says this encourages courtyard housing, but is this clear through the proposed code language? Would a graphic make it clearer?
141	33.130.242.A	The purpose statement should be updated to reflect the courtyard housing allowance.
141	33.130.242.B	Would it be easier to just say houses, etc. are exempt?
141	33.130.242.C	Is it OK for the residential entrance to be to one unit? Why not require a lobby or common area?
141	33.130.242.C.3.c(1)	Minimum dimension for the “courtyard”? 10 feet by 20 feet?
145	33.130.245.B.1	<p>“...and <u>those associated with</u> industrial categories.”</p> <p>What about accessory recreational vehicles, e.g., RV trailers and boats?</p> <p>B1 states that exterior display for uses in the industrial categories is not allowed. Section 33.130.100.B.5 states exterior display is prohibited.</p> <p>Also, for clarity, B.1 should read, “...building materials, and goods associated with uses...”</p>
145	33.130.245.B.2	<p>Look at exceptions to Retail Sales and Service uses. Many of the more industrially-oriented sales are classified in the industrial categories. Are these intentionally not allowed exterior display in CE?</p> <p>For clarity, this should read, “Exterior display of goods is allowed except for those associated with...”</p>
145	33.130.245.B.3	This standard should be listed first because it is the most general of the three. It should also be titled “Abutting R zones” otherwise it repeats the title of the subsection.
145	33.130.245.C.1	This states exterior storage is not allowed; Section 33.130.100.B.5 states exterior storage is prohibited for industrial uses.
147	33.130.250	<p>Can we please pull the window standard out of this section and put it with the Ground Floor Window section? This section is really a repeat of the BZDs for houses and it is too easy to miss here.</p> <p>Why does the window standard above the ground floor not apply to nonresidential floor area? Wouldn't we want windows on a commercial</p>

Page	Code Section	Comment
		building on a corridor?
153	33.130.250.D.3.b	The commentary says 24 feet but the standard says 22 feet.
171	33.130.260	The purpose statement does not explain the intent for the standards in Subsection B. If adjusted, there is no guidance.
175	33.266.100.B	It is not possible, in the building code, to hold up occupancy for landscaping. We bargain with inspectors to give a temporary C of O for tree planting sometimes, when trees need to be planted in a different season than the building completion. In ITAP, we are creating a way to hold up final C of O, but it is not routine practice right now. Please don't codify this; it cannot really be enforced.
175	33.266.100.C.1	Clarify that when there are multiple tenants with the same use, you add up the floor area rather than apply the minimum to each tenant.
177	33.266.100.E	Is the measurement taken to the property line or the parking?
177	33.266.100.F	Clarify that no attendant or guarantee is required for automated stacked parking.  Rectify disconnect with 33.266.140.B; which appears to assume some stacked parking scenarios will operate without an attendant.
179	33.266.110.B.2	This code should only reference the map, not have both the map and the reference to peak hour service; the peak hour service definition should be deleted. The map is of no use if we also still have to look at transit schedules for verification.  (also 33.266.115.B.1.b.)  Should streetcar be included or only if it offers frequent service?  ...according to recent (March 2016) communications from PBOT, the streetcar N/S Loops A and B offer peak hour service. Will these also be mapped?
181	33.266.110.B.3	The examination of joint parking agreements to see if "parking demands occur at different times" is slightly discretionary, perhaps it could be done similar to a documenting a non-conforming situation or something.
181	33.266.110.C	Does PBOT think the on-site carpool space requirement makes sense? Would those dedicated spaces better serve the users with flex car spaces or other types of shared vehicles that are identified/approved

Page	Code Section	Comment
		via the required TDM?
189	Table 266-1	It is too bad that there is no longer a commercial zone where parking is not required and the allowance is being taken out of the code in 2016 with our long range comprehensive plan.
191	Table 266-2	The Table needs to be consistent in how it refers to Footnote #2. The footnote should be added to uses that generally/usually reviewed as a CU—Parks and Open Areas, Schools, Religious Institutions, and Daycares.  Agricultural Uses, specifically, Marijuana grow operations, should have a parking requirement.
207	33.266.410.B	So, if I have 15 existing dwelling units on a site and add 15 more, no TDM plan is required?
211	33.270.010 last bullet	Typo: Energy efficient development.
217	33.270.200	Clarify that the additional requirements listed are for PDs in C/MU zones that are requesting bonus FAR and height through a PD. We may have PDs in commercial zones for other reasons, such as allocating allowed density/FAR across a split zoned site.  What are the “energy efficiency requirements of the BPS” and how will they be certified/maintained over the life of the PD?
223	33.415.200	Tough to implement with new shell buildings.  Also, this standard will result in only portions of a site needing to meet the standard. Would it be better to state, “For sites within 100 feet...”?  How are the hours of 7am to 9pm enforced?
223	33.415.200.I and J	Only required to be 25 percent of ground floor?
227	33.415.340	Only on transit street frontage or all frontages? Only on facades within 20 feet of the street?
227	33.415.35.B	For portions within maximum setback? For nonresidential portions of building?
229	33.415.300.B.2	Typo. “At least 25 percent of the ground-floor area of the building must be in one of <u>or</u> more of the following uses...”
239	33.520.100	These provisions are not enough to warrant a plan district. Already

Page	Code Section	Comment
247	33.545.100	have maximum setback, main entrance requirement. Is there also a “d” overlay?  Should these provisions just be incorporated into base zone? No surface parking by corners in 33.266?
241-267	33.520-Division 33.545-Lombard 33.575-Sandy  33.520.110.B 33.545.120.C.4 33.575.110	Assuming all MUZ areas will be mapped with the “d” overlay, provisions regarding exterior finish materials should be omitted from the Plan District as exterior materials must meet the Community Design Standards or be approved through discretionary DZ.  Further, please note that “Sheet pressboard” is outdated language – and certainly isn’t used anymore on an exterior surface. Changes to language should include “composite materials manufactured from wood or other products . . . less than 10%”. The correct language is shown on pg. 253 for 33.545.120.C.4.
249	33.545.110.D	Is the full bonus realized for any amount of housing?
253	33.545.120.C.3	The base zone design standards already address attached garages; this does not need to be identified in the Plan District language.
259	33.575.100.C	Base zone step down proposed appears to be adequate to address this and does not need to be duplicated here.
289	33.855	General comment about amendments to Planned Development chapter. Please pay attention to how the amendments could affect PDs that are not using the bonus option for C/MU zones. Clarification is needed in several places to indicate that the requirements apply only when the bonus option is used. Specific places are noted below.
289	33.855.200.A	Allowing design review for buildings within the PD site after the PD is complete doesn’t work for the typical PD processed under the current code. The PD review approves specific building footprints and elevations (or a set of development standards), therefore it is important for the PD and DZ to run concurrently. Suggest clarifying that subsequent design review is allowed when using the bonus option in C/MU zones if that is what is intended.
289	33.855.200.B	Clarify that the Type III process is for proposals in C/MU zones using the bonus option. Also, Type III review should not be triggered for all PDs simply because the site is in a Design overlay zone. The development proposed could meet community design standards, or if Design Review was required, it may be a Type II process.



Page	Code Section	Comment
291	33.855.250.A	Clarify that the supplemental application requirements apply to proposals in C/MU zones using the bonus option.
295-297	33.855.310 33.855.320	Clarify that the approval criteria in .320 apply to proposals in C/MU zones using the bonus option. Will proposals in C/MU zones that are not using the bonus option still use the criteria in .310?  We often have transfer of density across zone boundaries for sites that include commercial and residential (single or multi). The code needs to clearly identify which criteria apply as the way it currently reads we would be applying .310, .320, and .350
297	33.855.320.A.1	Please be more specific than “framework for development that meets the Community Design Guidelines”. To make findings for this criterion would require addressing the entire Community Design Guidelines when doing a Planned Development review.
297	33.855.320.C	How can BES approve individual buildings without determining compliance with the Stormwater Management Manual? Is there a maximum length of time for phasing?
297	33.855.340.C	Typo: Change reference to CN1 zone.
297, 305-307	33.855.320 33.855.500 33.855.510	Master Plans are only successful when the rigorous up-front process provides development <i>and</i> procedural incentives. Having implemented master plans, it seems that 33.855 requires Type III review for the most common types of market-driven changes that occur post Plan adoption. Without <i>procedural</i> incentives (most amendments = Type II or lower review, allowing projects to meet CDS rather than mandating DZ, etc.) the bonuses offered through PDs for larger sites will likely not be used.
299	33.855.350	It would be helpful to provide more direction on how these criteria apply to split-zoned sites. Perhaps: “The approval criteria of this section apply to Planned Developments where some or all of the site is within the RF through R2.5 zones and do not include a land division.”
303	33.855.350.G	Currently, the Transportation Impacts criteria for PDs with no land division mirror the Transportation Impacts criteria for land divisions in 33.641. This proposal would change one, but not the other resulting in different criteria applying if you do a stand-alone PD in single-dwelling zones vs. a land division and PD in a single-dwelling zone. Please keep this code sections consistent, unless there is a specific reason that they should be different.

Page	Code Section	Comment
303	33.855.350.G	PBOT reviewed the amendments proposed to the Transportation Impacts criterion for PD's in the RF - R2.5 zones and thinks they are positive changes. These same criteria should be applied to PDs in commercial zones when they are asking for FAR bonuses. These criteria should also replace the land division transportation criteria in 33.641. This will provide consistent language throughout the code when PBOT needs to determine the adequacy of transportation facilities.
307	33.855.520	Change "of a development plan" to "of the original planned development application". The term development plan isn't used anywhere else.
315	Zoning Maps	Main street overlay maps should indicate areas proposed with "d" overlay.

**From:** [sewmebug@netscape.com](mailto:sewmebug@netscape.com) [<mailto:sewmebug@netscape.com>]  
**Sent:** Tuesday, May 10, 2016 7:16 AM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** Sellwood-Moreland needs a design overlay

Good Morning,

My husband has lived in Sellwood since 1972; he has seen a lot of changes through the years; the children grow up and move into the neighborhood.

Initially at Milwaukie and Knapp St the property was undeveloped and there were peacocks wandering about.

- \* Then 3 condos were built.
- \* Then 3 more condos were built facing Milwaukie and with businesses
- \* The most recent addition was a long apartment complex with 10-12 apartments and no parking.

This last action seemed to tip the balance of parking in our location to where the 2 closest streets of Knapp and Rex are packed all the time with vehicles.

We don't even have the 70 units with 30 parking spots yet. I don't see where this is going and why it was allowed.

We see a lack of control over this latest round of development in the Sellwood-Moreland area with over 200 apartments/lofts/condos and only 30 parking places.

Why isn't anyone considering where they folks are going to park? When you do the math; and even if you give a liberal amount of latitude to the possibility that 50% are going to walk or bike; then there are still 70 units with cars coming to the area and if you did a drive around to those locations where will they go? My estimation is up the sidestreets; so our street will be filled and only 1 car will be able to pass at a time causing a lot of problems to even move around our own neighborhood.

- \* The parking at the end on our street has caused dangerous situations with cars/pedestrians/bicycles.
- \* There is room for only 1 car at a time and no where for a turning car to go.
- \* The 70 lofts/apartments on 13th near Knapp aren't completed and there is already no location for these people to park.

SELLWOOD-MORELAND needs a design overlay to stop the overbuilding with no parking and try to preserve some of what we've come to enjoy.

Best,

Beatrice and David R. Huth

1339 SE Knapp St.  
Portland, OR 97202-6003

**From:** Angela Zehava [mailto:angela.zehava@stanfordalumni.org]  
**Sent:** Tuesday, May 10, 2016 3:37 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:**

From: Angela Zehava  
1579 SE Nehalem St.  
Portland, OR 97202

To Whom It May Concern:

Sellwood is today a "hot" neighborhood. We are attracting a lot of attention from people looking to make money from developing our landscape and common space. Most of the people buying up property here do not live here, do not know our neighborhood, nor do they seem to care. We are seeing very ugly buildings going up (maximize profit, I guess) that not only do not blend with the neighborhood, they CLASH WITH EACH OTHER. We live here and we should not be subjected to the bad taste and carelessness of developers. These buildings will be here for the rest of my life and the lives of my children. We should be able to have a say AT LEAST on how these buildings look and function in OUR landscape.

Sellwood was founded in 1883 with SE 13th at its center. SE Milwaukie has served Portland since the 1840s when settlers made their homes after their long journey on the Oregon Trail. These two streets make up the town center which has been cherished as a pedestrian centered community for over a hundred years. It is a distinct walkable community and in the future should continue to be a distinct walkable community as our city grows. It deserves a design overlay. This is a unique and historic center of town, not one that investors with no stake in the community should be blot with cookie cutter development unsuited to the neighborhood without acknowledging the architectural and communal living history of Sellwood Moreland. Other neighborhoods such as St. Johns, Kenton, Mississippi have a design overlay and SE 13th and Se Milwaukie have earned the same respect.

Best Regards,

Angela Zehava

May 10, 2016

Dana L. Krawczuk  
DKrawczuk@perkinscoie.com  
D. +1.503.727.2036  
F. +1.503.346.2036

**VIA EMAIL (PSC@PORTLANDOREGON.GOV)**

Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
1900 SW Fourth Avenue, Suite 7100  
Portland, OR 97201-5380

**Re: Testimony Regarding the Proposed Draft of the Mixed Use Zones Project**

Dear Chair Schultz and Members of the Planning and Sustainability Commission:

This office represents WREH Lloyd Plaza LLC (“WREH”), the owner of Lloyd Plaza, located at 1425-1435 NE Irving Street (the “Property”). The Property is currently zoned Central Commercial (CX) and developed with four commercial buildings known as Lloyd Plaza. Its CX zoning is proposed to remain unchanged under the Council Amendments to the Recommended Draft of the 2035 Comprehensive Plan and the Proposed Draft of the Mixed Use Zones Project (“MUZP”).

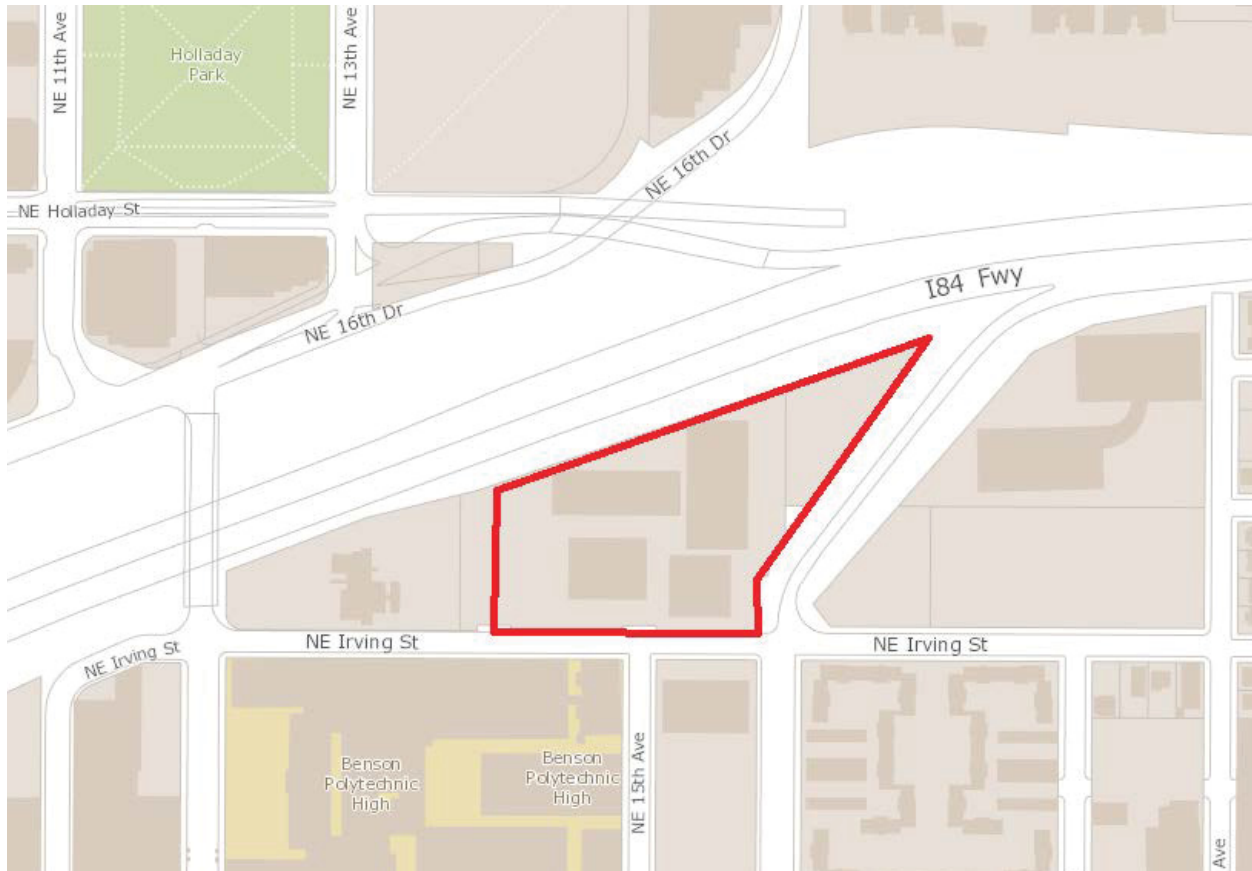
As explained in more detail below, we support retaining the CX zoning for the Property at this time, but believe that allowance for a height bonus is necessary in order for the Property to reach its full potential. We have identified the following two solutions:

1. Amend the MUZP to allow height bonuses up to 160 feet through Planned Development for CX-zoned sites outside of the Gateway and Central City Plan Districts (“CCPD”), including the Property; or
2. Include the Property in the CCPD.

**Background**

The Property is approximately 5.2 acres, is roughly triangular in shape, bordered by I-84 to the north and the on-ramp to the east, as depicted below.





The Property consists of four one-story buildings on approximately 5.2 acres. All of the buildings were built in 1963-64 for the Bonneville Power Administration.

The proposed Comprehensive Plan and zoning amendments have led WREH to consider what may be the best development potential for the Property. WREH has no immediate redevelopment plans for the Property, but IT acknowledges that the Property's size, access to transit and proximity to the Lloyd District, Central Eastside, Willamette River and Downtown presents a terrific future mixed use redevelopment opportunity. Unfortunately, the combination of the larger size of the site, the FAR limit (4 to 1) and relatively low height allowance (75 feet maximum) under the MUZP proposal encourage development of relatively low, very large floor plate buildings. Large floor plate development negates urban form objectives, such as providing open space, green space, and light. Mixed use, and particularly residential development, would

be very difficult to develop economically on the Property and similar sites under the proposed zoning. To encourage a mixed use development which would include open green spaces and proper floor plate sizes for this size of site, a height limit of 120 feet or higher would be appropriate. (This would allow 8-stories, which could include 6 stories of wood or light gauge steel construction on top of a 2-story concrete podium.)

### **Issue**

#### **Regulatory Gap for CX Properties Not Included in a Plan District and Resulting Relatively Low Height Limits**

Under the MUZP, the CX zone is “intended to provide for commercial and mixed use development within Portland’s most urban and intense areas, specifically the Central City and Gateway Regional Center areas.” However, some select sites outside of the plan districts, including the Property and others in the I-84 - Banfield Corridor, are proposed to remain zoned CX. Under the MUZP regulations proposed at this time, we agree that the Property should retain its CX zoning.

Because the Property is not within a plan district, it does not benefit from the plan district allowances like increased height, FAR and bonuses. The current draft of the MUZP also excludes the CX zone from the new height and FAR bonuses available through a Planned Development that is applicable to the other mixed use (CE and CM) zones. Thus, CX-zoned properties outside of the plan districts are left in a regulatory gap where they do not benefit from either plan district or base zone bonuses. Specifically, under the Property’s proposed CX zone, the maximum height is 75 feet, but the Planned Development available to other mixed use zones allows a height of up to 120 feet. Immediately north of the Property, across the Banfield, base heights of 150 to 250 feet and bonus heights of 225 to 325 feet are achievable.

This regulatory anomaly will lead to comparatively low height and density on sites zoned CX, which is contrary to the intent of the CX zoning in which “development is intended to be very intense with high building coverage, large buildings and buildings placed close together.” (MUZP Section 33.130.030.E, Characteristics of the Zones.)

### **Solutions**

#### **1. Amend the MUZP to Provide Planned Development Height Bonuses in the CX Zone**

We request that the Commission allow for the intended level of development on CX-zoned properties outside of the plan districts by adding CX to the list of zones that may utilize Planned

Development bonuses in MUZP Section 33.130.212.B.1. We propose an amendment to the MUZP language as follows (amended text underlined), and corresponding amendments to the other MUZP sections as shown on the attached **Exhibit A**:

33.130.212.B.1. Unless specified below, the bonus options in this section are allowed only in the CM1, CM2, CM3 and CE zones and in the CX zone outside of the Central City Plan District and Gateway Plan District. Sites located within Historic or Conservation districts are not eligible to use bonus options.

Our proposed amendment would require a corresponding amendment to Table 130-3 to add the CX zone. We propose a maximum FAR of 4 to 1 (no increase from base), a maximum of 75 feet in height with bonuses (no increase from base) and a maximum height of 160 feet as part of a Planned Development. This change would recognize the unique nature of the CX-zoned sites outside of the plan districts and allow additional height for sites two acres and larger only when warranted through the Planned Development process. The proposed changes to Table 130-3 are underlined below (existing language shown in grey).

Table 130-3 Summary of Bonus FAR and Height						
		CM1	CM2	CM3	<u>CX</u>	CE
<b>Overall Maximums Per Zone</b>						
Maximum FAR with bonus		2.5 to 1	4 to 1	5 to 1	<u>4 to 1</u>	3 to 1
Maximum Height with bonus		35 ft.	55 ft. 75 ft.[1]	75 ft. 120 ft.[1]	<u>75 ft.</u> <u>160 ft.[1]</u>	45 ft.
<b>Increment of Additional FAR and Height Per Bonus</b>						
Affordable Housing (see 33.130.212.C)	FAR Height	1 to 1 none	1.5 to 1 10 ft.	2 to 1 10 ft.	[tbd] [tbd]	none none
Affordable Commercial Space (see 33.130.212.D)	FAR Height	0.5 to 1 none	0.75 to 1 10 ft.	1 to 1 10 ft.	[tbd] [tbd]	0.5 to 1 none
Large Site Master Plan (see 33.130.212.E)	FAR Height	none none	1.5 to 1 up to 30 ft.	2 to 1 up to 55 ft.	[tbd] [tbd]	1.5 to 1 up to 30 ft.

[1] This larger overall maximum is only allowed through the Planned Development bonus option and required Planned Development Review

Ms. Katherine Schultz, Chair  
Planning and Sustainability Commission  
City of Portland  
May 10, 2016  
Page 5

2. Include the Property in the Central City Plan District

The same elements that make the more intense CX base zone appropriate for the Property (ideal location for infill development, proximity to transit and distance from sensitive uses) make it a logical choice for inclusion in the adjacent CCPD.

The Property is located next to the freeway and Benson Polytechnic High School and adjacent to the current CCPD boundaries to the north and west. It forms a connection between the existing Central Eastside employment area and the Lloyd Center, which are both within the CCPD. The Adopted SE Quadrant Plan for the Central City included the “Banfield Portal” area, including the Property, in its transportation study area due to its importance for land use and transportation proposals in the SE Quadrant.

The Property is not located near lower density residential communities, and its large size (approximately 5.2 acres) provides considerable potential for infill development and housing. The property is well-served by transit, including bus lines along 12th Avenue and the yellow, blue and red Max lines at the nearby Lloyd Center Station. As the City continues to grow east, it is important to adjust the CCPD to promote higher levels of development on appropriate sites. We request that the Commission adjust the boundaries of the CCPD to include the Property.

Thank you for your consideration of these requests.

Very truly yours,



Dana L. Krawczuk

DLK:cr1

Enclosure: Exhibit A

cc: Brent Lower (via email) (with enc.)  
Josh Keene (via email) (with enc.)

## Exhibit A

Proposed Amendments to MUZP Text (shown in underline):

33.130.212.B.1. Unless specified below, the bonus options in this section are allowed only in the CM1, CM2, CM3 and CE zones and in the CX zone outside of the Central City Plan District and Gateway Plan District. Sites located within Historic or Conservation districts are not eligible to use bonus options.

Table 130-3 Summary of Bonus FAR and Height						
		CM1	CM2	CM3	<u>CX</u>	CE
<b>Overall Maximums Per Zone</b>						
Maximum FAR with bonus		2.5 to 1	4 to 1	5 to 1	<u>4 to 1</u>	3 to 1
Maximum Height with bonus		35 ft.	55 ft. 75 ft.[1]	75 ft. 120 ft.[1]	<u>75 ft.</u> <u>160 ft.[1]</u>	45 ft.
<b>Increment of Additional FAR and Height Per Bonus</b>						
Affordable Housing (see 33.130.212.C)	FAR Height	1 to 1 none	1.5 to 1 10 ft.	2 to 1 10 ft.	[tbd] [tbd]	none none
Affordable Commercial Space (see 33.130.212.D)	FAR Height	0.5 to 1 none	0.75 to 1 10 ft.	1 to 1 10 ft.	[tbd] [tbd]	0.5 to 1 none
Large Site Master Plan (see 33.130.212.E)	FAR Height	none none	1.5 to 1 up to 30 ft.	2 to 1 up to 55 ft.	[tbd] [tbd]	1.5 to 1 up to 30 ft.

[1] This larger overall maximum is only allowed through the Planned Development bonus option and required Planned Development Review

33.270.100.I. Additional height and FAR. For sites in the CM2, CM3 and CE zones and in the CX zone outside of the Central City Plan District and Gateway Plan District that are greater than 2 acres in size, additional height and FAR may be requested through a Planned Development as specified in 33.130.212. Floor Area and height Bonus Options and Table 130-3.

33.270.200 Additional Requirements for Planned Developments in the Commercial/Mixed Use Zones

Planned developments in the CM2, CM3, and CE zones and in the CX zone outside of the Central City Plan District and Gateway Plan District must meet all of the following requirements: . . . .



**From:** Deborah Wessell [mailto:wessell@live.com]  
**Sent:** Tuesday, May 10, 2016 10:09 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony  
**Importance:** High

I'm writing to support the idea of a design overlay for Sellwood/Westmoreland, a unique Portland neighborhood that's currently attracting development and is bound to attract more in future. The nature of this development will be crucial to the future of the area.

Since the 1840s – almost two centuries! – SE Milwaukie near Bybee has been a walkable community center. And SE 13<sup>th</sup> has been the lifeline of Sellwood since 1883. These two neighborhood centers are charming and historic, providing exactly the qualities that draw people to SE Portland. Without a design overlay, they're in danger of being sliced up into soulless pieces by cookie cutter development that destroys those qualities.

St. Johns, Kenton and Mississippi, among other neighborhoods, enjoy the protection of a design overlay. Sellwood/Westmoreland deserve the same protection, before it's too late.

Thank you.  
Deborah Wessell  
7667 SE 21<sup>st</sup> Avenue  
Portland OR 97202

Testimony of Mike Warwick, 535 NE Thompson St. Portland, OR  
[Mike.warwick@pnl.gov](mailto:Mike.warwick@pnl.gov)

As a member of the MU PAC I largely support the Proposed Draft, with the following important exceptions:

1. The existing bonus allowances are too limited and restrictive and the proposed caps on non-affordable housing bonuses are inappropriate.
2. The benefits of public plazas and green space reach a far greater share of the population than affordable housing will. They should be reinstated, without caps.
3. Preservation of Portland's history and character through its buildings is essential if Portland is to remain "Portland." The historic preservation bonus should be greater and uncapped.
4. Bonuses have been gamed in the past. Reinstating and enhancing the public and green space, and historic bonuses as suggested above, should be accompanied by required approvals by either the local neighborhood association or relevant City bureau (Parks) or Commission (Landmarks).
5. The affordable housing bonus provision was proven to be ineffective during economic testing. Consequently, including it other than for political reasons is questionable.
6. The proposed "affordability" options for both housing and commercial space are much too bureaucratic to be effective. Allowance should be made for more innovative options as described below.

As this is the centenary of the birth of Jane Jacobs it only seems fitting to try and model her view of urbanism; namely, that cities are either living or dying, but even living cities can be killed off by poor plans, such as those of her nemesis, Robert Moses. I hold out more hope for this Plan, however, I will argue as Jane did more eloquently, even though cities must grow to survive, there are things that should be preserved and nurtured to make urban life worthwhile. Unfortunately, some of those are potentially being lost in the MU proposal; sacrificed for a single-minded pursuit of an unrealistic goal to substitute private sector investment in affordability for what is, by law as well as right, a City and County responsibility. I speak specifically about the proposed bonus process. However, the draft is also unimaginative, and overly bureaucratic, in its execution of affordability bonuses.

Increase Non-"affordability" Bonuses and Eliminate the Cap on them

I am sure Jane would agree, there are many benefits that can be incorporated into newly built environments that are as valuable, if not more, than affordable housing. After all, a unit of affordable housing only benefits its occupants, while a public plaza and additional landscaping benefit everyone who comes into contact with it, even those just driving by. Accordingly, I am strongly opposed to the loss and/or reduction in allowed FAR/height for those two bonuses. I am also strongly opposed to the reduced FAR/height for historic preservation as described in the draft. Each of these is an urban amenity Jane championed in her time and we should heed her advice.

That said, I support stripping bonus provisions other incentives, most of which were “gimmes” that did not significantly impact construction costs or project *pro formas* over expectations. It is also true that bonuses for public space and landscaping were gamed. The bonus provide for the Radiator’s plaza is a good example, as it is all but hidden from public view and access, and thus provides a solely private benefit. However, I believe there is a way to reintegrate public space and landscaping amenities in a way that restricts gaming opportunities; namely, by requiring support of the local neighborhood association, or if impractical (or it is intractable) the Parks bureau, as public plazas and enhanced landscaping provide a similar service to the citizenry. In this way, plazas and greenspaces can be sited in neighborhoods with the greatest need and bonuses scaled based on their contribution to that need. Regardless, the maximum bonus should not be limited as in the current draft to favor affordable housing over other bonus options.

#### Clarify Historic Preservation Bonus Treatment, Increase the Allowance, and Eliminate the Cap

I suggest a similar treatment for historic preservation. The current draft text appears to offer a bonus, but its reference to the bonus Table doesn’t show it. Presuming this is an error, and the intent IS to provide a bonus, I would also not cap any bonus to favor affordable housing. I would, however, allow for a greater than 1:1 bonus to incentivize preservation of especially vulnerable properties or extreme measures that may be required to preserve a resource, such as relocating a building. This additional bonus could be determined with the assistance of the Historic Landmarks Commission.

#### Allow for Innovative Options to Address Affordable Housing

It was clear during the PAC discussions that this was being guided by Council, including shameful engineering of economic results to support a demonstrably poor mechanism to increase affordable housing options. As was indicated during that discussion, forcing developers to include affordable units will most likely result in development within “allowed” limits rather than to “bonus” heights/FAR. It will also increase the cost of units in structures that use the bonuses. Consequently, this policy will undermine both the Plan’s density and affordable housing goals. This provision may be politically expedient, but this Plan is supposed to serve the City of Portland for the next 20 years, not a sitting Commissioner for the remainder of their term. Equally important, as drafted it is a very clumsy in its implementation. Incorporating the Housing Bureau and PDC in the design and development process virtually assures this provision will only be used by local developers wedded to the local market. All others will simply pursue projects in cities with more realistic policies.

To that point, there is the saying about giving a man a fish versus teaching him to fish. Subsidizing housing provides limited, albeit potentially necessary, assistance to the target population. One of the primary causes of housing unaffordability is uncertain rent. One of the primary paths to wealth creation in the US is through home ownership. A better option for both providing affordable housing AND a path out of poverty would be to allow for more

innovation on how to apply for the affordability bonus. A couple of options that come to mind would be to set aside a fraction of units for cooperative ownership, either by tenants or through a land trust entity such as Proud Ground. This could provide a “rent to own” path for tenants to insure stable rents and accumulate wealth through fractional ownership that could later be used for down payment on another residence when the tenant no longer meets income tests. Such an approach may facilitate distribution of units across a structure rather than being concentrated in a low-income ghetto. To the extent this provision is replaced by future inclusionary zoning regulations, the current target population (80% of MFI) would seem to be particularly well suited for a “rent to own” type program.

#### Allow for Innovative Options to Preserve Affordable Commercial Spaces

My concerns with this part of the Draft are the same as above; however, the solution is somewhat different. Again, the greatest threat to commercial tenants is rising rents. By the same token, the capital and expertise of business owners is optimally applied to their business operations, NOT building ownership and maintenance. Being a landlord is a business unto itself! As noted above, providing business owners with “ownership like rights” through commercial condos, fractional ownership, or “rent to own” building shell leases is the best way for them to ensure stable rent and focus on growing their business. Some businesses could be targeted by PDC or through other programs (including from non-profits) to enable their preservation in communities where rents are rising forcing out business catering to longtime residents, or to enable new businesses to “pioneer” newly developing neighborhoods.

In summary:

1. The “historic” bonus is not explicated in section 33.130.212 as drafted. Consequently, this section suggests bonuses are only allowed for “affordability.” The historic bonus and those suggested above for public and green spaces should be presented jointly.
2. A focus on “affordability” to the exclusion of all other civic benefits undermines the Plan’s objective of retaining Portland’s character.
3. Bonuses for historic preservation and plazas warrant higher bonuses (for historic) and retention (plazas/green spaces) and elimination of the proposed FAR/height caps.
4. The Draft bonus structure fails to reward urban design elements that benefit a greater fraction of residents than the affordability bonuses currently provided. Those other benefits (historic preservation, plazas, and landscaping), should be reinstated without current artificial caps.
6. Affordable goals for housing and commercial space can be achieved by mechanisms not included in the current draft, including ownership in condominium, cooperative, and land trust-type arrangements. Innovations such as these should be explicitly encouraged in the final code to allow greater flexibility and less bureaucratic alternative paths to the desired end.

Hi,

Here is a PDF of my letter. My mailing address is PO Box 80443 Portland, Or 97280.  
Thank you,

Jan Elizabeth Thorpe



Planning and Sustainability Commission, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW 4th Ave, Suite 7100, Portland, OR 97201

Attn: Mixed Use Zones Testimony

**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request that the PSC change this designation to CM1 to limit building height to 35 feet (3 stories) in the business district of Multnomah Village with a D overlay.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

7721 SW Aloma Way #3 Portland, Or 97223

cc: 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)

City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

**To:** Planning and Sustainability Commission (PSC)

**From:** Darnell Jackie Strong and Luther Strong (Property owners in the N/NE Portland corridor/center)

**Address of properties:** 4931 N. Williams; 4937 N. Williams; 4939 N. Williams; 4947 N. Williams; 20 N. Alberta; 106 N. Alberta; 114 N. Alberta (Jointly these properties equal approximately 1 acre).

**Date:** 5/10/16

**Re:** PSC Mixed Use Zones Testimony. Document requesting Zone designation be revised to CM2 on properties owned by the mentioned parties.

Dear committee members:

We the Strong brothers have been engaged in conversations with various members of PSC for several months. During the course of those conversations and related meetings we came to believe our property had a good chance to be zoned as CM2. However in the recent draft of the comprehensive plan it appears that you have proposed a CM1 designation, to our surprise and disappointment.

The purpose of this document is multiple, first it is to ask the Planning and Sustainability Commission to consider zoning our property to (CM2) versus the proposed zoning of (CM1) as outlined in your tentative plan.

The second purpose is to present our reasons why we are requesting this zone change to happen and to have those reasons documented with your office. The following bullet points details the reasons we are making this request:

- A review of your proposed draft summary reveals that the intent of the plan is to create zones of activity so that persons have the ability to walk or bike to get the things they need. Our properties have the unique position of being in the middle of the activity happening all around us. It is our belief that our property could be the center jewel in the middle of this activity.
- Our property is situated a mere 2 to 3 tenths of a mile from (Killingsworth) to the North, (Skidmore) to the South, (MLK) to the East and (Albina) to the West all short walking distances. There are also regular bus schedules and bike lanes that make our property easily accessible to community members. The high level of activity happening all around us reflects that we are not in a low density area and high density mixed use developments are going up within close proximity to our property regularly. Our properties are directly on the high traffic streets of Williams Avenue and Alberta Street (see color coded attachment that shows surrounding zones as proposed).

- According to your description of the proposed CM2 zone our property fits nicely. You state “This medium-scale commercial mixed-use zone is intended for sites in a variety of centers and corridors, and in smaller mixed-use areas that are well served by frequent transit or within a larger area zoned for multi-dwelling development”. As mentioned previously we are in the middle of and a short walk away from larger zoned areas zoned for large scaled multi-dwelling development. You additionally say “Development is intended to be pedestrian-oriented and complement the scale of surrounding residentially zoned areas”. If our property is zoned as CM2 we would match the zones bordering us in all directions and be in synch with the intent of the plan.
- I mentioned previously that the Strong family is one of the few African American families in N/NE Portland who has been able to ward off gentrification, a phenomena that has been documented in Portland and caused numerous African Americans to loose properties and be displaced from N/NE Portland.

We mention this issue because we have attempted to engineer several projects on our site and each time we have been stymied by the fact that the numbers would not work as the property is currently zoned. The proposed zone (CM1) would not allow a project to pencil out either.

The course of our past efforts has connected us with several groups who are optimistic about a possible project on this jewel of a site but all proclaim that the zoning is a hindrance, due to its limitations.

Our efforts have included consultation with the Portland Development Commission and their DOS program, a yearlong negotiation with Portland Community Reinvestment a non-profit affordable housing program and finally the Portland Housing Bureau who is excited about the possibility of a project if the zoning is CM2.

Additionally we have reached out to Commissioner Dan Saltzman’s office and have been in regular contact with Nan Stark from the Bureau of Planning and Sustainability. Nan has supported our efforts and ideas and has been a stable sounding board for our planning.

In a nut shell all parties we attempted to do a project with were excited about the possibility. They all concurred that a project that brought property owners of color together, with Non-profit housing programs that offered affordable housing, and private developers could be a development model duplicated elsewhere nationally to address gentrification and urban displacement.

- I have been in contact with several neighbors close to our properties and they are in agreement that a CM2 zone designation supports their vision of how this block should zoned.
- The Strong family, African American owners of the properties involved, have been long time neighborhood members dating back to 1956. The family is well known politically and is also known as being socially conscientious as represented by Luther Strong and Opal Strong, who is now 100 years of age. Both were community activists and mentors to leaders of color. Opal Strong was appointed by the late Governor Vic Atiyeh and served as a board member for the council of senior citizens, a state wide effort. She was also a founding member and active participant leading the Humboldt/King neighborhood associations dating back to model cities, which is now the N/Ne coalition of neighborhoods.

Their social work skills were passed on to their children and grandchildren who are also passionate about serving the community of Portland. The off springs have shown that same drive to help others and illustrate such by having positions of importance in the African American community and the community at large. For example her two sons who own these properties are concerned about how to address the issues of gentrification, affordable housing and job creation in N/NE Portland. Another one of her grandchildren is the Pastor of one of the largest predominantly African American churches in Portland, while yet another grandchild is a top administrator at the United Way.

I believe that as long time residents of this neighborhood and as long time owners of these properties since 1976, we are uniquely positioned to give credible and sound input about future zoning in the community where we still live and care deeply about.

In conclusion I want to reiterate that it is the Strong brother's intent to pursue development opportunities for our properties. Additionally we are excited about the possibility of teaming with the City of Portland, the offices of the Commissioners, Private developers, Nonprofit housing programs like the Portland Housing Bureau and the African American community to quell the issue of gentrification and affordable housing.

Thank you for your time to receive and review our input about changing the proposed zone to CM2.

The Strong brothers  
Jackie Strong  
12165 NW Big Fir Court  
Portland, OR 97229  
503-309-2460

Luther Strong  
20 N Alberta  
Portland, OR 97217  
503-575-6078

**From:** Carrie Strickland [mailto:Carrie@worksarchitecture.net]  
**Sent:** Tuesday, May 10, 2016 1:27 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony

I'd like to share some of my concerns regarding the current MUZ package. I've been tracking this package closely and have serious issues with the reduction of allowed FAR, building profile dictations and the overall feeling that we are embarking on a major regression of our city's progressive density goals. I've attempted to outline my concerns below:

*FAR changes:*

The compromises made as part of the MUZ process have essentially resulted in a direct down-zoning of the base zone allowances across most, if not all, of the C and EXd zones.

Doing so results in a penalty for property values, taxable values and dis-incentivizes development.

The attempts to "incentivize" increased FAR to get back to an allowed FAR that matches the allowed heights on the lots are poorly convinced and some of the incentives have actually been eliminated as the plan has progressed.

The current plan is being developed during a development bubble and we all know that property investment and development is cyclical... those of us that remember what it was like only a few years ago – when our city was starving for development progress - know that a down-zoning and reduction in progressive density now, will have giant effects down the road.

During the most recent downturn, we saw development come to a halt and we saw property values drop. This results in lower property taxes and the funds paid by development projects (SDC, school excise, etc) dry up and our city's ability to fund and operate becomes a slow crawl.

The hope that requiring that you must include affordable housing in order to earn back the FAR that this plans takes away is ill fated and additionally, the likely coming inclusionary housing rules could further push that needle, resulting in developments that only build what they can provide under the new,, reduced base zone allowances, if anything at all.

The goal should be to ensure that the maximum FAR is achieved when a site is being developed. Once a reduced FAR is constructed it will be there for a very long time.

*Massing and Building Profiles:*

The addition of the requirement for "stepped" street face setbacks is problematic for various reasons.

First, it confuses design guidelines and zoning and uses requirements. The zoning of the site shouldn't dictate form. This measure immediately creates one type of building massing that isn't always desirable and isn't functionally better.

Secondly, this stepped massing concept is being fed by a small, but vocal, group that feels that our main streets seem to dense. The main streets are where there should be that density and scale. Our last



round of urban planning understood this and this fundamental element of building density and capacity within our city.

*Regression:*

Portland has long been a symbol and progressive zoning and transportation policy. We repeatedly uphold the growth boundary, which means that we support focused growth within our close-in neighborhoods. In this current cycle, we have seen leaps in that urban form and this proposal is putting the brakes on what we had collectively planned for and supported. I blame this shift on concerns around “change” and the naïve idea that this pace of development will continue in perpetuity. We are at the top of a real-estate bubble and there will be a bottom again.. this is the way the world works. Reducing FAR and restricting building forms are reactive measures and don’t maintain the long term goals of our city.

This regression reduces the property values in Portland. Down-zoning needs to be taken seriously as it impacts can have a ripple effect across project feasibility and funding and realization.

In summary, I strongly urge the planners and commissioners to take care in what gets placed into code today – it will have long term impacts on development and in turn, affordability. Once you set this in motion there isn’t a an easy way to reverse it. Be brave and continue to support the progressive city that Portland is meant to be and not a regressionary version of itself.

Sincerely,

carrie strickland NE Portland resident, committed citizen

800 NE 53<sup>rd</sup> Ave  
Portland, Oregon 97213

**From:** Jane H. Stein [mailto:jhs49@comcast.net]  
**Sent:** Tuesday, May 10, 2016 2:29 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

I am commenting on this issue because I am upset about how the sustainability crowd is sharpening their knives to destroy a quiet tight knit community in the Sellwood. The developers want to ruin the area with multi unit tall buildings that will be extremely out of place. Where is the design overlay? I object to condos and rental buildings looking out of place in the area and tall buildings blocking already established housing's sunlight as well. Additionally they will be creating overcrowding in the school system, lack of sufficient parking for all and increased traffic everywhere. They are under some kind of illusion that everyone is going to take public transit or bike to work. That is far from reality. SE Tacoma Street and SE17th Ave. are already packed with Clackamas County drivers as is and now the car owning tenants of new buildings will add more of a carbon footprint in the area with more cars and accelerating gasoline fumes. When I lived in a 3,000+ tenant apt. in Brooklyn NY EVERY apt. had an assigned parking space. Sellwood will become the location of parking wars as the builders are providing insufficient amounts of parking spaces or none at all. The noxious fumes will contribute to respiratory problems for everyone and Portland has already been designated a polluted city. I have asthma and cancer and the overflow of people and their cars will make it worse.

Jane Stein  
1622SE Harney Street  
Portland OR 97202

PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear Members of the PSC,

This testimony applies to the triangular shaped vacant 2.57 acres located at the west end of Hayden Island with property ID R323354 Map 1N1E28 100. Specifically, this is the last privately owned property at the west end of Hayden Island Drive and is adjacent to the large Multnomah County ownership that was considered for the industrial terminal. The property generally has at its northerly boundary the Columbia River, the southerly boundary the elevated railroad bridge, and the easterly boundary the private Schooner Creek ownership zoned IG2.

Currently, the property has three (3) zones which are portrayed on the attached exhibit. The southerly zone encompasses about one-third of the property along Hayden Island Drive and is RF Residential Farm and Forest. This is the same zone designation as the Multnomah County terminal land had before it was recently changed to industrial. The northerly zone encompasses about two-thirds of the property adjacent to the Columbia River and is R2 Residential 2000. The very most easterly corner has a miniscule area under the guidelines of General Industrial 2 and is zoned IG2. This small area abuts the neighbor zone of IG2 that is currently Schooner Creek.

The property, for the following reasons, needs to be **ZONED IG2** which is the same as the surrounding properties and needs to have a **COMPREHENSIVE PLAN CHANGE ALLOWING IG2 ZONING**.

1. The location between the railroad bridge and the existing industrial properties certainly does not lend itself to a residential use.
2. The existing zones were basically "remnant" zones from the past. These zones make no sense as to the reasonable ultimate use of the property and a predictable development.
3. The property is better zoned compatible to its neighbors which is IG2.
4. The conversion of this unique property to IG2 Industrial adds needed industrial property to the City of Portland's industrial land inventory.

In conclusion, the PSC is reviewing the existing Comprehensive Plan and Zone for properties within the City to simplify and enhance development that are beneficial to long range strategies. One of the goals is to eliminate "split" zoning on City properties. This is a prime property needing a common sense Comprehensive Plan and Zone change eliminating the "split" zone and adding valuable industrial land for development.

Thank You on behalf of property owners SDP LLC and Steve Stanich 4915 NE Fremont Street Portland Oregon tele: 503-544-1633

22  
 23  
 24  
 25  
 26  
 27  
 28  
 29  
 30  
 31  
 32  
 33  
 34  
 35  
 36  
 37  
 38  
 39  
 40  
 41  
 42  
 43  
 44  
 45  
 46  
 47  
 48  
 49  
 50  
 51  
 52  
 53  
 54  
 55  
 56  
 57  
 58  
 59  
 60  
 61  
 62  
 63  
 64  
 65  
 66  
 67  
 68  
 69  
 70  
 71  
 72  
 73  
 74  
 75  
 76  
 77  
 78  
 79  
 80  
 81  
 82  
 83  
 84  
 85  
 86  
 87  
 88  
 89  
 90  
 91  
 92  
 93  
 94  
 95  
 96  
 97  
 98  
 99  
 100  
 101  
 102  
 103  
 104  
 105  
 106  
 107  
 108  
 109  
 110  
 111  
 112  
 113  
 114  
 115  
 116  
 117  
 118  
 119  
 120  
 121  
 122  
 123  
 124  
 125  
 126  
 127  
 128  
 129  
 130  
 131  
 132  
 133  
 134  
 135  
 136  
 137  
 138  
 139  
 140  
 141  
 142  
 143  
 144  
 145  
 146  
 147  
 148  
 149  
 150  
 151  
 152  
 153  
 154  
 155  
 156  
 157  
 158  
 159  
 160  
 161  
 162  
 163  
 164  
 165  
 166  
 167  
 168  
 169  
 170  
 171  
 172  
 173  
 174  
 175  
 176  
 177  
 178  
 179  
 180  
 181  
 182  
 183  
 184  
 185  
 186  
 187  
 188  
 189  
 190  
 191  
 192  
 193  
 194  
 195  
 196  
 197  
 198  
 199  
 200  
 201  
 202  
 203  
 204  
 205  
 206  
 207  
 208  
 209  
 210  
 211  
 212  
 213  
 214  
 215  
 216  
 217  
 218  
 219  
 220  
 221  
 222  
 223  
 224  
 225  
 226  
 227  
 228  
 229  
 230  
 231  
 232  
 233  
 234  
 235  
 236  
 237  
 238  
 239  
 240  
 241  
 242  
 243  
 244  
 245  
 246  
 247  
 248  
 249  
 250  
 251  
 252  
 253  
 254  
 255  
 256  
 257  
 258  
 259  
 260  
 261  
 262  
 263  
 264  
 265  
 266  
 267  
 268  
 269  
 270  
 271  
 272  
 273  
 274  
 275  
 276  
 277  
 278  
 279  
 280  
 281  
 282  
 283  
 284  
 285  
 286  
 287  
 288  
 289  
 290  
 291  
 292  
 293  
 294  
 295  
 296  
 297  
 298  
 299  
 300  
 301  
 302  
 303  
 304  
 305  
 306  
 307  
 308  
 309  
 310  
 311  
 312  
 313  
 314  
 315  
 316  
 317  
 318  
 319  
 320  
 321  
 322  
 323  
 324  
 325  
 326  
 327  
 328  
 329  
 330  
 331  
 332  
 333  
 334  
 335  
 336  
 337  
 338  
 339  
 340  
 341  
 342  
 343  
 344  
 345  
 346  
 347  
 348  
 349  
 350  
 351  
 352  
 353  
 354  
 355  
 356  
 357  
 358  
 359  
 360  
 361  
 362  
 363  
 364  
 365  
 366  
 367  
 368  
 369  
 370  
 371  
 372  
 373  
 374  
 375  
 376  
 377  
 378  
 379  
 380  
 381  
 382  
 383  
 384  
 385  
 386  
 387  
 388  
 389  
 390  
 391  
 392  
 393  
 394  
 395  
 396  
 397  
 398  
 399  
 400  
 401  
 402  
 403  
 404  
 405  
 406  
 407  
 408  
 409  
 410  
 411  
 412  
 413  
 414  
 415  
 416  
 417  
 418  
 419  
 420  
 421  
 422  
 423  
 424  
 425  
 426  
 427  
 428  
 429  
 430  
 431  
 432  
 433  
 434  
 435  
 436  
 437  
 438  
 439  
 440  
 441  
 442  
 443  
 444  
 445  
 446  
 447  
 448  
 449  
 450  
 451  
 452  
 453  
 454  
 455  
 456  
 457  
 458  
 459  
 460  
 461  
 462  
 463  
 464  
 465  
 466  
 467  
 468  
 469  
 470  
 471  
 472  
 473  
 474  
 475  
 476  
 477  
 478  
 479  
 480  
 481  
 482  
 483  
 484  
 485  
 486  
 487  
 488  
 489  
 490  
 491  
 492  
 493  
 494  
 495  
 496  
 497  
 498  
 499  
 500  
 501  
 502  
 503  
 504  
 505  
 506  
 507  
 508  
 509  
 510  
 511  
 512  
 513  
 514  
 515  
 516  
 517  
 518  
 519  
 520  
 521  
 522  
 523  
 524  
 525  
 526  
 527  
 528  
 529  
 530  
 531  
 532  
 533  
 534  
 535  
 536  
 537  
 538  
 539  
 540  
 541  
 542  
 5

PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear Members of the PSC,

This testimony applies to the property at 4915 N.E. Fremont Street in Portland Oregon with Property ID R111567 Map 1N 2E 19CD 2600. The owner of the property for many, many years is the Gladys and George LLC and their business Stanich's Restaurant continues by the family at this location to this day.

Currently, the property carries a Neighborhood Commercial 2 (CN2) commercial zone.

The new proposed Comprehensive Plan designation is Mixed Use-Neighborhood. This designation is acceptable to the property owner with the assumption that the new Zone for the property becomes **COMMERCIAL MIXED USE 2—CM2**.

The reasons for these plan and zone requests are as follows:

1. This property has 100 feet of Street frontage on N.E. Fremont Street. N.E. Fremont Street is a well established commercial corridor in northeast Portland. This particular area of Fremont Street has numerous long standing residential and commercial development.
2. Lately, there has been a recent residential development nearby on Fremont Street of a four (4) story building in an existing CS zone. The CS zone allows for a 45ft height limitation, which is similar to the new Zone CM2.
3. The specific property lends itself to the density and height criteria of the CM2 zone. The property is bordered southerly by Fremont Street, on the north by the open space of a cemetery, on the west by N.E. 49<sup>th</sup> Avenue, and on the east by Settlemier Jackets. Settlemier Jackets are also requesting a CM2 zone. There is very limited impact on any adjacent properties.
4. N.E. Fremont Street provides City transit (bus line).
5. The new Comprehensive Plan and Zones will be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Property values, project loan criteria and the market will be important to determine the development for new projects. **PRECEDENCE ALREADY ESTABLISHED: The City approved and construction recently completed five (5) blocks away at 4429 NE Fremont Street the four (4) story Beaumont Village mixed use development.** The Gladys and George LLC believes, given the increased demand for these infill sites, the ability for greater density with the bonuses and incentives of the CM2 zone will be crucial to the property ultimate development and pricing of the final product.



In conclusion, the Gladys and George LLC feels the resource of a 10,000 sqft property at this location is best suited to the Mixed Use-Neighborhood Comprehensive Plan designation with a **CM2 ZONE**.

Thank you very much for your consideration of this matter.

The Gladys and George LLC 4915 N.E. Fremont Street Portland Oregon 97213 tele: 503-544-1633 (Steve Stanich)

May 10, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4th Ave., Suite 7100  
Portland OR 97201

Dear Honorable Commissioners:

I am writing to express my support for the proposed CM1 zoning in the Sellwood-SE 13th existing commercial storefront area and elsewhere. I applaud the work that was done with this proposal, as it honors the area's historical streetcar development yet allows for new growth to integrate into the neighborhood, and reflects conversations with residents. It also reflects a careful assessment of key qualities that makes CM1 a prudent choice in this area.

Please also consider extending CM1 northward from SE Nehalem to SE Malden. The character of CM1 is more consistent than CM2 with this area: it is located within a lower density residential area and is not within a larger area zoned for multi-family development; there are numerous small lots developed as commercial uses; it would eliminate an awkward transition; and this parking-challenged corridor is located a mile from light rail. With limited ability to legislate quality, materials and context-sensitive design (such as building another 4-story tall concrete building vs. the brick differentiation that defines this area), applying CM1 would support development types that enhance this area's unique street experience. Our neighborhood still has growth capacity as most of the commercial corridors would still be zoned CM2.

Currently, the commercial corridors in our neighborhood are predominately one and two-story buildings. The proposed CM1 zoning on 13<sup>th</sup> would help integrate the existing low-rise storefront character of this commercial district as it transitions to a 3-story model. As a long-time resident, I value the charm and walkability of our neighborhood, but also recognize that growth is coming. I believe CM1 allows for a compromise between development and those who live or work here everyday now and in the future, who must bear the burden or results of these difficult decisions for years to come: beginning from the zoning to how a private parcel actually gets developed (and over which we have no influence). Many residents don't track these processes when the die is cast because it is not their profession or their day job.

The CM1 zoning would be consistent with the policies of the Sellwood Moreland Community Plan. As our commercial corridors are built up, two lower commercial cores will help 'preserve the historic character of neighborhood areas' and 'reinforce a distinctive sense of place by emphasizing neighborhood boundaries, connections, business districts, public open spaces, and focal points.'

On this last point, I would encourage you to explore creative solutions to stimulate and support historic commercial preservation. It would be wonderful to reward those community stewards who maintain, rehab and continue to operate these special pillars. These buildings define these commercial hubs and corridors as unique places to conduct a small business and provide jobs. A creative approach would make these properties a bonus, not a liability, and more valuable as an ongoing operation than a tear-down. It would also signal what we value as a community.

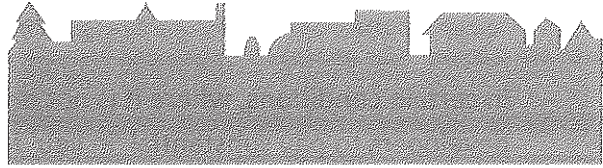
Thank you for your time and consideration; I hope you will support the CM1 proposal in this area.



Beth St. Amand  
1345 SE Miller Street

May 10, 2016

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, OR 97201-5380



RE: Testimony on Mixed Use Zones

Thank you for the opportunity to present comments today. It was a great experience to serve as a member of the Mixed Use Zones Policy Advisory Committee. I would like to commend the work of staff in taking on a very complicated project and proposing a much improved zoning scheme for mixed use zones.

The advisory process included committee members visiting various mixed use areas to experience these environments first hand. We heard presentations from various experts and consultants. City transportation staff discussed parking and traffic issues that interface with mixed use development. Economists analyzed the financial feasibility of proposed bonuses. Members of the public had the opportunity to share comments at the end of each meeting. Committee members engaged in much discourse and provided feedback to inform the staff's work. The result is a much more streamlined and improved mixed use zoning scheme that should improve development in the City's centers and corridors. There is more work to be done, but there was a thoughtful and well implemented process with much give and take.

My professional background is in affordable housing, and particularly housing for very low income persons with special needs. I also live in a historic district in Northwest Portland and have observed how insensitive infill development can adversely change the character of areas that should be preserved as part of our City's heritage.

Based on my background and experience on the committee, I would like to highlight three areas:

1. Affordable Housing. The proposed bonuses to provide additional density in exchange for affordable housing units are a key component. They provide an opportunity and a challenge. The greatest need is for affordable housing for the lowest income populations (those at 0-30% of AMI). It would be a shame if the bonuses only create housing for persons at 80% of AMI, as proposed. As these bonuses get implemented, I encourage incentives that enable affordable housing units for persons at 0-60% of AMI to be included in new development. For example:

- Consider providing gradations of bonuses where the greatest bonuses are allowed for the provision of the lowest-rent units;
- Encourage new business models where private developers can partner with nonprofit housing providers who can manage the affordable units; and

- In certain conditions, where it is not practical or desirable to include affordable units, allow developers to pay substantial 'in lieu' fees and use these fees to subsidize units for the lowest income populations (0-30% of AMI).

2. Preserving Portland's Sense of Place. There has been much tension in Portland around demolitions and increasing density. In considering mixed zone criteria, there was considerable discussion about preserving neighborhood character and providing for transitions between mixed use and lower density residential zones. I applaud proposed provisions that help preserve historic districts. These include (a) not allowing the transfer of development rights from historic buildings to new development within a historic district and (b) not allowing bonuses to apply within historic districts. These measures help to implement the historic preservation goals in the new Comprehensive Plan. It's easy to forget that preserving older buildings often means preserving affordable housing units. Preserving our City's heritage is important. Maintaining historic areas helps to retain Portland's sense of place as our city grows.

3. Overlays and Plan Districts. Zoning schemes are very complicated. I personally learned much about the various zoning mechanisms that govern the location of various uses throughout our community and the characteristics of new development. The new mixed use zones create some inconsistencies, or maybe confusion, for areas where there is an existing plan district and/or historic district. Staff did a remarkable job of responding to questions and concerns. Overall, there is an assurance that the plan district criteria are retained. However, there is still work to be done to sort out how the new zoning scheme specifically applies to areas where there are plan districts and overlay zones (such as historic districts). In some cases, a plan district may have had "placeholder zoning" (such as EX in NW Portland). I encourage the Commission to consider the need for further clarification and refinement. In NW Portland, where I live, there is a plan district and an historic district. You will be hearing from representatives of the Northwest District Association and other neighborhoods. I urge continued attention to the voices of people who live in Portland's many wonderful neighborhoods as the new mixed use zones are implemented.

Respectfully submitted,

Vicki Skryha  
1728 NW Hoyt Street  
Portland

Chair Shultz and Vice-Chair Baugh,

Portland Shoupistas supports progressive parking policies and projects, including reducing parking demand, to achieve affordability, equity, and climate goals. Transportation and Parking Demand Management (TDM), along with mode share based parking maximums and market rate parking, are among the most powerful strategies for reducing parking demand and achieving City goals.

Next week PSC will begin hearings on a new mixed use zone code, including transportation and parking demand management. Shortly thereafter you will host briefings on Central City 2035, with substantial parking and TDM proposals.

Transportation and parking demand management can be especially important for meeting affordability and equity goals, because it reduces the need for car ownership and eliminates the shared expense of parking construction. Lower and moderate income workers most benefit from the low-cost transit passes and bicycling incentives often at the core of effective TDM plans. We were disappointed that the PSC delayed action on PBOT's Title 17 Transportation and Parking Demand Management (TDM) proposal. As you consider TDM requirements for Mixed Use Zone and Central City 2035, we'd appreciate your consideration of the following four principles.

**Principle 1: Any TDM and parking code changes should be stronger/more effective than current code.**

- If we want to accommodate job and housing growth while achieving affordability, equity, and climate goals, we must have codes that do a better job of reducing traffic and parking impacts.
- We're concerned by the testimony from Portland Providence Medical Center requesting that their current relatively low performance TDM plan remains in place, and that they and other institutions be allowed to add parking without improving their TDM plan. PPMC has resisted paid parking and bicycling incentives, strategies which help OHSU and PPMC's sister hospitals in Seattle and Santa Monica perform much better than PPMC's poor 66% drive alone rate. This is significantly higher than the city's 2035 goals. Under current code, PPMC is required to meet with PBOT biennially to consider TDM plan improvements.
- We're also concerned by the Central City 2035 proposal to largely remove TDM plan requirements from the Central City Parking Review (CCPR). CCPR currently requires TDM plans for certain types of projects that generate more than 100 peak hour trips, and with more than 60 retail parking spaces. While we support many of the shared parking proposals in CC 2035, it would be an unwise step backwards to give up the TDM plan requirement for 100 peak hour trips and greater than 60 retail parking spaces in Central City unless and until a Central City-wide TDM requirement is in place.

**Principle 2: Code changes support market rate parking prices, such as mandatory unbundling of parking from leases, mandatory parking cash-out for employees, and a prohibition on subsidized parking for employees.**

- The draft TDM pre-approved plan in the TSP Proposed Draft includes parking unbundling. This is a major step forward. We support mandatory unbundling, parking cash-out, and a prohibition on new development subsidizing employee parking, which distorts the market, artificially increasing traffic and parking demand. Since those who receive the subsidies tend to be wealthier, it also undermines our equity goals.

**Principle 3: TDM plans should be in place until at least to 2035, and preferably the life of the building.**



- New development will generate traffic and parking impacts for the life of the building, so trip reduction measures would ideally last the life of the building. Several US cities require this. At a minimum, the requirements should be in place until 2035, the comp plan's horizon year.
- Many US cities require ongoing TDM incentives, such as low-cost transit passes. One-time TDM incentives are better than nothing, but will not be effective at reducing traffic and parking demand in five years, let alone 10 and 20.
- BES requires that buildings maintain stormwater facilities for the life of the building. TDM should be an ongoing standard practice for commercial development in Portland.

**Principle 4: TDM plans should be strong enough to meet 2035 mode share targets.**

- Portland City Council and PSC adopted a 70% mode share target in the Portland Plan and the Climate Action Plan. Our largest and newest developments, those mostly located in Central City and centers, must meet or exceed the targets for the rest of the City to have a chance. PSU is already exceeding the mode share target for both students and faculty.
- There are two TDM strategies shown by years of research to be most effective: pricing parking and ongoing multimodal financial incentives (think low-cost transit passes and bicycling incentives). If the TDM proposal requires these elements, it is likely to be successful at meeting mode share targets.

We'd also appreciate knowing when PBOT plans to engage neighborhood, transportation, and environmental stakeholders, in addition to developers and institutions. Several of us participated in the November 2015 broad stakeholder meetings. We've heard that PBOT has met with development and institution stakeholders on several occasions since then and would appreciate meetings with a broad range of stakeholders.

Thank you for your consideration.

Portland Shoupistas

Portland Shoupistas can be contacted via Tony Jordan  
[twjordan@gmail.com](mailto:twjordan@gmail.com) - [971.207.1348](tel:971.207.1348) - 4540 SE Yamhill St., Portland

Please see the attached letter/testimony about zoning for our property at 2624 SE Division St.

thank you  
bryan

bryan scott  
503.679.7949

Attn: Portland City Planners, City Council and Mayor Hales

Our property was one of many residential properties proposed to change to commercial zoning within the new comprehensive plan. It was also like most residential properties, left with its current zoning designation for now (in our case, R1).

I fully understand the reasoning behind leaving these properties residential because each should be considered on a case by case basis with the neighbors and neighborhood in mind, and with a focused eye on whether infrastructure on the street and in the neighborhood can handle the zoning change now, or should wait for a future phase.

I'm simply writing to describe why our particular case should be considered for immediate zoning change rather than only being part of a long range plan.

Our address is 2624 SE Division St. This probably doesn't mean anything to you, but to everyone in our neighborhood or anyone we give directions to we are "the house that sits in the shadow of Big Rust".

We sit 5' away from one of the condo buildings that has built to the full extent of the allowable height and we live in the shadows that this building casts much of our day...certainly not our intent when we bought this tiny home back in 2008. When we live there we spend more time watching people park and listening to the phone calls of those grabbing coffee from the bakery next door than we do chatting with neighbors as they water their lawn (we have no neighbors and they have no lawn). Living here has been difficult to say the least. We have also struggled to rent the house to others because of the "looming giant" and ever-present eyes looking down on the house and back yard from the glass walls above. Privacy (as you'll see in the photos attached) is simply impossible.

The neighbors on our opposite side couldn't take it anymore and moved their family to a more family friendly street last year, but they also sold their home to developers who presumably plan to do the same thing. This will leave us literally sitting in the middle of two giants as the "UP house" with balloons hanging from the roof hoping to escape. Their home is also currently scripted as residential, but as developers I'm sure they can afford to push the designation change now, as we cannot. There is no question in terms of surroundings and neighborhood that our home is better suited immediately to commercial storefront than to residential.

Outside of our current living environment... I also know and understand that much of the reason for waiting to convert residential zoned lots to commercial zoning was to look case by case at the strength of surrounding infrastructure and whether the zoning change can be handled by existing infrastructure in the neighborhood. In our case, the city (and us its taxpayers) just spent millions of dollars and 2 years ripping up Division Street, disrupting traffic flow and livability (I'm sure you're familiar as you've gotten plenty of calls about that over the last few years) in order to enhance the systems to allow now for the long range plan of the Division corridor.

The Division Street Plan (2013-2015) was carried out by the Department of Transportation and Environmental Services with the express intent of:

- Building curb extensions for bus landing
- Adding new crosswalks and streetlights
- Improving signalization
- Installing public art
- Repaving Division from SE 10th to Cesar E Chavez.
- Managing stormwater runoff from streets and improve watershed health
- Replacing aging sewer lines and manholes to relieve sewer backups and increase sewer system reliability
- Increasing safety, access, and visibility for pedestrians, bicyclists, and transit users
- Improving traffic operations through the corridor and provide on-street parking
- Stimulating the local economy
- Increasing neighborhood attractiveness

Our neighborhood's infrastructure (street, sewers, stormwater control, sidewalks, curb extensions, crosswalks, public transportation and even public art) are already years ahead of our case by case zoning designation and it clearly makes the most sense for 2624 SE Division St to change in zoning to commercial now to fit the surrounds and the infrastructure that exist today, and not in a long range plan.

Please help us by changing our zoning to match the environment and infrastructure we are already living within so that this lot can be used in a way that is more fitting to its surrounds!

Thank you for your time and consideration.  
Bryan and Jen Scott





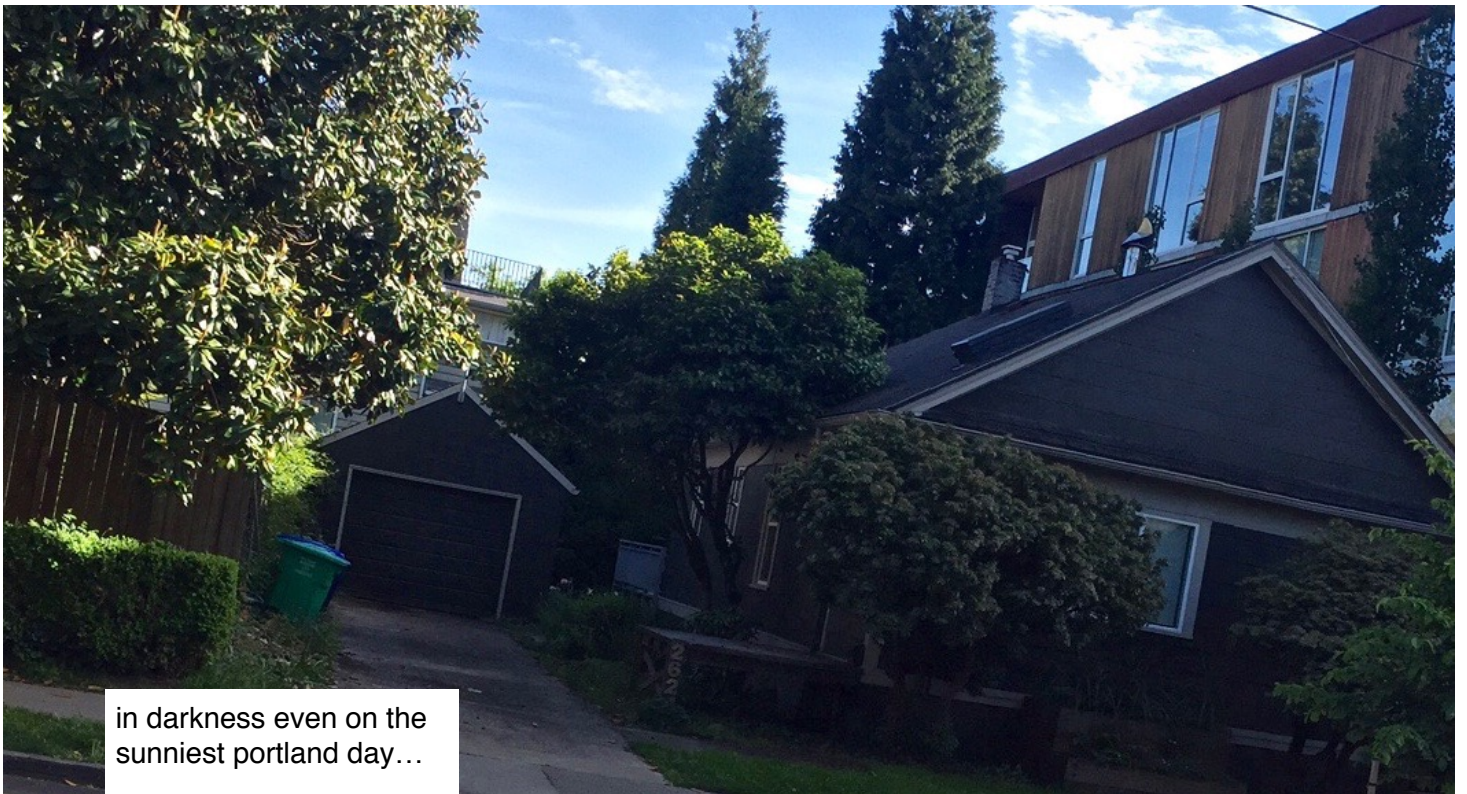


one of these things does  
not belong



shadow cast from "big rust"  
falls over our house





in darkness even on the  
sunniest portland day...



view from the front yard





impossible to get privacy in  
our back yard (fishbowl)



our windows all look out at  
sewer/exhaust and the  
parking lot behind it

**From:** Kim Read [mailto:instantconfidante@yahoo.com]  
**Sent:** Tuesday, May 10, 2016 3:10 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** [Approved Sender] PSC Mixed Use Zones Testimony

Please protect the Sellwood-Moreland neighbor from unreasonable development. Sellwood-Moreland needs and deserves a design overlay similar to other historic and walkable neighborhoods. Thank you.

Kim Read  
7925 SE 16th Ave



**From:** Justin Dollard [<mailto:jdollard@pps.net>]  
**Sent:** Tuesday, May 10, 2016 3:07 PM  
**To:** BPS Comprehensive Plan Testimony <[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)>  
**Cc:** Sara King <[sking1@pps.net](mailto:sking1@pps.net)>; Manning, Barry <[Barry.Manning@portlandoregon.gov](mailto:Barry.Manning@portlandoregon.gov)>  
**Subject:** Mixed Use Zones Project PPS Request to Change Zoning for R150599 Near SE 14th and SE Morrison

Date: May 10, 20

To: The City of Portland Planning and Sustainability Commission

From: Sara King, Director Planning and Asset Management, Portland Public Schools

RE: PPS Request to Change Zoning for R150599 Near SE 14th and SE Morrison

Dear Commissioners,

Portland Public Schools (PPS) requests a legislative zoning change for its property (R150599) near SE 14<sup>th</sup> and SE Morrison from High-Density Residential (HR) to Commercial Mixed Use 3 (CM3) through the Mixed-Use Zones Project.

CM3 zoning will allow for redevelopment that better meets the intention of the Comprehensive Plan Update and better serves the neighborhood through a broad array of retail, service, and office uses that promote local employment and housing opportunities and minimizes impacts to the historic residential fabric of Inner Southeast Portland.

CM3 zoning will reduce size, mass, and density of future development otherwise allowed by right under RH zoning (*please see development envelope analysis below*).

CM3 zoning will support the highest and best use of the site based on PPS market analysis (*available upon request*).

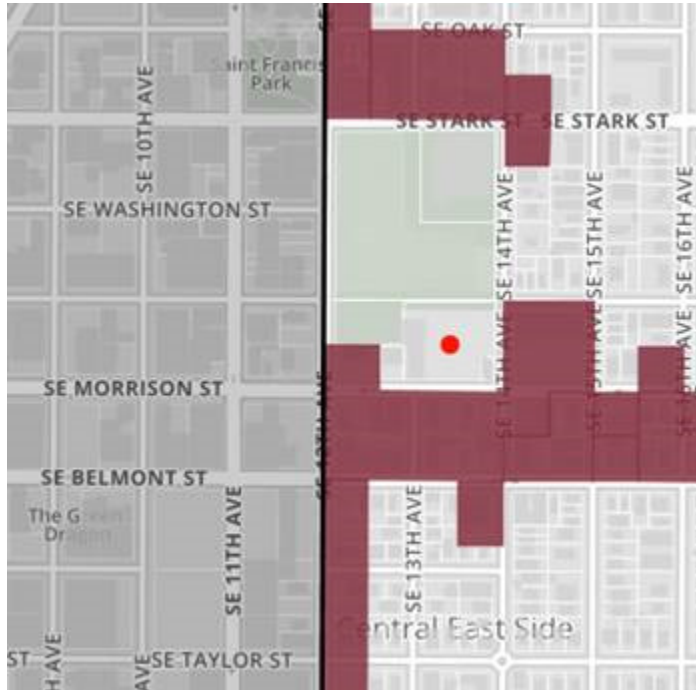
**Site Analysis:** The 57,182 square feet site is located on a block which directly abuts the Central City Plan District, is well-served by mass transit, and well-positioned to support neighborhood preservation efforts by concentrating new development on a “civic” corridor. The site is surrounded predominately by Commercial Storefront (CS) zoning and existing development in the vicinity is mixed-use. The site is within the Central Eastside Urban Renewal Area (*see URA map below*) .

**Current Zoning Entitlements:** RH with an allowed 4:1 Floor Area Ratio (FAR) and a height of 75 feet (*see RH FAR map below*). Total allowed development is 228,728 SF. At this location, RH zoning does not allow ground floor retail or office uses.

**Proposed Zoning:** PPS believes that CM3 zoning is appropriate for the site for the following neighborhood and city level planning reasons:

- on a civic corridor, close to the Central City
- served by frequent-service transit
- located in an area planned for more intense mixed-use development

- directly adjacent to proposed Mixed Use – Urban Center zoning by the Bureau of Planning and Sustainability (*see graphic below, PPS property designated by red dot*)
- compatible with the recent adaptive reuse of the former PPS Washington High School into a mixed-use development

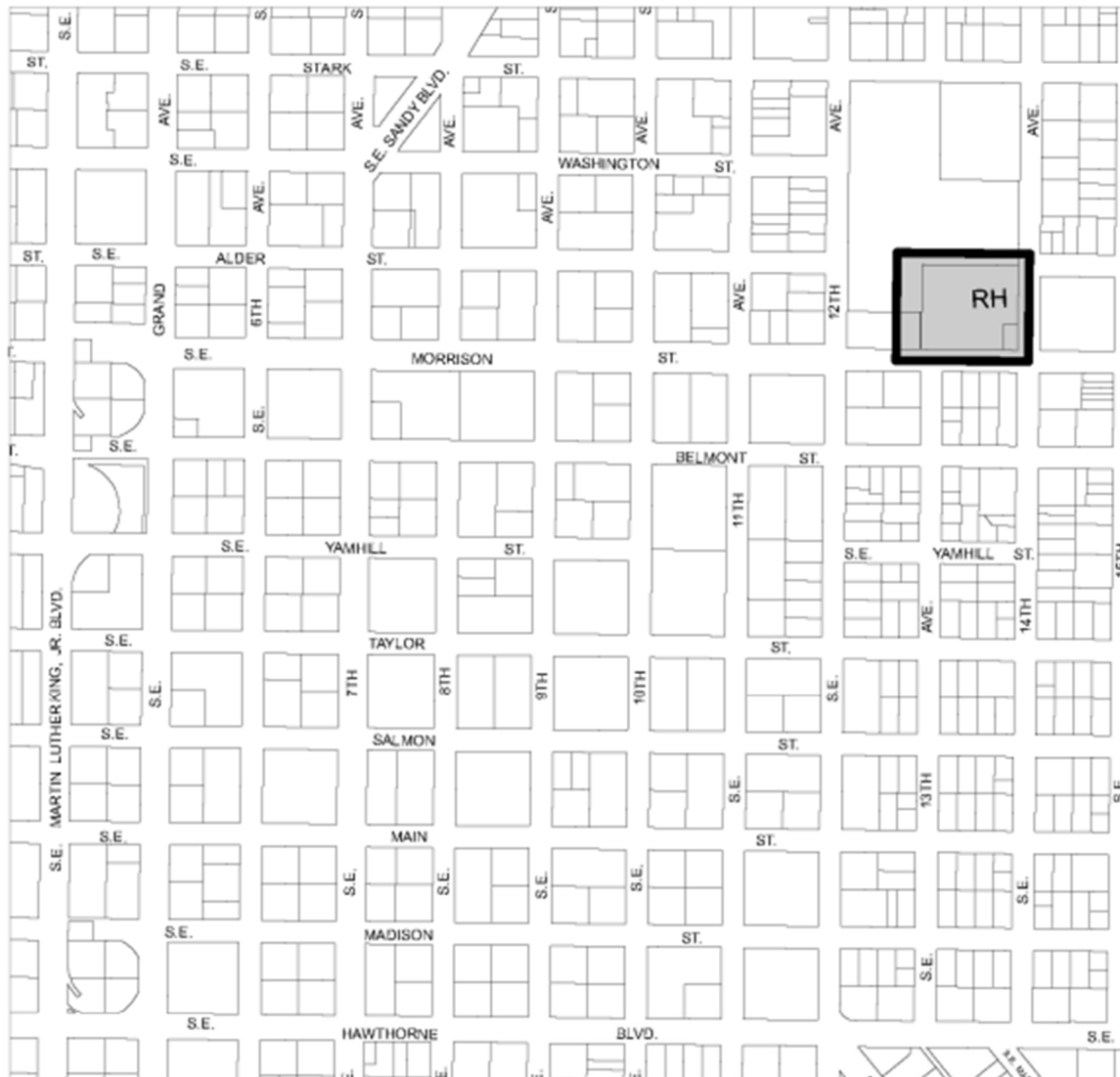




# RH Areas with Maximum FAR of 4:1

## Map 120-15

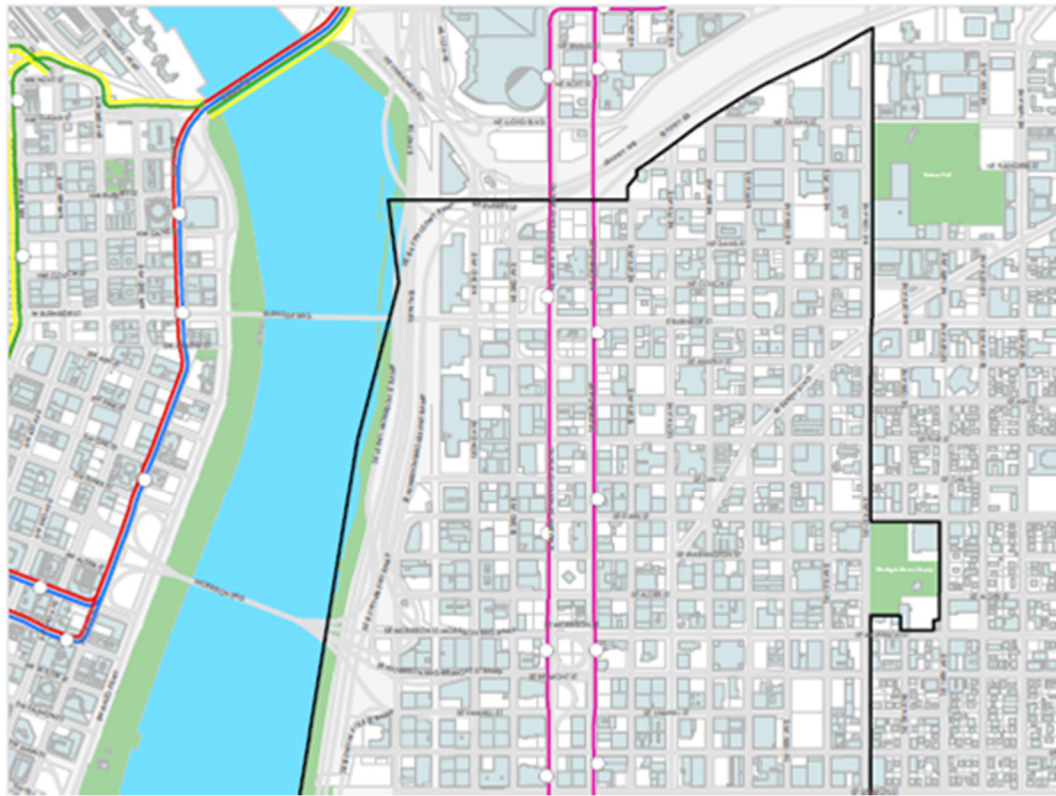
Map Revised January 1, 2015



- City Boundary
- Boundary of Existing/Potential  
RH - Zoned Area

Quarter Section(s): 3131





### Zoning and Development Envelope Analysis RH versus CM3

Zone	RH	CM3	CM3 with Housing Bonus
Height	75 feet	65 feet	75 feet
Height Setback from Street	0	10 feet at 35 feet	10 feet at 35 feet
Height Setback from R1	0	10 feet at 35 feet	10 feet at 35 feet
FAR	4:1	3:1	4.5:1
Minimum Setbacks Front/Side/Rear	0/Varies up to 14 feet /Varies up to 14 feet	0/0/0	0/0/0
Coverage	85% of site area	100% of site area	100% of site area
Ground Floor Retail	No	Yes	Yes
Office	No	Yes	Yes



RH Development Allowed by Right at 4:1 FAR and 85% Building Coverage





CM3 Allowed by Right at 3:1 FAR and 100% Building Coverage



CM3 Allowed with Housing Bonus at 4.5:1 FAR and 100% Building Coverage

Please contact Justin Fallon Dollard, PPS Project Manager with questions or requests for additional information, [jdollard@pps.net](mailto:jdollard@pps.net) or 503-916-3998.

Regards,

Sara King AICP  
PPS Director of Planning and Asset Management



## **Portland Neighbors for Sustainable Development**

---

c/o Doug Klotz  
1908 SE 35<sup>th</sup> Place  
Portland, OR 97214  
5-10-16

### **Testimony on Mixed Use Zones Project Proposed Draft to PSC**

To: Portland Planning and Sustainability Commission  
Chair Schultz and Commissioners:

Portland Neighbors for Sustainable Development is working to shape our city with land use and transportation policies that combat climate change, make housing available to all, and support alternative transportation. We laud the effort that went into the Mixed Use Zones project. We applaud the expansion of pedestrian-friendly, urban zoning, and the reduction in the amount of auto-dominated areas in the city. We appreciate the effort to improve Neighborhood Centers through the Main Street Centers Overlay.

We do have some concerns:

#### **CM-2 FAR and Bonuses:**

The primary innovation of the Mixed Use Zones project was to reduce the allowed capacity (in FAR) in the new CM-2 zone, compared with the CS and CM it will replace. Then, bonuses in FAR and in an additional partial fifth floor would be offered when developers provided Community Benefits such as Affordable Housing and Affordable Commercial Space. However, a city-commissioned market analysis from 18 months ago and done again more recently shows the bonus is not likely to be taken advantage of very often citywide, and probably never in East Portland. In addition, a key incentive was the fifth floor, which will not be available in many parts of the city where CM-2 is mapped, furthering the inequities in this bonus system.

This “tamp down and bonus up” scheme has the net effect (since the bonus will be used rarely) of reducing housing capacity along Corridors and in Centers by about one-fourth, in places that have the best transit service and shopping options outside downtown. It will lead to higher housing costs as close-in sites for multifamily housing are restricted in density and less housing gets built. **We urge you to either change the CM-2 base FAR from 2.5:1 to 3.5:1, or eliminate the FAR maximums, in order to increase housing affordability, and grow our Centers and Corridors into viable 20-minute Neighborhoods.**

#### **Low-rise commercial storefront areas:**

A late addition to the proposal, this move downzones, from CM-2 to CM-1, the heart of many of the neighborhood main street areas throughout the city, including Hawthorne, Sandy, Multnomah Village, and Woodstock. It is contrary to the planning principles incorporated in the Centers and Corridors strategies in the Growth Scenarios Report. The core of these Centers is exactly where the highest density should be, to provide the most

people living within a walkable neighborhood, to reduce auto use, and allow more housing in high opportunity areas. Reducing the zoning capacity in these key areas will, again, contribute to increased housing costs.

It is not clear that limiting new buildings to 3 stories instead of 4 would achieve the desired preservation of “low-rise” areas, and it could still result in teardowns. Significant buildings should be protected through city efforts to facilitate placing them on the National Register of Historic Places, which several Hawthorne buildings are already on. **We urge you to eliminate the “low-rise commercial storefront area” downzoning from all areas of the city, to increase housing affordability and support the Growth Strategy. These properties should return to CM-2.**

**Support proposal in banning drivethroughs in CM-1, 2 and 3:**

We support the proposed Comp Plan policy statement banning new drivethroughs in the Central City, and limiting them in Centers and Corridors. We also approve of the rezoning of many CG areas to CM-2. New language in the plan is more flexible on rebuilding in those places where nonconforming drivethroughs already exist.

**Oppose requested Zone Changes for auto-oriented businesses:**

We oppose changing the zoning on the four Fred Meyer stores where the company asked to change from CM-2 to CE to allow drivethroughs at those stores (Hawthorne, Glisan, Gateway, and Barbur.). We oppose other downzonings for large retailers. We also ask that gas stations, fast food and coffee establishments and other retailers not be granted special zoning for drivethroughs in the areas where CM-2 or CM-3 is now planned. .

**Ground Floor Windows:**

We support the increased Ground Floor Window requirements, including the several options for residential-only buildings. We also note that for a window assembly to function as a “ground floor window”, one must be able to see into the building in the entire area between 4’ and 6’ above the adjacent exterior grade. Language to require this should be added back to Sec. 33.130.230 C. In addition, fins, slats or screens should not cover such windows.

**Setbacks & Stepbacks:**

We thank the staff for conceiving language to relate building façade height to street width in the CM-3 zone, and for crafting the required rear setbacks that protect light and air for adjacent single-family development in all Mixed Use zones.

We thank the Commission for your diligent review of this complex document, and urge the refinement of the regulations noted here, to improve this proposal and help our commercial areas and our city thrive in a sustainable manner.

Signed:

Brian Cefola  
Joseph P. Edge

Steve Gutmann  
Brendon Haggerty  
Marsha Hanchrow  
Marshall Johnson  
Tony Jordan  
Alan Kessler  
Doug Klotz  
Erik Matthews  
Brian Posewitz  
Dan Rutzick  
Ben Schonberger  
Bill Stites  
Davis Sweet  
Mark Wheeler



**Hathaway Koback  
Connors LLP**

520 SW Yamhill St.  
Suite 235  
Portland, OR 97204

**E. Michael Connors**  
503-205-8400 main  
503-205-8401 direct

[mikeconnors@hkcllp.com](mailto:mikeconnors@hkcllp.com)

May 10, 2016

**VIA EMAIL & HAND DELIVERY**

Planning & Sustainability Commission  
Bureau of Planning & Sustainability  
City of Portland  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Re: Mixed Use Zones Project  
Pliska Investments LLC & Space Age Fuel, Inc.

Dear Commissioners:

This firm represents Pliska Investments LLC and Space Age Fuel, Inc. ("Space Age Fuel"). Pliska Investments LLC owns several properties in which Space Age Fuel operates gas stations/convenience stores/service garages throughout the City. The Mixed Use Zones Project proposes to rezone the following Space Age Fuel properties as follows: (1) 16431 SE Foster Rd. from CG to CE; (2) 8410 SE Foster Rd. from EX to CM3; (3) 12920 SE Stark St. from CG to CM2; and (4) 11214 SE Powell Blvd. from CN2 to CM1. All of these properties have gas stations and convenience stores, and the 8410 SE Foster Rd. and 12920 SE Stark St. properties have vehicle repair shops as well. On behalf of Space Age Fuel, we are submitting the following comments and concerns regarding the draft Mixed Use Zones Project.

Space Age Fuel has serious concerns about the draft Mixed Use Zones Project because the proposed rezoning will render the gas stations and vehicle repair shops on at least three of these properties nonconforming uses and will make it virtually impossible to modernize or upgrade these sites. A gas station or "Quick Vehicle Servicing" use is prohibited in the CM1, CM2 and CM3 zones.<sup>1</sup> The only mixed use zone that would allow a gas station is the CE zone. With the exception of the 16431 SE Foster Rd. property, none of the remaining Space Age Fuel properties are proposed to be zoned CE. As a result of this proposed zoning, the gas stations and vehicle repair shops on three of Space Age Fuel's properties will be nonconforming uses and will be prohibited from being remodeled, modernized or redeveloped with another gas station. Not only will the proposed mixed use zones impact the existing uses, but they will substantially reduce the value of

---

<sup>1</sup> Gas stations qualify as "Quick Vehicle Servicing" uses under the PCC. PCC 33.920.220(A).

these properties since it is extremely difficult to redevelop a site that was previously occupied by a gas station.

Although the draft Mixed Use Zones Project proposes certain nonconforming use accommodations for Drive-Through Facilities in PCC 33.130.260 and gas stations are included in the definition of Drive-Through Facilities under PCC 33.910, we were recently advised by the City staff that these nonconforming use accommodations do not apply to gas stations. As a result, Space Age Fuel and similar gas stations with proposed mixed use zones other than CE will not be able to take advantage of these nonconforming use accommodations designed specifically to soften the impact of the new mixed use zones on automobile accommodating uses. Moreover, the nonconforming use accommodations set forth in PCC 33.130.260 are not adequate and would significantly restrict the ability to remodel, update or redevelop a gas station even if these standards applied.

One of the stated goals of the draft Mixed Use Zones Project has been to retain and match the use allowances of the zones being replaced and not cause existing uses to become nonconforming. The draft Mixed Use Zones Project is not adhering to this principle with respect to gas stations. In fact, gas stations appear to be one of the few use categories that will be converted to nonconforming uses on a broad scale under the draft Mixed Use Zones Project and not provided any nonconforming use accommodations. While we understand that the mixed use zones are intended to be more pedestrian friendly, there is still a substantial public need for accessible gas stations throughout the City since automobiles are the primary mode of transportation for the vast majority of Portland residents and will continue to be so for decades to come. Additionally, the draft Mixed Use Zones Project does not similarly impact other automobile-intensive uses, including some uses that generate far more traffic than a gas station (i.e. big box retail, grocery store, etc.).

To avoid converting these existing gas stations into nonconforming uses and significantly reducing the value of these properties, Space Age Fuel requests that the Planning and Sustainability Commission make one or more of the following changes to the draft Mixed Use Zones Project: (1) zone all of Space Age Fuel's properties CE; (2) allow gas stations and vehicle repair shops in the other mixed use zones; and/or (3) broaden the nonconforming use accommodations set forth in proposed PCC 33.130.260 and expressly provide that these provisions apply to gas stations. Based on our recent conversations with Barry Manning and Chris Scarzello with the City, the City staff is open to considering these changes and is particularly supportive of Space Age Fuel's proposals to zone its properties CE so the gas stations remain an allowed use in the new mixed use zone.

**A. All of Space Age Fuel's properties should be zoned CE.**

The easiest and most effective way to ensure that Space Age Fuel is not adversely impacted by the Mixed Use Zones Project is to zone all four of its properties CE. When selecting the appropriate mixed use zone for a particular property, the existing use should weigh heavily in that consideration and the City should avoid imposing a new mixed use zone that will cause the existing use to become nonconforming. Since the CE zone is the only new mixed use zone that allows gas stations, the City should select the CE zone for all of Space Age Fuel's properties that have existing gas stations and/or vehicle repair shops. Not only would zoning these properties CE avoid converting the existing gas stations into nonconforming uses, but there are compelling reasons for changing the zoning to CE.



For the 11214 SE Powell Blvd. property, the CE zone is more appropriate than the proposed CM1 zone given the existing uses and the characteristics of the surrounding area. The proposed CM1 zoning applies to a small area around the intersection of SE Powell Blvd. and SE 112<sup>th</sup> Ave. that has predominately auto-oriented uses. This small area includes Space Age Fuel's gas station and convenience store, a quick service automobile battery and repair shop across the street at 11207 SE Powell Blvd. (Battery Specialist) and another gas station on the same block at 11421 SE Powell Blvd. (Leather's Oil), as well as restaurants. Given the predominant auto-oriented uses in this area, the proposed CM1 zone is inappropriate since it is intended to accommodate small scale "pedestrian oriented" development. The City should not impose a new pedestrian-oriented zone on an area that is predominately auto-oriented. In contrast, the CE zone is "intended for sites along corridors in areas between designated centers, especially along Civic Corridors that are also major truck streets." This area is not within a town center, SE Powell Blvd. is a Civic Corridor and this section of SE Powell Blvd. is between designated centers, and therefore the CE is appropriate in this area. Ms. Scarzello with the City advised us that she is supportive of a CE zone for this site.

For the 12920 SE Stark St. property, the CE zone is more appropriate than the proposed CM2 zone. This particular CM2 zoned area is relatively small and is just outside the town center located along SE 122<sup>nd</sup> Ave. The CM2 zone is intended for "smaller mixed use areas that are well served by frequent transit," but this section of SE Stark St. is not well served by frequent transit. Additionally, this CM2 zoned area is practically adjacent to a CE zoned area that extends west along the south side of SE Stark St. The City could simply extend the CE zoned area to the east. Ms. Scarzello with the City advised us that she is supportive of a CE zone for this site.

For the 8410 SE Foster Rd. property, the CE zone is more appropriate than the proposed CM3 zone. The immediate surrounding area includes a number of automobile oriented uses, such as Space Age Fuel's gas station, convenience store and vehicle repair shop, an automobile tire service center at 8530 SE Foster Rd. (Premium Tire Service), an automobile service center at 8324 SE Foster Rd. (Automotive Outfitters), and a gas station at the corner of SE Foster Rd. and 82<sup>nd</sup> Ave. (Shell). Given the predominant auto-oriented uses in this area, the proposed CM3 zone is inappropriate since "development is intended to be pedestrian oriented." The City should not impose a new pedestrian-oriented zone on an area that is predominately auto-oriented. In contrast, the CE zone is "intended for sites along corridors in areas between designated centers, especially along Civic Corridors that are also major truck streets." SE Foster Rd. is a Civic Corridor and this section of SE Foster Rd. is between designated centers, and therefore the CE is appropriate in this area.

To the extent the City does not want to make larger changes to the proposed mixed use zoning in these areas, the City can and should change the proposed zoning for just Space Age Fuel's properties given the existing uses on those properties. The Mixed Use Zones Project is proposing single CE zoned properties that are surrounded by other mixed use zones in order to accommodate

existing uses in other instances.<sup>2</sup> The City should provide similar accommodations to Space Age Fuel's properties. Ms. Scarzello at the City advised us that she is supportive of a CE zone for the 11214 SE Powell Blvd. and 12920 SE Stark St. properties, and is open to considering a CE zone for the 8410 SE Foster Rd. property.

Finally, it is important to note that the Mixed Use Zones Project includes proposals to change some residentially zoned properties with established commercial use to a mixed use commercial zone so the existing uses can become legally conforming. If the City is rezoning residential properties to mixed use commercial in order to conform existing nonconforming uses, it should be willing to change the type of mixed use commercial zone for a particular property in order to avoid converting the existing commercial use into a nonconforming use.

**B. Gas stations and vehicle repair shops should be allowed uses in all of the mixed use zones.**

Although we recognize that the City wants the new mixed use zones to be more pedestrian friendly, there is still a substantial public need for gas service stations throughout the City. Automobiles are currently the primary mode of transportation for the vast majority of Portland residents and will continue to be so for decades. Space Age Fuel's four gas stations noted in this letter average between 450 to 900 customers per day, and provide its customers a low cost fuel source. Residents need easy access to gas service stations or they will be forced to drive further distances to find this service. The City should ensure that gas stations are reasonably accessible to the public and should not adopt new mixed use zones that will prohibit these types of uses or discourage their redevelopment and modernization.

Currently, gas stations are only allowed in industrial and commercial zones. Commercial zones are the most appropriate zones for these uses since they need to be accessible to surrounding businesses and residents that travel to these commercial areas. If the draft Mixed Use Zones Project is adopted, gas stations will be limited to the CE zone and some industrial zones. Given the limited areas that are proposed to include CE zoning, there are simply not enough properties zoned to accommodate the gas stations necessary to serve the growing population.

Rendering existing gas station properties nonconforming uses in the majority of the mixed use zones will not lead to redevelopment of these properties with pedestrian-oriented uses. It is extremely challenging and cost prohibitive to redevelop a former gas station use into another type of use due to environmental issues. It is even more challenging to redevelop small sites like Space Age Fuel's properties because the return on the development is not large enough to redevelop an environmentally challenging site. The only viable economic use for such a site is to retain the existing gas stations no matter how old or outdated. Preventing Space Age Fuel from modernizing

---

<sup>2</sup> The following are examples of the City proposing a single CE zoned properties surrounded by other mixed use zones in order to accommodate an existing use. The Mixed Use Zones Project proposes a CE zone for the gas station and vehicle repair shop located at 9808 SE Division St. notwithstanding the fact that it is surrounded by CM1 and CM2 zoned properties. The Mixed Use Zones Project proposes a CE zone for the Fabric Depot property located at 700 SE 122<sup>nd</sup> Ave. notwithstanding the fact that it is surrounded by CM2 and CM3 zoned properties.

or upgrading its gas stations on a site that cannot be redeveloped in a cost effective manner will substantially reduce the value of these properties.

To avoid this problem, the City should allow gas stations in some or all of the other mixed use zones, at least those areas outside the Central City area. There is no reason why a gas station should be prohibited in the medium-scale CM2 commercial zone and large-scale CM3 commercial zone when it is allowed in the medium-scale CE commercial zone. Gas stations should be allowed in all medium and large-scale commercial zones. Gas stations should not be prohibited in the CM1 zone since they are currently allowed in one of the corresponding small scale commercial zones, the CN2 zone.

**C. The nonconforming use accommodations set forth in proposed PCC 33.130.260 should be broadened.**

To the extent the Commission is not willing to zone all of Space Age Fuel's properties CE or allow gas stations in the other mixed use zones, the Commission should broaden the nonconforming use accommodations set forth in proposed PCC 33.130.260 and expressly provide that these provisions apply to gas stations and vehicle repair shops. The Mixed Use Zones Project proposes modifications to the Drive-Through Facilities provisions set forth in PCC 33.130.260 that would allow for nonconforming drive-through facilities to redevelop in the CM2 and CM3 zones if certain standards are satisfied. The staff commentary for this section indicates that these changes are intended to soften the impact of the new mixed use zones on automobile accommodating uses and "allow for the improvement of existing development, which would otherwise be regulated as a non-conforming development, limiting the ability to rebuild or update facilities with this status." In order to provide similar rights for gas stations, the Commission should broaden this proposed provision in several respects.

The Commission should expressly provide that these provisions apply to gas stations. Although gas stations are expressly included in the definition of Drive-Through Facilities under PCC 33.910, we were recently advised by the City staff that these nonconforming use accommodations are not intended to apply to gas stations. There are two problems with the staff's position. First, if gas stations are expressly included in the definition of Drive-Through Facilities and the primary component of a gas station clearly meets the characteristics of a drive-through facility (fuel pump islands), there is no reason why these provisions should not apply to gas stations. Second, the rationale for providing these accommodations to drive-through facilities applies equally to gas stations. While the City may want to restrict new automobile-oriented uses in the mixed use zones, it should not punish existing uses by transforming them into nonconforming uses or create a disincentive to modernize or redevelop these sites. The City should support efforts to modernize or redevelop these sites with newer gas stations, not impeded such plans. It would be patently unfair for the City to provide nonconforming use accommodations to drive-through facilities in general and not provide the same accommodations to gas stations even though they qualify as drive-through facilities and are similarly situated.

The Commission should also allow for these nonconforming use accommodations in the CM1 zone. Currently, proposed PCC 33.130.260 only provides these nonconforming use accommodations in the CM2 and CM3 zones. Since gas stations are allowed in the current CN2 zone, which is one of the corresponding zones for the CM1 zone, the CM1 zone should allow these

same nonconforming use accommodations because some CN2 properties will have existing uses that will be converted to nonconforming uses if the CM1 zone is applied. Space Age Fuel's 11214 SE Powell Blvd. property is a perfect example. It is currently zoned CN2, and therefore the gas station is an allowed use. The proposed zone is CM1, which will convert the existing gas station to a nonconforming use. This is precisely the type of situation that proposed PCC 33.130.260 is intended to address.

The Commission should delete or modify the requirement in proposed PCC 33.130.260(A)(3) that rebuilt drive-through facilities in the CM3 zone must be part of a larger development on the site with a minimum FAR of 1 to 1. A gas station/convenience store is typically a stand-alone development that is not part of a larger development. Nor is it possible to redevelop a gas station with a minimum FAR of 1 to 1 because they are one-story buildings and need to provide room for the fuel islands. To accommodate existing gas stations in the CM3 zone, this provision should be deleted or modified to allow for an exception for gas stations since they are not part of a larger development nor do they have a minimum FAR of 1 to 1.

### **Conclusion**

The City should not impose new mixed use zoning standards in a way that causes a select category of existing uses to become nonconforming and effectively prohibits the redevelopment or modernization of these types of facilities. The City needs to ensure that gas stations and vehicle repair shops are reasonably accessible to the public and should not adopt new mixed use zone standards that will jeopardize these types of uses, discourage their redevelopment and modernization, and substantially reduce the value of the underlying properties. Space Age Fuel proposed three specific ways of addressing this problem and urges the Commission to adopt one or more of these approaches.

Please understand that if the City is not willing to accommodate Space Age Fuel's concerns in a reasonable manner, it will have no choice but to strenuously object to the Mixed Use Zones Project and challenge it through any legal means possible. We appreciate your consideration of our comments. We look forward to working with the City further on this matter.

Very truly yours,

HATHAWAY KOBACK CONNORS LLP



E. Michael Connors

EMC/pl  
cc: Clients



TERRY PARKER  
P.O. BOX 13503  
PORTLAND, OREGON 97213-0503

**Subject: Testimony to the Portland Planning and Sustainability Commission related to the Mixed Use Zoning Project, parking and mitigation of the impacts, May 10, 2016.**

**Design &  
Development  
Policies  
4.32 & 4.33**

Adequate off-street parking must be provided with new mixed use zone development. Design and Development policies in the Comprehensive Plan specifically address the mitigation of off-site impacts on adjacent residential areas. Filling up residential streets with car storage because adequate off street parking is not provided is not mitigation. Neither is charging single family home households a fee to park on residential streets in front of their own homes. The burden of mitigation must remain with the new development, not with existing residences and businesses.

**Urban Form  
Policies  
3.45 - 3.47**

Urban Form corridor policies address accommodating growth and mobility needs for people of all ages and abilities, and balancing all modes of transportation. Equitably balancing all modes must require providing adequate off-street parking and adding a fee to bicycling when bike lanes take up street and curb space.

**Parking  
Management  
Policies  
9.54 - 9.57**

These policies must supersede the fantasy world mindset of Parking Management policies that seek to encourage lower car ownership and limit parking for car storage.

**Amendment  
P-99**

Missing from the comp plan amendment that allows for adequate parking is the definition of "adequate". Although it may be different for the central city, the Rose City Park Neighborhood Association Land Use and Transportation Committee defined the word adequate as "three parking spaces for every four residential units". It was approved by the neighborhood association board on April 5th. This language reflects the city's own studies that have found that 72% households in new multi-unit developments have one or more cars.

In the Portland-Metro area, nearly 80% of the trips are made by car. Over the next 20 years, car trips are expected to increase by 49 percent regardless of how much mass transit service is added.\* The best way to plan for the transportation needs of the future is to reinforce how people are getting around today. The expectation is that a three parking spaces for every four units standard be applied to any new mixed use or residential development that occurs on Sandy Boulevard, and anywhere else in the Rose City Park Neighborhood.

Finally, drivers are currently the primary financial stakeholders for all TSP projects. You need to start representing these core taxpayers, agree to some financial equity and reject discriminatory car hater transportation policies. A paradigm shift is needed!

Respectively submitted,

Terry Parker, Northeast Portland

\* Figures gathered by the Portland Business Alliance

Ord. 188177, Vol. 2.3.H, page 10054



**From:** Shannon Page [mailto:[shannon@cloudone.com](mailto:shannon@cloudone.com)]  
**Sent:** Tuesday, May 10, 2016 9:41 AM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** PSC Mixed Use Zones Testimony

Hello

As a resident of Oregon for most of my 49 years and as a single working Mom raising my daughter in West Moreland for the past 6 years, I have strong opinions regarding the design aesthetic of current and future development in our area. Sellwood Moreland's charming bungalow and other period style homes anchor our historical neighborhood with size, scale and detail that echo back to the eras when Portland was becoming itself.

Both sets of my grandparents were immigrants (from Germany and Poland) and contributed to the rich tapestry of a Portland that, as I was growing up on the Oregon Coast, both enthralled and educated me about a proud history of neighborhoods that represented communities.

I've lived in gated communities, neighborhoods with strict CCRs, at the beach and in the Gorge where "everything goes" and now our beloved Sellwood Moreland. I have been saddened to see that the combination of dense unit construction and new home building has often been accompanied by a questionable level of taste and contemporary design that stand out like sore thumbs in contrast to the established city scape.

We clearly need a thoughtful set of rules and requirements to uphold our historical neighborhood's character.

Thank you.



**Shannon F. Page**  
Executive Vice President

7503 SE 20th Ave.  
Portland OR 97202

**CELL** [503.840.7389](tel:503.840.7389)  
**FAX** [360.326.3063](tel:360.326.3063)  
**EMAIL** [shannon@cloudone.com](mailto:shannon@cloudone.com)

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

[Linkedin.com-shannonpage](https://www.linkedin.com/in/shannonpage)



**PROTECTING YOUR  
RIGHT TO ROAM**

May 10, 2016

Portland Planning and Sustainability Commission  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Oregon Walks Comments on Mixed Use Zones Proposed Draft, March 2016

Chair Schultz and Planning Commissioners:

Oregon Walks advocates for safe and convenient conditions for walking in Oregon. We have reviewed the Proposed Draft Mixed Using Zoning and strongly support the provisions that emphasize the development of pedestrian friendly city by providing for a mix of land uses and development regulations in centers and corridors that make it easy, safe, and comfortable to walk or use transit to meet our daily needs.

The continued restrictions on new Drive-Through Facilities in section 33.130.260 will help reduce the negative effects that drive-thoughts have on the pedestrian experience. Driveways generally create potential conflicts for users of the sidewalk because they are the locations where automobiles cross the pedestrian realm. Drive-throughs, which generate significantly greater volumes of cars, present a greater danger to pedestrians.

Likewise, Oregon Walks supports the increased requirements for Ground-Floor Windows in the Mixed Use Zones, from 25% to 40% of the ground floor wall area. Ground-floor windows make a big difference for walking, giving pedestrians a view into stores and building lobbies, increasing visual interest and increasing personal safety by ensuring "eyes on the street" from those within the building.

Oregon Walks ▪ P.O. Box 2252 ▪ Portland, OR 97208 ▪ [oregonwalks.org](http://oregonwalks.org) ▪ 503- 223-1597



**PROTECTING YOUR  
RIGHT TO ROAM**

We are concerned, however, that the requirement for a 4' high maximum for the bottom of windows is proposed to be removed from section 33.130.230, C. The windows must be at eye level to allow pedestrians to see into buildings, and to allow those inside to be able to see people on the outside, call for help when needed, as well as provide an interesting and varied pedestrian experience. Without a maximum bottom height, builders can set windows with their sills at 6 feet, say, and extending to 10 feet height to achieve the required window area, without providing pedestrians a visual connection to the life inside the building.

We welcome the additional window percentage requirements in the Mixed Use Zones proposal, and request a change in the draft proposed language requiring the windows be placed at a maximum 4' bottom height to ensure that people are able to see in and out at eye level on any window assembly counting toward the standard.

Thank you for your consideration,

Lidwien Rahman  
Oregon Walks



**PROTECTING YOUR  
RIGHT TO ROAM**

Oregon Walks ▪ P.O. Box 2252 ▪ Portland, OR 97208 ▪ [oregonwalks.org](http://oregonwalks.org) ▪ 503- 223-1597

May 10, 2016

Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, Oregon 97201

Dear Chair Baugh and Commissioners:

On behalf of Oregon Opportunity Network, the statewide association of nonprofit affordable housing and community development organizations, I write in support of the Mixed Use Zones (MUZ) Draft Proposal, and in particular the prioritization of affordable housing for the incentive/bonus program. We greatly appreciate that the previous draft was revised in recognition that affordable housing provides the greatest public benefit and should be given the highest priority.

As a proud member of Anti-Displacement PDX, Oregon Opportunity Network is excited to see the Comprehensive Plan move forward with strong equity and anti-displacement language – we thank you again for your leadership in ensuring that the plan includes, among other key provisions:

*Equitable access to housing Portland ensures equitable access to housing, making a special effort to remove disparities in housing access for people with disabilities, people of color, low-income households, diverse household types, and older adults.*

The MUZ bonus program designed to optimize the public benefit of housing affordability is a crucial step forward toward meeting this goal, and we urge your support.

We were glad to see noted in the proposal that the Legislature's recent lifting of the statewide ban on Inclusionary Zoning adds a new (very welcome, and hard-won!) layer of complexity. As expert nonprofit housing providers, Oregon ON and its members stand ready to assist City bureaus in developing an aligned program including parameters for mandatory and voluntary incentives/bonuses. We urge the City to provide certainty, flexibility, and code simplicity.

Thank you as always, for your volunteer service to our community.

Sincerely,



Ruth Adkins  
Policy Director



On behalf of Oregon ON's 20 member organizations in Portland:

BRIDGE Housing  
Cascadia Behavioral Healthcare  
Catholic Charities/Caritas Housing  
Central City Concern  
Enterprise Community Partners  
Habitat for Humanity Portland/Metro East  
Hacienda CDC  
Home Forward  
Housing Development Center  
Human Solutions, Inc.  
Innovative Housing, Inc.  
NAYA Family Center  
NOAH (Network for Oregon Affordable Housing)  
Northwest Housing Alternatives  
Portland Community Reinvestment Initiatives (PCRI)  
Portland Housing Center  
Proud Ground  
REACH Community Development  
ROSE Community Development  
Sabin CDC

**From:** Bill Neburka [mailto:Bill@worksarchitecture.net]  
**Sent:** Tuesday, May 10, 2016 2:13 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Testimony Related To Mixed Use Zones

I'd like to share some of my concerns regarding the current MUZ package. I've been tracking this package closely and have serious issues with the reduction of allowed FAR, building profile dictations and the overall feeling that we are embarking on a major regression of our city's progressive density goals. I've attempted to outline my concerns below:

*FAR changes:*

The compromises made as part of the MUZ process have essentially resulted in a direct down-zoning of the base zone allowances across most, if not all, of the C and EXd zones.

Doing so results in a penalty for property values, taxable values and dis-incentivizes development.

The attempts to "incentivize" increased FAR to get back to an allowed FAR that matches the allowed heights on the lots are poorly convinced and some of the incentives have actually been eliminated as the plan has progressed.

The current plan is being developed during a development bubble and we all know that property investment and development is cyclical... those of us that remember what it was like only a few years ago – when our city was starving for development progress - know that a down-zoning and reduction in progressive density now, will have giant effects down the road.

During the most recent downturn, we saw development come to a halt and we saw property values drop. This results in lower property taxes and the funds paid by development projects (SDC, school excise, etc) dry up and our city's ability to fund and operate becomes a slow crawl.

The hope that requiring that you must include affordable housing in order to earn back the FAR that this plans takes away is ill fated and additionally, the likely coming inclusionary housing rules could further push that needle, resulting in developments that only build what they can provide under the new,, reduced base zone allowances, if anything at all.

The goal should be to ensure that the maximum FAR is achieved when a site is being developed. Once a reduced FAR is constructed it will be there for a very long time.

*Massing and Building Profiles:*

The addition of the requirement for "stepped" street face setbacks is problematic for various reasons.

First, it confuses design guidelines and zoning and uses requirements. The zoning of the site shouldn't dictate form. This measure immediately creates one type of building massing that isn't always desirable and isn't functionally better.

Secondly, this stepped massing concept is being fed by a small, but vocal, group that feels that our main streets seem to dense. The main streets are where there should be that density and scale. Our last round of urban planning understood this and this fundamental element of building density and capacity within our city.

*Regression:*

Portland has long been a symbol and progressive zoning and transportation policy. We repeatedly uphold the growth boundary, which means that we support focused growth within our close-in neighborhoods. In this current cycle, we have seen leaps in that urban form and this proposal is putting the brakes on what we had collectively planned for and supported. I blame this shift on concerns around "change" and the naïve idea that this pace of development will continue in perpetuity. We are at the top of a real-estate bubble and there will be a bottom again.. this is the way the world works. Reducing FAR and restricting building forms are reactive measures and don't maintain the long term goals of our city.

This regression reduces the property values in Portland. Down-zoning needs to be taken seriously as its impacts can have a ripple effect across project feasibility and funding and realization.

In summary, I strongly urge the planners and commissioners to take care in what gets placed into code today – it will have long term impacts on development and in turn, affordability. Once you set this in motion there isn't an easy way to reverse it. Be brave and continue to support the progressive city that Portland is meant to be and not a regressionary version of itself.

Sincerely,

William Neburka  
Resident, 4213 SE Raymond Street  
Portland 97206

**From:** Pat Miksa [mailto:pmlooneybird@yahoo.com]  
**Sent:** Tuesday, May 10, 2016 3:13 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Attention Portland Planning and Sustainability Commission,

I have been a resident of the Sellwood-Moreland neighborhood since 1983. I understand that to prevent urban sprawl it is necessary to have infill housing and development, however the tendency of developers to erect buildings that do not fit with the historical motif of the neighborhood is disturbing. Residents and visitors of the Sellwood-Moreland neighborhood cherish the historic character of our commercial corridors (e.g SE 13th, 17th and Milwaukie Ave). They enjoy walking and biking to family owned businesses and appreciate learning about the changes of ownership and transformations of the one of a kind, unique buildings. It would be desirable if a design overlay would be drafted for this neighborhood to guide future development. When creative minds gather, they should be able provide mixed use zones that are a good fit with existing neighbors.

Thank you for your attention.

Sincerely,  
Patricia Miksa  
8438 SE 21 Ave.  
Portland, OR  
97202-7404

**From:** David Mihm [<mailto:davidmihm@davidmihm.com>]

**Sent:** Tuesday, May 10, 2016 1:09 PM

**To:** BPS Comprehensive Plan Testimony <[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)>; Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>

**Subject:** [User Approved] Testimony on the proposed mixed-use zoning update

To whom it may concern:

I learned about the ongoing zoning revisions being proposed at the Richmond Neighborhood Association meeting last night. Doug Klotz of the RNA did an excellent job laying out the impact and implications of the proposed changes.

I was surprised and disappointed to see that there are still large swaths of red-colored areas along SE Powell between the Ross Island Bridge and 35th that this plan proposes to leave as "general commercial."

SE Powell is one of the widest/largest corridors in the entire inner eastside, soon to be served by a bus rapid transit system. It's one of the most natural places for large-scale residential building projects to happen outside the downtown core. And certainly is a more natural place for these kinds of projects than a number of locations where Mayor Hales' administration has already allowed them to occur (N. Williams is the most glaring example).

I had thought that Mayor Hales' embarrassingly-belated declaration of a housing emergency in Portland several months ago was designed to allow for all options to be on the table when it comes to zoning for more housing. Especially for more affordable housing, and especially for more affordable housing close to transit hubs.

This section of SE Powell seems like a perfect place for that to happen, and I strongly suggest it be considered more thoroughly to \*at least\* be zoned as Mixed-Use as part of this process.

Sincerely,  
David Mihm  
1982 SE 30th Ave  
Portland, OR 97214



### Proposed Rezoning of Property Located at 3621 and 3623 SE Hawthorne

The current zone of this site is CS. The proposed new zone is CM1. The Public Notice I received indicated that this proposal to revise zoning was "developed by City planners based on feedback from a project advisory committee." I was told by City staff that this committee was actually split specifically regarding the height restriction that's proposed and that there was not a clear majority supporting that particular restriction. The existing building at 3621 and 3623 SE Hawthorne and property are quite small and the potential for redevelopment under the current zone is reasonable. This is a single-story building 1,980 square feet in size and the lot consists of 3,330 square feet. The proposed new zoning substantially reduces the value and redevelopment potential of the site. The significant adverse impacts of the new zone include but are not limited to the following:

#### Current Zone-CS

Allows up to 4 stories

Retail Sales and Service-Limited

Vehicle Repair-Allowed

Wholesale Sales-Allowed

Height-45' (Update allows bonus of 5 stories)

#### New Zone-CM1

Limits height to 3 stories

Retail Sales and Service-Allowed

Vehicle Repair-Not Allowed

Wholesale Sales-Not Allowed

Height-35' Max., No Bonus Options

My understanding from staff is that neighbors object to 5 story buildings. If this is the case, then redefine how the height is measured and limit the height to 4 stories. It is not necessary to limit the height of a small section of Hawthorne to 3 stories to create a "main street". If 5 stories adversely impact nearby neighbors, then why would the City propose up to a maximum of 5 stories (e.g. if affordable housing is proposed another story is allowed)? The designation of a maximum of 3 stories between SE 35<sup>th</sup> and 38<sup>th</sup> along Hawthorne appears to be capricious and arbitrary. The City is proposing to take away our right to redevelop up to a 4 story building. There doesn't appear to be historic buildings in the area or a uniqueness to the existing development. There are a number of 4 story buildings in the area.

How does the appearance of up to 5 stories and then down to 3 stories for 3-4 blocks and then back up to 5 stories create a main street effect? Old Town zoning allows much higher than 5 stories and I believe no height limit for a short section and yet it has a main street feel to it. I would say that Hawthorne already has the main street feel with the current zoning. The existing development includes a variety of heights and includes buildings that are 4 stories in height.

Forcing the "core" area blocks to be dwarfed by up to 5 story buildings will result in less light and more shadows for those buildings. In addition, the much taller buildings will look down on our development resulting in a lack of privacy and a "fish bowl" effect. Allowing a combination of 4 to 5 stories results in less adverse impacts and provides more equity.

Some of the other criteria staff cited to define the "core" area include predominantly pre-war buildings- (many were built after the war, ours was built in 1956), buildings are built next to the sidewalk (most of the buildings are built next to the sidewalk now), and the buildings have a 0' setback (most have 0' setbacks now).

City staff indicated that there would be an opportunity to potentially receive a zone change from CM1 to CM2 (CM2 allows up to 4 stories) but this is misleading as it is very costly to apply for a zone change and obviously there is no guarantee of approval.

I urge the Planning and Sustainability Commission to allow buildings up to 4 stories in height in the CM1 district.

I appreciate your consideration regarding this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lori Meuser".

Lori Meuser  
11426 SW Oak Creek Drive  
Portland, OR 97219

503 293-6999

[Meuser.lori@gmail.com](mailto:Meuser.lori@gmail.com)

PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear Members of the PSC,

This testimony applies to the property at 4934 N. Vancouver Ave in Portland Oregon with Property ID R308868 Map 1N1E22AC 1500. The owner of the property is Douglas McCabe.

Currently the property carry a Neighborhood Commercial 2 (CN2) commercial zone.

The new proposed Comprehensive Plan designation is Mixed Use Neighborhood. This designation is acceptable to the property owner with the assumption that the new zone for the property becomes **COMMERCIAL MIXED USE 2 (CM2)**.

The new Comprehensive Plan and zones proposed by the City will be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Project values, project loan criteria, and the market will be important to determine the development for new projects.

The specific 5740 Sq.Ft. property has frontage on N Vancouver Avenue which is a significant traffic carrier that has experienced numerous developments lately. Many of the buildings nearby on Vancouver Avenue and MLK Ave. are 4-6 stories in height with high density. The abilities of the **CM2** zone on this property allow for similar height and density as other properties in the area.

A letter from adjacent property owners Ernest and Sonja Hill (4946 N. Vancouver Ave.) and Jackie Strong (106 and 114 N. Alberta St.) is also being submitted requesting the CM2 zone. Nearby property owners Luther and Jesse Strong (20 N. Alberta) also will be submitting a request for the CM2 zone.

In conclusion, Ernest and Sonya Hill feel the resource of their 5740 Sq.Ft. property at this location is best suited to the **MIXED USE NEIGHBORHOOD COMPREHENSIVE PLAN DESIGNATION WITH A CM2 ZONE**.

Thank you very much for your consideration,

Douglas McCabe POBox 14593 Scottsdale Arizona Telephone contact: 503-314-3331

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

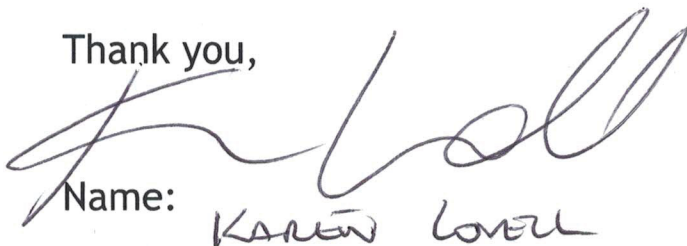
The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

Name:



Address:

4410 SE WOODSTOCK BLVD  
#200  
PORTLAND, OR 97206

Dear Chair Bough & Members of the Planning Commission, May 10, 2016.

I have a work conflict and have come forward today as a member of the Mixed Use Zone Public Committee and my comments today relate only to the process of this document which you review today. I will be submitting written testimony later on specifics of the draft plan.

Working together, Barry Manning as Project Lead & Bill Cunningham along with BB staff run an excellent, informed & collaborative process which worked very hard to listen to citizen input and address concerns.

I want to commend those two gentlemen in particular for their hard work, and all the committee members in general for their thoughtful, ~~draw~~ intelligent efforts over a long public process.

Members  
Mixed Use  
Zone Committee  
Lindsay  
Susan  
Jesse Paul



PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland, Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear Members of the PSC,

This testimony applies to the following properties which are ALL owned by L&N Third, LLC :

Map 1S 1E 01AA Tax Lot 09000 Parcel # R112202 House on 5,000 sf lot (residential use on Morrison St)

Map 1S 1E 01AA Tax Lot 08900 Parcel # R112203 House on 5,000 sf lot (residential use on Morrison St)

Map 1S 1E 01AA Tax Lot 08800 Parcel # R112205 House on 3333 sf lot (commercial use on Morrison St)

Map 1S1E 01AA Tax Lot 08700 Parcel # R112204 Parking Lot on 3330 sf (commercial use on corner Morrison St./Cesar Chavez Ave)

Map 1S1E 01AA Tax Lot 08500 Parcel # R112210 2 Houses on 6667 sf lot (commercial use on Belmont St)

Map 1S1E 01AA Tax Lot 08400 Parcel # R112209 House on 3333 sf lot (residential use on Belmont St)

The existing Commercial zone for those properties fronting Belmont St is CN-2. Two of the properties, Tax Lots, 8700 and 8800, have split zoning with the south half of each CN-2 and the north half of each R-1. The other properties which front Morrison St are residential R-1.

Tax Lots 8500, 8700, and 8800 are currently commercially used for the long time neighborhood Belmont Academy school, and the other Tax Lots are currently improved with the school use AND duplex and triplex rentals.

L&N Third, LLC believes the proposed new Comprehensive Plan designation for the properties on Belmont St of Mixed Use-Urban Center is acceptable, but only with a **CM2 Zone**.

L&N Third LLC also believes the properties on Cesar Chavez Ave and Morrison St. should have a similar Comprehensive Plan designation of Mixed Use-Urban Center and a **CM2 Zone**.

The reasons for these requests are as follows:

1. All the properties are under the same ownership and are contiguous Tax Lots comprising 26,663 sf of property fronting on Morrison St on the North; Cesar Chavez Ave on the East; and Belmont St on the South.
2. The properties as they exist now have a split zones CN-2 and R-1. The R-1 properties consisting of the north half of Tax Lots 8700, 8800 and all of Tax Lots 8900, and 9000 (total of 13,331.50 sf)

have Cesar Chavez Ave and Morrison St frontage. The CN-2 properties facing Belmont St are Tax Lots 8400 and 8500 and the CN-2 properties facing Cesar Chavez Avenue are the south half of Tax Accounts 8700 and 8800 (total of 13,331.50sf). Since this property is in one ownership, and has potential as one large development with three (3) street frontages, one new commercial comprehensive plan of Mixed Use-Urban Center and one new commercial conceptual zone of CM2 provides for a better property use and eliminates the split zone problem.

3. There is a significant likelihood that the 6,000 sf property in another ownership at the Northwest corner of Belmont St and Cesar Chavez Ave (which abuts Tax Lots 8500, 8700, and 8800) will be incorporated into a development of the L&N Third, LLC property. Cesar Chavez Ave is a Civic Corridor and Belmont St a Neighborhood Corridor with both streets served by City transit at this "important" intersection.
4. Pedestrian traffic will benefit by the L&N Third, LLC property being developed as a whole.
5. The new Comprehensive Plan and Zones will likely be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Property values, project loan criteria and the market will be important to determine the development for new projects. L&N Third, LLC believes, given the increased demand for these infill sites, the ability for the greater density with bonuses and incentives of the CM2 zone will be crucial to the properties ultimate development and pricing of the final product.

The Sunnyside Neighborhood Association has been contacted and those at the meeting appeared to support the CM2 zone.

In conclusion, although L&N Third, LLC would like all the property it owns at this location to have the same Zone of CM2.

**NOTE: THE NOTICE OF PROPOSED ZONE CHANGE TO CM-2 WAS RECEIVED FOR 5 OF THE 6 PARCELS OWNED BY L&N THIRD, LLC. HOWEVER, THE 6<sup>TH</sup> PARCEL---R112202 AT 3834 SE MORRISON ST. WAS NOT RECEIVED. OUR REQUEST IS THAT ALL THE PARCELS BE ZONED CM-2.**

Thank You,

L&N Third, LLC

Larry and Nina Lindstrom 11550 S.W. Riverwood Portland, Oregon 97219---owners of L&N Third, LLC  
tele: 503-997-9520

PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear members of the PSC,

This written testimony applies to the two (2) properties in the City of Portland in Multnomah County that constitute the existing Maplewood Retail Center located at the Southeast corner of S.W. Multnomah Boulevard and S.W. 45<sup>th</sup> Avenue. These two (2) properties are identified by State tax ID 1S1E20CB2000 and 1S1E20CB 2100. The properties are owned by L&N Fourth, LLC---Larry and Nina Lindstrom.

Currently the properties are zoned CN2 and are proposed for new zone CM1. The property owners are not in agreement with the proposed zone of CM1 and request that the PSC zone the properties **COMMERCIAL EMPLOYMENT (CE)** for the following reasons:

-----The CE zone is described as a medium-scale commercial zone and is intended for commercial sites OUTSIDE designated centers, especially along major streets and traffic routes. This describes the location of the properties well. The east-west Multnomah Boulevard is a major traffic carrier to southwest Portland neighborhood and even has it's identified I-5 exit to these communities. The intersection at 45<sup>th</sup> and Multnomah is really a 5-street "signalized" intersection with 45<sup>th</sup> Avenue providing access north and south to many long established residential and commercial locations. These streets are certainly major streets and traffic carriers.

-----The existing 9670 sq.ft. retail structure, even though not located in what could be called a "commercial center" has a proven value to the nearby residents of the area as a vital source for their commercial needs. Most all the existing tenants of the building have been there as tenants for over 15 years.

-----The property has adjacent residential zones. The property south is a relatively new residential structure and was constructed in an R-2 multi-family zone. The properties east are zoned single family with access to their existing structures from a southerly street and are separated from the subject property by a major forested/creek area with environmental protection. There is little impact to adjacent and close-by properties by the change of development parameters from the proposed CM1 to the requested CE zone.

-----The development parameters for the requested CE zone verses the proposed CM1 zone are quite minimal. There appears to be only a minor FAR upgrade and 10 foot more height allowance. Given the future housing projections for the City of Portland, if these properties were to be re-developed these

minimal upgrades could be the difference in providing a much better mixed use building than the older existing single story building much sooner.

In conclusion, the property owners L&N Fourth LLC feel that the resource of this large site at this major intersection would best be served by the development parameters found in the **COMMERCIAL EMPLOYMENT (CE)** zone. However, if the PSA feels that the property does not "fit" the **CE** zone, then the owners believe the **CM2—Commercial Mixed Use 2** zone (for the same reasons as the change to **CE**) is a better use for the properties. There is proposed **CM2** zoning close to this property just east along Multnomah Blvd.

Thank you very much for your consideration regarding this matter,

L&N Fourth LLC and it's owners Larry and Nina Lindstrom 11550 SW Riverwood Portland Oregon  
Telephone 503-997-9520

**From:** Kristin [mailto:kristinkaufman@gmail.com]  
**Sent:** Tuesday, May 10, 2016 4:24 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony - Sellwood / Moreland

Hello,

Sellwood was founded in 1883 with SE 13th at its center. SE Milwaukie has served Portland since the 1840s when settlers made their homes after their long journey on the Oregon Trail. These two streets make up the town center which has been cherished as a pedestrian centered community for over a hundred years.

I moved here over a year ago, because of this community, and the small town centers, and the normal sized older craftsman style homes. I bought my house here 100% due to these reasons. In the year that I've lived here, I am shocked at the amount of destruction and the amount of condos/1 bedroom boxes that are now being built - or 4 bedroom 3 bath homes that are poorly made, that replace 2 bedroom, 1 bath homes.

I would be afraid to purchase another home in Sellwood/Moreland, because you have no idea what is going to be built right next to your home and yard - it's possible to have no sun on your property, at all, due to a new development..it's scary - a condo development / 19 apartment building.

Also, where I came from in CA - my neighborhood of 1 story ranch style homes from the 40s and 50s - anyone who wanted to destroy/rebuild had to have the approval made by the neighborhood - and 1 story only.

I was shocked, as I stated above, that here in Portland, you can build anything you want.

Sellwood/Moreland is a distinct walkable community and in the future should continue to be a distinct walkable community as our city grows. It deserves a design overlay. This is a unique and historic center of town, not one that investors with no stake in the community should be blot with cookie cutter development unsuited to the neighborhood without acknowledging the architectural and communal living history of Sellwood Moreland. Other neighborhoods such as St. Johns, Kenton, Mississippi have a design overlay and SE 13th and Se Milwaukie have earned the same respect.

Regards,

Kristin Kaufman  
7655 SE 22nd Avenue  
Portland, OR 97202



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

From: Barbara Hoffstetter [mailto:[hoffstetter7297@gmail.com](mailto:hoffstetter7297@gmail.com)]

Sent: Tuesday, May 10, 2016 7:08 AM

To: Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>

Subject: PSC Mixed Use Zones Testimony

Hello,

I'd like to add my voice to those who want Sellwood to be designated a Mixed Use Zone.

Since I am in my late 60's, I moved to Sellwood because it is a walkable neighborhood and I felt that as I got older, I would want to live in a neighborhood that is possible to negotiate without a car. Although I own a car, sometimes days go by when I don't use it. I can walk to my bank, the post office, 2 food stores, the hardware store, the cleaners, many restaurants and food carts and a wide variety of specialty shops. It is even more convenient than I had anticipated. Please designate Sellwood as a Mixed Use Zone.

Barbara Hoffstetter  
937 SE Marion St.

**From:** Robert [mailto:r\_elan@comcast.net]

**Sent:** Tuesday, May 10, 2016 11:07 AM

**To:** Cunningham, Bill <Bill.Cunningham@portlandoregon.gov>; Planning and Sustainability Commission <psc@portlandoregon.gov>

**Cc:** Stephen Adams <stephen.adams@stephenadams.com>

**Subject:** NE 15th and Brazee

Dear Mr. Cunningham,

We are writing to express our concern over the rezoning of the commercial property at NE 15th and Brazee. It is our understanding that the proposed changes would result in new rules, including hours during which businesses can operate. Our neighborhood worked long and hard to come up with a good neighbor agreement that works for all concerned and we have spent much time attempting to enforce the agreement and resolve other problems that have arisen. Rezoning this property will nullify much if not all we've worked for.

We ask that the property retains its R-5 status and if that is not possible, to please amend the proposed rezoning so the current rules and limitations remain. We understand that this could be accomplished by simply amending Section 33.130.100 B 2 (c) to 15,000 sf.

Sincerely,

Robert Hodgson

Stephen Adams

2443 NE 15th Ave

PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear Members of the PSC,

This testimony applies to the property at 4946 N. Vancouver Ave in Portland Oregon with Property ID R308870 Map 1N1E22AC 1400. The owner of the property is Ernest and Sonya Hill.

Currently the property carry a Neighborhood Commercial 2 (CN2) commercial zone.

The new proposed Comprehensive Plan designation is Mixed Use Neighborhood. This designation is acceptable to the property owner with the assumption that the new zone for the property becomes **COMMERCIAL MIXED USE 2 (CM2)**.

The new Comprehensive Plan and zones proposed by the City will be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Project values, project loan criteria, and the market will be important to determine the development for new projects.

The specific 3080 Sq.Ft. property is at the southeast corner of N. Alberta Street and N. Vancouver Ave. Both these streets are significant traffic carrier that has experienced numerous developments lately. Many of the buildings nearby on Vancouver Avenue and MLK Ave. are 4-6 stories in height with high density. The abilities of the **CM2** zone on this property allow for similar height and density as other properties in the area.

A letter from adjacent property owners Douglas McCabe (4934 N. Vancouver Ave.) and Jackie Strong (106 and 114 N. Alberta St.) is also being submitted requesting the CM2 zone. Nearby property owners Luther and Jesse Strong (20 N. Alberta) also will be submitting a request for the CM2 zone.

In conclusion, Ernest and Sonya Hill feel the resource of their 3080 Sq.Ft. property at this location is best suited to the **MIXED USE NEIGHBORHOOD COMPREHENSIVE PLAN DESIGNATION WITH A CM2 ZONE**.

Thank you very much for your consideration,

Ernest and Sonya Hill 4946 N Vancouver Ave Portland Ore Telephone contact: 503-286-1103



Home Builders Association  
of Metropolitan Portland

---

May 10, 2016

Katherine Schultz, Chair  
Portland Planning & Sustainability Commission  
1900 SW Fourth Avenue  
Portland, OR 97204

Re: Mixed Use Zones Project

Chair Schultz and Commissioners:

The Home Builders Association of Metro Portland (HBA) appreciates the opportunity to comment on the City's Mixed Use Zones Project. We recognize the importance of this project in helping revise commercial zones outside of Central City, as well as addressing policies of the new Comprehensive Plan that work to address housing affordability for current and future residents of Portland.

The HBA appreciates the effort that has gone into the project, and there are aspects of the draft plan that are to be commended. However, there are key items that stand out as potentially problematic, especially toward achieving the shared goal of housing affordability for Portland residents.

Specifically, proposed changes to replace the current zoning with a more restrictive height and FAR for all uses, runs counter to our need for increased density and more affordable opportunities. Namely, a restriction on the height and FAR requirement may potentially result in the unintended consequences of discouraging building, reducing density, increasing rents for non-affordable portions of projects, and ultimately exacerbating an already tenuous housing situation within the city.

Rather than artificially limiting the height and FAR along the centers and corridors, a better and sensible approach would be to allow more density throughout the city to help increase supply and provide more affordable opportunities for current and future residents.

Moreover, the types and location of the housing built and residents of those units are integral to achieving the city's sustainability objectives. These residents are drawn to Portland for the urban experience, to live close to their place of employment. Many elect to take mass transit, walk or bike to their workplace. As a city, we should work to encourage those housing types that help lessen our carbon footprint.

At a time when the city is in the midst of an affordability crisis and facing unprecedented growth, now is not the time to place unduly onerous restrictions that impact affordability. Rather, by increasing density throughout the city we can hope to achieve a balance in the supply/demand spectrum that is currently lacking and avoid taking another step in the direction toward San Francisco.

Home Builders Association of Metro Portland  
15555 SW Bangy Rd., Ste. 301  
Lake Oswego, OR 97035  
503-684-1880 • Fax 503-684-0588

The HBA values our relationship with the City and looks forward to working together on these important issues for Portland. Thank you for your consideration of the proposed items.

Respectfully,

A handwritten signature in black ink, appearing to read 'P. Grove', with a stylized, cursive script.

Paul Grove  
Associate Director of Government Relations  
Home Builders Association of Metro Portland



2536 SE 33<sup>rd</sup> Place  
Portland, OR 97202

May 10, 2016

Chair Schultz and Planning and Sustainability Commission Members:

I am writing to offer my support for the recommendations that have been offered by the Division Design Committee for consideration in regards to the Mixed Use Zones proposed draft. Key points include:

- Restoring a residential FAR requirement for Mixed Use Buildings, encouraging the city to fix this problem immediately rather than waiting for implementation perhaps two years down the road, or even longer.
- Incorporating all of the new Division Design Guidelines into the Division Plan District.
- Supporting the preservation of "Vintage Low-Rise Commercial Areas," limiting development to 3-story (35') scale in commercial storefront areas with continuity of 400' of pre-1920s buildings. The stretch of blocks from SE 35<sup>th</sup> to SE 38<sup>th</sup> Avenues along Division Street is an excellent choice for implementation of this proposal. Thank you for listening and acknowledging community desire for preservation of our architectural character.
- Supporting Design Review and Design Commissions to be established for each quadrant of the city.
- Requesting a Southeast area plan in order to give the southeast neighborhoods an opportunity to reflect broadly on our common vision and future goals in concrete and meaningful ways.

I appreciate your work and time spent considering community needs.

Sincerely,



Denise Hare  
2536 SE 33<sup>rd</sup> Place  
Portland, OR 97202

PSC

1900 S.W. Fourth Avenue

Suite 7100

Portland Oregon 97201

Re: PSC Mixed Use Zones Testimony

Dear Members of the PSC,

This testimony applies to the property at 4929 N.E. Fremont Street in Portland Oregon with Property ID R111568 Map 1N 2E 19CD 2500. The owner of the property for many, many years is Settlemier Award Jackets, Inc. and their business continues at this location to this day.

Currently, the property carries a Neighborhood Commercial 2 (CN2) commercial zone.

The new proposed Comprehensive Plan designation is Mixed Use-Neighborhood. This designation is acceptable to the property owner with the assumption that the new Zone for the property becomes **COMMERCIAL MIXED USE 2—CM2**.

The reasons for these plan and zone requests are as follows:

1. This property has 100 feet of Street frontage on N.E. Fremont Street. N.E. Fremont Street is a well established commercial corridor in northeast Portland. This particular area of Fremont Street has numerous long standing residential and commercial development.
2. Lately, there has been a recent residential development nearby on Fremont Street of a four (4) story building in an existing CS zone. The CS zone allows for a 45ft height limitation, which is similar to the new Zone CM2.
3. The specific property lends itself to the density and height criteria of the CM2 zone. The property is bordered southerly by Fremont Street, on the north by the open space of a cemetery, on the west by private ownership of Gladys and George LLC (Stanichs Restaurant), and on the east by a newer 3 story mixed use building. The property owned by Gladys and George LLC (current Stanichs Restaurant) adjacent west is also requesting a **CM2 Zone**.
4. Fremont Street provides City transit (bus line).
5. The new Comprehensive Plan and Zones will be in place for a long time. The City's progressive development attitude benefits the trend to live "close in" to take advantage of the resulting commercial amenities and transit. Property values, project loan criteria and the market will be important to determine the development for new projects. **PRECEDENCE ALREADY ESTABLISHED: The City approved and construction recently completed five (5) blocks away at 4429 NE Fremont Street the four (4) story Beaumont Village mixed use development.** The Gladys and George LLC believes, given the increased demand for these infill sites, the ability for greater density with the bonuses and incentives of the CM2 zone will be crucial to the property ultimate development and pricing of the final product.

In conclusion, the Gladys and George LLC feels the resource of a 10,000 sqft property at this location is best suited to the Mixed Use-Neighborhood Comprehensive Plan designation with a **CM2 ZONE**.

Thank you very much for your consideration of this matter.

The Gladys and George LLC 4915 N.E. Fremont Street Portland Oregon 97213 tele: 503-544-1633 (Steve Stanich)

**From:** Connie Levine [mailto:ConnieL@giustina.com]  
**Sent:** Tuesday, May 10, 2016 3:11 PM  
**To:** BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>  
**Cc:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Objection to 2035 Comprehensive Plan Amendments

We are the property management company for properties located at 2330 NW Flanders; 467 and 475 NW 23<sup>rd</sup>; 2310 NW Glisan; 333 NW 23<sup>rd</sup>; 1403 and 1409 Weidler; 1615 NE 15<sup>th</sup>; 1444, 1445 and 1448 NE Weidler; 1439 NE Halsey; 1504, 1510, 1512, and 1520 NE Broadway; 1620 NE Grand Ave.; 510 NE Broadway; 2303 W. Burnside; 2307, 2315, 2320, 2323, 2329 NW Westover; and 3445 N Williams Ave., Portland, Oregon. On behalf of the owners of these properties, we object to the 2035 Comprehensive Plan Draft City Council Amendments dated March 18, 2016, Policy #P32, which proposes a new policy be added after Section 4.23 (Design and Development of Centers and Corridors) of the Comprehensive Plan. The proposed Amendment would prohibit drive through facilities in the Central City, and limit them in centers and corridors in order to “support a pedestrian-oriented environment and reduce conflicts between automobiles and pedestrians and bicyclists.”

The proposed Amendment will have a substantial financial impact on the properties affected, as well as the potential tax revenues generated therefrom. It would limit potential commercial uses. Drive through facilities are necessary for persons with children, people with disabilities, and elderly who rely on automobiles for convenience and safety. Conflicts between automobiles, pedestrians and bicycles can be accomplished through adequate cross-walks, sidewalks, lighting, and designated bicycle lanes.

Sincerely,

*Connie Levine*

**G GROUP, LLC**

200 International Way, Springfield, OR 97477  
PO Box 529, Eugene, OR 97440  
(541) 465-1600  
(541) 485-2050 (fax)  
[conniel@ggroup.com](mailto:conniel@ggroup.com)

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

From: Laurie A Flynn [mailto:laurie.a.flynn@gmail.com]

Sent: Tuesday, May 10, 2016 6:48 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Psc@portlandoregon.gov

>>> May 9 2016

>>> GWF LLC

>>> Laurie Flynn

>>> 7858 SW 5th Ave

>>> Portland Oregon. 97219

>>>

>>> Re: Proposed downsizing of our two properties located at

>>> 4607-4617 SE Woodstock Blvd

>>> 7121-7137 NE Fremont

>>>

>>>

>>> To Portland Planning and Sustainability Commission,

>>>

>>> Both our two properties are targeted for the proposed downsizing to CM1 which will limit any future development but also most likely will impact our property values. Our properties have been in my family for a number of years. I'm am the third generation. My guess is many of the targeted properties in the 15 neighborhoods you selected are similar to our story.

>>>

>>> I am fortunate to be a member of the Woodstock Stakeholders Group. We were informed of these proposed changes quite by accident. We met with a few city representatives to explain the why behind this proposal. Being told these buildings were historic in nature...pre-street car I believe the word used. There is nothing historic about either of our properties..and I really question if anyone went to any of these neighborhood sites to really get an idea how it is going to really work. I am new to city planning...but I was very offended when I was told that this is politically motivated...so basically it has nothing to do with a thoughtful planning of our commercial neighborhoods..how short sighted and how short sighted not to understand how it impacts family's that own these properties and the family small businesses we rent to. To be told that if we can't convince you to reverse this plan of yours we can go and buy our rights back...shame on you! Perhaps the city should think about buying our rights. We are a family...our resources are limited...we are not property developers with deep pockets.

>>> Our Woodstock Stockholders went to both the Woodstock Neighborhood Association and The Woodstock Business Association and both groups are supporting us in opposing the downsizing of certain properties in the neighborhood. My guess is most neighborhoods would oppose this.

>>> Our Fremont building does not have any property owners group..so I am on my own...which my guess is in most of the neighborhoods you selected that is the case.

>>> Our building was built in 1951...that is certainly not pre-street car era. The way it looks on the proposed map we will be surrounded by tall buildings...and there we will sit downsized. Also so you know in this neighborhood for years we were lucky rent the spaces as office space and there was no retail in the neighborhood until recently...so now you are proposing limiting who we can rent to if we develop the space in the future...this isn't planning..this is political.

>>> I hope you will agree with us this is wrong...it is not planning and it does not fit into Portland's growth plan. Taking property rights is not how to move our city's growth forward...it is a very bad precedence.

>>>

>>> Thank you

>>> Laurie Flynn

>>> GWF LLC



May 10, 2016

Portland Planning and Sustainability Commission  
c/o Portland Bureau of Planning and Sustainability  
1900 SW 4<sup>th</sup> Avenue, Suite 7000  
Portland, Oregon 97201

RE: Mixed Use Zones Project

**I recommend three things:**

- 1) Change the names of the proposed zones from **Mixed Use Commercial 1, 2, and 3** to **Storefront Commercial 1, 2, and 3**.
- 2) Provide for flexibility in the proposed Main Street Overlay.
- 3) Avoid the political rhetoric "progressive" over things such as the demise of the car.

**First:** Zoning is meaningless for most people; although zoning fundamentally shapes life as a police power. A word "mixed use" is meaningless except to planners. The word "storefront" has meaning to all.

**Second:** In the 80s, before I was active in Portland as a land use planner, streets like Belmont, Alberta, Hawthorne, and Mississippi were viewed as "commercial strips" by Portland's planners. The strategy was to social engineer the breakup of these "commercial strips" by placing commercial nodes such as Hawthorne at Cesar E. Chavez with R1 zoning between nodes along the "commercial strip". The strategy failed creating many non-conforming uses and market dysfunction.

In the late 1990s, the Planning Bureau through Coleen Acres saw the pain and conducted the "BLAZE" study on Belmont rezoning it to commercial storefront and the "Main Street" came alive. This was repeated with the Albina Community Plan and Martin Luther King, Mississippi and Alberta came alive.

Zoning cannot create market. Zoning restricts market. Imposing strict zoning on areas with low surrounding densities will only destroy whatever retail/commercial vitality exists. The Main Street Overlay needs to provide flexibility through adjustments to allow for market growth. The creation of urbanism is a comprehensive approach. The extreme vitality of the Central Eastside is due to a comprehensive strategic approach not zoning. In fact, as the market gains in power in its specific designated areas, we have allowed more flexibility in the EXd and IG1 areas; not less.

**Third:** The rhetoric around the car is not surprising as people tend to demonfy things to gain political leverage. The car is our modern day horse. Our cars provide us the power of individual control and mobility; particularly those with precious cargo such as children and pets and those with disabilities.

I was born and raised in San Francisco. I have used transit systems around the world. Our transit system is emerging as world class; which I am blessed to be a part of its development. Yet we cannot restrict the use of cars to force change. The drive-thru is critically important to those many that are not young and able.

As we get older, mobility is important. Why victimize those who are struggling to accommodate the political rhetoric of those who are not yet struggling. Compassion is flexibility to accommodate things that are needed now even though they may violate your values.

Sincerely,



Peter Finley Fry

**303 NW Uptown Terrace #1B  
Portland, Oregon USA 97210  
peter@finleyfry.com**

November 12, 2015

City of Portland Bureau of Planning and Sustainability  
Attn: Barry Manning  
Mixed Use Zones Project  
1900 SW 4<sup>th</sup>, Suite 7100  
Portland, Oregon 97201

RE: Mixed Use Zones Project; Discussion Draft – September 2015

The draft is a strong improvement over the existing commercial zoning code.

The term "Commercial Storefront" shall be missed; however the approach to the new zones maintains the important qualities of the Commercial Storefront zone and adds flexibility and incentives.

Two comments:

1) "Special Area Plan District"

Large properties (four acres or more) exist throughout Portland and are located in industrial or residential areas. These properties are occupied by important low intensity commercial uses on large site with significant amounts of cultivated natural areas and/or plants and trees. These include golf courses; farms; nurseries; and sanctuaries. These commercial uses need to thrive as commercial uses due to their special and historic purpose.

Over time, a large low intensity (and often very green use) may no longer be viable and the property would require conversion to another use.

A "Special Area Plan District" could provide that mechanism. As all plan districts, the districts would allow the operation, improvement, and expansion within limits of intensity regardless of the underlying zone. If and when the property is redeveloped, then the special area plan district would require a land use process such as subdivision and/or master plan.

2) Clear standards

The draft proposes standards that can be adjusted such as exterior display, drive-through, and storage. The code zoning could be designed to identify standards to permit exterior display such as a ten foot lawn setback, ornamental fencing, and flower beds (this has been on several projects through the adjustment process). Clear standards are consistent with the City's Compatibility Guidelines and current policy.

Sincerely,



Peter Finley Fry



Woodstock Community Center, 5905 SE 43rd Avenue, Portland, Oregon 97206

To: The Portland Planning and Sustainability Commission  
From: The Woodstock Neighborhood Association  
Re: Low-rise Commercial Storefront designation at SE Woodstock Blvd.

With this letter, the Woodstock Neighborhood Association wishes to speak against the proposed low-rise commercial storefront designation of a portion of the Woodstock Commercial corridor.

The March 2016 Proposed Draft of the Mixed Use Zones Project (MUZ) introduced new mapping and Zoning Code regulations intended to continue the scale and characteristics of older main street areas where low-rise Streetcar Era storefront buildings are predominant. The Proposed Draft identifies some properties along Woodstock Blvd., between SE 44<sup>th</sup> Ave and SE 47<sup>th</sup> Ave to be rezoned Commercial Mixed Use 1 (CM1).

The Woodstock Neighborhood Association and its Land Use Committee believe that the CM1 designation does not meet the intent and criteria of the Low-rise Commercial Storefront Areas as the properties included do not have contiguous concentration of low-rise Streetcar Era storefront buildings. In fact, the buildings included in these blocks are utilitarian commercial structures built in the 1940's or later. Interesting to note, the proposed CM1 designation includes a New Season store that opened in late 2015. While we appreciate the city effort to preserve areas of the city with buildings of established historic character, we believe this does not apply to the Woodstock Commercial Core. Furthermore, the 80' width of Woodstock Blvd Right of Way is about 20' wider than most of the other locations within the city where the CM1 designation is being proposed, making the height of buildings to width of right of way ratio less of a concern.

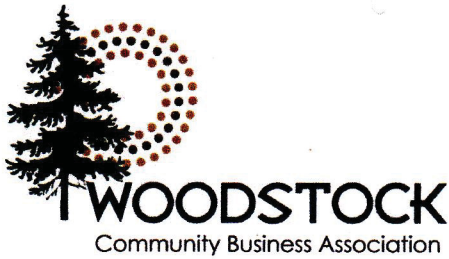
Most of the properties within the proposed CM1 designation are currently zoned CS. Table VI-1 Zone Conversion Table (p.316) in the MUZ Project Proposed Draft indicates that for Mixed Use Neighborhood Comprehensive Plan Designation (such as Woodstock Blvd.), the conversion of the current CS zone would correspond to CM2 in the new MUZ Project. We believe that the CM2 designation is more appropriate for the subject properties, more consistent with the current zoning entitlements as well as with previous drafts of the MUZ Project that have been circulated over the course of the Comp Plan Update process.

Representatives of the Woodstock Stakeholders Group (commercial property owners), made their case against the CM1 designation at the WNA general meeting on April 6, 2016. At that meeting, the WNA board voted in support of the Stakeholders Group and gave the mandate to the Land Use Committee co-chairs to draft a letter of support for the Stakeholders Group and against the proposed CM1 designation. At the April 20, 2016 meeting, the Woodstock Land Use committee further discussed the matter and a straw poll vote showed again support for the Stakeholders Group.

The content of the above testimony was reviewed once again by the Woodstock Neighborhood Association board on May 4, 2016.

Respectfully submitted,  
Ben Bortolazzo and Terry Griffiths  
Co-Chairs, Woodstock Neighborhood Association Land Use Committee





4207 SE Woodstock Blvd., PMB# 130  
Portland, OR 97206  
[www.woodstockbiz.com](http://www.woodstockbiz.com)

May 2, 2016

RE: Testimony for proposed Mixed Use Zoning along Woodstock Blvd

Dear Planning Commission:

At the recent April meeting of the Woodstock Community Business Association meeting, the Woodstock Stakeholders Group, a formally organized group made up of commercial property owners in the Woodstock community, made a presentation regarding the current proposed Mixed Use Zoning map. The Woodstock Stakeholders shared their concerns about the "down-zoning" of several properties in the core of the business district and the negative effect they believe it would have on their existing property rights.

The Woodstock Business Association formally supports of the Woodstock Stakeholders' position on this matter. We felt that a rezoning of properties to CM1 in the core of the business district would not be appropriate or in the best interest of the Woodstock Community.

Sincerely,

Woodstock Community Business Association  
Eric Norberg, WCBA Secretary

# KENNETH S. EILER, P.C

*Receiver*

*Attorney at Law*

*Bankruptcy Panel Trustee*

---

PMB 810  
515 NW Saltzman Rd.  
Portland, Oregon 97229

kenneth.eiler7@gmail.com  
Phone 503.292.6020  
Fax 503.297.9402

May 10, 2016

CITY OF PORTLAND  
BUREAU OF DEVELOPMENTAL SERVICES  
ATTN: DANA PARKER  
1301 SE LINN  
PORTLAND, OR 97202

RE: PROPOSED ZONE CHANGES TO HAWTHORNE BLVD

Greetings,

Thank you for allowing me an opportunity to comment upon the proposed zone change to a five (5) block section of Hawthorne Blvd. It is my understanding that the present proposal is to change the current zoning from CS to CM1, and to impose a design review overlay zone and a centers main street overlay zone. I am writing you on behalf of myself and my wife, Mary Sellin. We have owned the property located at 3556 - 3568 SE Hawthorne Blvd. since 1986. This property is currently the home of three (3) retail tenants on the ground level and five (5) office tenants on the second floor. My wife previously operated a retail clothing business, M. Sellin for Women, on the ground level from 1986 until 2003. My youngest daughter, Sarah, currently operates a jewelry business, Cassidy Jewelry, in that same location. My daughter is also a resident of the Hawthorne community, owning a home with her husband a few blocks from the store, on 34<sup>th</sup> Ave.

I and my family are very familiar with the character and quality of the Hawthorne business and residential community. We have watched it evolve from a declining area into one of Portland's premier retail destinations as well as a highly desired residential community. I would like to believe that the efforts of my wife, with her business, and my daughter, with hers, have contributed to that evolution. Because of our long history in the Hawthorne community, we are, understandably, very interested in any proposed changes to the current zoning rules and regulations.

I understand that this is the first of what will likely be several hearings before the Planning Commission regarding these proposed changes. It is also my understanding, based upon conversations that my daughter has had with your planning department, that some of the regulations necessary to implement these changes have not been fully developed. Consequently, I may have additional comments to the proposed changes as those details become available.



At this time, I have three areas of concern. The first deals with the limitation that the proposed zone change would have on production and wholesale operations. There are several businesses in the Hawthorne area affected by the proposed zone change that have mixed retail, production and wholesale components. My daughter has considered designing and manufacturing her own line of jewelry on site, and selling it in to other retailers. She is aware of other businesses on Hawthorne that currently do the same. The proposed zone change would appear to restrict or eliminate that use.

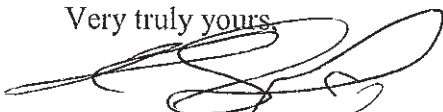
As a further example, I have received a proposal for a brew pub use that would encompass producing beer on site, selling it on site, but also selling to other retailers. Again, the proposed zone change would appear to restrict or prevent that type of small business. Consequently, any limitation on manufacturing, production and wholesale sales would need to be carefully crafted not to interfere with the kind of small business development that has driven the revitalization of the Hawthorne District over the last several decades. I would suggest that any limitation be tied to square footage, perhaps limiting production and wholesale activities to no more than 10,000 sq. feet.

My second concern has to do with the proposed height restriction. The zone change would limit building heights to 35 feet. The planning department understands that this restriction would accommodate a three-story building. I have no objection to limiting buildings in the affected area to three stories. However, I do not believe that a 35 foot height restriction would allow for a three story structure. By way of example, our two story building is approximately 29 feet high. Consequently, it is unlikely that 35 feet would allow for a three story building, especially considering a preference for tall ceilings. I would suggest that a three story, 45 foot, height restriction would be more appropriate.

My final concern has to do with the proposed imposition of a design review overlay. Our property was constructed in 1909. We would envision that any improvements constructed on our property would be consistent with the current structure. However, having lived in Cannon Beach prior to moving to Portland, I am sensitive to the challenges that the planning department faces when trying to create objective review standards for something that is inherently subjective. I am also concerned that such an overlay zone would likely include an approval process that could make minor upgrades to a property too costly or too time consuming. Consequently, I would suggest that any design review process be limited to major improvements, involving over 50% of the property and/or over 50% of the property's value, and include standards that are as objective as possible and susceptible to efficient review.

We are big promoters of the health and well being of the Hawthorne business and residential community. We look forward to working with you in the coming weeks and months regarding these proposed zone changes and hope that you will reach out to us for future input. Thank you for your considerations.

Very truly yours,



Kenneth S. Eiler

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

Name: Elisa Edgington

Address: 5522 SE 54<sup>th</sup> Ave, Portland 97206

**Ben Earle**

5524 NE 30<sup>th</sup> Ave.  
Portland, OR 97211

503-680-8322  
ben.earle@comcast.net

City of Portland Bureau of Planning and Sustainability  
Attn: Mixed Use Zones Project  
1900 SW 4th Ave., Suite 7100  
Portland, OR 97201  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

*PSC Mixed Use Zones Testimony – May 10th, 2016*

Dear Planning & Sustainability Commission Members,

First, you should know that though I am submitting these comments as a private citizen, I have become active over the past year with a variety of both residential and mixed use land use related concerns at the neighborhood level and have been serving as Secretary of the Land Use & Transportation Committee (LUTC) for the Concordia Neighborhood Association (CNA) since February 2015. I was also asked by DRAC Chair Maryhelen Kincaid and ReStore Oregon's then Sr. Field Programs Manager Brandon Spencer-Hartle – he has recently become the City of Portland's Historic Resources Program Manager – to be CNA's LUTC representative on the "Demo Tool Kit" Advisory Committee that developed guidelines to assist citizens and neighborhood associations in filing residential demolition delay extension applications.

Also, while some of my comments are essentially my own, since I agree fully with them I have included a number sections without no or minimal change from those submitted separately by my colleague Garlynn Woodsong, who is Chair of the CNA LUTC and Co-Chair of the NECN LUC, with his permission.

I want to begin my comments by saying while this draft of the Mixed Use Zones Project proposal does provide much good direction to ensure higher-quality buildings and neighborhood mixed use developments than we are currently seeing built in these important multi-zone transitional areas, there are a number of aspects that I respectfully ask you give serious consideration to modifying as follows.

**Penthouses** (Drawing on Page 2)

The currently-proposed height standards appear to provide for stepping-back the top level of a building once. However, it seems that the code could provide for a second step, to allow for penthouse-level development atop buildings, as long as those roof-level structures are stepped back even further and thus do not contribute to the shadow cast by the building or the street presence of the building.

**Awnings** (Drawing on Page 2, requirement for ground floor windows on Page 36)

There is nothing in this proposal related to awnings or providing shade and shelter for pedestrians. Awnings are a time-tested solution to provide shade from the sun and shelter from the rain for pedestrians. Within centers and corridors, it thus makes sense to require awnings on all new buildings, to provide for the public policy goal of encouraging pedestrian activity. The co-benefits of awnings include reduced energy consumption for cooling in the summer, by reducing solar gain through plate-glass windows. Since awnings are more effective if every building has them, it is not sufficient to leave the choice to provide awnings up to the private sector, as the choice will invariably be to avoid the excess cost of the awning if it is not required.

**Rooftop uses requirement** (Drawing on Page 2)

It is essential to think holistically about how the next generation of mixed-use buildings will help the City achieve its greenhouse gas reduction goals for the performance of the structures of the built environment. To this end, Portland should follow the significant lead of San Francisco's recently implement requirement for installation of solar panels on new buildings (with appropriate "waivers" for situations where solar efficiency is not sufficient to justify installation).

Further, there should be an overarching active rooftop uses requirement which could be met using either intensive or extensive green roofs; through the installation of photovoltaic, thermal, or photovoltaic-thermal (PVT) solar panels; or through the installation of non-vegetated roof-top decks to provide additional useable outdoor space for building residents, tenants and visitors. (While rooftop decks might not directly relate to GHG emissions in the manner of the other options for rooftop uses, they would satisfy an alternate public policy goal, of providing sufficient outdoor space for residents).

**Flexible Ground Floor Space** (Ground Floor Residential Development on Page 36)

Since the set of Mixed Use Zones is invariably applied in locations where pedestrian activity is expected and encouraged, and throughout our system of Centers and Corridors, it makes sense to provide for the changes in use that will occur over the century-plus of life that we should expect from the next generation of buildings. This means that the ground floors of these buildings should all have, if not retail space, at least flexible space with direct entrances to the outdoors at grade, so that those spaces would have the ability to adapt to changing market conditions over time. The same space could thus be a live/work unit, retail or other non-residential space, or an entirely residential unit. The requirement should relate to ensuring that the built form allows for this adaptability, rather than to the proposed initial use of the space.

**Outdoor Space** (Outdoor Space, Page 36)

The requirement of 48 square feet per unit of private or shared outdoor space for residents is, in my view, too vague. Further, it is confusing. Why would a household of human beings within a single-family zone require a minimum of 144 square feet of outdoor space (the 12'x12' area proposed as a part of the Residential Infill Project), but a household of human beings in a mixed-use zone only require 48 square feet, which could be part of an area shared with other people? It seems to me that there should be some requirement for private outdoor space for each unit. I propose that 96 square feet of private outdoor space be required for each unit, in addition to 48 square feet of public / shared outdoor space. 96 square feet roughly corresponds to a single 8' x 12' balcony, large enough for two people to sit around a table and enjoy a meal together. It is somewhat smaller than the front porch on my single-family house, but would provide about the same level of functionality. Developers could choose to provide one balcony per unit, or a patio, or a porch, or a small yard, or a rooftop deck, or any number of other variations on this theme. It would be very intriguing to watch the design solutions that our city's talented architects would develop over time in response to this new requirement!

**Flexible-Use Parking Spaces** (Shared Parking, Page 37)

Off-street parking should look more like garages than parking stalls, and should include: walls, utility connections, and garage doors. Parking spaces should be decoupled (sold/leased) from the units in each building, and sold/leased separately, either to building residents, tenants, or others outside the building in need of such a space. Use should be flexible: park a car, play in a garage band, park bicycles & snowboards, repair bikes, engage in woodworking projects, have an art studio, etc.

**Coalition-level Design Standards and Review** (Design Overlay, Page 39)

In addition to the blanket requirement for Design Review within the D overlay, residents in single-family homes adjacent to mixed-use zones should have the right to request design review for developments proposed adjacent to their property; this should be enforced via notification as a part of the pre-approval process. Such design review should be conducted, within Coalition boundaries outside of the Central City, by Coalition-level Design Review committees. NECN, for instance, would be empowered to conduct Design Review within its borders, and would form a new Design Review Committee for this purpose, under the guidance of City or Coalition staff. Coalitions should then also have a process to develop and maintain their own variations on citywide design standards. This will help to address Comprehensive Plan goals for variations between different areas of the city.

**Vintage Commercial Storefront Areas** (Low-rise Commercial Storefront Areas, Page 40)

The proposal to down-zone certain areas to CM1 with Centers Main Street overlay regulations seems logical. However, it should really be branded "Vintage Commercial Storefront Areas," to recognize that this proposal is as much about protecting historic character as it is anything else. Call it what it is.

**Break up long building walls** (Building Length and Facade Articulation, Page 43)

200 feet is way too long for a wall outside of the Central City with no articulation. It is true that in downtown, the blocks are 200 feet on a side. These regulations are for the centers and corridors outside of downtown, however. In most of Portland's traditional commercial areas, the average lot size is 50 feet or so. Therefore, the traditional character of the city is for buildings to be broken up in increments of no more than 50 feet along our main streets — not 200 feet. Even 110 feet was too high of a number. The threshold should thus be 50 feet to help preserve the character of our neighborhood commercial areas. This number can be higher in the single-use industrial sanctuary zones, but not our mixed-use zones.

**Minimum Floor Area** (Minimum Floor Area in Centers, Page 44)

The minimum floor area changes seem to be headed in the wrong direction. We are talking about a city that will be growing and intensifying over the coming decades, as additional people and businesses find room to fit within the existing footprint of the city. We need to provide ample space for this to occur, especially in areas where there is a high potential to provide development with a lower per-capita VMT than the citywide average. Indeed, it is the fact of requiring a higher minimum FAR that will help to achieve the goal of lowering VMT per capita. Therefore, within all of our Centers and Corridors, we should require a minimum FAR of 1.0, with the ability to apply for an exception through the design review process to allow a minimum FAR of 0.75 in the Eastern and Western pattern areas. These zones are, after all, called the Mixed Use Zones, not the Single Use Automobile Oriented Zones. We need to encourage these places to change and to intensify over time. Change is the only constant. A city that does not allow for, and encourage, change over time, will shut down the evolutionary processes that will lead to its future success.

**Required Setbacks** (Required Setbacks from a side lot line, Page 102)

The requirement for a 10-foot setback for buildings adjacent to residentially-zoned lots should specifically be waived for existing buildings or adaptive re-use projects involving existing buildings. We only require a 5-foot setback between houses. Why should people in one type of building be forced further away from people in another type of building? If the people in one type of building have been living within a certain proximity of the people in the other type of building for the past century, why should that other type of building be forced to relocate once it is subject to incremental improvements? This should be a by-right allowance of the zoning code, not something requiring discretionary review.

**Bay Windows** (Extensions into required building setbacks, Page 105)

The proposal to not allow bays or bay windows to extend into a required setback abutting an RF-RH zoned lot, is overkill. The requirements for extensions into side setbacks should match those of the facing property. For instance, if the adjacent property is R2.5, then the mixed-use building should only need to follow the requirements for extensions into setbacks of the R2.5 zone. We have a lot of small sites in Portland; we need to encourage thoughtful design of the buildings that will be placed on these sites. Placing too many poorly-conceived restrictions on the form of these buildings will stifle the creativity of design decisions that could lead to increased livability for their future users.

**Native Plants for Screening Requirements** (Garbage and recycling collection areas, Page 135)

In my experience, the L3 standard for landscaping as screening is primarily met in Portland using non-native plant species. This standard itself should be changed to provide greater allowance for the use of native plant species to satisfy the screening requirement. This may include relaxing the requirement for evergreen shrubs, in favor of requiring perennial shrubs, whether deciduous, evergreen, or other. Nobody is going to die if they are able to see the cars in a parking lot during the winter, as opposed to having the view obstructed by an evergreen shrub. (On the contrary, they might be there to provide the eyes on the street that could help to prevent a crime, and thus potentially save a life!!)

**Permeable Pavers** (Paving, Page 145)

The use of permeable pavers should be encouraged or required here.

**Demolitions** (33.130.275 Demolition, Page 165)

Adjustment review should be required for any proposed demolition permit in the City of Portland. The purpose of the review should be to identify, and require, alternatives to demolition where possible. These alternatives could include moving the structure, adaptive re-use of the structure, or deconstruction of the structure if moving it or adaptive re-use of it are deemed impossible. It seems that the people of the city are very protective of the character provided by our older buildings; we should respect this by thoroughly evaluating a proposal to end a building's life prematurely, before approval.

I also strongly recommend IMMEDIATE adoption of an automatic 35 day delay upon filing for a demolition permit, with accompanying notification of neighboring business and residential property owners, identical to the current residential demo permit regulations.

**Centers Main Street Overlay Zone** (Map, Page 220)

The Centers Main Street overlay zone should be extended to include the areas of mixed-use zoning east of MLK Jr. Blvd on Killingsworth and Dekum streets west of 42nd Ave.

**Design Review Overlay Zone** (Map IV-2, Design Overlay Zone, Page 39)

The 'D' overlay zone should be extended to include the areas of mixed-use zoning east of MLK Jr. Blvd on Killingsworth and Dekum streets west of 42nd Ave.



**Building Height Increase for Ground-Floor Retail** (Building Height, Page 229)

The allowable increase in building height, and the thresholds, should have more variation. The proposal to allow a 3' increase in building height if at least 25% of the ground-floor area of the building is in the selected set of uses is fine, but overly reliant on a prescriptive set of uses. I would argue that if a ground-floor space is designed to allow for potential non-residential or live-work use by providing at-grade entrances facing the sidewalk, and meets the sidewalk-facing window coverage standard, then it should be eligible for this bonus regardless of the proposed use. Uses change with tenants. The built form of the building, especially its height, is a permanent feature of the landscape (at least as measured against a human life span). Further, if a building is proposed with a design including this sort of flexible space for at least 50% of the ground floor area, then it should be eligible for a 5' height bonus. Taller ceilings are good design; they are a timeless element that leads to more enjoyable, higher-quality spaces.

Thank you for your important work for the future of our city and for your serious consideration of these comments.

Sincerely,

Ben Earle

May 10, 2016

To: Portland Bureau of Planning and Sustainability

**Re: Mixed Use Zones Proposed Draft**

I work at an architecture firm in the Central Eastside primarily on privately developed commercial and residential mixed use projects located in Portland's close in neighborhoods. I am also a resident of the Beaumont-Wilshire neighborhood in NE Portland. I have been following the Comprehensive Plan proposals with particular interest in the Central Eastside, Central City and MUZ projects. Given my profession and ownership of a residential property in a neighborhood actively fighting development, I have a firsthand view of the intersection that occurs with private development along Portland's corridors.

I am very supportive of creating density in close in neighborhoods in order to meet the City's goals of housing, multi-modal transportation, and for the general sustainability of our City and long term health of our planet. I am also in general supportive of the MUZ's project objectives to respond to livability and affordability close to the centers and corridors. I do however have concerns about the recent draft of the MUZ proposal which seems to have compromised the overall sustainability and livability objectives with responses to concerns which seem expressed by a few residential neighborhoods, but have been applied across all the centers and corridors. Specifically, I think the following areas need to have clearer code language for effective implementation and more in depth assessment as to the impact that these changes will have on the number of *actual* housing units, development tax revenues, design caliber of our built environment and workload of City Planning and Building Officials.

1). The base FARs, height limits and lot coverage for the new CM zoning designations are greatly reduced from that allowed in the existing Commercial and Employment zones. The graphics shown in the MUZ draft greatly misrepresent the development potential allowed by the current Commercial and Employment zones by not showing how the buildings maximize the allowed height with residential use areas that are allowed beyond the base FAR. When these areas are applied to the massing diagram for the current zoning it shows that the proposed CM designations, even with available bonuses, the same development potential is unachievable. This is in effect a down zoning from the current allowed best use of the properties resulting in less density and likely less housing units and/or commercial workspace.

- Has there been a study published of how this downzoning impacts the number of housing units the proposed zoning can accommodate as compared with the new?
- Has there been a study published on how this reduction in developable envelope effects projected property and business tax revenues?
- How does downzoning of properties achieve the overall objectives for sustainable density and maintenance of the Urban Growth Boundary?

2) The proposal of the 'm' overlay and associated 35ft height limit in the 'centers of centers' results in even less developable envelope than the base MU designation. In some cases the designation is located in a center that would put over half the effected properties in non-conformance with the proposed zoning and the rest of them with only a third of the current development potential. It appears that this designation is being suggested by a few communities, but applied to several centers that meet the characteristics of pre-war / streetcar main street hubs. In many cases three stories will not fit in the 35ft height limit because of plan district regulations for ground floor active use heights and current construction methods further limiting the potential developable envelope.

- Has there been input from *all* the neighborhoods and business owners where this designation is proposed?
- Has there been a suggestion to neighborhoods concerned with development of their historic centers to create their own Plan Districts with Guidelines that address the specific concerns of the neighborhood instead of applying them throughout the City?

3) The current bonuses seem targeted towards the affordability objectives of the plan. While this is a worthy objective, the limited amount of added FAR or height is not enough to justify the tradeoff of reduced allowable residential floor area in the base zoning. Without comparable tradeoff, the bonuses would not be used and therefore the affordability goals would not be achieved. It does not seem like the State mandated Inclusionary Zoning has been thoroughly considered with the proposed base zone designation FARs or Bonuses. I encourage you to consider how the inclusionary zoning impacts the zoning and reconsider the bonuses. It is imperative that the zoning code language is clear so that the results are predictable enough to proforma in a due diligence process and the objectives for affordable housing can be achieved.

— How will the affordable residential unit ratios & commercial workspace rent rates be tracked and updated with market response or neighborhood to neighborhood? Database? Have resource allocations been considered?

4) The proposed development requirements for the MU zones have several setbacks, height restrictions and stepped setbacks in height and length that are complicated and will result in formulaic, homogenous development along the corridors – just look at the cover of the draft report – all the buildings look the same. While the objective of these development requirements is to respond to livability of adjacent residential neighborhoods and light and air in the corridors, the code language is more of a design guideline than development regulation. The development potential of the adjacent residential neighborhoods also does not seem considered – not all residential neighborhoods adjacent to corridors are single family zoning designations and not all should require the same setback requirements. Required outdoor space seems is a better way to incentivize the setbacks and allow designers to creatively integrate them into the massing of projects resulting in development that effectively meets the objectives without creating a homogenous landscape.

5) The overall expansion of the 'd' overlay seems to double down on the proposed development requirements for setbacks and height and furthermore can only be effective with appropriate resource allocation and revised guidelines/procedures to the process. The City Design Review staff and Commission are already extremely overwhelmed by their current workload resulting in unpredictable timelines and inconsistent implementation of the guidelines. The current guidelines will need to be more robust and clear to effectively implement the objectives across more development sites.

— If the overlay designation is to be expanded how will the City Design Review and BDS Planning staff be able to provide effective predictability, turnaround times and consistency without additional resources and more robust guidelines?

Thank you for hearing my concerns. By working with neighborhood representative *AND* the development community I am confident we can achieve the objectives of affordability, sustainability and livability for Portland without compromising density and projected tax revenues associated with current developable envelopes.

Sincerely,



Jennifer Dzienis  
3720 NE Failing St.  
Portland OR 97212



# City of Portland

## Design Commission

1900 SW Fourth Ave., Suite 5000  
Portland, Oregon 97201  
Telephone: (503) 823-7300  
TDD: (503) 823-6868  
FAX: (503) 823-5630  
[www.portlandonline.com/bds](http://www.portlandonline.com/bds)

**Date:** May 10, 2016  
**To:** Barry Manning, Senior Planner, Bureau of Planning and Sustainability  
**From:** Portland Design Commission  
**Subject:** Mixed Use Zone Project, March 2016 Proposed Draft Comments

Thank you for the opportunity to comment on the Mixed Use Zone Project [MUZ] March 2016 Proposed Draft. The March 17, 2016 presentation on the changes to the September 2015 MUZ Discussion Draft was very helpful. Many aspects of the original concept plans and code language have been simplified and the overall project presents vast improvements to the current zoning code, particularly in the areas of providing stronger tools to better activate the streetscape at the ground floor level.

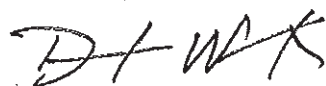
This memo is focused on highlighting several areas of concern with associated recommendations:

1. 33.130.210 Height/33.130.230.B. The allowance for 3'-6" of additional height for parapets and railings promotes commercial building roof edge articulation and activation of the rooftops. However, to allow further flexibility within the current height limitations, allowing for an additional 3'-6" in height at the ground floor level, whether for flexibility of ground floor residential conversion, or to incentivize taller ground floor commercial spaces, is strongly encouraged.
2. Minimum FAR. Land in Portland's densest areas of town should not be underutilized. The Commission strongly believes a minimum FAR should be established for all mixed-use zones.
3. 33.130.222 Building Length and Façade Articulation. Increasing the maximum building length to from 100' to 200' is a positive move. But the revised code needs to be careful in how and where these new requirements for façade articulation are to be applied. They add cost and complexity to construction.
4. 33.130.230 Ground Floor Windows. The minimum Ground Floor Window [GFW] standard should be increased to 50% for all street facing frontages, and also not reduced for secondary frontages. Options for lowering the standard on one frontage or another could be allowed through averaging 50% across all frontages, with a minimum requirement at each street frontage.
5. 33.130.230.D Ground Floor Window Standard for Ground Floor Residential. All of the three options should require a pedestrian connection from the street for each unit. As currently written, 33.130.230.D.2 and D.3 [pages 131 & 133] would only create raised first floor levels and/or landscaped setbacks. The increased window requirements, while helpful, only raise the height and amount of otherwise shuttered ground floor windows. Pedestrian entrances directly into these adjacent residential spaces are critical to activating the streetscape.
6. Ground Floor Residential Uses. Allowing ground floor residential units remains a significant issue. Ground floor residential should only be allowed to front a Corridor if it is a Live/Work unit with an individual entrance and a mezzanine for the more private uses of

the residential program. (Mezzanines are easily achievable when an additional 3'-6" in height is afforded to ground levels.) Ground floor residential facing side streets that are not designated Corridors is encouraged, but should only be allowed when each unit includes an individual entrance.

7. 33.270.200 Planned Development, C. Energy Efficient Buildings. It is not clear what the requirement of "Energy Efficient Buildings" set by the Bureau of Planning and Sustainability would be as noted in these criteria. The otherwise common Leadership in Energy and Environmental Design [LEED] certification is likely a difficult standard to enforce because the program may change significantly over the next 20 years. Other programs with aspirational environmental goals may be appropriate. In any case, it seems acceptable to have more than one accepted standard.
8. 33.520 – Division Street, 33.545 – Lombard Street, and 33.575 Sandy Boulevard. As these three main street corridors will be subject to the two-track design review process, it is critical that the Community Design Standards are rewritten and in place at least at the same time MUZ is implemented, if not sooner.

Sincerely,



---

David Wark, Chair of the Portland Design Commission

David Wark, Chair of the Portland Design Commission

cc: Bureau of Planning and Sustainability  
Portland Design Commission



# MARK DANE PLANNING INC.

12725 SW GLENHAVEN STREET, PORTLAND OR 97225, 503-332-7167

## MEMO: Proposed Zone Changes tied to the current Comprehensive Plan update

The owner of the following properties has requested that as part of the Comprehensive Plan Update, that the City permit his properties to be changed to zoning that is most similar the current zone:

**7409-7411 SW Capitol Hwy**, Portland, owned by Health Morton Properties, LLC

Current zoning	Zoning Requested
<b>CS</b> (Storefront Commercial)	<b>CM2</b>

**7970 & 7972 SE 13th Ave, & 7956 SE 13th Ave**, Portland, owned by Morton Brothers, LLC

Current zoning	Zoning Requested
<b>CS</b> (Storefront Commercial)	<b>CM2</b>

**6637 SE Milwaukie Ave**, Portland, owned by Claybourne Commons, LLC

Current zoning	Zoning Requested
<b>CS</b> (Storefront Commercial)	<b>CM2</b>

In all cases the properties are currently zoned Store-front Commercial. It is anticipated that should the owner not make a specific request that the City might re-zone the property CM1. This will be a substantive change to the current development rights.

**Table IV-1: Summary of Key Commercial/Mixed Use Development Standards**

	CM1	CM2	CM3	CE
Base Height Limit (stories)	35' (3)	45' (4)	65' (6)	45' (4)
Base FAR	1.5:1	2.5:1	3:1	2.5:1
Maximum Height Limit with Bonus (stories)	35' (3)	55' (5)*	75' (7)	45' (4)
Maximum FAR with Bonus	2.5:1	4:1	5:1	3:1
Maximum Building Coverage % Inner/East/West Pattern Area	85/75/75	100/85/85	100/85/85	85/75/75
Required Landscaping** % Inner/East/West Pattern Area	15/15/15	15/15/15	15/15/15	15/15/15

\* The 55' height limit is allowed only in areas with a Mixed Use – Urban Center Comprehensive Plan designation and in areas with the Mixed Use – Civic Corridor Comprehensive Plan designation where the Design overlay zone is applied.

\*\* In "Inner Neighborhood" pattern areas, required landscaping may be met by choosing among options.

- 1) The current CS zoning permits a maximum height of 45 ft (Table 130-3) as will the CM2. The CM1 zoning would reduce that height to 35-ft (Table IV 1, page 33 MUZP).

# MARK DANE PLANNING INC.

12725 SW GLENHAVEN STREET, PORTLAND OR 97225, 503-332-7167

- 2) The current FAR in the CS zoning is 3:1. The CM2 zoning permits a 2.5:1 FAR, while the CM1 zoning restricts the FAR to 1.5:1. While the CM2 zoning would reduce the potential development value of the sites by 17%, the CM zoning would reduce it by 50%.
- 3) To get the CM1 zoning to the 2.5:1 ratio would require that the property received 100% of the onus density. In the CM2 zone this is 4:1
- 4) CS zoning has no maximum lot coverage requirement and no landscaping requirement. The CM2 lot coverage is between 85-100%, while the CM1 zone restrict coverage to 75-85%

It is for these reasons that the current property owner requests that the City work with the owner to protect and preserve as close as possible the current CS zoning standards. The applicant realizes that the City is looking at its Comprehensive Plan designations, not specific zoning. However the owner would like to state his request, and have it placed in the record. It would be appreciated if staff could respond to this request in writing.

Mark Dane

**From:** Susie Cunningham [mailto:susiepdx@gmail.com]  
**Sent:** Tuesday, May 10, 2016 9:03 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Honorable Commissioners:

I am sending this testimony in support of adding the design overlay zone to the proposed Mixed Use Neighborhood Centers and specifically the Sellwood and Westmoreland areas in Proposed Draft Map IV-2 and IV-1.

After attending many neighborhood meetings discussing the Comprehensive Plan and reading the final draft letter that was sent to you by the Sellwood Moreland Improvement League (SMILE) on May 9, 2016, I am in complete agreement with their assessment and support their recommendations in its entirety.

My neighborhood will become more densely populated - but this must be accomplished in a collaborative, thoughtful way. To retain the neighborhood feel and charm so cherished and enjoyed by residents like me, and visitors alike, I encourage – no I implore you - to follow SMILE's recommendation and vote to include a design overlay zone into our Mixed Use Neighborhood Centers. It's the only defense our community/neighborhood would have to allow public discourse about design, scale, and site location BEFORE a building is permitted by the City and erected.

PLEASE – support the SMILE testimony and recommendations in its entirety for the neighborhood it represents. Your agreement will insure the continued vitality and livability of Portland's long-established neighborhoods and particularly the Sellwood Westmoreland neighborhood.

Sincerely,

Susan Cunningham

7506 SE 18th Avenue

Portland, OR 97202

503-380-5138

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

From: Amy Conway [mailto:[aconway7833@yahoo.com](mailto:aconway7833@yahoo.com)]

Sent: Tuesday, May 10, 2016 12:42 AM

To: Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>

Subject: PSC Mixed use Zones Testimony

Amy Conway  
1525 SE Miller Street  
Portland 97202

Hi ( sent prior email too soon!)

I am writing to voice my support for a "design overlay" for the Sellwood Moreland neighborhoods. I grew up in an historic area back east where every aspect of the exteriors of homes/ businesses were scrutinized by the town's zoning committee.

Did I enjoy all the hoops we had to go through to change our house color, or to put on a small addition? No. But I knew it was an important step to keep the flavor of the town alive. I go back one time a year. Things have changed, and the population has grown. But this is for sure: I will not encounter out-of place (out of scale) apartment buildings, and the roots of the town are still very much intact.

Please support zoning in Sellwood that would allow for more scrutiny of land use.

Thanks!

Amy Conway

**Mailing Addresses**

Dr. John Chirgwin  
26505 SE Rebman Road  
Boring, OR 97009

Portland City Council

Dr. Bradford Rhodes  
1110 SE 122<sup>nd</sup> Avenue  
Portland, OR 97233

To Whom It May Concern:

We are owners of adjacent properties (1048 and 1110 SE 122<sup>nd</sup> Ave, Portland, OR 97233) that are currently zoned R-3 but have been used as professional offices (medical/dental/real estate) since the 1960's.

Our immediate neighbors to the north (1034 SE 122<sup>nd</sup> Ave) and to the south (1130 SE 122<sup>nd</sup> Ave) are both commercial offices that are currently zoned CO-1, but the city is proposing a zoning change to CM-1.

Since all four properties share a common parking lot (to the east of our buildings, and share entrance of exits to the parking lot) and are office/commercial in usage, we would like to request that the proposed changes to CM-1 be considered for our properties as well as the adjacent properties.

Thank you for your consideration.

Sincerely,

Dr. John Chirgwin  
Owner: 1048 SE 122<sup>nd</sup> Avenue  
Portland, OR 97233  
503-349-3275

Dr. Bradford J. Rhodes  
Owner: 1110 SE 122<sup>nd</sup> Avenue  
Portland, OR 97233  
503-255-7095



**From:** Jim & Amy Carpenter [mailto:carpjam@comcast.net]  
**Sent:** Tuesday, May 10, 2016 5:59 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Dear Planning and Sustainability Commission (PSC):

Sellwood Moreland needs a design overlay for SE 13th Avenue and SE Milwaukie Avenue to protect the heritage and future of these main streets in our community. These two streets and their surrounding areas make up the neighborhood's "town center", which has been cherished as a pedestrian centered community for over a hundred years. This is a unique and historic area, not one that investors with no stake in the community should be allowed to blot with cookie cutter development unsuited to the neighborhood.

Many neighborhoods have design overlay protections, whereby a developer has to make sure the building fits the neighborhood. It is clear there is and will be a lot of development in Sellwood Moreland, more than planners expected. Area residents and its representative neighborhood organization, SMILE, deserve to be given significant say in discussing the design of new development so that we can keep this a distinctly pedestrian friendly, attractive and uncluttered community. Acknowledging our future growth potential, we would like to encourage thoughtful building rather than one day find ourselves amidst canyons of excessively tall unattractive apartment buildings that lack adequate parking.

Please allow the existing residents a say in our future so that Sellwood Moreland can remain a livable, walkable, safe community for the families who live here, as well as the individuals hoping to move here.

Amy Carpenter  
5845 SE 22nd Ave  
Portland, OR 97202



THE  
BOOKIN  
GROUP  
LLC

Land Use &  
Institutional  
Planning

Policy Analysis

Project  
Management

Group  
Facilitation

812 SW Washington  
Suite 600  
Portland, Oregon  
97205

Telephone  
503.241.2423

May 10, 2016

Planning and Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, Oregon 97201-5380.

*Request: Change the Proposed Commercial Zoning Designation from CM1 to CM2 for the New Seasons Market, 4500 SE Woodstock Boulevard*

*Dear PSC Commissioners:*

The Bookin Group LLC (TBG) represents Mr. Bruce Ament, owner of the New Seasons Market building at 4500 SE Woodstock Boulevard (1S2E18CC 300). Under the proposed Mixed-Use Zoning Project (MUZP), Mr. Ament's property is proposed to be re-zoned to Commercial Mixed-Use 1 (CM1) Zone, as is the case for most of the Woodstock Commercial Corridor. Mr. Ament requests that the PSC recommend that this designation be changed to CM2 and for his property.

**Background.** Completed in 2015, the Woodstock New Seasons Market is located on a 25,000-sf parcel at the corner of SE 45<sup>th</sup> Avenue stretching from the south side of SE Woodstock Boulevard to SE Harold Street. The building contains a total nearly 49,100 gross square feet, including 23,610 on the main floor and partial 2<sup>nd</sup> floor, and 25,480 gsf in the basement, primarily devoted to below-grade parking. The latter is accessible from a driveway the east side of the store via SE Harold Street. At its tallest point, in the northwest corner, the building rises 43'. A rendering of the building and site plan are contained in Figures 1 and 2, respectively.

The parcel currently is zoned Commercial Storefront (CS), with the exception of the strip along the east side of the warehouse where the garage driveway is located, which is zoned R5. The building was designed to comply with the design standards in the CS zone for size, height, setbacks and FAR. The entire Woodstock Commercial Corridor from SE 41<sup>st</sup> to SE 50<sup>th</sup> Avenues on both sides of SE Woodstock Boulevard also is zoned CS with the exception of the two superblocks across the street from the site on either side of SE 44<sup>th</sup> Avenue, which are zoned Neighborhood Commercial 2 (CN2).

**Planning Process.** To understand the history of the application of the MUZP to the Woodstock Commercial Corridor, we discussed the matter with the Bureau of Planning and Sustainability's (BPS) Barry Manning, MUZP's Project Manager, and Marty Stockton, BPS SE Community Planner. Based on these conversations:

- In the initial round of re-zoning, BPS proposed that the entire corridor be re-zoned to CM2, consistent with the established zoning conversion table ("cross-walk") that indicates that the existing CS, CO2, CM and CG are most like the proposed new CM2 or Commercial Employment (CE) zones, in terms of mix of uses, maximum height (45'), maximum FAR and other development standards.
- After the first round of reviews, apparently a coalition of neighborhood associations commented that the CM2 designation was too intense in terms of height and scale and that this would threaten the destruction of intact, low-rise streetcar-era commercial buildings.
- In response to this, BPS initiated the Low-Rise Commercial District study of 15 commercial corridors including Woodstock. As a result, in the second round of proposed re-zoning, all properties in the Woodstock Commercial Corridor including the New Seasons' property were re-designated from CM2 to CM1. The exception is the CN2-zoned two superblocks (Mart/Safeway strip center) across SW Woodstock Boulevard that are proposed to remain CM2. Ironically, in the zoning cross-walk described above, CN2 sites are to be converted to CM1.
- As proposed in the revised chapter on commercial zones, Chapter 33.130, retail uses in the CM1 zone are to be limited to 5,000 gsf/use with a maximum height of 35'. Other standards include various minimum setbacks, maximum lot coverage of 85%, maximum FAR of 1.5:1, and minimum landscaping of 15%, all of which are significantly less generous than the proposed CM2 zone.

- To mitigate for some of the impacts of the re-designation, BPS now proposes a new overlay district, Centers Main Street Overlay Zone (Chapter 33.415). In Section 33.415.420, Development Standards in the CM1 Zone, new standards are proposed within the overlay, including increasing the maximum size per retail use to 40,000 gsf, increasing maximum FAR to 2:1, increasing maximum lot coverage to 100% and eliminating minimum landscaping. However, there is no relief from the maximum height in the CM1 zone of 35'. Thus, the new overlay designation "gives back" most of the development capacity to some of the affected neighborhood commercial corridors lost as part of the proposed re-designation from CM2 to CM1. This calls into question the purpose and utility of the re-designation itself.

### **Impact on the New Seasons Market Site**

**Proposed CM1 Zoning (Proposed Chapter 33.130):** Under this proposed zoning designation, New Seasons Market, at 49,100 gsf, becomes non-conforming for size by nearly 10 times, maximum height by 7' (43'), and minimum landscaping (10%) by 5%. The project will remain in compliance with new minimum/ maximum setbacks, maximum FAR and maximum lot coverage.

**Centers Main Street Overlay Zone (Chapter 33.415)** The proposed overlay provisions for the CM1 zone:

- Would cure the problem for minimum landscaping by reducing it from 15% to 0%.
- At more than 49,000 gsf, the building would still be 9,000 gsf out of conformance for maximum size even with the increase to 40,000 gsf. This includes underground parking that is both unusual and an asset in a neighborhood commercial corridor designed to be pedestrian- and transit-friendly.
- At 43' at its highest point, the building would remain nonconforming for maximum height.

**Non-Conforming Development.** Mr. Ament is concerned about the impact of having non-conforming development as it might affect the refinancing or sale of the building. Moreover, should the building be significantly damaged by fire, earthquake or other natural disaster, he is concerned about the potential constraints on replacement. With regard to the latter, according to Section 33.258.070(E)(2):

*When a structure or other development that has nonconforming elements is removed or intentionally destroyed, replacement structures and other development must comply with the development standards of the base zone, overlay zone and plan district. When a structure that has non-conforming elements is partially or totally damaged by fire or other causes beyond the control of the owner, the structure may be rebuilt using the same structure footprint. An adjustment is required to allow the replacement structure to be more out of compliance with the development standards than the previous structure.*

Under this provision, Mr. Ament could replace the total 49,100-gsf building by rebuilding "in the same building footprint". However, "building footprint" is not the same as "building envelope", so it is likely the building would still be non-conforming for height. He would then have to request an Adjustment to restore the non-conforming height or else the building would have to be re-designed to achieve its existing size.

**Request.** Mr. Ament contends that the reasons for justifying the change from the original proposed zoning, CM2, to CM1 for a majority of the entire Woodstock Commercial Corridor and his site specifically is based on flawed analysis and should be reconsidered.

**Woodstock Commercial Corridor.** Mr. Ament supports the request of his fellow property owners to re-designate the entire Woodstock Commercial Corridor from SE 42<sup>nd</sup> – 50<sup>th</sup> Avenues from CM1 to CM2 for many of the reasons that such a change is warranted on his specific property.

- The proposal is inconsistent with the zoning conversion table. Although advisory, the proposed zoning conversion table clearly equates the CS zone with CM2/CE in terms of range of uses, height, density and other development standards. The proposed down-zoning implicit in the CM1

designation in terms of maximum use, size and height clearly does not reflect existing development. It particularly rankles other owners that the two CN2-zoned superblocks immediately across the street from the site are being designated CM2 when according to the zoning conversion table they should be designated CM1.

- The creation of the Centers Main Street Overlay Zone (Chapter 33.415) gives almost everything back – maximum use size, maximum lot coverage, minimum landscaping – with the exception of maximum height, which will remain at 35'. If the CM1 zoning designation is appropriate to begin with, it would not be necessary to create an overlay zone. This seems a convoluted approach to justify the reduced maximum height.
- The Woodstock Commercial Corridor is dissimilar from other commercial districts included in the Low-Rise Commercial District Study in two important ways;
  - Although developed along an early 20<sup>th</sup> century street-car line, Woodstock is no longer a typical street-car commercial district with “special character, which often includes many intact, low-rise streetcar-era commercial buildings”. [Page 49, Mixed Use Zones Project: Proposed Draft (3/16)]. Unlike Multnomah Village or the Hawthorne Commercial District for example, the district features a wide range of architectural building types built over several decades (Figure 3). In fact, the only building in the district that is even on the City's 1980 Historic Building Inventory is the Ace Hardware Store at 4430 SE Woodstock Boulevard. Thus, as there are no historic buildings to save, the 35' height limit is not necessary.
  - SE Woodstock Boulevard has an 80' right-of-way (ROW), unlike Capitol Highway through Multnomah Village (60') or Hawthorne Boulevard through the Hawthorne Commercial District (70'). A wider street ameliorates scale at the street edge. Thus, taller buildings are perfectly consistent from an urban design perspective.
- The Woodstock Neighborhood Association was not among those neighborhood associations that requested the imposition of the CM1 zoning designation. In fact, it is our understanding that the WNA's Land Use Committee is preparing a letter that supports the re-designation to CM2, based on a unanimous vote of the NA's Board.

**New Seasons Market Site.** Even if it does not recommend the re-designation of the whole corridor based on the compelling justification presented above, Mr. Ament requests that the PSC recommend a request to re-designate his site from the proposed CM1 to CM2, as follows:

- Actual Harm. Although most if not all of his neighboring property owners will lose potential development rights should the CM1 zoning be adopted, Mr. Ament has experienced actual loss of development capacity. Even with the proposed overlay, his property will still be substantially non-conforming for maximum size and height.
- This is not spot-zoning as the two superblocks across the street are proposed for CM2 zoning. The blocks between SE 43<sup>rd</sup> and SW 46<sup>th</sup> Avenues form the core of the corridor, so it is not inconsistent that there should be higher-zoned properties there

Thank you for the opportunity to share our concerns with you in this important matter.

Sincerely,

*Beverly Bookin*

Beverly Bookin, AICP, Senior Principal

Attachments



101 SW Main Street, Suite 1100  
Portland, Oregon 97204

balljanik.com

t 503.228.2525  
f 503.295.1058

May 10, 2016

Damien R. Hall  
Also Admitted in California and Washington  
503.944.6138  
dhall@balljanik.com

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4<sup>th</sup> Ave, Suite 1700  
Portland, OR 97201

Re: Rezoning of 3830 SE 82<sup>nd</sup> Avenue  
Mixed Use Zones Project

Dear Commissioners:

This firm represents Mr. Joseph Angel, owner of the real property at 3830 SE 82<sup>nd</sup> Avenue ("Site"), which currently houses a restaurant with a drive-through facility. The current draft of the Mixed Use Zones Project proposes to rezone the Site from CG to CE.

As you are aware, the CE zone is the sole mixed use zone in which drive-through facilities are not prohibited outright. However, the CE zone prohibits drive-through facilities that are within 50 feet of a lot line abutting a residential zone or a local service street adjacent to a residential zone. See 33.130.260.B, Drive-Through Standards for the CE zone. This provision would prohibit the existing drive-through on the Site.

Address	Current Zone	MUZP Draft Zone	Requested Zone
3830 SE 82 <sup>nd</sup> Ave	CG	CE	CE - with safe harbor amendment

Since CE is the only zone in which drive-through facilities are allowed under any circumstance, we request to retain the CE designation on the Site, but also request that the PSC adopt a policy that all existing drive-through facilities not be rendered nonconforming by the adoption of the mixed-use zones.

This policy would create a safe harbor for existing drive-through facilities by safeguarding the continued viability of existing businesses that are reliant on drive-through facilities, and providing the certainty needed to enable future investment in the remodeling and modernization of properties with existing drive-through facilities. Without such a safe harbor, the MUZP would cause any number of drive-through facilities to become nonconforming, thereby creating a disincentive to invest in these commercial properties and calling into question the future viability of these businesses.

A proposed text amendment is included as Attachment 1 to this letter. Adoption of this text amendment would achieve the following:





Portland Planning and Sustainability Commission  
City of Portland  
May 10, 2016  
Page 2

- Create a safe harbor for existing drive-through facilities in all mixed-use zones to retain their conforming status;
- Continue the prohibition on new drive-through facilities in all mixed-use zones other than CE; and
- Ensure that new drive-through facilities in the CE zone be adequately screened from any nearby residential use.

We request that the PSC consider this safe harbor approach as the optimal manner in which to balance the City's policy objectives of promoting and preserving existing auto-accommodating commercial uses, while retaining the limitation on establishment of new auto-accommodating uses to only the CE zone. Thank you in advance for your consideration of this request.

Sincerely,

Damien R. Hall

DRH:DRH  
encs  
cc: Client

## **ATTACHMENT 1**

### **I. PROPOSED DRIVE-THRU FACILITIES STANDARDS:**

This is the language proposed by the City in the 3/16/16 draft of the Mixed Use Zoning Project.

#### **33.130.260 Drive-Through Facilities**

Drive-through facilities are allowed in the zones which are intended for auto accommodating development. Existing facilities in other commercial/mixed use zones may be rebuilt when certain conditions are met or when they are part of a redevelopment that includes a significant amount of new floor area. The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. CM1, CM2, CM3, and CX zones.** Drive-through facilities are prohibited in the CM1, CM2, CM3, and CX zones. In the CM2 and CM3 zones, a nonconforming drive-through facility can be demolished and rebuilt when all of the following are met:

1. The nonconforming drive-through facility operations have not been interrupted for more than a 2 year period;
2. The site is adjacent to a Major City Traffic Street or District Collector as designated by the Transportation Element of the Comprehensive Plan; and
3. In the CM3 zone, the rebuilt drive-through will be part of a development on the site that has a minimum FAR of 1 to 1.

- B. CE zone.** Drive-through facilities are allowed in the CE zone, except as follows:

1. Drive-through facilities are prohibited within 50 feet of a lot line that abuts a residential zone; and
2. Drive-through facilities are prohibited within 50 feet of a lot line that is across a local service street from a residential zone.

### **II. PROPOSED EDITS:**

Removed language is in strikethrough, new language is in **RED**.

#### **33.130.260 Drive-Through Facilities**

New ~~Drive-through~~ drive-through facilities are allowed in the zones which are intended for auto accommodating development. Existing, legally established facilities in ~~other all~~ commercial/mixed use zones are allowed outright. ~~may be rebuilt when certain conditions are met or when they are part of a redevelopment that includes a significant amount of new floor area.~~ The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. CM1, CM2, CM3, CX, and CE zones.** In the CM1, CM2, CM3, CX, and CE zones, all legally established drive-through facilities in existence as of **[INSERT]**

EFFECTIVE DATE OF CODE], are allowed outright and are not subject to Chapter 33.258, Nonconforming Situations.

- B. CM1, CM2, CM3, and CX zones.** Establishment of new drive-through facilities are is prohibited in the CM1, CM2, CM3, and CX zones. ~~In the CM2 and CM3 zones, a nonconforming drive-through facility can be demolished and rebuilt when all of the following are met:~~

- ~~1. The nonconforming drive-through facility operations have not been interrupted for more than a 2-year period;~~
- ~~2. The site is adjacent to a Major City Traffic Street or District Collector as designated by the Transportation Element of the Comprehensive Plan; and~~
- ~~3. In the CM3 zone, the rebuilt drive-through will be part of a development on the site that has a minimum FAR of 1 to 1.~~

- C. CE zone.** Establishment of new drive-through facilities are is allowed in the CE zone, ~~except as follows~~ subject to the following:

- ~~1. New drive-through facilities are prohibited within 50 feet of a lot line that abuts a residential zone boundary must incorporate landscaping to the L2 standard between the drive-through facility and the residential zone; and~~
- ~~2. Drive-through facilities are prohibited within 50 feet of a lot line that is across a local service street from a residential zone.~~

### III. PROPOSED EDITS (CLEAN VERSION):

#### **33.130.260 Drive-Through Facilities**

New drive-through facilities are allowed in the zones which are intended for auto accommodating development. Existing, legally established facilities in all commercial/mixed use zones are allowed outright. The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. CM1, CM2, CM3, CX, and CE zones.** In the CM1, CM2, CM3, CX, and CE zones, all legally established drive-through facilities in existence as of **[INSERT EFFECTIVE DATE OF CODE]**, are allowed outright and are not subject to Chapter 33.258, Nonconforming Situations.

- B. CM1, CM2, CM3, and CX zones.** Establishment of new drive-through facilities is prohibited in the CM1, CM2, CM3, and CX zones.

- C. CE zone.** Establishment of new drive-through facilities is allowed in the CE zone, subject to the following:

1. New drive-through facilities within 50 feet of a residential zone boundary must incorporate landscaping to the L2 standard between the drive-through facility and the residential zone.



101 SW Main Street, Suite 1100  
Portland, Oregon 97204

balljanik.com

t 503.228.2525  
f 503.295.1058

May 10, 2016

Damien R. Hall  
Also Admitted in California and Washington  
503.944.6138  
dhall@balljanik.com

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4<sup>th</sup> Ave, Suite 1700  
Portland, OR 97201

Re: Rezoning 6454 N Greeley Avenue  
Mixed Use Zones Project

Dear Commissioners:

This firm represents Mr. Joseph Angel, owner of the real property at 6465 N Greeley Avenue ("Site"). The current draft of the Mixed Use Zones Project proposes to rezone the Site from CN1 to CM1. The Mixed Use Dispersed Comprehensive Plan designation is proposed for the Site, with corresponding zones of CE and CM1. Here, the characteristics of the Site correspond to the CE implementing zone and we request that the PSC apply the CE zone. The past, current, and future use of the Site are more conducive to the CE zone, as the Site has a history of employment uses.

Address	Current Zone	MUZP Draft Zone	Requested Zone
6454 N Greeley Ave	CN1	CM1	CE

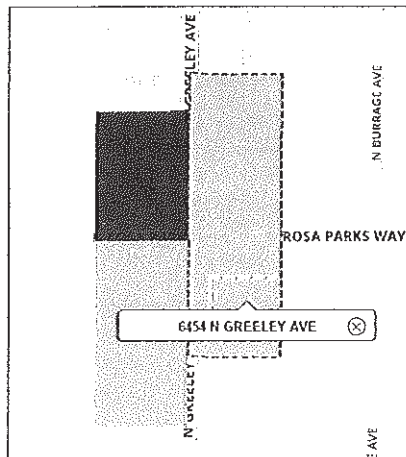
Since the 1920s, the Site has been used for vehicle servicing of one kind or another, over the years having housed both a gas station and auto mechanic. The Site currently houses the owner's corporate offices, including storage and servicing of company vehicles.

The long-term redevelopment potential of the Site should allow more development capacity and potential employment uses than would be permitted under CM1. This would reflect not only the historic employment use of the Site, but also the character of the Site currently, as it is sits at the intersection of two neighborhood collector streets and is well served by transit.

Furthermore, the CE zone is being proposed at the very same intersection for another property with a history of vehicle service and current use as a gas station (see map on following page). That lot currently has the same CN1 designation as the Site. Due to the similarities between the characteristics and proximity of these properties, the same CE zoning should be applied to Site as well.



City of Portland  
Planning & Sustainability Commission  
May 10, 2016  
Page 2



We request that the PSC not arbitrarily limit the future development capacity of the Site based on the rote application of the conversion chart. Instead, we request the PSC to consider the Site characteristics and context, including providing the same treatment to the similarly situated property across the street, and apply the CE zone.

Thank you in advance for your consideration of this request.

Sincerely,

A handwritten signature in dark ink, appearing to read "DRH".

Damien R. Hall

DRH:DRH  
cc: Client





101 SW Main Street, Suite 1100  
Portland, Oregon 97204

balljanik.com

t 503.228.2525  
f 503.295.1058

May 10, 2016

Damien R. Hall  
Also Admitted in California and Washington  
503.944.6138  
dhall@balljanik.com

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4<sup>th</sup> Ave, Suite 1700  
Portland, OR 97201

Re: Rezoning 12225 N Jantzen Drive  
Mixed Use Zones Project

Dear Commissioners:

This firm represents Mr. Joseph Angel, owner of the real property at 12223 N Jantzen Drive ("Site"). The current draft of the Mixed Use Zones Project proposes to rezone the Site from CN2 to CM1, thereby rendering the existing drive-through facility on the property non-conforming. Under the current MUZP draft, the sole zone that does not expressly prohibit drive-through facilities is the CE zone. In order to maintain the conforming status of the use, it is requested that the PSC apply CE zoning to the Site.

Address	Current Zone	MUZP Draft Zone	Requested Zone
12225 N Jantzen Dr	CN2	CM1	CE

The current use of the site as a restaurant with a drive-through operates under a long-term lease that allows for modernization and remodeling of the restaurant building every ten years, as is typical of agreements with similar franchises throughout the City. Under the currently proposed zoning designation, the ability to make remodeling and modernization related improvements will be impaired. This would operate as a disincentive to invest in the Site, as well as the immediately adjacent properties which house a restaurant and service station. All of these businesses are reliant on drive-through patronage of I-5 motorists. Revenue from the residences of Hayden Island is insufficient to viably operate these businesses.

The use of the Site matches the stated characteristics of the CE zone (a copy of PMC 33.130.030 identifying characteristics of the CE zone is included as Attachment 1 to this letter). The Site has the following characteristics consistent with the CE zone:

- Located on two District Collector Streets;
- Houses a drive-through facility, an auto-accommodating use;
- Primarily serves I-5 traffic, a regional Trafficway and trucking corridor;  
and

1061107\v2

- Further, the Hayden Island Plan District supports designation of the Site as CE, stating that "The area east of Center Avenue is not designated as a pedestrian district and is appropriate for auto-oriented uses, based on the current uses and the proximity to the bridge ... " and specifying the purpose to "preserve the ability of existing and future businesses [east of Center Avenue] to have drive-through facilities." PMC 33.532.270.A.2.

An aerial photograph of a residential neighborhood. A white callout box with a black border points to a specific property, labeled "12225 N JANTZEN DR" with a circled 'X' icon. The surrounding area includes streets such as "N ELEGONIA AVE", "N MALEA AVE", and "DR 120". Other labels include "Recreation River" and "Park". The map shows a mix of dark, forested areas and lighter, developed land.

There is no policy rational underlying this zoning pattern. The PSC should consider the site characteristics and context, decline to rotely follow the conversion chart, and apply the CE zone.



Planning & Sustainability Commission  
May 10, 2016  
Page 3

In any event, the Hayden Island Plan District should be amended to reflect the zone that the PSC applies to the site. PMC 33.532.270.B.2, specifically allows drive-through facilities zoned CN2 and located east of Center Avenue. The Site is currently zoned CN2 and is located east of Center Avenue. The text of PMC 33.532.270.B.2 should be amended to apply to the new zone applied to the Site, in order to ensure ongoing consistency with the Hayden Island Plan District.

In sum, we request that the Site be zoned CE, and that PMC 33.532.270.B.2 be revised to read, "East of Center Avenue, drive-through facilities are allowed on the portion of a site within a CE zone." Thank you in advance for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read "DRH", written over a horizontal line.

Damien R. Hall

DRH:DRH  
encs  
cc: Client

- B. Commercial/Mixed Use 2 zone.** The Commercial/Mixed Use 2 (CM2) zone is a medium-scale zone intended for sites in a variety of centers, along corridors, and in other mixed use areas that have frequent transit service. The zone allows a wide range and mix of commercial and residential uses, as well as employment uses that have limited off-site impacts. Buildings in this zones will generally be up to four stories tall unless height and floor area bonuses are used, or plan district provisions specify other height limits. Development is intended to be pedestrian-oriented, provide a strong relationship between buildings and sidewalks, and complement the scale of surrounding residentially zoned areas.
- C. Commercial/Mixed Use 3 zone.** The Commercial/Mixed Use 3 (CM3) zone is a large-scale zone intended for sites in high-capacity transit station areas, in town centers, along streetcar alignments, along civic corridors, and in locations close to the Central City. It is intended to be an intensely urban zone and is not appropriate for sites where adjacent properties have single-dwelling residential zoning. The zone allows a wide range and mix of commercial and residential uses, as well as employment uses that have limited off-site impacts. Buildings in this zone will generally be up to six stories tall unless height and floor area bonuses are used, or plan district provisions specify other height limits. Development is intended to be pedestrian-oriented, with buildings that contribute to an urban environment with a strong street edge of buildings. The scale of development is intended to be larger than what is allowed in lower intensity commercial/mixed use and residential zones. Design review is typically required in this zone.
- D. Commercial Employment zone.** The Commercial Employment (CE) zone is a medium-scale zone intended for sites along corridors with a Neighborhood Collector or higher traffic classification, especially along civic corridors that are also Major Truck Streets or Priority Truck Streets. This 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. The zone allows a mix of commercial uses, as well as some light manufacturing and distribution uses that have few off-site impacts. The zone allows drive-through uses and is appropriate for sites of sufficient size to provide transitions to areas with residential zoning. The emphasis of this zone is on commercial and employment uses, but residential uses are also allowed. Buildings in this zone will generally be up to four stories tall. Development is intended to be pedestrian-oriented, as well as auto-accommodating, and complement the scale of surrounding areas.
- E. Central Commercial zone.** The Central Commercial (CX) zone is intended to provide for commercial and mixed use development within Portland's most urban and intense areas, specifically the Central City and Gateway Regional Center areas. A broad range of uses are allowed to reflect Portland's role as a commercial, cultural, residential, and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together. Development is intended to be pedestrian-oriented with a strong emphasis on a safe and attractive streetscape.





101 SW Main Street, Suite 1100  
Portland, Oregon 97204

balljanik.com

t 503.228.2525  
f 503.295.1058

May 10, 2016

Damien R. Hall  
Also Admitted in California and Washington  
503.944.6138  
dhall@balljanik.com

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4<sup>th</sup> Ave, Suite 1700  
Portland, OR 97201

Re: Rezoning of 3830 SE 82<sup>nd</sup> Avenue  
Mixed Use Zones Project

Dear Commissioners:

This firm represents Mr. Joseph Angel, owner of the real property at 3830 SE 82<sup>nd</sup> Avenue ("Site"), which currently houses a restaurant with a drive-through facility. The current draft of the Mixed Use Zones Project proposes to rezone the Site from CG to CE.

As you are aware, the CE zone is the sole mixed use zone in which drive-through facilities are not prohibited outright. However, the CE zone prohibits drive-through facilities that are within 50 feet of a lot line abutting a residential zone or a local service street adjacent to a residential zone. See 33.130.260.B, Drive-Through Standards for the CE zone. This provision would prohibit the existing drive-through on the Site.

Address	Current Zone	MUZP Draft Zone	Requested Zone
3830 SE 82 <sup>nd</sup> Ave	CG	CE	CE - with safe harbor amendment

Since CE is the only zone in which drive-through facilities are allowed under any circumstance, we request to retain the CE designation on the Site, but also request that the PSC adopt a policy that all existing drive-through facilities not be rendered nonconforming by the adoption of the mixed-use zones.

This policy would create a safe harbor for existing drive-through facilities by safeguarding the continued viability of existing businesses that are reliant on drive-through facilities, and providing the certainty needed to enable future investment in the remodeling and modernization of properties with existing drive-through facilities. Without such a safe harbor, the MUZP would cause any number of drive-through facilities to become nonconforming, thereby creating a disincentive to invest in these commercial properties and calling into question the future viability of these businesses.

A proposed text amendment is included as Attachment 1 to this letter. Adoption of this text amendment would achieve the following:





Portland Planning and Sustainability Commission  
City of Portland  
May 10, 2016  
Page 2

- Create a safe harbor for existing drive-through facilities in all mixed-use zones to retain their conforming status;
- Continue the prohibition on new drive-through facilities in all mixed-use zones other than CE; and
- Ensure that new drive-through facilities in the CE zone be adequately screened from any nearby residential use.

We request that the PSC consider this safe harbor approach as the optimal manner in which to balance the City's policy objectives of promoting and preserving existing auto-accommodating commercial uses, while retaining the limitation on establishment of new auto-accommodating uses to only the CE zone. Thank you in advance for your consideration of this request.

Sincerely,

Damien R. Hall

DRH:DRH  
encs  
cc: Client

## **ATTACHMENT 1**

### **I. PROPOSED DRIVE-THRU FACILITIES STANDARDS:**

This is the language proposed by the City in the 3/16/16 draft of the Mixed Use Zoning Project.

#### **33.130.260 Drive-Through Facilities**

Drive-through facilities are allowed in the zones which are intended for auto accommodating development. Existing facilities in other commercial/mixed use zones may be rebuilt when certain conditions are met or when they are part of a redevelopment that includes a significant amount of new floor area. The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. CM1, CM2, CM3, and CX zones.** Drive-through facilities are prohibited in the CM1, CM2, CM3, and CX zones. In the CM2 and CM3 zones, a nonconforming drive-through facility can be demolished and rebuilt when all of the following are met:

1. The nonconforming drive-through facility operations have not been interrupted for more than a 2 year period;
2. The site is adjacent to a Major City Traffic Street or District Collector as designated by the Transportation Element of the Comprehensive Plan; and
3. In the CM3 zone, the rebuilt drive-through will be part of a development on the site that has a minimum FAR of 1 to 1.

- B. CE zone.** Drive-through facilities are allowed in the CE zone, except as follows:

1. Drive-through facilities are prohibited within 50 feet of a lot line that abuts a residential zone; and
2. Drive-through facilities are prohibited within 50 feet of a lot line that is across a local service street from a residential zone.

### **II. PROPOSED EDITS:**

Removed language is in strikethrough, new language is in **RED**.

#### **33.130.260 Drive-Through Facilities**

New ~~Drive-through~~ drive-through facilities are allowed in the zones which are intended for auto accommodating development. Existing, legally established facilities in ~~other all~~ commercial/mixed use zones are allowed outright. ~~may be rebuilt when certain conditions are met or when they are part of a redevelopment that includes a significant amount of new floor area.~~ The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. CM1, CM2, CM3, CX, and CE zones.** In the CM1, CM2, CM3, CX, and CE zones, all legally established drive-through facilities in existence as of **INSERT**

**EFFECTIVE DATE OF CODE]**, are allowed outright and are not subject to Chapter 33.258, Nonconforming Situations.

- B. CM1, CM2, CM3, and CX zones.** Establishment of new drive-through facilities are is prohibited in the CM1, CM2, CM3, and CX zones. ~~In the CM2 and CM3 zones, a nonconforming drive-through facility can be demolished and rebuilt when all of the following are met:~~

- ~~1. The nonconforming drive-through facility operations have not been interrupted for more than a 2-year period;~~
- ~~2. The site is adjacent to a Major City Traffic Street or District Collector as designated by the Transportation Element of the Comprehensive Plan; and~~
- ~~3. In the CM3 zone, the rebuilt drive-through will be part of a development on the site that has a minimum FAR of 1 to 1.~~

- C. CE zone.** Establishment of new drive-through facilities are is allowed in the CE zone, ~~except as follows~~ subject to the following:

- ~~1. New drive-through facilities are prohibited within 50 feet of a lot line that abuts a residential zone boundary must incorporate landscaping to the L2 standard between the drive-through facility and the residential zone; and~~
- ~~2. Drive-through facilities are prohibited within 50 feet of a lot line that is across a local service street from a residential zone.~~

### III. PROPOSED EDITS (CLEAN VERSION):

#### **33.130.260 Drive-Through Facilities**

New drive-through facilities are allowed in the zones which are intended for auto accommodating development. Existing, legally established facilities in all commercial/mixed use zones are allowed outright. The standards for drive-through facilities are stated in Chapter 33.224, Drive-Through Facilities.

- A. CM1, CM2, CM3, CX, and CE zones.** In the CM1, CM2, CM3, CX, and CE zones, all legally established drive-through facilities in existence as of **[INSERT EFFECTIVE DATE OF CODE]**, are allowed outright and are not subject to Chapter 33.258, Nonconforming Situations.

- B. CM1, CM2, CM3, and CX zones.** Establishment of new drive-through facilities is prohibited in the CM1, CM2, CM3, and CX zones.

- C. CE zone.** Establishment of new drive-through facilities is allowed in the CE zone, subject to the following:

1. New drive-through facilities within 50 feet of a residential zone boundary must incorporate landscaping to the L2 standard between the drive-through facility and the residential zone.

Testimony submitted in video form by Libbi Albright at May 10, 2016 PSC hearing on Mixed Use Zones.

Portland Planning and Sustainability Commission Testimony 5/10/16

File name: albright\_muz

City of Portland Bureau of Planning and Sustainability  
Attn: Mixed Use Zones Project  
1900 SW 4th Avenue  
Suite 7100  
Portland, OR 97201  
[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Re: PSC Mixed Use Zones Testimony

May 9th, 2016

Dear Planning & Sustainability Commission Members,

First, I want to express that this Mixed Use Zones Project has resulted in a proposal that would seem to result in higher-quality buildings than we are currently seeing built in the zoned areas that will become the set of mixed-use zones.

Second, I want to express that the Mixed Use Zoning project is inextricably intertwined with something else that sounds very similar, the concept of Missing Middle Housing. Now, Missing Middle Housing types are, by definition, those types that are neither the single-family homes directly abutting the mixed use zones, nor are these the types that are most likely to be constructed in the mixed use zones. The Missing Middle types are called that precisely because they are missing; because there is no zone tailor-made to accommodate them; and therefore, they are unlikely to be constructed in large numbers anywhere in the city under our existing zoning code. And yet, with this new Mixed Use Zoning code, it is exactly those Missing Middle types that we are likely to need more of. This Mixed Use Zoning project has resulted, effectively, in a down-zoning of our centers and corridors. It is reducing the capacity, both in terms of dwelling units and in floorspace of non-residential space, of our future city. This is precisely why we will need to figure out a way, as a city, to accommodate large numbers of new Missing Middle housing types in areas that are currently zoned for single-family homes.

If we can collectively agree that we will do this, that we will find a way to say yes to Missing Middle housing types, all of them, somewhere within the lands currently zoned single-family, then I think it's actually a good thing that we adopt this set of policies for our centers and corridors, as it will likely lead to a higher-quality built environment.

That being said, I do have some suggestions for improvements to make to this proposal, as I do not yet believe that it is perfect. There is still room for improvement. Here is what I see.

**Transportation: Relationship between new TDM requirements and LOS**

(Page 3)<sup>1</sup>: While the document lays out new requirements for Transportation Demand Management (TDM) for residential projects, it does not lay out any relationship to Level of Service (LOS). City staff have told me that Portland is committed to moving away from LOS, which is primarily an automobile-oriented metric, to some sort of replacement. Yet, I have not seen even a draft proposal as to what that replacement might be. The State of California, led by

---

<sup>1</sup> All page references are to the March, 2016 Mixed Use Zones Project — Proposed Draft document.



the Governor's Office of Planning and Research (OPR), has shifted away from LOS and towards Vehicle Miles Traveled (VMT) as the primary transportation metric, with the goal for each project of reducing VMT (or reducing VMT per capita by at least 15% from the average for the region or city). I recommend that the City of Portland do something similar; I see no reason why the Mixed Use Zones project should not pilot this effort, by requiring all new developments in Mixed Use Zones to achieve at least a 22% reduction in VMT per capita over the citywide average (or perhaps an even higher number that corresponds with the thresholds/goals in Metro's Climate Smart Communities project).

**Penthouses:**

(Drawing on Page 2) The currently-proposed height standards appear to provide for stepping-back the top level of a building once. However, it seems that the code could provide for a second step, to allow for penthouse-level development atop buildings, as long as those roof-level structures are stepped back even further and thus do not contribute to the shadow cast by the building or the street presence of the building. Perhaps a 10' height bonus for rooftop structures with at least a 10' setback from all roof edges?

**Awnings:**

(Drawing on Page 2; requirement for ground floor windows on Page 36) Currently, there is nothing in this proposal related to awnings or providing shade and shelter for pedestrians. Awnings are a time-tested solution to provide shade from the sun and shelter from the rain for pedestrians. Within centers and corridors, it thus makes sense to require awnings on all new buildings, to provide for the public policy goal of encouraging pedestrian activity. The co-benefits of awnings include reduced energy consumption for cooling in the summer, by reducing solar gain through plate-glass windows. Since awnings are more effective if every building has them, it is not sufficient to leave the choice to provide awnings up to the private sector, as the choice will invariably be to avoid the excess cost of the awning if it is not required.

**Rooftop uses requirement:**

(Drawing on Page 2) While it is laudable to include bonuses to encourage affordable housing and affordable commercial space, it is also important to think holistically about how the next generation of mixed-use buildings will help the City achieve its greenhouse gas reduction goals for the performance of the structures of the built environment. To this end, and following the lead of San Francisco, which recently required the installation of solar panels on new buildings, I propose a requirement for active rooftop uses. This requirement could be met using either intensive or extensive green roofs; through the installation of photovoltaic, thermal, or photovoltaic-thermal (PVT) solar panels; or through the installation of non-vegetated roof-top decks to provide additional useable outdoor space for building residents, tenants and visitors. (While rooftop decks might not directly relate to GHG emissions in the manner of the other options for rooftop uses, they would satisfy an alternate public policy goal, of providing sufficient outdoor space for residents).

**Flexible Ground Floor Space**

(Ground Floor Residential Development on Page 36) Since the set of Mixed Use Zones is invariably applied in locations where pedestrian activity is expected and encouraged, and throughout our system of Centers and Corridors, it makes sense to provide for the changes in use that will occur over the century-plus of life that we should expect from the next generation of buildings. This means that the ground floors of these buildings should all have, if not retail space, at least flexible space with direct entrances to the outdoors at grade, so that those

spaces would have the ability to adapt to changing market conditions over time. The same space could thus be a live/work unit, retail or other non-residential space, or an entirely residential unit. The requirement should relate to ensuring that the built form allows for this adaptability, rather than to the proposed initial use of the space.

### **Outdoor Space**

(Outdoor Space, Page 36) The requirement of 48 square feet per unit of private or shared outdoor space for residents is, in my view, too vague. Further, it is confusing. Why would a household of human beings within a single-family zone require a minimum of 144 square feet of outdoor space (the 12'x12' area proposed as a part of the Residential Infill Project), but a household of human beings in a mixed-use zone only require 48 square feet, which could be part of an area shared with other people? It seems to me that there should be some requirement for private outdoor space for each unit. I propose that 96 square feet of private outdoor space be required for each unit, in addition to 48 square feet of public / shared outdoor space. 96 square feet roughly corresponds to a single 8' x 12' balcony, large enough for two people to sit around a table and enjoy a meal together. It is somewhat smaller than the front porch on my single-family house, but would provide about the same level of functionality. Developers could choose to provide one balcony per unit, or a patio, or a porch, or a small yard, or a rooftop deck, or any number of other variations on this theme. It would be very intriguing to watch the design solutions that our city's talented architects would develop over time in response to this new requirement!

### **Flexible-Use Parking Spaces**

(Shared Parking, Page 37) Off-street parking should look more like garages than parking stalls, and should include: walls, utility connections, and garage doors. Parking spaces should be decoupled (sold/leased) from the units in each building, and sold/leased separately, either to building residents, tenants, or others outside the building in need of such a space. Use should be flexible: park a car, play in a garage band, park bicycles & snowboards, repair bikes, engage in woodworking projects, have an art studio, etc.

### **Coalition-level Design Standards and Review**

(Design Overlay, Page 39) In addition to the blanket requirement for Design Review within the D overlay, residents in single-family homes adjacent to mixed-use zones should have the right to request design review for developments proposed adjacent to their property; this should be enforced via notification as a part of the pre-approval process. Such design review should be conducted, within Coalition boundaries outside of the Central City, by Coalition-level Design Review committees. NECN, for instance, would be empowered to conduct Design Review within its borders, and would form a new Design Review Committee for this purpose, under the guidance of City or Coalition staff. Coalitions should then also have a process to develop and maintain their own variations on citywide design standards. This will help to address Comprehensive Plan goals for variations between different areas of the city.

### **Vintage Commercial Storefront Areas**

(Low-rise Commercial Storefront Areas, Page 40) The proposal to down-zone certain areas to CM1 with Centers Main Street overlay regulations seems logical. However, it should really be branded "Vintage Commercial Storefront Areas," to recognize that this proposal is as much about protecting historic character as it is anything else. Call it what it is.

### **Don't Pander to Automobile-Oriented Uses**

(Auto-Accommodation Issues, Page 42; Setbacks for Large Retailers, Page 43; 33.130.215.F, Page 112) I'm curious, what exactly is the public policy interest in protecting automobile-oriented land uses that would otherwise find it uneconomical to comply with our fair city's zoning regulations? We have an obesity epidemic, we have Vision Zero policy goals, and we have mode split goals, all of which point to reducing accommodations for the automobile, in favor of doing everything that we can to encourage walking, bicycling, transit use, skateboarding, etc. So, why should the City accommodate traditional auto-oriented developments in the Portland landscape? You need to break eggs to make an omelet. We will need, as a community, to make hard choices to achieve our broad policy goals. This is one of those hard choices. Except, it's not that hard, really. Just say no to auto-focused interests that find it hard to think outside of the business-as-usual box. Shouldn't large national big-box retailers have to change their format to fit our walkability goals, rather than the other way around? Specifically, drive-through developments should be prohibited in our mixed-use zones. The threshold for triggering alternative setback standards for large retail uses should not be reduced from 100,000 to 60,000 square feet. Instead, we should be looking to impose higher minimum FAR requirements on these sorts of businesses, to encourage a transition away from automobile-oriented development towards a built form that is more supportive of pedestrian activity by design. Further, East Portland already has enough big-box retail. What East Portland needs is more walkable, local-serving retail of the sort that encourages the use of non-automobile modes! This is an equity issue for folks who have been displaced to East Portland from the more walkable areas of inner Portland; the City has an obligation to repair East Portland after decades of neglect, to make it into a series of walkable, mixed-use communities. The City should actively reject those forces that seek to maintain East Portland as a mecca for the blight of excessive automobile-oriented uses.

### **Break up long building walls**

(Building Length and Facade Articulation, Page 43) 200 feet is way too long for a wall outside of the Central City with no articulation. It is true that in downtown, the blocks are 200 feet on a side. These regulations are for the centers and corridors outside of downtown, however. In most of Portland's traditional commercial areas, the average lot size is 50 feet or so. Therefore, the traditional character of the city is for buildings to be broken up in increments of no more than 50 feet along our main streets — not 200 feet. Even 110 feet was too high of a number. The threshold should thus be 50 feet to help preserve the character of our neighborhood commercial areas. This number can be higher in the single-use industrial sanctuary zones, but not our mixed-use zones.

### **Minimum Floor Area**

(Minimum Floor Area in Centers, Page 44) The minimum floor area changes seem to be headed in the wrong direction. We are talking about a city that will be growing and intensifying over the coming decades, as additional people and businesses find room to fit within the existing footprint of the city. We need to provide ample space for this to occur, especially in areas where there is a high potential to provide development with a lower per-capita VMT than the citywide average. Indeed, it is the fact of requiring a higher minimum FAR that will help to achieve the goal of lowering VMT per capita. Therefore, within all of our Centers and Corridors, we should require a minimum FAR of 1.0, with the ability to apply for an exception through the design review process to allow a minimum FAR of 0.75 in the Eastern and Western pattern areas. These zones are, after all, called the Mixed Use Zones, not the Single Use Automobile Oriented Zones. We need to encourage these places to change and to intensify over time. Change is the

only constant. A city that does not allow for, and encourage, change over time, will shut down the evolutionary processes that will lead to its future success.

### **Required Setbacks**

(Required Setbacks from a side lot line, Page 102) The requirement for a 10-foot setback for buildings adjacent to residentially-zoned lots should specifically be waived for existing buildings or adaptive re-use projects involving existing buildings. We only require a 5-foot setback between houses. Why should people in one type of building be forced further away from people in another type of building? If the people in one type of building have been living within a certain proximity of the people in the other type of building for the past century, why should that other type of building be forced to relocate once it is subject to incremental improvements? This should be a by-right allowance of the zoning code, not something requiring discretionary review.

### **Bay Windows**

(Extensions into required building setbacks, Page 105) The proposal to not allow bays or bay windows to extend into a required setback abutting an RF-RH zoned lot, is overkill. The requirements for extensions into side setbacks should match those of the facing property. For instance, if the adjacent property is R2.5, then the mixed-use building should only need to follow the requirements for extensions into setbacks of the R2.5 zone. We have a lot of small sites in Portland; we need to encourage thoughtful design of the buildings that will be placed on these sites. Placing too many poorly-conceived restrictions on the form of these buildings will stifle the creativity of design decisions that could lead to increased livability for their future users.

### **Native Plants for Screening Requirements**

(Garbage and recycling collection areas, Page 135) In my experience, the L3 standard for landscaping as screening is primarily met in Portland using non-native plant species. This standard itself should be changed to provide greater allowance for the use of native plant species to satisfy the screening requirement. This may include relaxing the requirement for evergreen shrubs, in favor of requiring perennial shrubs, whether deciduous, evergreen, or other. Nobody is going to die if they are able to see the cars in a parking lot during the winter, as opposed to having the view obstructed by an evergreen shrub. (On the contrary, they might be there to provide the eyes on the street that could help to prevent a crime, and thus potentially save a life!!)

### **Permeable Pavers**

(Paving, Page 145) The use of permeable pavers should be encouraged or required here.

### **Demolitions**

(33.130.275 Demolition, Page 165) Adjustment review should be required for any proposed demolition permit in the City of Portland. The purpose of the review should be to identify, and require, alternatives to demolition where possible. These alternatives could include moving the structure, adaptive re-use of the structure, or deconstruction of the structure if moving it or adaptive re-use of it are deemed impossible. It seems that the people of the city are very protective of the character provided by our older buildings; we should respect this by thoroughly evaluating a proposal to end a building's life prematurely, before approving it.

### **Centers Main Street Overlay Zone**

(Map, Page 220) The Centers Main Street overlay zone should be extended to include the areas of mixed-use zoning east of MLKjr, Blvd on Killingsworth and Dekum streets west of 42nd ave.

### **Design Review Overlay Zone**

(Map IV-2, Design Overlay Zone, Page 39) The 'D' overlay zone should be extended to include the areas of mixed-use zoning east of MLKjr, Blvd on Killingsworth and Dekum streets west of 42nd ave.

### **Building Height Increase for Ground-Floor Retail**

(Building Height, Page 229) The allowable increase in building height, and the thresholds, should have more variation. The proposal to allow a 3' increase in building height if at least 25% of the ground-floor area of the building is in the selected set of uses is fine, but overly reliant on a prescriptive set of uses. I would argue that if a ground-floor space is designed to allow for potential non-residential or live-work use by providing at-grade entrances facing the sidewalk, and meets the sidewalk-facing window coverage standard, then it should be eligible for this bonus regardless of the proposed use. Uses change with tenants. The built form of the building, especially its height, is a permanent feature of the landscape (at least as measured against a human life span). Further, if a building is proposed with a design including this sort of flexible space for at least 50% of the ground floor area, then it should be eligible for a 5' height bonus. Taller ceilings are good design; they are a timeless element that leads to more enjoyable, higher-quality spaces.

I thank you for your important work for the future of our city, and I appreciate your serious consideration of my comments.

Sincerely yours,



Garlynn Woodsong<sup>2</sup>  
Chair, Concordia Neighborhood Association  
(CNA)'s  
Land Use & Transportation Committee (LUTC)  
Co-Chair, NE Coalition of Neighborhoods LUTC  
5267 NE 29th Ave  
Portland, OR 97211  
[garlynn@gmail.com](mailto:garlynn@gmail.com)  
(503)936-9873

---

<sup>2</sup> Speaking for myself only, as neither organization (CNA or NECN) had enough time during this comment period to properly review the full document, produce a set of comments, and have those comments reviewed & approved by committees & boards. While some of these ideas are mine, and some are from others, the task has fallen to me personally to compile them and send them.



May 9, 2016

Name: Richard and Eileen Wallace

Mailing Address: 8716 SW 21<sup>st</sup> Avenue, Portland, OR 97219

Email Address: eileen.wallace@gmail.com

Testimony: Regarding property located at: 6515-6519 SE Foster Boulevard, Portland, OR 97203, adjacent house located at 4536 SE 65<sup>th</sup> Ave, Portland, OR 97203, and nearby commercial property located at 6313-6317 SE Holgate Blvd, Portland, OR 97203 in regard to Portland's Comprehensive Plan

I am requesting that the Commission re-designate my commercial property located at 6515-6519 SE Foster Boulevard, small single family house that sits directly behind this building at 4536 SE 65<sup>th</sup> Avenue, and nearby commercial property located at 6313-6317 SE Holgate Blvd from its current designation of CS – Commercial Storefront to Mixed Use – Civic Center (CM2). One year ago, I received an initial notice that indicated that the properties would be designated as CM2. Recently, in April of 2016, I received another notice that changed the designation on these same properties from CM2 to CM1. I am requesting that the Commission restore the zoning on these properties to the original designation of CM2.

The 6515-6519 SE Foster property has two ground floor commercial tenants including a vehicle repair shop that has been in this location for 30+ years and a small tavern that has been in operation for over 25 years. There are also two apartment units above the tavern. The 6313-6317 SE Holgate property has two ground floor tenants including a barber shop and a community shared office space.

My father purchased these properties in the early 1980's. I grew up maintaining the properties, having my cars repaired at the auto shop, and over the years becoming close with the tenants. Since my father passed away in 2004, I'm now a second generation caretaker of the buildings. Because of my family history and love of Portland, I am strongly committed to the future of the heart of Foster and creating an area where you can live, work and play.

Background: On April 12, 2016, I met with a City Planner to discuss the recent zoning change. My property is located in a low-rise commercial storefront area, in what is called the "Heart of Foster," which is between SE Holgate Boulevard and SE 68th Avenue. Recently, the City Planner indicated this area was changed to CM1 in order to preserve the scale and characteristics of older main street areas. After talking with the city planners, I understand the City took a blanket approach of changing the CM2 to CM1 zoning throughout 15 areas in Portland to designate low-rise commercial storefront areas. To my understanding, this blanket change was based on citizen feedback from other neighborhoods such as Multnomah Village and SE Hawthorne, rather than the Foster-Powell neighborhood, where this property is located. After reviewing the 15 different areas, I understand and agree with this approach for neighborhoods with a stronger established neighborhood/cultural hub, such as Multnomah Village and SE Hawthorne where my family owns a few properties as well. In these neighborhoods it makes sense to balance growth and preservation with the associated zoning. However, this approach does not make sense for the Foster area. I met with the Land Use Chair for the Foster-Powell

neighborhood association to discuss the recent zoning change and my willingness to work together. The association is planning to meet soon. It is unique these days to find a family that has owned property for 30+ years and intends to pass it on to the next generation. I have also talked with other property owners that own 8 properties inside the heart of Foster who are in agreement with my position and will also be submitting supporting testimony. The following are the reasons the Commission should restore the zoning on the properties to the original designation of CM2:

Summary:

1. Heart of Foster is Not Yet a Core Commercial Area – Lack of Anchor Organization/Commercial Activity
  - a) CM1 limits needed growth in Heart of Foster - not a core commercial area of center yet
  - b) I *support* the ‘m’ main street overlay with CM2 designation to establish and promote a core business area
  - c) I *support* the Foster Transportation and Streetscape Plan
2. Personally impacts my 30+ year tenant who operates a vehicle repair shop that services the community
  - a) Creates nonconforming use issues
  - b) Tenant will be ‘grandfathered-in’, but commercial improvement would be limited
  - c) Alternative mechanisms should be explored to balance growth, preservation and the tapestry of the city, rather than overly restrictive zoning
3. Foster Boulevard is designated as Mixed Use – Civic Corridor and is a Wide Street
  - a) Significant 95 foot street right of way supports a good relationship between building height and street size

Additional Support:

*1. Heart of Foster is Not Yet a Core Commercial Area – Lack of Anchor*

*Organization/Commercial Activity:*

According to the City’s Proposed Draft document, the CM1 zone with a Main street overlay “m”, is designed to reflect these areas’ roles as core commercial areas which are anchors to complete communities. I am in agreement with the “m” main street overlay for this area with requirements around minimum floor areas and ground floor windows; however, I am requesting the CM2 designation to allow for more commercial improvement flexibility that the CM1 designation does not provide. My concern is that the Heart of Foster is not a core commercial area of center yet as the Proposed Draft document suggests. It is a corridor that needs the spark of transit, cultural identity, and commercial business growth to revitalize the area. The proposed CM1 zoning may prompt businesses and residents to move to better improved spaces just a few blocks away from this area because of the higher development capacity and better zoning in those areas that are directly surrounding this area, rather than stay in the Heart of Foster.

Additionally, there is not an anchor building that draws people to this area as suggested in the City’s Proposed Draft document, such as a community center, theater or grocery store, that establishes cultural and neighborhood identity. Multnomah Village, Hawthorne, and Sellwood, are clear established hearts of their respective areas and this approach makes sense for these

areas where space is already limited because it is already developed and has a strong commercial base. The Heart of Foster is not there yet, and the same zoning should not apply, which will restrict the goal of making this area a core commercial area.

I am also in agreement with the \$3.85M Foster Transportation and Streetscape Plan, which will slow down traffic, make the street safer, improve pedestrian/bicycle accessibility and contribute toward making the heart of Foster a thriving commercial hub. However, I believe the new CM1 zone will have the opposite affect and limit the use of business activities, in an area that needs more investment. This plan provides the infrastructure necessary to create a core commercial hub of activity and the zoning should create more commercial improvement flexibility with the CM2 designation.

*2. Personally impacts my 30+ year tenant who operates a vehicle repair shop that services the community:* As a result of the CM1 zoning, my 30+ year tenant who operates a small vehicle repair shop will be considered nonconforming use under the CM1 zoning. If I decide to make changes to the building down the road, I understand I will need to remove my 30+ year tenant and will even be further limited with this zoning change.

*3. Foster Boulevard is designated as Mixed Use – Civic Corridor and is a Wide Street:* The proposed Comprehensive Plan policies provide support for larger-scale buildings located along wide streets, supporting a good relationship between building height and street size. Foster Boulevard is designated a civic corridor street in Portland and has a significant 95 foot right of way. This is even wider than MLK and very different than Multnomah Village and SE Sellwood where streets are significantly narrower. Grouping the Heart of Foster with Multnomah Village and Sellwood does not make sense since the infrastructure is so different.

As a local long term property owner who is invested in the community, I want to thank you for considering my proposal to change the proposed CM1 zoning to CM2 zoning for these properties.

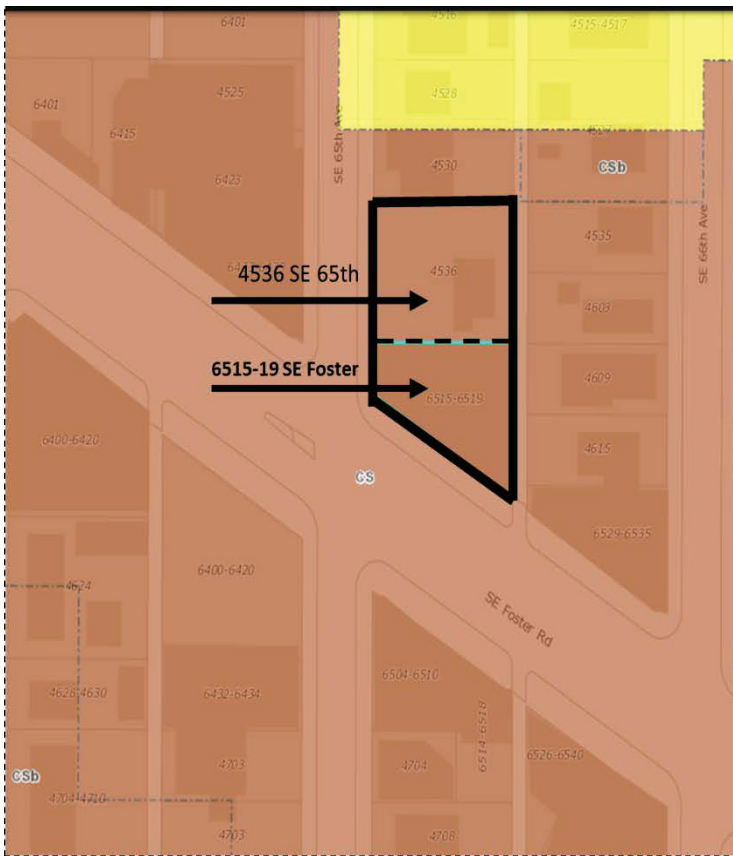
Sincerely,

Richard and Eileen Wallace

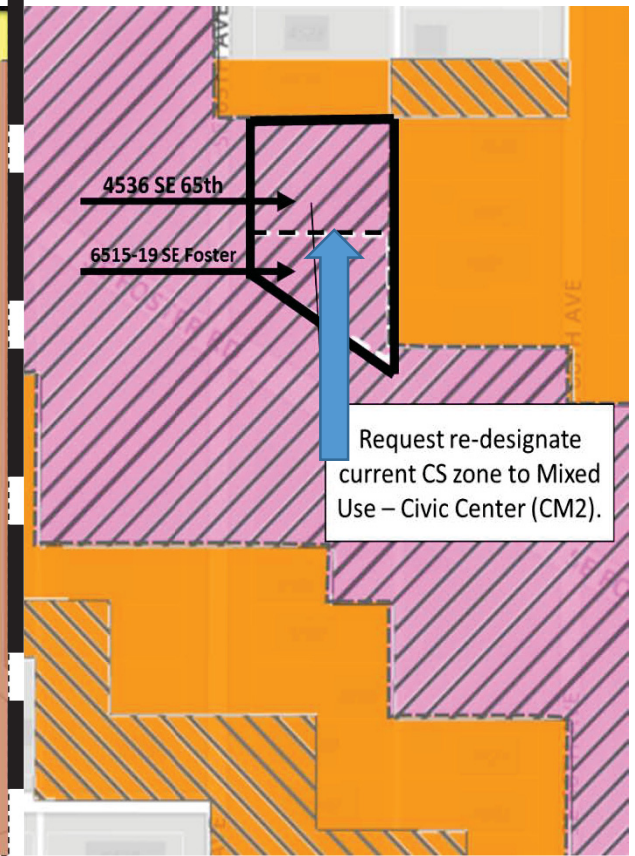
Enclosures:  
Exhibit A

6515-19 SE Foster Boulevard and 4536 SE 65<sup>th</sup> Avenue

**Current**



**Proposed**

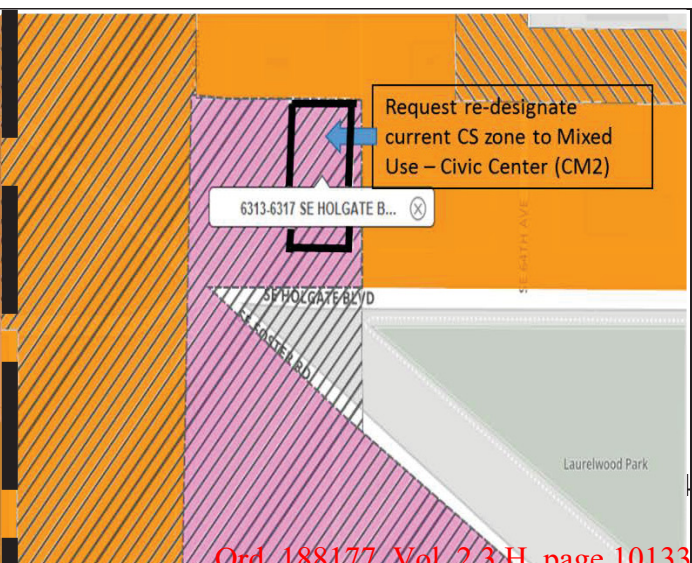


6313-6317 SE Holgate

**Current**



**Proposed**





May 9, 2016

Portland Planning and Sustainability Commission  
Re: Mixed-Use Zones Testimony

Dear Commissioners,

As a commercial property owner on Woodstock Blvd., I'm upset by the City's proposal to down-zone my property at 4410-4416 SE Woodstock Blvd. I have been a community leader in Woodstock for three decades. In that time, I have worked within the community to shape and improve the Woodstock business district. I am testifying to oppose my property's zone change from CS to CM1 and to oppose this in Woodstock's business district. The Woodstock properties District should have the CM2 zoning and be treated the same as the other properties with current CS zoning. I also ask that Woodstock be exempt from this proposal and receive no further consideration.

Woodstock does not fit the criteria of "low-rise commercial." The building stock is not high quality or historic. The blocks that were selected are not continuous. In fact, one of the three blocks has a 44' New Seasons that was built in 2015. That block is the middle segment of the proposed down-zoned blocks and breaks up the 400' or 2 block "shoulder to shoulder" criteria used. This disqualifies Woodstock. Also, the public right-of-way is 80 feet. A lesser 70 foot criteria is used for CM3, but yet a down-zone to CM1 is the proposed for my property?

I do not think this proposal accomplishes its goals. You cannot preserve historic character through zoning. This amounts to a faux "historic" designation. It's the City creating a "sense" that down-grading building rights by 10 feet will somehow rubber stamp a future historic preservation. It's actually "doing something" that will do nothing.

What the down-zones will do is strip property owners of their rights by down-grading a "crosswalk" or "lateral" zone change. Even with the "lateral" change from CS to CM2, owners are already losing rights, but a deeper down-grade to CM1 damages rights and value.

Everything about this proposal points to inequitable broad stroked planning without thoughtful consideration for the neighborhood or how it works. This proposal goes in the opposite direction of Portland's 2035 Comp Plan vision. It does not address growth. It does not address density. In fact, in a business district nine blocks long, it is punitive.

In Woodstock we talk to each other. The Woodstock Stakeholder Group, Neighborhood and Business Associations work together with one goal. A goal is for a cohesive, successful, vital and livable neighborhood in which everyone thrives.

While another neighborhood found it necessary to gather thousands of signatures, we communicated with each other. We have a vision for our business district. Woodstock finds middle ground and solutions. This last month has been no different. With the new zoning map changes that caught us all by surprise, we found a way to gather information, discuss and agree to one voice. That voice says that what other neighborhoods want is not what Woodstock wants.



The Woodstock Stakeholders, Business and Neighborhood Associations have all written testimony supporting commercial property owners and opposing this plan. As a district, we've asked for consistent zoning, straightening of the gap-toothed business district and opportunities for commercial and economic growth. With this united neighborhood opposition, I am hoping the commission will see that Woodstock shouldn't have been included in the first place.

The City has told me that if I'm unsuccessful in reversing this decision that I will have the ability to apply for a zone change once this is all over. This will cost me tens of thousands of dollars to "buy back" the rights I have today. This is not only unfair, it is punitive.

Interestingly, included in my concerns is that on the back side of our property at 4410-4416, we have a strip lot that is 15' X 100' that has been zoned R5 as it was cut off the back residential lot to prevent land locking the commercial building in the 1940's. This split-zone is slated to be zoned to match the rest of our property. The map app shows this at CM1, which is the same as the proposed down-zone. It is my concern that after the anticipated reversal of this down-zone, that the strip lot be consistent with the CM2 zoning and will create another split zone.

Please end this fight with a reversal of this proposal, restore our zoning to CM2 and do not leave any commercial properties between SE 40th and 45th or my split zone behind.


Respectfully,

Angie Even

Mailing Address:  
4410 SE Woodstock Blvd. #250  
Portland, Oregon 97206

WACK CO RESTAURANTS, INC.  
1520 NE Grand~ Portland, Oregon 97232  
Phone (503) 249-1809~ Fax (503) 698-6370

May 9, 2016

HAND DELIVERED  
5/9/16 

Katherine Schultz, Chair  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

**Re: Mixed Use Zones Project - Request for CE Zoning for McDonald's Restaurant(s)**

Dear Chair Schultz and Members of the Commission:

I am the Owner/Operator of a McDonald's restaurant, located at 12005 NE Center- 1520 NE Grand and 3110 NE Going (All in Portland). I understand that the City of Portland proposes to change the zoning of my location(s) such that a drive-through will no longer be permitted. I submit this letter requesting that the proposed zoning of my restaurant(s) be Commercial Employment (CE) to ensure that my existing drive-through remains conforming with the Portland Zoning Code.

A large portion of our business derives from the operation of the drive-through facility component of the restaurants, without which they could not profitably operate. We are concerned that the proposed mixed use zones will greatly reduce our ability to maintain and modernize our drive-through facilities. As the only proposed mixed-use zone that does not prohibit drive-through facilities is the CE zone, we hereby request that our site(s) be zoned CE.

Even if McDonald's restaurants are zoned CE, we are also 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. [...] 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."

In addition to zoning our site(s) CE, 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.

Yours truly,

Doug Wacker-McDonald's Owner (20 Years-45 with the system)

Cc: RTF/ICSC GR Committee

**From:** [cnkrause@comcast.net](mailto:cnkrause@comcast.net) [<mailto:cnkrause@comcast.net>]  
**Sent:** Monday, May 09, 2016 10:18 PM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** "PSC Mixed Use Zones Testimony"

Hello

I would like to express strong support for a design overlay in the Sellwood-Moreland area in SE Portland. We fell in love with this area of Portland in large part because of the clear roots and history of Portland that it held and still displayed and lived every day. We have never felt so very connected to a neighborhood as we do here. It is literally like a main street in an old town. There is so much awareness and involvement from the community. Because it is so walkable, familiarity amongs neighbors is not just those to 1-2 houses up or down the block...it is many people for many blocks. We worked extremely hard to get into this area because we have children and this is a place where we feel that children can be safe walking and biking with parents or friends. That is priceless these days. Soon after buying our house, we began watching houses be torn down and another three times it size being erected. And then as we take our normal walk we have come across 2 (soon to be three) new apartment complexes that bring many more residents and seemingly no parking or consideration for impact in terms of our community. I then heard of buyers buying homes to turn into rentals or Air B & Bs. Within months of buying are house we got request from investors with offers to buy it from us. It felt empty as does much of the new planning. I previously lived in north Portland, where certainly some of the new development work had some gentrification effects that are tough to accept. Still, there was a consideration for the communities in which development was occurring. We deserve that input here too...we deserve the consideration for an area of town founded so very long ago that has worked hard to retain it's historical character.

Thank you for your time, consideration and respect

Christine & Anne Viola-Krause  
7663 SE 22nd Ave  
Portland OR 97202

# S • M • I • L • E

SELLWOOD MORELAND IMPROVEMENT LEAGUE  
8210 SE 13<sup>TH</sup> AVENUE • PORTLAND, OR 97202  
STATION (503) 234-3570 • CHURCH (503) 233-1497

May 9, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4th Ave., Suite 7100  
Portland OR 97201

Honorable Commissioners:

The Sellwood Moreland Improvement League (SMILE) is submitting the following testimony regarding the Proposed Draft Report of the Mixed Use Zones project.

The Sellwood Moreland Neighborhood Association requests that the design overlay be expanded to Mixed Use Neighborhood Centers such as those in our neighborhood. Our commercial corridors are proposed to be Mixed Use - Neighborhood Centers for which the Mixed Use Zones Project does not presently apply the Design Overlay Zone. Specifically, the Design Overlay Zone expansion (Proposed Draft Map IV-2) should include the Sellwood Moreland Neighborhood Centers (Map IV-1). The design overlay zone would benefit our community and be consistent with zoning in other Mixed Use - Neighborhood Centers

The commercial corridors in Sellwood and Westmoreland are key contributors to the vitality and fabric of our neighborhood. Most buildings are older two story buildings that are being replaced with 4-story mixed use buildings at an increasing rate. The Design Overlay Zone and associated Community Design Standards have not been applied to these buildings, resulting in some unappealing buildings that foment opposition to new development, opposition to increased density, and a belief that the City and developers do not care about preserving the charm of our neighborhood. The appearance of these buildings would have been improved if the Community Design Standards had been applied. Our survey of our members revealed that they like the livability, walkability, charm, and locally-owned businesses in our neighborhood (see Neighborhood Survey Results at [sellwood.org](http://sellwood.org)). Applying the Design Overlay Zone to our commercial corridors would help our neighborhood increase density while better preserving our neighborhood charm.

As we accept light rail and increased density into our neighborhood we have the right to apply a higher design standard on our commercial corridors. This includes materials, design details and attention to the ground floor pedestrian experience. We don't believe that Design Standards will create perfect buildings, but we hope they will help in noticeable ways to maintain some of the




character of our neighborhood and help with this difficult and rapid transition to more density in our centers. We believe that with a revision, the Design Standards can be more effective when they are informed by the current times, rather than the 1980's when they were written. We believe that the requests in the conclusion in the Design Commission's May 8, 2013, State of Design report regarding the need to update the Design Standards and to expand design districts are even more important today as we think about the future of our neighborhoods and go forward with our Comprehensive Plan.

In the late 1990's both the East Portland Community Plan and the SW Community Plan were initiated. A Southeast Community Plan would have followed. In November 1996, the state of Oregon passed Ballot Measure 47 and the resulting property tax cuts led to the early suspension of these neighborhood planning programs. The city turned its focus to the Regional 2040 Growth Concept. Although Sellwood Moreland did complete a Neighborhood Plan process in 1998, the focus was totally on our residential zoning. The zoning of our commercial corridors has not been updated since the 1980 Comprehensive Plan. Through the Community Plan program three SW neighborhoods, Multnomah Village, Hillsdale and Johns Landing received a design ("d") overlay in their centers. Sellwood Westmoreland has the same Neighborhood Center designation and we ask to receive the "d" overlay in parity with these SW neighborhoods. There are surely other neighborhoods in Southeast which are in the same situation as we are and deserve a long overdue design overlay update to our neighborhood commercial center.

In summary, expanding the Design Overlay Zone to include the Sellwood Moreland (and possibly other) Mixed Use - Neighborhood Centers would help preserve the existing and desirable neighborhood character as density increases in the Centers.

This testimony was approved by the SMILE Board of Directors by a vote of 10-0 on April 20, 2016.

Sincerely,

  
Corinne Stefanick, President  
Sellwood-Moreland Improvement League

# S • M • I • L • E

SELLWOOD MORELAND IMPROVEMENT LEAGUE  
8210 SE 13<sup>TH</sup> AVENUE • PORTLAND, OR 97202  
STATION (503) 234-3570 • CHURCH (503) 233-1497

May 9, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4th Ave., Suite 7100  
Portland OR 97201

Honorable Commissioners:

The purpose of this testimony is to inform the Commission that the Sellwood Moreland Improvement League (SMILE) endorses the proposed CM1 zoning in our low-rise commercial storefront areas. The proposed CM1 zoning is along SE 13<sup>th</sup> Avenue and near the intersection of SE Bybee and Milwaukie. In addition, the SMILE Board of Directors recommends that the northern boundary of the CM1 zone along SE 13th Avenue be located at Malden Street instead of Nehalem Street.

The commercial corridors in our neighborhood are predominately one and two story buildings. The proposed CM1 zoning would help preserve the low rise storefront character of these commercial districts. SMILE values the charm and walkability of our neighborhood which was recently recognized by *Sunset* magazine as one of the best city neighborhoods in the west. We believe that our low-rise commercial storefront areas are a key feature of our neighborhood and we fear that they will become undesirable monotonous 4-story tall canyons if CM2 zoning were retained over their entirety. We feel that the low-rise storefront development on SE 13th extends north to Malden Street and we recommend that the boundary be located there rather than Nehalem Street. Our neighborhood would retain a lot of capacity for growth because most of our commercial corridors would still be zoned CM2 and the CM1 zoning would allow increased density on almost all of the affected properties.

The CM1 zoning would be consistent with the policies of the Sellwood Moreland Community Plan. As our commercial corridors are built up in the coming years, two lower commercial cores will help 'preserve the historic character of neighborhood areas' and 'reinforce a distinctive sense of place by emphasizing neighborhood boundaries, connections, business districts, public open spaces, and focal points.'

This testimony was approved by the SMILE Board of Directors by a votes of 9-1 and 8-1 on April 20, 2016.

Sincerely,



Corinne Stefanick, President  
Sellwood-Moreland Improvement League

**From:** Tanya Schaefer [mailto:tkshaef@gmail.com]  
**Sent:** Monday, May 09, 2016 9:26 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Sellwood/Westmoreland deserves a design overlay given the increasing and rapid development in our neighborhood. Sellwood was founded in 1883 with SE 13th at its center. SE Milwkie has served Portland since the 1840s when settlers made their homes after their long journey on the Oregon Trail. These two streets make up the town center which has been cherished as a pedestrian centered community for over a hundred years. It is a distinct walkable community, and we should preserve its walkability while planning for future development. This is a great, distinct neighborhood which merits being treated as such when working with developers.

Thank you,

Tanya Schaefer  
7425 SE 18th Ave  
Portland, OR 97202

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

From: RHONDA REEDY [mailto:rreedy@ucla.edu]

Sent: Monday, May 09, 2016 9:31 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

The Sellwood Moreland neighborhood needs a design overlay to protect the character of the neighborhood.

I have no problem with development that is well-planned and thoughtful. Already, my neighborhood has been blighted with development that is neither.

We need this type of protection to preserve our community.

Thank you.

Rhonda Reedy  
1732 SE Ellis St.  
Portland OR 97202

**From:** Bill Reedy [mailto:tikiclampett@gmail.com]  
**Sent:** Monday, May 09, 2016 9:30 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

The Sellwood Moreland neighborhood needs a design overlay to protect the character of the neighborhood.

I have no problem with development that is well-planned and thoughtful. Already, my neighborhood has been blighted with development that is neither.

We need this type of protection to preserve our community.

Thank you.

Bill Reedy  
1732 SE Ellis St.  
Portland OR 97202



**From:** Brian Posewitz [mailto:brianposewitz@comcast.net]  
**Sent:** Monday, May 09, 2016 11:35 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony - Sellwood Moreland Overlay

Dear Planning and Sustainability Commission:

I live in Sellwood. I have reviewed the proposed MUZ overlay for Sellwood/Moreland and find it inappropriately provincial and stuck in the past. In particular, the neighborhood centers (loosely defined) around 13th/Tacoma and Bybee/Milwaukie should be at least CM3 and/or CM2. Nothing should be CM1, which is proposed for the core parts of these intersections.

Sellwood/Moreland is a close-in neighborhood that can and should grow significantly taller and more dense if our wider metropolitan area grows as projected. This will help accommodate growth while minimizing regional sprawl. Moreover, it will enhance the livability of our neighborhood by facilitating (through economic incentive) the repair and replacement of the many old, run-down structures that still occupy our neighborhood centers (despite vast improvement in recent years). I see little to no risk that every building in these centers/corridors will be torn down and replaced with the same type and size of building to create the “four-story tall canyons” feared by the majority of the board of the neighborhood association board. The nice buildings will be preserved and the run-down ones will appropriately be replaced, creating a fresher, more diverse and more vibrant neighborhood.

Thank you for considering my comments.

Regards,

Brian Posewitz

8508 SE 11th Ave.

Portland, OR 97202

503-432-8249

[brianposewitz@comcast.net](mailto:brianposewitz@comcast.net)



Ocean Inc.  
P.O. Box 90608  
Portland, Oregon 97290-0608  
(503) 449-5856  
Fax: (503) 722-5398  
E-mail: mcdot\_2000@yahoo.com

May 9, 2016

Katherine Schultz, Chair  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

**Re: Mixed Use Zones Project - Request for CE Zoning for McDonald's Restaurant(s)**

Dear Chair Schultz and Members of the Commission:

I am the Owner/Operator of a McDonald's restaurant, located at 9100 Se Powell Blvd\_\_\_\_. I understand that the City of Portland proposes to change the zoning of my location(s) such that a drive-through will no longer be permitted. I submit this letter requesting that the proposed zoning of my restaurant(s) be Commercial Employment (CE) to ensure that my existing drive-through remains conforming with the Portland Zoning Code.

A large portion of our business derives from the operation of the drive-through facility component of the restaurants, without which they could not profitably operate. We are concerned that the proposed mixed use zones will greatly reduce our ability to maintain and modernize our drive-through facilities. As the only proposed mixed-use zone that does not prohibit drive-through facilities is the CE zone, we hereby request that our site(s) be zoned CE.

Even if McDonald's restaurants are zoned CE, we are also concerned that the existing CE zone is not truly auto-accommodating, as currently defined in Portland Zoning Code:

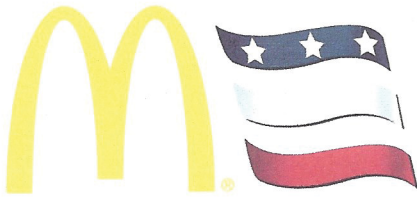
"Auto-Accommodating Development. Development which is designed with an emphasis on customers who use autos to travel to the site, rather than those which have an emphasis on pedestrian customers. [...] The main entrance is oriented to the parking area. In many cases, the building will have parking between 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."

In addition to zoning our site(s) CE, 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.

Yours truly,

James Dotson

Cc: RTF/ICSC GR Committee



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

May 9, 2016

Portland Planning and Sustainability Commission  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Re: Portland Mixed Use Zones Project

Dear Chair Schultz and Members of the Commission:

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 under the City's Mixed Use Zones Project. This letter is respectfully submitted to request that these sites are zoned Commercial Employment ("CE") and not subjected to the Centers Main Street Overlay ("CMSO") zone during this rezoning process. We also recommend that the CE zone be revised to better acknowledge existing 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. This ability becomes much more difficult when our restaurants have significant areas of non-conformity with Portland City Code.

The City proposes to rezone four of our locations as mixed-use zones and apply the Centers Main Street Overlay ("CMSO"). 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

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 50-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,

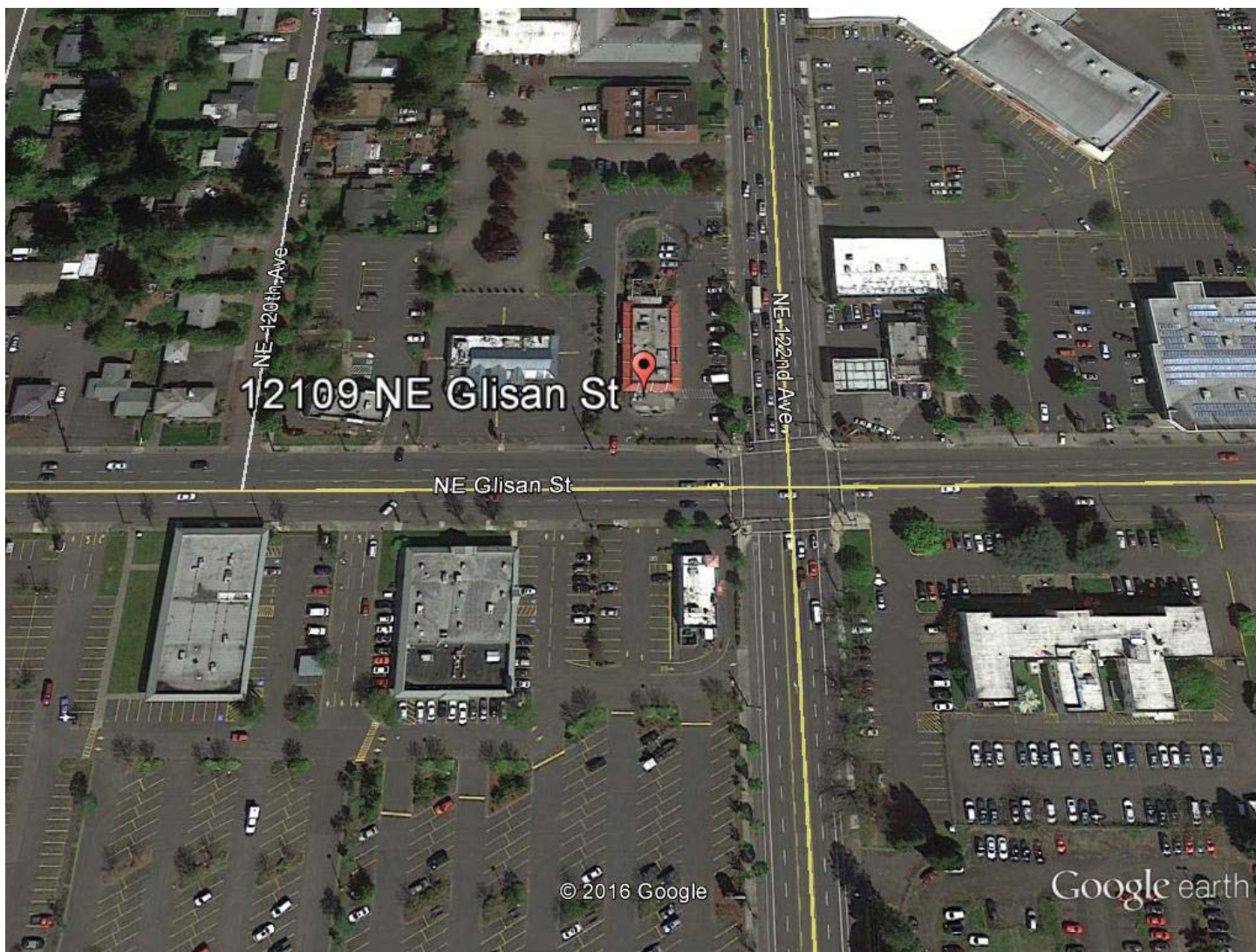


Glenda Hollenbeck

Enclosures

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





Google earth







Google earth





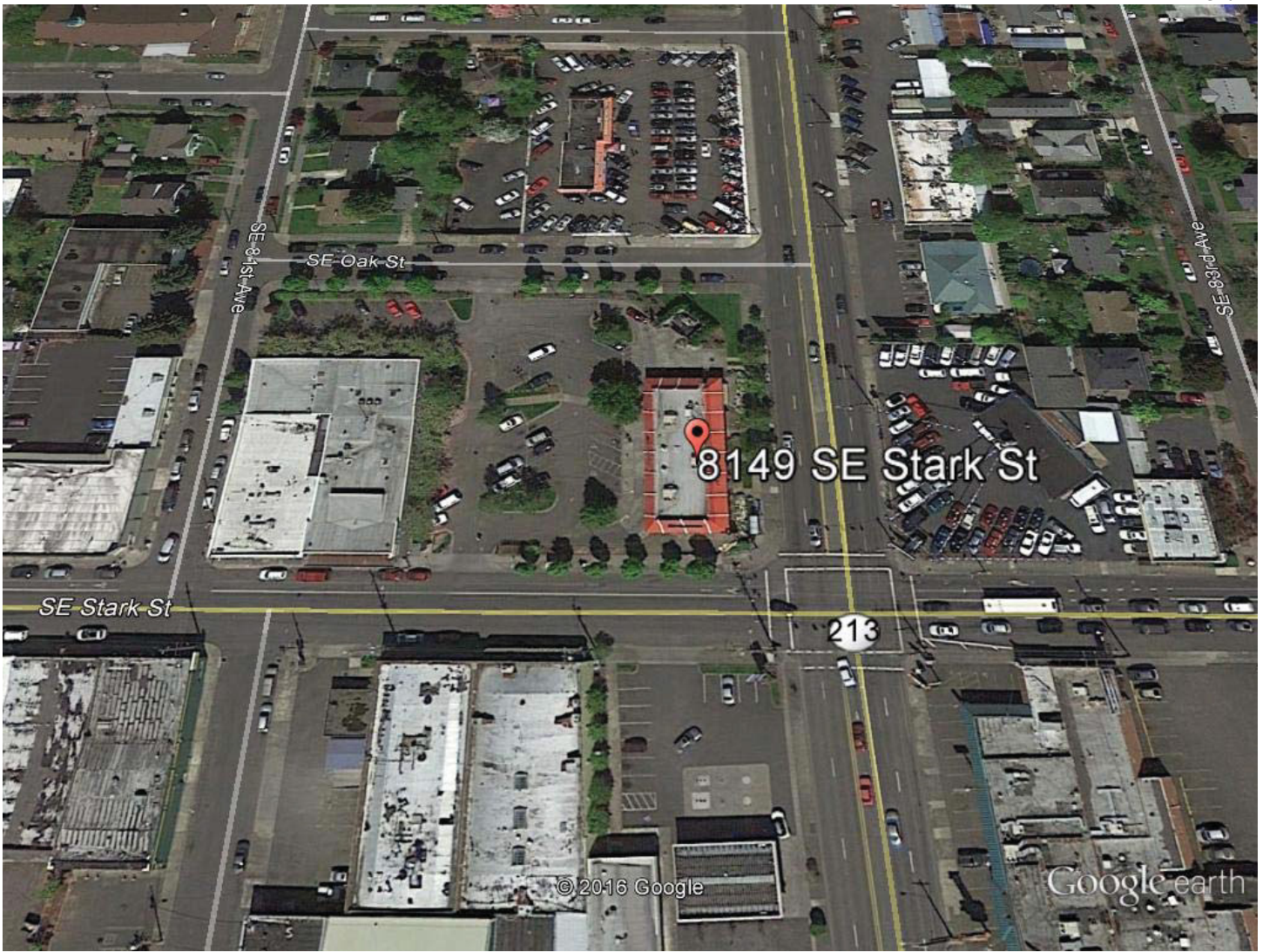


Google earth

feet 300  
meters 100







Google earth

feet  
meters





JWM Enterprises Inc. & Scoot Boots Inc.

McDonald's

1831 West Burnside

Portland, OR 97209

May 9, 2016

Katherine Schultz, Chair  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

**Re: Mixed Use Zones Project - Request for CE Zoning for McDonald's Restaurant(s)**

Dear Chair Schultz and Members of the Commission:

I am the Owner/Operator of a McDonald's restaurant, located at 1831 West Burnside, Portland, OR 97209 and 8011 NE MLK Blvd, Portland, OR 97211. I understand that the City of Portland proposes to change the zoning of my location(s) such that a drive-through will no longer be permitted. I submit this letter requesting that the proposed zoning of my restaurant(s) be Commercial Employment (CE) to ensure that my existing drive-through remains conforming with the Portland Zoning Code.

A large portion of our business derives from the operation of the drive-through facility component of the restaurants, without which they could not profitably operate. We are concerned that the proposed mixed use zones will greatly reduce our ability to maintain and modernize our drive-through facilities. As the only proposed mixed-use zone that does not prohibit drive-through facilities is the CE zone, we hereby request that our site(s) be zoned CE.

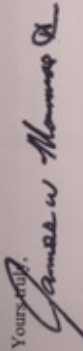
Even if McDonald's restaurants are zoned CE, we are also concerned that the existing CE zone is not truly auto-accommodating, as currently defined in Portland Zoning Code:

"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. [...] 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."



M

In addition to zoning our site(s) CE, 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.

Yours truly,  
  
James Monroe II

President, Owner/Operator  
Owner / Operator

Cc: RTF/ISC GR Committee

**From:** John Koenig [mailto:john@waterclosetmedia.com]  
**Sent:** Monday, May 09, 2016 10:45 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** "PSC Mixed Use Zones Testimony"

*I'm writing to express my concern that the proposed Mixed Use Zones Project for my family's small retail buildings and store fronts is unfair.*

My wife and I own two side by side properties on NE Alberta and 18<sup>th</sup> where we also operate our two neighborhood stores. We're not developers and are good stewards of the neighborhood and have been since 2000.

We're finding our investments and our future opportunity limited by your zoning our small block and a half as CM1, whereas the rest of Alberta is CM2.

If the goal is to set aside some history, and maintain that history on the street, there are several blocks with the same history on Alberta, and those owners may benefit from their greater opportunities in the future, while we are being singled out to save some 'history'. It's unfair.

When our neighborhood association director (Sara Wittenberg-Alberta Main Street) questioned Nan Stark, a City project planner from your Portland Planning, on the rationale for the zoning change for our small section on Alberta, she responded:

*"We are looking at ways to dis-incentivize redevelopment of our early 20<sup>th</sup> century commercial development on main streets throughout the city – preservation tools to retain the character that these buildings bring to our neighborhood commercial districts. At this time, the proposal is to zone those areas (specific blocks that contain the oldest development) CM1. That will be the case on Alberta around 18<sup>th</sup> for one to two blocks."*

As for this section of Alberta, much of the square footage has already been developed (the North side specifically), and the other properties including ours, are indeed older structures.

But if the goal is to maintain the 'character' of this area, shouldn't the plan consider offering 'historical' incentives to the property owners to maintain some integrity?

For example, neither of our structures are 'earthquake ready', wouldn't a 'grant program' be in order to help owners keep building status historically accurate?

Shouldn't a reduced "Property Tax" be given to building owners in these 'preservation' areas to keep and maintain the history, the same incentive offered to other properties we deem 'historic' in our city?

It's more than frustrating to build a business, have an asset you hope to pass on to your kid, or preserve, be limited in our use

Its not fair and is a taking of a future opportunity that just cherry picks from a street with shared history and other owners.

As someone else asked, why our block? Which really means, why the entire south side of 17-19th which is the segment of the plan that it effects the most?

I've spoken to a few property owners on our block who have also no idea the zoning changes would effect their properties. *What outreach has gone to those who've been historic owners but are unaware?* We're on a street that has been 'gentrified' and a some of these stakeholders are minorities, long term owners of properties on these blocks, but when I asked a minority building owner neighbor if his family had information the proposal, they were shocked and had no idea. They have hopes to handle their investments as good neighbors, but also be afforded the same opportunities as 95% of the remaining commercial spaces on Alberta. Again, we're small business owners, we've build our business, had the foresight to take a bit and invest in our properties as part of our future retirement, and now finding we can't do what 95% of the rest of the Alberta Street area from MLK to 33rd would be allowed to do with their assets in the future.

It's not fair. Please reconsider and either treat our entire 'rezoned' street with the same Zoning overlay, and offer building owners a reason and incentive to offset their change in designation such as reduced property taxes and grants to maintain their status as 'historical' properties.

Sincerely Concerned,

***John Koenig***

Big Green Racecar LLC/Wear More Dresses LLC

1812/1816 NE Alberta Street

Portland, OR 97211

Phone 503-998-3465

*Home Address*

*3206 NE 14<sup>th</sup> Ave*

*Portland, OR 97212*

Doug Klotz  
1908 SE 35<sup>th</sup> Place  
Portland, OR 97214  
5-9-16

To: Katherine Schultz, Chair,  
Planning and Sustainability Commission

## **Comments on Pedestrian Issues in Mixed Use Zones Proposed Draft, March 2016**

Chair Schultz and Commissioners:

I support the provisions in the Proposed Draft that emphasize the development of a pedestrian friendly city. The continued restrictions on new drive-through facilities in 33.130.260 will help reduce the deleterious effects these have on the pedestrian experience. Mapping previously CG-zoned areas to the CM-1, CM-2 and CM-3 zones will increase the pedestrian-friendly districts of the city.

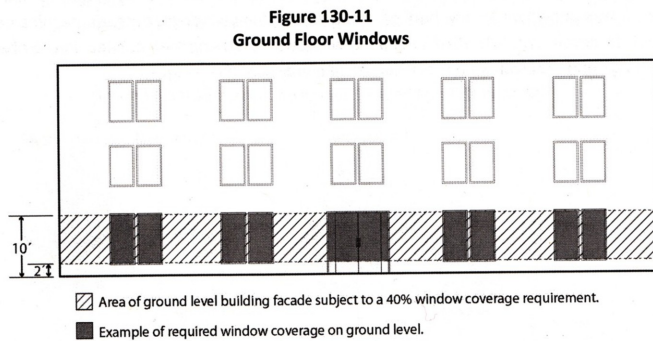
### **Ground Floor Window heights**

Likewise, I support the increase in requirements for Ground-Floor Windows in the Mixed Use Zones, from 25% to 40% of the ground floor wall area. Ground-floor Windows make a big difference for walking, giving pedestrians a view into stores and building lobbies, increasing interest and increasing personal safety by ensuring “eyes on the street” from those within the building.

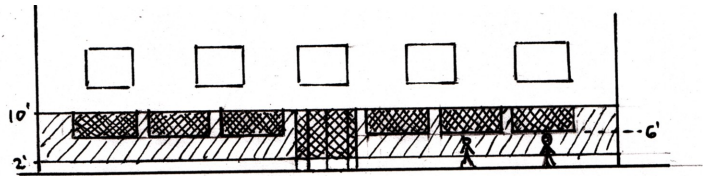
I am concerned, however, that the requirement for a 4’ high maximum for the bottom of windows is being removed from 33.130.230, C. The main purpose of the regulation is to allow pedestrians to see into stores, and for those inside to be able to see people on the outside, and see activities in the street and call for help when it is needed, as well as provide an interesting and varied pedestrian experience.

Without this maximum bottom height, there are many places where builders don’t want to have windows, and will take advantage of this, resulting in windows with their sills at 6 feet, say, and extending to 10 feet height to achieve the required window area, while leaving pedestrians no connection to the life inside the building.

Staff contends the larger required percentage will often force the windows to reach down to the 4' level anyway. Here's their diagram from the proposal:



Yet it doesn't take much imagination to see how a builder can use windows with their bottom at 6' above grade to satisfy the same requirement:



This example window, with a bottom at 6.5 feet and top at 8 feet, would count as a "Ground Floor Window" under the proposed regulation:



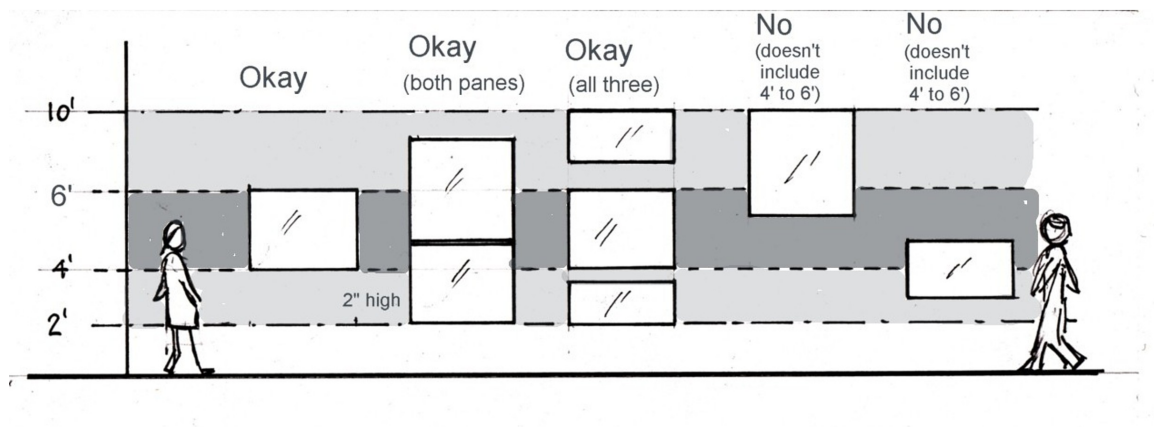


Apparently staff were worried that the 4' bottom requirement would prevent “transom” windows above the main windows from being counted toward the total:



Here’s one solution: Add this language to 33.130-230, C.:

“To qualify, a single window must have the bottom no more than 4 feet above the adjacent exterior grade, and the top no less than 6 feet above that grade. Other windows directly above and below this “qualifying” window also qualify, if between the 2’ and 10’ heights. Horizontal dividers (muntins) less than 2 inches high are allowed within any window.”



This language, while more complicated, allows the older pattern windows as well as modern window assemblies, while ensuring that windows are used within the critical height for people to see in. I think it’s worth it.

### **Screens and slats**

I also feel that elements in front of Ground Floor Windows, such as bars, slats or perforated metal screens likewise reduce pedestrian-friendliness and safety on commercial streets. These should be prohibited on Ground Floor Windows.



Slats over windows at 28<sup>th</sup> and Sandy.

I welcome the additional window percentage requirements in the Mixed Use Zones proposal, and urge the above changes or similar is made to ensure that people are able to see in at eye level on any window assembly counting toward the standard.

### **10' Setback on Civic Corridors in Eastern and Western pattern areas**

This requirement, in 33.130.215.B.1.a. seems to be the result of a misunderstanding of what makes a pleasant pedestrian environment, coupled with a plea for “more greenery”. This regulation requires buildings set back at least 10’ from the back of the sidewalk, but not that this area be all paved for pedestrians. So, it goes against principles of putting buildings up to the sidewalk so walkers can see in the windows and relate to the building. In addition, being applied in the Eastern and Western Pattern areas where the streets are already so wide that they feel hostile to pedestrians. Having PBOT require a right-of-way dedication to get a 15’ instead of 12’ sidewalk, would allow for bigger street trees in the walk, and more buffering area for pedestrians.

Instead, this misguided requirement will result in an interrupted landscape buffer between the pedestrian, and the building, instead of concentrating larger trees between the pedestrian and the street.

The effects of this type of requirement can be seen on SE Powell, which has had such requirement for decades:



This requirement should be removed, and efforts concentrated on getting a wider sidewalk requirement on Civic Corridors, whichever Pattern Area they are in, so that larger tree-wells fit within the sidewalk. There can be landscaping near the curb, but not separating the walkers from the commercial building frontage they want to access.

Thank you for your attention to these small details that make or break the pedestrian environment.

A handwritten signature in black ink that reads "Doug Klotz". The signature is written in a cursive, flowing style.

Doug Klotz

**From:** Marshall Johnson [mailto:marshall.d.johnson@gmail.com]  
**Sent:** Monday, May 09, 2016 5:24 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Mixed Use Zone Project team-

Our city is desirable—we have a great climate, wonderful neighborhoods, creative residents, and a history of taking bold action. Portland has been a leader, with over 30 years of vision demonstrating a commitment to maintaining the regional ecosystem as demonstrated through initiatives like the UGB, public transportation infrastructure, transit oriented development, and the comprehensive plan. Current market conditions are bringing a convergence to 30 years of planning and makes now an important time to continue to think big and embrace growth and change.

The city should continue to provide infrastructure for market forces to compliment comprehensive planning goals. Dwellings in mixed used zones bring diversity into our neighborhoods. As our neighborhoods adapt and expand to meet changing community needs, I urge the Portland Planning and Sustainability Commission to consider the following elements in finalizing the Mixed Use Zones plan:

- Expand upon past efforts by continuing to demonstrate Portland as a leader in building active, vibrant neighborhoods.
- Make it practical for developers to add vibrant, mixed-use buildings to help meet the needs of the future. Encourage policies that create a framework for vibrant neighborhoods through increased density, while allowing flexibility and creativity for the market to respond as land values increase and building practices evolve over time
- The Low Rise Commercial areas plan goes too far to limit development potential in key areas that are best positioned to support density. These buildings, often in older street-car era areas, will turn over slowly and may outlive their useful purpose. There are existing tools to target resources or create incentives to encourage preservation (ie, historic and/or conservation districts) while allowing the cycling in of new development that can meet future community needs.
- Building Height requirements in CM2 and CM3 zones allow for taller first floors to encourage ground floor retail/multi-use. Efforts should be made to encourage a variety of purposes for mixed-used buildings in CM1 zones—both as intended and future uses. These rules need to do more to promote increased height allowance of first floors, which may have varying uses now and adaptability in the future to meet changing needs as the corridors and neighborhood purposes evolve.
- Building Articulation—a variety of building facades and aesthetic details, many of which contrast existing forms, have popped up all over the city over the past decade. This display has resulted in patterns recreated in varying districts, as well as unique structures not to be replicated. I believe the intent of creating Façade articulation is to standardize aesthetics and I worry the revised draft goes too far in mandating how buildings should aesthetically fit into a neighborhood. Articulation is best left to designers and architects who are responding to established criteria as specified in the building code and to allow freedom for creative development without mandated requirements.
- Encourage a framework for the city to accommodate diversity, underrepresented communities, and affordable housing. The plan should go further and do more to prioritize support for affordable housing as part of the mix. Now that Inclusionary Zoning is legal in Oregon, the plan needs to incorporate additional consideration to leverage this



vehicle. The city and BPS must incorporate the perspective of underrepresented residents—those with lower incomes, artists, future residents, renters, millennials, etc. While neighborhood associations have supported the city in revitalization of depreciated neighborhoods, they are becoming an outdated vehicle to represent a broad variety of perspective. I urge the city to develop new ways of incorporating a more diverse, equitable framework in planning for our future needs.

- CM 1, 2 and 3 zones should be oriented around walking, biking, and cars, such that the infrastructure is designed to meet the future needs of an urban area and the 20-minute neighborhood. The proposed Comp plan policy restrictions should not be loosened to accommodate drive thru services for Fred Meyer or other retailers like gas stations, fast food, or drug stores. New drive-thrus should be prohibited in the Central City, Centers, and Corridors.

Best regards,

Marshall Johnson  
2133 SE 47<sup>th</sup> Ave.



**From:** Zach Holz [mailto:[zach.a.holz@gmail.com](mailto:zach.a.holz@gmail.com)]  
**Sent:** Monday, May 09, 2016 7:22 AM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** PSC Mixed Use Zone Testimony

Hi there,

Thank you for allowing residents to provide some testimony/feedback about the new mixed use zones. I only have some brief comments.

First, I wanted to thank you for working to bring these regulations up to date, and out of the era of auto-oriented development! I am thankful to live in a city where we pay attention to the future of walkable, bikable and transit-oriented neighborhoods. I support nearly all of the changes being made in the MUZ Proposed Draft.

I live in the Richmond neighborhood, in one of the new mixed use buildings on Division. Even though I've lived all over in Portland during my 8 years here, I love my current building, and the ease in which I can get everything that I need within walking and biking distance, allowing me and my partner to live our dream of being a no-car household. I owe this luxury to the density of our urban corridors.

While I understand the concerns of some neighbors who are frightened by the pace of change in their area, I do not think that building scale restrictions, like the ones proposed on Division between 35th and 37th, or on Hawthorne between 35th and 38th, are a sound way to address the housing crisis we are in. Historical preservation is important, but not when it is used as a tool to block new people from moving to a neighborhood. One (and even two, sometimes) story buildings, unless they are of significant historical importance, do not belong on major arterial streets like Hawthorne and Division.

Division has not been a "streetcar suburb" for quite some time. Until the city redesigned the streetscape from west of 39th, Division was just another auto-oriented arterial. The plea to save its "streetcar character" is a bit of a red-herring, serving only current property interests in the neighborhood, and not its future residents, many of whom will move here for density, walkability and transit-oriented access.

Please do not make it more difficult to build multistory, multifamily housing in the neighborhoods that need it most -- those close in to the inner city. These are desirable areas, for many reasons, and we need to allow as many people as we can to take advantage of their benefits, encouraging those who are able to live without cars. (So, also, please no new parking requirements either on apartments, unless the entire neighborhood signs on to parking reform/permitted parking.)

Otherwise, I support many of the other changes! I particularly like the new benefits on page 2 of the MUZ proposed draft, with required outdoor access for residents (e.g. balconies) and a minimum activation of ground floor space for retail, etc.

Thank you for your work on this, and I look forward to seeing these changes in the upcoming years.

Best,

Zach Holz  
3150 SE Division St, Apt 309  
Portland, OR 97202  
240.315.8087



May 9, 2016

Dear Members of the PSC,

The Hosford-Abernethy Neighborhood Association (HAND) wishes to testify about regulation 33.130.100 B 2 c, which adds a limitation to the CM1 zone for sites less than 7,500 sq. ft. that abut properties that are in a single family zone, and are operating as Retail Sales and Service. The proposed rule would limit hours of operation to 6AM - 11PM.

We strongly support adding specific limitations for commercial sites in primarily residential areas, and have requested such limitations be codified in previous testimony. However we believe the current proposal is lacking in some fundamental ways. In HAND, we have three sites that would be affected by these rules, all of which are currently zoned residential and have non-conforming commercial uses. Neighbors of these sites currently have protections against noise, redevelopment, and increased impacts that they stand to lose under the new rules.

- Existing regulations limit daytime noise emitted from non-conforming residential sites as measured on the property line of the nearest residential receiver to 55dBA (nighttime noise limits are lower) [City of Portland Charter Chapter 18.10.010], however if these properties are granted commercial status, permissible noise levels will increase to 60dBA. Given that a 10dBA increase represents a doubling of perceived volume, 5dBA is a significant increase. The code should specify that isolated commercial sites such as these have the same noise emission limits as residential sites, which is the rule today for non-conforming properties.
- With commercial zoning, it would be possible to redevelop these sites for high-density residential use with no commercial elements at all, an ironic outcome given that the stated reason for making them commercial is to retain commercial use on these sites so they can continue providing services to the surrounding residential areas. We want the zoning rules to require that, at a minimum, the ground floor must remain in commercial use should the site be redeveloped. An alternative might be to specify that should these sites be developed as entirely residential, the permitted density would be that of the highest density adjacent residential zone. Without one of these proposals, we fear development pressure might cause the loss of the commercial function that is critical to maintaining a livable community.
- There are currently restrictions on change-of-use that would trigger review if the cumulative impacts of a site increase. This restriction is important to ensure a change in use would remain compatible with a neighborhood setting. This existing review mechanism should be added back to the zoning code. As an example, nearby residents

are concerned that the quiet naturopathic office on SE Clinton currently in non-conforming use might someday be bought and converted into a rowdy karaoke bar, which would be possible under the proposed rules. While this is an extreme example, it highlights the significant impact that a single isolated commercial property can have on its neighbors.

- The proposed rules should apply to all commercial uses, not just Retail Sales and Service. The intent here is to limit nighttime noise and activity and to limit other impacts to neighbors from these sites; we believe these rules should apply to all commercial uses.

One other major shortcoming of the proposal as it stands is that it only affects properties adjacent to single family zones. This should be changed to include any residential zone; we firmly believe that all residential uses should enjoy the protections this rule is intended to convey, especially now that home ownership is financially out of reach for many households in Portland. HAND has one site (1540 SE Clinton St.) that meets the size criteria for the new commercial zoning rules, but is zoned R1/R2, which means the new rules would not apply to this site as it is surrounded by multi-family zoning.

The code would be simpler to apply and understand if you were to recommend creation of a new zoning category, perhaps called CM0, that could be applied to small, isolated commercial sites such as these. It would be more clear if designated properties could be given the CM0 designation outright, rather than having special rules within the CM1 zone that applied only to certain properties under certain conditions.

We would like to clarify that we are not opposed to commercial uses' being interspersed throughout residential neighborhoods. Quite the contrary, we greatly appreciate the benefit that commercial properties can provide to their neighbors, and the role they play in helping to create livable neighborhoods. Rather, we want to ensure that these commercial properties can exist harmoniously with their residential neighbors, and are requesting these rule changes toward that goal.

Whether with a CM0 or CM1 designation, we ask that the proposed zoning rules be updated to include the additional restrictions that are in place today for non-conforming commercial properties. These rules have long worked well for businesses and residents alike. The unique relationship between residential areas and the isolated commercial sites embedded within them requires different rules than are needed for larger commercial areas.

Thank you,

Susan E. Pearce  
Hosford-Abernethy Neighborhood Association Chair

**From:** Jennafer Furniss [mailto:jennafermarie@gmail.com]  
**Sent:** Monday, May 09, 2016 9:21 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Testimony for Mixed Use Project  
Submitted by  
Jennafer Furniss  
1534 SE Rex St  
Portland, Or 97202

Sellwood was founded in 1883 with SE 13th at its center. SE Milwaukie has served Portland since the 1840s when settlers made their homes after their long journey on the Oregon Trail. These two streets make up the town center which has been cherished as a pedestrian centered community for over a hundred years. It is a distinct walkable community and in the future should continue to be a distinct walkable community as our city grows. It deserves a design overlay. This is a unique and historic center of town, not one that investors with no stake in the community should be blot with cookie cutter development unsuited to the neighborhood without acknowledging the architectural and communal living history of Sellwood Moreland. Other neighborhoods such as St. Johns, Kenton, Mississippi have a design overlay and SE 13th and Se Milwaukie have earned the same respect.



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

From: Christopher Eykamp [mailto:chris@eykamp.com]

Sent: Monday, May 09, 2016 1:42 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Testimony

Dear Members of the PSC,

I wish to testify about regulation 33.130.100 B 2 c, which adds a limitation to the CM1 zone for sites less than 7500 sq. ft. abutting single family zoned residential properties, which operate a Retail Sales and Service business.

Sites that fall into this category will be small businesses, usually within a single building, and will be mostly or completely surrounded by residential buildings. These sites provide valuable commercial services, but also pose distinct challenges based on their residential setting. They are intended to be small and low impact (per Goal 10.1.13). Therefore, special rules, especially those related to noise and nighttime activity (one of the most common points of residential-commercial conflict), are needed.

The currently proposed rule limits hours of operation to 6AM - 11PM, which is a good start, but is not sufficient for small commercial sites operating in residential areas.

Rules for noise emission (City of Portland Charter Chapter 18.10.010) are based on zoning. Most isolated commercial sites are currently zoned as residential; once rezoned to commercial they would fall into a different noise category, and could emit noise 5dBA louder noise than they currently do. I would ask that the zoning code specify that, for noise purposes, isolated commercial sites be treated as residential. In most cases, this will not result in a change of rules from how they are currently treated, and will help protect residents living nearby from uncomfortable levels of noise.

Another concern is that, due to their potential for high-density residential development, isolated commercial sites pose tempting targets for redevelopment in our current real estate market. I would ask that there be a requirement that if redeveloped, these sites retain a commercial element (for example, that the ground floor must remain 100% commercial) in order to ensure that the sites continue in active commercial use. An alternative course would be to allow residential redevelopment only to the level of the surrounding residentially zoned properties. That would lower the pressure for redevelopment, helping to preserve access to commercial services by the community.

Finally, these rules should apply to all commercial sites, not just those categorized as Retail Sales and Service. While it is true that retail services, restaurants, and bar uses are of greatest concern to neighbors, any business that has the potential for late night operation (with the coming and going of customers) would be of concern to adjacent residents.

Thank you,

Chris Eykamp  
2101 SE Tibbetts

**To whom it may concern**

**Portland, May 9<sup>th</sup> 2016**

**I have lived in Sellwood in the same house for 27 years.**

**My house was built in 1928 and has all the charm, character and soul of that era.**

**What appealed to me then, was the small town feeling, the alive community, the beautiful neighborhood, charming homes, magnificent trees and being able to walk safely in beautiful streets.**

**It is what appealed to me, and it is what I still want for Sellwood.**

**It is an historic area and was founded in 1883 with 13<sup>th</sup> street and Milwaukie avenue at its center.**

**It needs a design overlay like other neighborhood have such as St Johns, Kenton and Mississippi.**

**Let's not ruin the heritage it gives us by having too modern, cookie cutter development in our beloved neighborhood (like the black box next to Gastro pub on Milwaukie avenue).**

**It surely does deserve a design overlay before developers ruin the character of it and it loses its charm and history forever.**

**Thank you**

**Elizabeth Ereckson**

**1345 SE Bidwell st**

**Portland, OR 97202**

**etenafisa@comcast.net**

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

From: Michelle Easby [mailto:micheasby@icloud.com]

Sent: Monday, May 09, 2016 11:03 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: Sellwood- Westmoreland

I am writing with hope that it is not too late to save the historical Sellwood-Westmoreland neighborhood. Developers are overwhelming the area with oversized structures that do not fit the character of this charming Portland neighborhood. I believe that there needs to be limits on the height of buildings so as not to overshadow the existing houses. This neighborhood is a special place and one that I am proud to call home. Thank you for your time.

Sincerely,

Michelle Easby

1435 SE Flavel st Portland OR 97202

Sent from my iPad

May 9, 2016

Planning & Sustainability Commission,

My name is Brent Carpenter, and I'm testifying today about our property at 3905 SE Main St.

First off, I want to express our gratitude to the Mayor and BDS who requested and supported the re-designation of our property to Mixed Use/Civic Corridor.

3905 SE Main sits on the intersection of SE Main and Cesar Chavez. Those familiar with the intersection know that the three other corners embrace Fred Meyer, US Bank and Da Lat Restaurant. Our property is the only one on the intersection that is not zoned commercial.

My wife and I have owned this rental property since 2003, and over the years, we've improved this once neglected house into a neighborhood asset. We currently rent out two units in the house.

Sitting on the Cesar Chavez corridor, the house is well suited for mixed used as residential and office space. In that event, we would move our small businesses into the first floor flat and keep the upper unit as a long-term rental.

My wife and I own two successful businesses that both need space to grow. My wife's company employs three agents and one full-time assistant, and my company scales to hire dozens of freelancers for projects.

Our property at 3905 SE Main would provide the space and lower overhead to grow our respective companies and hire additional employees and freelancers.

While we're very sensitive to the affordable housing crisis in Portland, we feel it's critical to balance those objectives with the importance of creating of real wage-earning jobs.

Both of our companies are prime examples of the types of small businesses which help create healthy employment opportunities. It's our firm belief that good paying jobs are just as critical in alleviating Portland's affordable housing challenge.

By rezoning 3905 SE Main, you will help small business to flourish in Portland and make a positive impact on our local economy.

We support it. The Mayor supports it. BDS supports it. It's well-reasoned and sensible.

We respectfully ask you today to change the zoning for 3905 SE Main St. to Mixed Use/Civic Corridor.

Thank you,

A handwritten signature in black ink, appearing to read 'Brent Carpenter', with a long, sweeping horizontal stroke extending to the right.

Brent Carpenter  
PO Box 14336  
Portland, OR 97293



B L A C K

H E L T E R L I N E LLP

ATTORNEYS AND COUNSELORS AT LAW

PHILIP J. WUEST  
DIRECT DIAL: (503) 417-2152  
E-mail: [pjw@bhlaw.com](mailto:pjw@bhlaw.com)  
*Oregon and Washington*

May 9, 2016

***VIA E-MAIL ONLY TO: PSC@PORTLANDOREGON.GOV***

Mixed Use Zone Testimony  
1900 SW Fourth Ave., Ste. 7100  
Portland, OR 97201

Reference: Mixed Use Zoning Project Proposals No. 1501 and No. 1107

Dear Mr. Manning:

I represent Mr. Thomas Brown. Mr. Brown owns all of the property at the southwest corner of Bybee and Milwaukie in Westmoreland (the "Brown Property"), the area bounded by Bybee to the North, Rural Street to the South, 16<sup>th</sup> Avenue to the West, and Milwaukie to the East which amount to approximately 54,000 square feet. The Brown Property is proposed for significant and economically damaging downzoning from CS to CM1 (the "Proposal"). This letter requests that the City of Portland abandon its current and patently unfair Proposal and, rather than apply a punitive downzone, treat the Brown Property the same as all other properties currently in the CS zone on Milwaukie in Westmoreland and apply the newly created CM2 zone.

Mr. Brown has been working and investing since the 1980s to assemble the property now proposed for downzoning by the City of Portland. It was Mr. Brown's intentional strategy to invest in CS-zoned property and, after years of hard work and perseverance, Mr. Brown has assembled ownership of all seven parcels that make up the Brown Property. Some of that property is mortgaged with mortgages that are based on the value of the property with CS zoning. All of the buildings on the Brown Property, with the exception of one new building constructed by Mr. Brown at the corner of 16<sup>th</sup> and Bybee, are so old that the only real value is in the land itself.



805 SOUTHWEST BROADWAY • SUITE 1900 • PORTLAND OREGON 97205-3359  
TELEPHONE 503.224.5560 FACSIMILE 503.224.6148 [WWW.BHLAW.COM](http://WWW.BHLAW.COM)

Ord. 188177, Vol. 2.3.H, page 10175

Mr. Brown manages and maintains the buildings on the Brown Property and has done so for years as a family business which Mr. Brown's son now helps to manage and which the family intends to own for generations. It is and has been the Browns' intention to someday redevelop the property. The Browns are heavily invested in Westmorland in every sense and have long been dedicated to its success as good neighbors and citizens. Now, the City's proposed reversal of the current CS zoning, which amounts to a reversal of long-standing City policy of encouraging density and redevelopment, singles out Mr. Brown (and a very few other similarly situated property owners) for economically adverse downzoning and threatens to undercut Mr. Brown's many years of hard work and investment.

The City's foundation for the Proposal is thin, apparently based on some (but not a lot) of testimony expressing concern about the character of Neighborhood Centers. While the underlying concern expressed in that testimony may be valid, the City, apparently for the sake of convenience or expediency, has selected the wrong tool to address those concerns. In a city like Portland, using downzoning to preserve neighborhood character is like using a six pound sledgehammer to drive a three penny nail. It is simply the wrong tool; it may get the job done, but will almost certainly cause a lot of collateral damage. We expect Portland, with a long tradition of smart planning and a long-standing policy of accommodating growth and density through redevelopment, to develop and implement smarter and better tools to get the job done, not to simply pull out the biggest hammer that happens to be in reach.

The proposed downzoning is drastic. Today, under the CS zone, the FAR is 3 to 1 and the base maximum height is 45 feet. Exhibit A attached here is a rendering of a building that could be built on the site under the current zoning. The proposed CM1 zoning, with the Main Street Overlay, proposes a maximum 2 to 1 FAR and a 35 foot maximum height. The difference in development capacity and land value from the proposed zone change for the Brown Property is staggering. Over the entire Brown Property, the reduction of 1 FAR amounts to a 54,000 square foot reduction in development capacity (reduced from a total potential of 161,866 sqft down to a total potential of 107,923 sqft). At the commercially reasonable rate of \$165/square foot, the City is proposing, in a single punitive stroke, to sever nearly \$3,000,000.00 of potential value from the Brown Property.<sup>1</sup> Loss of even half of that value would be staggering, yet even the CM2 zone proposes to reduce maximum FAR from the current 3:1 in CS to 2.5:1.

The Brown Property is also included in the Bybee Light Rail Station Area because it is within ½ mile of the Bybee Light Rail Station. Page 44 of the September 2009 *Portland to Milwaukie LRT Station Area Best Practices Assessments and Recommendations* lists

---

<sup>1</sup> Loss of land value is: \$165/SF \* 53,962 = \$8,903,730, Loss of 33% of FAR due to proposed rezone = \$8,903,730 \* .33 = \$2,938,231; Loss is \$2,938,231.



as one of the Transit Supporting Land Uses the fact that “The far western edge of the one-half-mile station area captures the intersection of SE Bybee and SE Milwaukie, the heart of the Westmoreland business district.” Now that the light rail line is open, the City is proposing to downzone commercially-zoned land in a light rail station area in the heart of the Westmoreland business district. It is inconceivable that the proposed downzoning is consistent with City of Portland and Metro transportation and land use plans and policies.

The Proposal is clearly inconsistent with Comprehensive Plan Policies. For example, *Policy 3.13* describes the role of centers as follows: “Enhance center as anchors of complete neighborhoods that include **concentrations of commercial and public services**, housing, employment, gathering places, and green spaces.” The proposed downzoning would deconcentrate development. *Policy 3.36* states “In Neighborhood Centers, provide for **higher concentrations of development**, employment, commercial and community services . . .” Here the City is proposing to lower concentrations of development in a neighborhood center. The Proposal is similarly inconsistent with the *Sellwood-Moreland Neighborhood Action Charts*, adopted by City Resolution No. 35663. Action BG 11 sets forth as an ongoing action to “Strengthen **urban design and economic function of core intersections**,” including the intersection of Milwaukie and Bybee. *Comprehensive Plan Policy 3.42* provides direction on how to maintain and enhance district identities: “Use historic preservation and design review tools to **accommodate growth** in ways that preserve historic resources and enhance the distinctive characteristics of Inner Ring Districts, especially in areas experiencing significant development.” Here, rather than implementing the City’s policy with carefully considered design standards to accommodate growth, the Proposal seeks to simply limit growth. The Proposal, therefore, is flatly inconsistent with the City’s land use planning principles, plans and policies.

For the reasons set forth above, we request that the City discontinue further consideration of the Proposal to downzone as a means of maintaining neighborhood center character because it is punitive and inconsistent with the City’s transportation and land use policies. As described above, even a change from CS to CM2 would still deprive Mr. Brown of hard-earned value, but would not be nearly as damaging as the proposed change from CS to CM1. Moreover, a change from CS to CM2, rather than CM1, would treat Mr. Brown the same as all other CS-zoned property owners in the area rather than singling out Mr. Brown and a few others for disparate and unfair treatment.

If, despite the problems with the Proposal identified in this letter, the City persists in its current course, we recommend the City invest the time and resources necessary to develop design standards to accommodate growth rather than use the sledgehammer of downzoning to limit growth. If an applicant can demonstrate compliance with such design standards in a Neighborhood Center, they should be allowed to develop under the CM2 code as a matter of





right. With design standards in place, the City could achieve its purported policy objective of retaining the character of Neighborhood Centers without having to ignore other comprehensive land use and transportation policies which support accommodating, but not limiting, growth.

Very truly yours,



Philip J. Wuest

PJW:pjw  
Attachment  
1152026\_3







PSC MIXED USE ZONES TESTIMONY

May 9, 2016

I am Libbi Albright. My husband and I own a property at 1427 N. Bryant, 97217. We are strongly in favor of the proposed rezoning. In our case our property will be rezoned from EX to CM3, which allows higher density, particularly for low-income housing.

Portland is obviously booming. People are pouring in, raising home prices and rents for lucky homeowners. But what about the not so lucky ones, the homeless and those who can't afford such high rents?

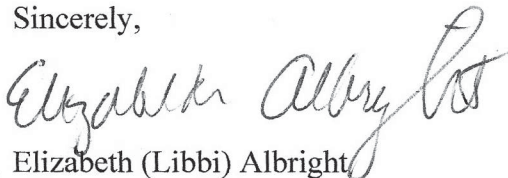
I was originally planning to sell the property this summer. It is one block from the Interstate Fred Meyer's, and a light rail station. But as I spent time at the property, preparing it for sale, I started to get to know the homeless and handicapped people who spend a lot of time near our property. They are some of the kindest, sweetest and uncomplaining people I have ever met, which has given me a lot to think about.

So I've taken our home on Bryant off the market in the hope that we can somehow develop low-income/homeless housing on it. I need to learn who to talk to for more information about possibilities and programs. I have seen some terrific projects, such as one involving micro housing between N.E. Halsey and Broadway, across from Trader Joe's. Perhaps a project like that could fit on our approximately 3,500 sq. ft. lot. I would love to know who the builder/owner/developers are. I am also a big fan of the Orange Splot project across from Peninsula Park.

I believe the best and highest use for our property, with its proximity to Light Rail, Fred Meyer's, and easy access to medical care, such as Kaiser Permanente, would be high-density housing for low income or homeless people. I appreciate any guidance and information you can offer.

Thank you.

Sincerely,



Elizabeth (Libbi) Albright  
Albright Properties, LLC  
204 Oswego Smt  
Lake Oswego, OR 97035

(503) 317-3062  
libbial@gmail.com

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

From: Dave Monnie [mailto:dave@monnie.com]

Sent: Sunday, May 08, 2016 3:17 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

I am writing this letter as a resident in the SMILE neighborhood association area, and would like to add my voice to the following concerns:

- I would like to see the maximum height of commercial development along 13th Ave to be kept at 3 stories, keeping this neighborhood business corridor at CM1 zoning - not CM2.

- I would like the design overlay to be applied to our commercial corridors.

Thank you,

David Monnie  
1146 SE Lambert St  
Portland OR 97202  
971-221-3947

**From:** Reid Joan [mailto:joansbone@yahoo.com]  
**Sent:** Sunday, May 08, 2016 1:07 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Cc:** Joan Reid <joansbone@yahoo.com>  
**Subject:** PSC Mixed Use Zones Testimony

## PSC mixed Use Zones Testimony

Area addressed:

Northside of NE Broadway between NE 7<sup>th</sup> and NE 27<sup>th</sup>

This mixed use zone area is included in Irvington Historical District. Some of the buildings in this mixed use zone are listed as “contributing” to the historical district. Design and size of buildings in an historical district is an important part of keeping Portland unique and interesting.

As a residents/owners of 100 year old historically contributing building which is directly adjacent to this zoning area, we are writing to advocate that this zoning area:

1. Not allow any bonus features in any new construction. The current proposed zoning plan in this area apparently has been modified to dis-allow bonus features in historical district and we support this modification.
2. Add a design overlay to this zone.
3. Apply height transitions and buffering (as in 33.130.210) to any mixed use buildings next to residential **historical** district (to apply to both R-1 and R-2 zones in **historical** district).

Thank you for your consideration of our concerns:

Members FE Bowman Irvington Condo Assoc.  
Joan Reid (unit #1) (email: [joansbone@yahoo.com](mailto:joansbone@yahoo.com))  
Tyler Matta/Bianca Bartel (unit #2)  
Janis Bailey (unit #3)  
Ben Ross, Jade Frank (unit #4)

**1731 NE 25<sup>th</sup> Ave**  
**Portland, Oregon 97212**

**From:** Jennafer Furniss [mailto:jennafermarie@gmail.com]  
**Sent:** Sunday, May 08, 2016 6:24 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Southeast Milwaukee has served as a roadway for the citizens of Portland for over 150 years.

It became a thoroughfare in the 1840s by settlers who arrived after the long journey along the Oregon Trail. A roadway so long ago etched in our past will prove important in the future of Portland, as so much of it is zoned commercially as well as it is next to SE 17th street which is mostly r2.5ad. This means there is a future of increased density along this narrow main street from our past. It is not near a freeway and already well known for congestion, so it is especially important that alternative transportation and pedestrian friendly buildings be essential while planning the zoning of this street. The street is rather narrow by modern standards and is in Westmoreland and Sellwood primarily dotted with local businesses, small apartment complexes and single family homes. There are some historical buildings of particular fondness at the intersection of Bybee and Milwaukie, that provide historical relevance and community center.

The Proposed Mixed Use Zone places a design overlay over part of historic Westmoreland to respect its place at the heart of a residential community which has long enjoyed walking along its corridor. This design overlay is essential for SE Milwaukee to be a safe place for community to grow and flourish. This street if neglected will become dangerous for pedestrians, many of which are children, and cyclists coming home at night, as well as polluted from congestion. It is a narrow street by modern standards unconnected to a larger vein for traffic like the I-5 do congestion here will come quicker and be worse as a result if not planned for. Also parking overflow into neighborhoods has its own ramifications for the safety of children who ride their bikes along its streets as well as neighborhood community. It is very important that Milwaukee is developed in responsible way.

The design overlay at the heart of Westmoreland that would help development come to its best and most responsible use extends from Se Tolman to Se Knapp, stopping quite suddenly although the commercial zone extends three more blocks. These three blocks are occupied by low rising small businesses, small apartment complexes and and single family homes. These three blocks are bordered by nearly hundred year old homes occupied primarily by families, meaning there is a large population of children riding bikes and learning to walk surrounding this center, and as density increases there will be more. The design overlay should continue over these three blocks from SE Knapp to SE Malden. It is important for safety and for building upon the pedestrian community which has lived here for generations and walked this corridor.

The heart of Westmoreland along SE Milwaukie has a long history in Portland, and a bright future if we put in place guidelines for smart, responsible density. The design overlay should be continuous rather than stopping three blocks short. The intersection of Bybee and Milwaukee maintained at the CM1 status. This historic street has served us well for over 150 years, we need to serve it well by allowing it to serve at its best use as a pedestrian thoroughfare with deep roots in our city's history.

Thank you,  
Jennafer Furniss

**From:** Jennafer Furniss [mailto:jennafermarie@gmail.com]  
**Sent:** Sunday, May 08, 2016 5:26 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Testimony regarding the Mixed Use Development Project Proposal  
Submitted by  
Jennafer Furniss  
1534 SE Rex St.  
Portland, OR 97202

Sellwood was founded in 1883 and became the home of those who worked the mill and streetcar workers. It was a modest little town with modest and lovely homes, its center was bustling with neighborhood business and there was communal pride in the brick buildings that housed the bank, the grocer, and so forth, business even trickled to the downstairs of lovely Victorian homes while their owners resided upstairs. Generations would stroll its boulevard on sunny days, parents bought penny candy for their children here who would later buy nickle candy for their own and so on and so forth through time. The center of Sellwood is one cherished by the community, and the old buildings who have stood a hundred years are as much a pride to its residents today as a hundred years ago.

They say architecture is destiny. It tells us where we are from and where we are going. That is why it is so important that all the street zoning for SE 13th from SE Harney to SE Malden be CM1. This historic center deserves the respect to grow as the pedestrian friendly center it has always been in its heart. Indeed one of the flagship buildings marked on Mixed Use Zone website as a staring example of responsible development in the CM1 style is the Sellwood library building, one we all take pride to have on our street. The Sellwood area already has a significant amount of CM2 zoning along Tacoma and other sections of the neighborhood, but 13th is a special place with a special history and a special relationship with the individuals who love its shared heritage.

This is another reason SE 13th deserves a design overlay. This is a unique and historic center of town, not one that outside investors with no stake in the community should be able to do quick and cheap without acknowledging the architectural and communal living history of Sellwood. Other neighborhoods such as St. Johns, Kenton, Mississippi and others have these protections and SE 13th deserves the same respect.

The CM1 designation has been placed on large swathes of NW Portland and along N Interstate and N Williams. Surely SE 13th, a community center with a long history of being a walkable neighborhood should be appreciated with the proper designation of CM1, a bustling pedestrian centered street where residents of the surrounding neighborhood come together as they have for generations.

Thank you,  
Jennafer Furniss



May 8, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zone Testimony

Dear Planning Commissioners,

For the last month I have been aware that a change was made to the zoning map. That change is to my commercial property at 4410-4416 SE Woodstock Blvd. I have been engaged in the Comp Plan Process since its conception as I have worked with the neighborhood and the City regarding a split-zone at that address.

The new surprising zone map change to down-grade my property is prejudicial and unfair. My property is currently zoned CS and the change to CM2 already impacts my rights. An additional down-grade to CM1 is a second hit.

Woodstock is a small district. We cannot afford to lose opportunities in the core. The only thing I can see this accomplishing is current buildings further decaying while the rest of the district thrives around them causing the core to die.

The buildings selected on Woodstock do not fit the criteria for historic preservation. They are not quality buildings and include New Seasons that was built in 2015. I believe the City failed to meet their criteria as this block alone takes up close to 30% of the properties picked. It is built to current CS code and is a mis-match to the proposed CM1 zoning.

Woodstock Blvd. has a 80 foot right-of-way. A criteria used for higher zoning than even CM2. Yet, the City thinks these properties should be CM1. This is inequitable and makes no sense.

Woodstock did not ask for this. Woodstock was not asked if they wanted this. I was not asked if I want this. The idea that one neighborhood in SW could force this onto 14 neighborhoods on the east side is wrong. If some of those 14 east side neighborhoods decide this is for them, great. It is not for Woodstock.

Woodstock has their own vision. We worked hard to have the City clean up the commercial district lines and inconsistencies. This new last minute proposal goes against Woodstock's vision and puts Woodstock in the back seat compared to the rest of the City's plans for the future. I ask today that this proposal be reversed on my property and that it and the Woodstock business district are exempted from further consideration.

Respectfully.

Tim Even

Effected Property: 4410-4416 SE Woodstock Blvd. (4416 Split-Zone)  
4410 SE Woodstock #250  
Portland, Oregon 97206

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201

Subject Address: 8113 SE 13<sup>th</sup> AVE

Owners: Aaron & Cynthia Brown

Current Zoning: CS

Proposed Zoning: CM1

Subject: Protest of Proposed Zoning Change of CS Properties in Sellwood/Westmoreland to CM1

**Our position: Zoning, if changed, to be CM2**

We are the property owners of 8113 SE 13<sup>th</sup> Ave Portland, OR which we purchased in 2006. At that time we had been looking for 4 years throughout Portland for property that had location and commercial zoning for investment. Our property sits at the SW corner of Tacoma Street and SE 13<sup>th</sup> Avenue. The main frontage faces Tacoma, which is the major corridor servicing the Sellwood bridge not only for the neighborhood, but East Multnomah and Clackamas counties. Being the primary intersection we are at the heart of the Neighborhood Center. It is the only part of Tacoma that has 4 lanes of traffic (*please refer to the attached exhibits 1-4*). We are surrounded by commercial uses and our land is not adjacent to any single family residential property. With New Seasons, 2 major banks (On-Point and Key Bank), Starbucks, Columbia Sport Outlet, and many other commercial entities as our neighbors.

We agree, with the commission in trying "help manage growth to create more vibrant places, increase housing choices, and enable businesses to thrive and meet the daily needs of nearby residents." In the past 10 years we have watched Sellwood change. Businesses struggled while the bridge was being built, but we knew if we could survive, that Sellwood would continue to have positive changes. As an active member and former board member to the Sellwood Westmoreland Business Alliance our goal is and has been to build a vibrant community. We are vested in this neighborhood and its future development.

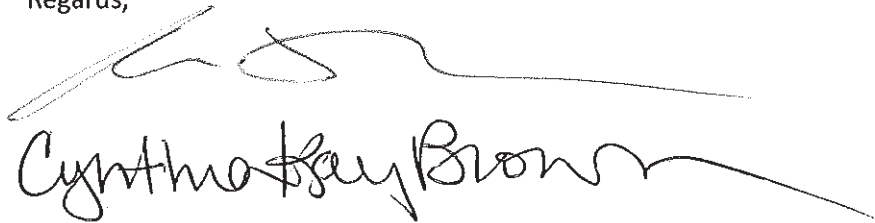
On October 13<sup>th</sup>, 2015 we received a Notice of Proposed Zoning change that indicated that our zoning would change from Urban Commercial (CS) to "Mixed use-neighborhood". When we looked online at Zone Conversion Table, it showed a CS zoned property in a Mixed Use Neighborhood moving to CM2. As this was a logical progression we had no cause to dispute this change.

On Thursday April 6, 2016, however, we received a new Notice indicating our zoning would change from CS to CM1. Now we have cause for concern. This down zoning makes no sense, as other properties along Tacoma away from the neighborhood center are being up zoned from CM to CM2. This will have a huge financial impact to the future property value and development potential of our property. (Please refer to the attached exhibits 5-7). It would, in effect, create an inverted development pattern, pushing higher density construction into the neighborhoods and away from the major high traffic corridor. The summary of Proposed Mixed Use Zones provided with the Notice, including the grid diagram and zoning code descriptions, all support our property changing from **CS to CM2**. In addition, based on the City of Portland data, over 98% of current CS zoned properties are moving to CM2 or CM3. It is unreasonable

May 8<sup>th</sup>, 2016

that our zoning which currently supports the Comprehensive Plan with strong commercial retail uses, promotes increased housing choices for the neighborhood, while having no direct impact on residential properties, be down-zoned from CS to CM1. Our position is that the appropriate zoning for our property, was correctly assessed in the October 2015 version of Notice of Proposed zoning change. Current CS zoned properties at the major intersections in the Sellwood/Westmoreland neighborhood and along the Tacoma corridor should be zoned CM2. Let's keep the highest density development from being pushed further into the neighborhood, which is what will happen under this most recent plan revision.

Regards,

A handwritten signature in black ink, appearing to read "Cynthia Brown", with a long horizontal flourish extending to the right.

Aaron and Cynthia Brown, TTM  
Brown Sellwood, LLC  
4206 NE Glisan Portland, OR 97213  
503 708-9083





Exhibit 1. Property along the Tacoma corridor at the primary intersection in Sellwood - Tacoma Ave and SE 13<sup>th</sup> street (southwest corner)

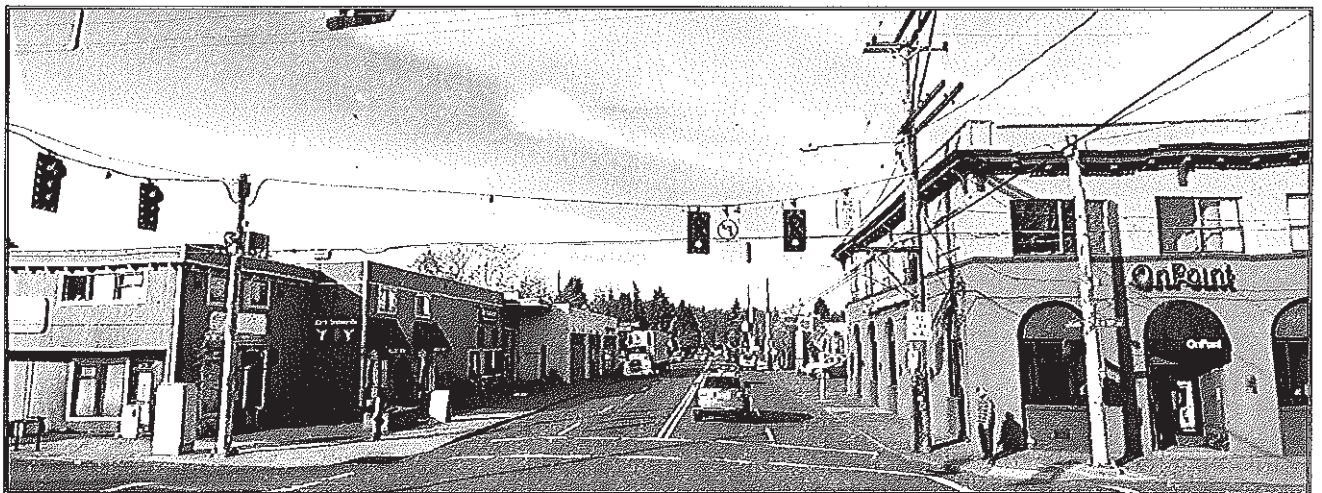


Exhibit 2. View of Tacoma frontage facing west. Note it is a 4 lane thoroughfare in this section.



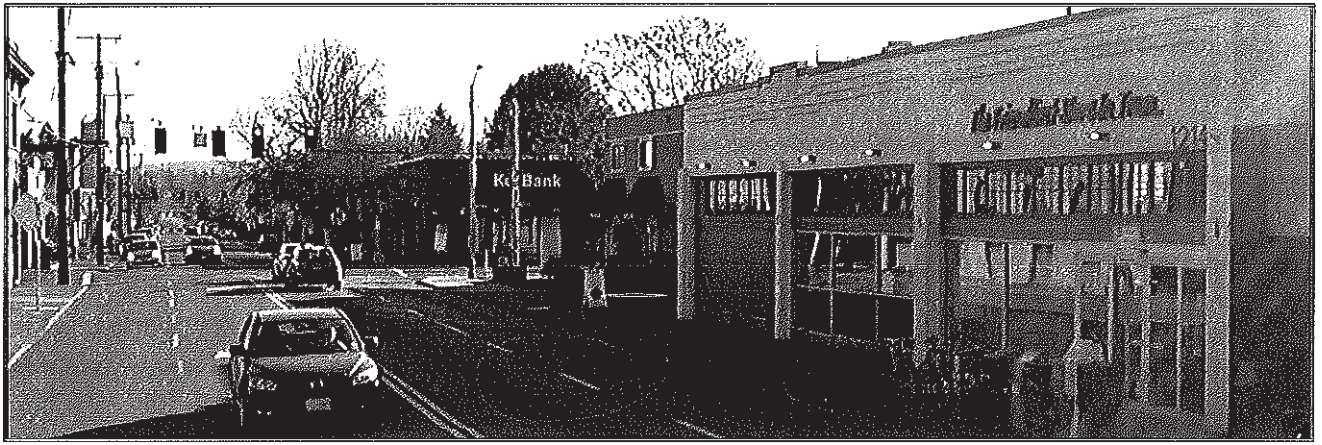


Exhibit 3. View of Tacoma Avenue facing east. Note surrounding uses of New Seasons Market and Key Bank.

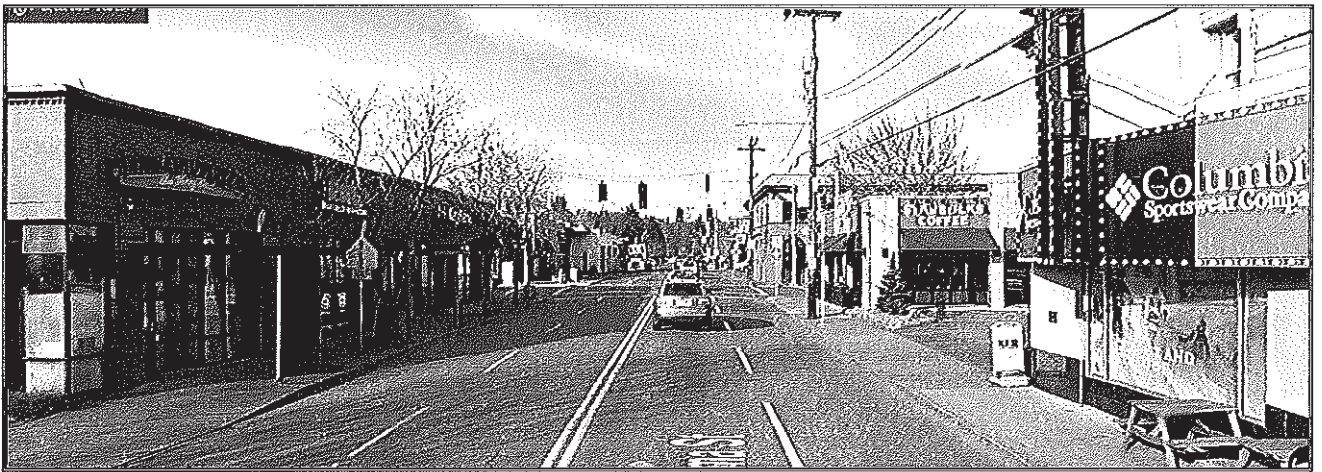


Exhibit 4. View of Tacoma facing west further to the east showing nearby commercial uses supporting the intersection being the heart of Sellwood Neighborhood.



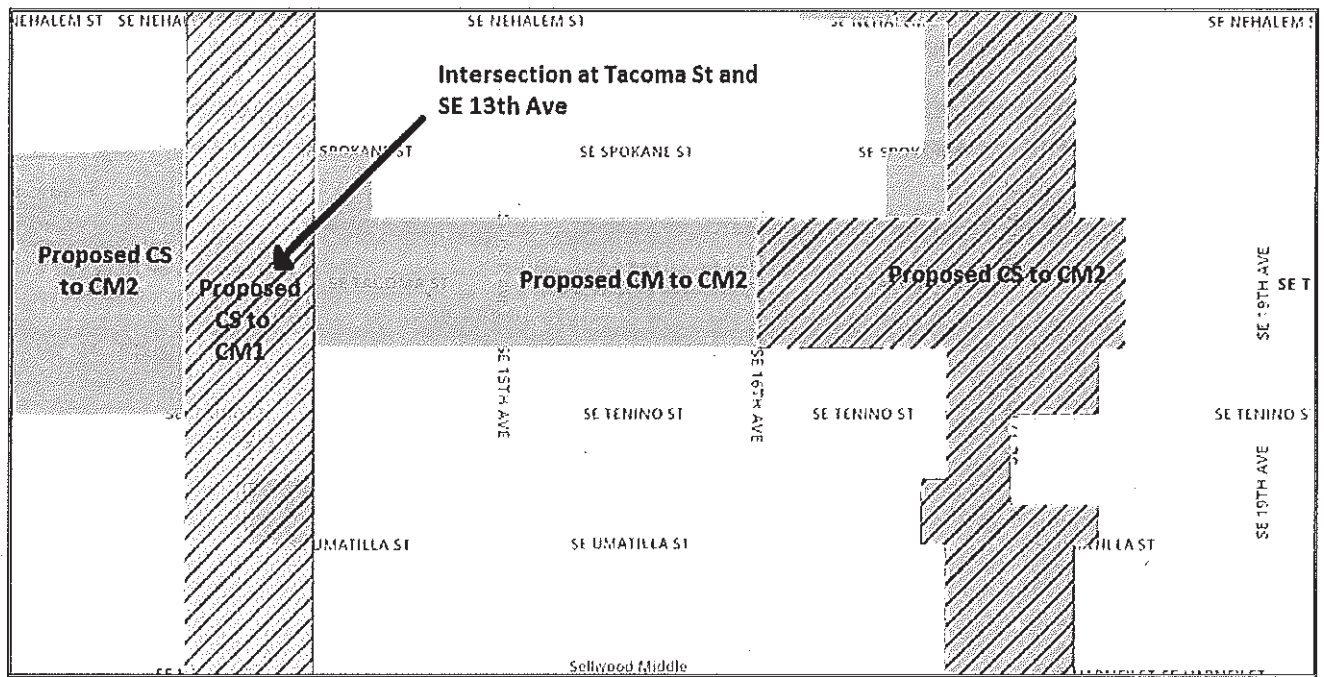


Exhibit 5. Current Comprehensive plan along Tacoma Street. Note CM to CM2 is an up zone (orange) while CS to CM1 is a down zone. All other areas are retaining similar zoning, moving from CS to CM2.



Exhibit 6. View of Tacoma Street facing west showing area being up zoned from CM to CM2 for comparison with area being down zoned at intersection of Tacoma Street and SE 13<sup>th</sup> Avenue.

Table 130-3 Summary of Development Standards in Commercial Zones								
Standard	CN1	CN2	CO1	CO2	CM	CS	CG	CX
Maximum FAR (see 33.130.205)	.75 to 1	.75 to 1	.75 to 1	2 to 1	1 to 1 See 33.130.253	3 to 1	3 to 1	4 to 1
Maximum Height (see 33.130.210)	30 ft.	30 ft.	30 ft.	45 ft.	45 ft.	45 ft.	45 ft.	75 ft.
Min. Building Stbks (see 33.130.215) Street Lot Line or Lot Line Abutting an OS, RX, C, E, or I Zone Lot	0	0	0	0	0	0	0	0
Lot Line Abutting other R Zoned Lot	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4	See Table 130-4
Garage Entrance Setback (see 33.130.250.E)	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft	5/18 ft
Max. Building Stbks (see 33.130.215) Street Lot Line Transit Street or Pedestrian District	None  10 ft.	None  10 ft.	None  10 ft.	None  10 ft.	10 ft.  10 ft.	10 ft.  10 ft.	None  10 ft.	None  10 ft.
Building Coverage (see 33.130.220)	Max. of 85% of site area	Max. of 65% of site area	Max. of 50% of site area	Max. of 65% of site area	Min. of 50% of site area	Min. of 50% of site area	Max. of 85% of site area	No Limit
Min. Landscaped Area (see 33.130.225)	15% of site area	15% of site area	15% of site area	15% of site area	None	None	15 % of site area	None
Ground Floor Window Stds. Apply (see 33.130.230)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Pedestrian Requirements (see 33.130.240)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

# NOTICE OF PROPOSED ZONING CHANGES THAT MAY AFFECT THE PERMISSIBLE USES OF YOUR PROPERTY AND OTHER PROPERTIES

## What does this mean for me?

The City is proposing a zoning change for all the commercially zoned properties outside the Central City.

You received this notice because a new Commercial/Mixed Use Zone is proposed for your property. This may affect the permissible uses of your property, as well as other properties with the same zone. This proposal would also change the shape and size of new buildings that could be built on your property — if you choose to redevelop. These changes may affect the value of your property.

State law requires periodic plan updates. The City is completing Portland's Comprehensive Plan as a part of the state's periodic review.

One of the properties that may be affected is your property at: 8113 SE 13TH AVE

State ID #: 1S1E23CD 13700

### BASE ZONE

The current base zone(s) for this property is (are): CS

The proposed base zone(s) for this property is (are): CM1

### OVERLAY ZONE

The current overlay zone(s) for this property is (are): No existing overlays

The proposed overlay zone change(s): Add m

### PLAN DISTRICT

The existing plan district for this property is: No existing plan district

The proposed plan district change(s): No proposed plan district changes

## Inside you will find ...

- Information for property owners.
- How to learn more, including websites, a schedule of drop-in hours and information in Spanish.
- Planning and Sustainability Commission hearing information and how to testify.
- An insert explaining proposed Commercial/Mixed Use Zones and how they differ from what's in place today.

## Have questions?

- Get answers from our Helpline.  
Call 503-823-0195.
- Find more information, including maps and frequently asked questions at:  
[www.portlandoregon.gov/bps/muzwelcome](http://www.portlandoregon.gov/bps/muzwelcome)



OCTOBER 13, 2015

# NOTICE OF A PROPOSED COMPREHENSIVE PLAN MAP CHANGE THAT MAY AFFECT THE PERMISSIBLE USES OF YOUR PROPERTY AND OTHER PROPERTIES

## What does this mean for me?

You received this notice because the Portland Planning and Sustainability Commission has recommended a new Comprehensive Plan Map designation for your property. If adopted, this new designation may affect permissible uses of your property as well as other properties with the same map designation. These changes may affect the value of your property.

One of the properties that may be affected is your property at: 8113 SE 13TH AVE

State ID #: 1S1E23CD 13700

The current Comprehensive Plan designation(s) for this property is (are): Urban Commercial

The proposed Comprehensive Plan designation(s) for this property is (are): Mixed Use - Neighborhood

The Recommended Draft Comprehensive Plan applies new Commercial/Mixed Use designations to allow opportunities for shops, restaurants, offices and homes in locations that promote convenience, walkability and access to services. **The new designation(s) proposed for this property is (are) generally similar to what applies today.** Rules for building size and design will be updated through the Mixed Use Zones Project ([www.portlandoregon.gov/bps/mixeduse](http://www.portlandoregon.gov/bps/mixeduse)).

You may have received a letter or notice last year about Planning and Sustainability Commission hearings on the proposed Comprehensive Plan. This new notice is to let you know that the Portland City Council will now consider adopting the Commission-recommended plan. **This is your final notice about Comprehensive Plan Map changes.**

Comprehensive Plan and Zoning map changes will not take effect until the City Council adopts them by ordinance and the Oregon Land Conservation and Development Commission approves them by order.

## Why are these changes proposed?

The Portland Planning and Sustainability Commission (PSC) has recommended a new Comprehensive Plan, a 20-year plan for the development of the city. The Comprehensive Plan Map and Zoning Map depict how land can be used and developed over time. Both maps show broad categories of uses, such as residential, mixed use, industrial, employment, and open space, and convey information about the scale of future development (the type and size of buildings).

## How can I learn more about this proposal?

1. **View the interactive Map App** at [www.portlandmaps.com/bps/mapapp](http://www.portlandmaps.com/bps/mapapp) on any computer, tablet or smart phone and click on the **Land Use** tab. All Multnomah County libraries have public access computers. Type the property address to see proposed Comprehensive Plan Map designations (and zoning changes, if proposed) that may affect your property.
2. **Attend an information session** (brief presentation and Q&A) or **drop in to chat with City staff at a location near you** (staff will answer your questions one-on-one).
  - **Information sessions and drop-in hours:** Check online at [www.portlandoregon.gov/bps/58191](http://www.portlandoregon.gov/bps/58191) or call 503-823-0195 for a schedule.
3. **Ask City staff a question.** We are happy to help. Call 503-823-0195 or email us at [pdxcompplan@portlandoregon.gov](mailto:pdxcompplan@portlandoregon.gov).

## How can I provide feedback to City Council?

Ord. 188177, Vol. 2.3.H, page 10193

You may testify about proposed changes to the Portland City Council in the following ways:



EDWARD F. WAGNER  
1836 N. W. Couch Street  
Portland, OR 97209

07.MAY.2016

No. 3835 S.E. POWELL BLVD.  
MIXED-USE HEARING

PSC COMMISSIONERS & STAFF;

MY NAME IS ED WAGNER AND I OWN THE SMALL PARCEL OF LAND  
AT THE N.W. CORNER OF S.E. 39<sup>TH</sup> & POWELL BLVD.

I HEREBY REQUEST A ZONING UPGRADE TO CM3 AND BEYOND.  
I ALSO REQUEST THE ESTABLISHMENT OF "TRANSIT OVERLAY ZONES"  
AT THIS AND OTHER KEY BUS AND RAIL STOPS IN A STRATEGIC &  
DELIBERATE EFFORT TO CONCENTRATE DENSITIES AT TRANSIT STATIONS.

THIS INTERSECTION & MY PROPERTY WILL EXPERIENCE ACTIVITY  
INCREASES AS TRI-MET IMPLEMENTS ITS EXPRESS BUS SERVICE ON POWELL  
BLVD. BETWEEN THE DOWNTOWN AND I-205. A HIGH DENSITY, MULTI-STORY,  
MIXED-USE TRANSIT STATION LOCATED ON MY SITE AND CONTIGUOUS LAND  
WILL SERVE DENSITY GOALS AND TRI-MET SERVICE MOST EFFECTIVELY.

LANDS WITHIN 1000 TO 2000 FEET OF MAJOR RAIL & BUS  
STOPS SHOULD BE RECOGNIZED AS VALUABLE PUBLIC ASSETS AND  
GRANTED "TRANSIT OVERLAY ZONES" ENCOURAGING TRANSIT STATION  
COMMUNITIES WITHIN THE GPMRA. INCREASED HEIGHT LIMITATIONS  
(OR NO HEIGHT LIMITS), MAXIMUM FAR'S, ZERO SET-BACKS,  
ETC. WILL BE APPROPRIATE.

TRANSIT STATION DEVELOPMENT HAS OFTEN BEEN CONSIDERED  
AND TRULY IS: THE OTHER HALF OF THE SYSTEM, AND  
HAS BEEN IGNORED TO DATE. THE WORDS HAVE BEEN GENEROUSLY  
SPRINKLED THROUGHOUT PLANNING AND POLITICAL SPEECHES &  
DOCUMENTS. BUT NOTHING HAPPENS. I AM AVAILABLE TO DISCUSS  
THIS AT YOUR CONVENIENCE.

SINCERELY,



(503) 221-1837  
RES: (503) 228-0007



**From:** Daniel Pirofsky [mailto:pirofsky@pdx.edu]  
**Sent:** Saturday, May 07, 2016 11:48 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones testimony on Proposed Change #796

Testimony on Mixed Use Zoning, May 7, 2016  
Daniel Pirofsky  
2173 N.E. Multnomah Street, Portland, Oregon 97232

Proposed Change #796  
Amendment #M62  
Proposed Comprehensive Plan Designation: High - Density Multi - Dwelling  
Existing Comprehensive Plan Designation: Low Density Multi-Dwelling

Please change the land use designation to High Density Multi-Dwelling and zoning for this area to High Density Residential (RH) to be consistent with Comprehensive Plan Council Amendment #M62, adopted by City Council on April 28, 2016, which changes its Land Use Designation From Mixed Use – Urban Center to High Density Multi-Dwelling.

This change affects properties between 17st and 21st on the north side of Weidler, which are currently zoned as Residential 2,000 (R2). Properties affected: R193011 to R193017, R502819, and R193025 to R193029.

Thank you.

--

Daniel Pirofsky  
[danielpirofsky@comcast.net](mailto:danielpirofsky@comcast.net)

**From:** Daniel Pirofsky [mailto:pirofsky@pdx.edu]  
**Sent:** Saturday, May 07, 2016 11:49 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones testimony on Proposed Change #797

Testimony on Mixed Use Zoning, May 7, 2016  
Daniel Pirofsky  
2173 N.E. Multnomah Street, Portland, Oregon 97232

Proposed Change #797  
Amendment #M63  
Proposed Comprehensive Plan Designation: Multi - Dwelling 1,000  
Existing Comprehensive Plan Designation: Attached Residential

Please change the land use designation to Multi - Dwelling 1,000 and zoning for this area to R1 to be consistent with Comprehensive Plan Council Amendment #M63, adopted by City Council on April 28, 2016, which changes its Land Use Designation From Mixed Use - Urban Center to Multi - Dwelling 1,000.

This change affects properties between 21st and 24th on the north side of Weidler, which are currently designated as Attached Residential and zoned as Residential 2,500 (R2.5). Properties affected: R193011 to R193017, R502819, and R193025 to R193029.

Thank you.

--

Daniel Pirofsky  
[danielpirofsky@comcast.net](mailto:danielpirofsky@comcast.net)

**From:** Daniel Pirofsky [mailto:pirofsky@pdx.edu]  
**Sent:** Saturday, May 07, 2016 11:48 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones testimony on Proposed Change #599

Testimony on Mixed Use Zoning, May 7, 2016  
Daniel Pirofsky  
2173 N.E. Multnomah Street, Portland, Oregon 97232

Proposed Change #599  
Proposed Base Zone: CM3  
Existing Base Zone(s): Office Commercial 2 (CO2), High Density Residential (RH)

Please change the proposed zoning of Commercial Mixed Use 3 (CM3) for this site to High Density Residential (RH) to be consistent with Comprehensive Plan Council Amendment #M21, adopted by City Council on April 28, 2016, which changes its Land Use Designation From Mixed Use – Urban Center back to High Density Multi-Dwelling.

Since Amendment #M21 designates this entire site as High Density Multi-Dwelling, the existing Office Commercial (CO2) zoning on one lot in this area should be changed to High Density Residential (RH) to be consistent with the existing RH zoning on its adjacent lots.

Thank you.

--

Daniel Pirofsky  
[danielpirofsky@comcast.net](mailto:danielpirofsky@comcast.net)

**From:** Deborah Kalapsa [<mailto:openpalm@comcast.net>]  
**Sent:** Saturday, May 07, 2016 10:16 AM  
**To:** BPS Comprehensive Plan Testimony <[cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)>  
**Subject:** Mixed Use N. Interstate Corridor

May 5<sup>th</sup>, 2016

To: The Planning and Sustainability Commission,

The population is increasing on N. Interstate Ave. and the bordering neighborhoods. We are seeing increased traffic and other livability challenges that come with residential density. We need public space, retail space to provide residents with services and support pedestrian use. We would ask that the new Mixed Use Zones project require commercial uses on the ground level of all new development on the N. Interstate Corridor to support these goals.

We will soon lose a long time neighborhood establishment, The Interstate Lanes Bowling Alley (6049 N. Interstate Ave.), to new development. Fairfield Residential will build 175 apartments with limited parking and no mixed use, commercial or public space on the ground floor. This is a great concern for the neighborhood. We will gain a new population of residents, while we lose a community gathering space. The developer is not required at this time to include any mixed use or any green space, or public use area in this building.

N. Interstate Ave. is a major connecting street, bringing people to the Moda Center, Kaiser Permanente, Providence Health Clinic; bringing tourists and visitors from the airport to downtown. With the MAX line and transit center located on N. Interstate Ave. and its central location close-in to downtown and easy access to I-5, it is a city corridor ready to support a variety of new businesses and community services.

**We ask for new Mixed Use Zones project to require developers to:**

**Provide commercial space on the ground levels to allow for new retail and basic community services.**

**Provide some parking in residential buildings.**

**Use sustainable and environmentally friendly building practices.**

**Include natural and green space, public space, trees, and public use amenities at the street.**

As a city we must be active in our actions to deal with urban growth. We want to see immediate intervention by city zoning agencies to address the buildings being built today. Without the zoning that will require mixed use space in new development we are very concerned N. Interstate Ave. will become a densely populated major street with no space to hold the basic services that would support the coming population.

As the population increases with high density development we hope to see the city provide developers with incentives which support public use amenities like pocket parks, public

benches, water features, space for trees, community gardens, farmer's markets and other amenities for public use. We hope Portland's inner city streets can develop in a way that will provide for future generations, safe sustainable, pedestrian friendly community centers.

Deborah and Bill Kalapsa

3951 N. Overlook Blvd. 97227

503 282 6697

Residents of the Overlook Neighborhood since 1985.



# AIA/APA/ASLA Urban Design Panel

Portland and Oregon Chapters of the American Institute of Architects, American Planning Association and American Society of Landscape Architects

Date: May 6, 2016

To: Planning and Sustainability Commission  
Portland, Oregon

## MIXED USE ZONES – PROPOSED DRAFT

The Urban Design Panel is sponsored jointly by the Oregon and/or Portland chapters of the American Institute of Architects, the American Planning Association and the American Society of Landscape Architects, and composed of urban design professionals from those 3 organizations.

The Panel has been closely following the development of this proposal for the last couple of years with great interest. We would like to recognize and thank BPS staff members Barry Manning and Bill Cunningham for involving the UDP over the last couple of years in the development of this proposal. It was a tough balancing act, and we sincerely appreciate their efforts. The MUZ is critical to the successful implementation of Portland's evolution to a more sustainable, livable, and affordable city, and we support its adoption. We do, however, see some areas where we believe changes need to be made to ensure the new code language will meet those worthy overall objectives.

1.) The UDP strongly believes that the recently added "center of centers" language is not appropriate for a couple of reasons, and should be removed:

- a. It reduces the ability to place more dense development exactly where it is most needed and appropriate, in the most transit and walking friendly environments. This provision would seem to directly contradict several proposed Comprehensive Plan policies, especially 4.20 Walkable Scale, which states "Focus services and higher-density housing in the core of centers to support a critical mass of demand for commercial services and more walkable access for customers". While we fully support the need to protect genuinely historic features, the key to the success of the MUZ is balancing the evolution of a dynamic urban environment with the preservation of properly evaluated structures that truly represent an important period in that evolution, not all buildings. We understand that there are mitigating provisions in the proposal that would attempt to make up for the reduced height, but the net effect is liable to be confused redevelopment priorities, stagnation and a commensurate reduction in intense residential redevelopment in key centers.
- b. It overly complicates the redevelopment of these key places. By placing another set of conditions on these areas, the new ordinance will become much more complex and hard to implement well. It would be far better to rely on design guidelines and/or standards to ensure redevelopment is compatible with existing structures, designated as historic, as change happens.

2.) That being said, we have significant concerns about the ability of the current design review process to adequately handle the substantial increase in project load that extension of design

review to the MUZ areas implies. The Design Overlay Zone Assessment just getting underway will provide significant recommendations for improvements to that process. The UDP has made recommendations over the last 2 years to revise and streamline the DR process, and we will strongly support the DOZA effort. However, it is imperative that the City make a firm commitment to quickly implementing the recommended changes so that when the MUZ ordinance goes into effect the DR structure and process are fully capable of handling the anticipated projects. One additional suggestion for DOZA is that it look at the evolving MUZ language to determine where there may be areas to improve the MUZ as it moves toward adoption.

3.) As number 1. above indicates, the UDP is very concerned that the MUZ enable full realization of the full floor area ratios envisioned through the higher density designations in the new Comprehensive Plan. We recognize that the tradeoff between a reduction in allowed FAR in some areas, along with an accompanying elimination of other bonus options, was made in order to accommodate and encourage greater use of the affordable housing bonus. However, some of our members are very concerned that this bonus tradeoff will not achieve this objective. We also understand that recently approved inclusionary zoning provisions will be incorporated into the MUZ in the next 6-9 months. As that happens the existing FAR, height and bonus language needs to be carefully re-examined to ensure that the City will effectively achieve the maximum FAR in MUZ areas, to the extent practical. The UDP strongly supports the City's priority to achieve as much new affordable housing as possible within these centers and corridors. One way to ensure that happens is to make the new code as straightforward and inexpensive to implement as possible.

4.) There are two provisions that have been reduced or eliminated from this proposal that we would like to see reconsidered. We believe that the three (3) foot additional height provision for active ground floor uses should be available in all MUZ zones. This provision, if applied in all MUZ areas, will simplify administration of the code and add much needed flexibility for these types of uses. The other is to make provision of open space part of the bonus equation again. It does not rise to the level of importance of affordability, but it does make these redevelopment projects much more human in scale, and more acceptable and enjoyable for the entire neighborhood.

The UDP is ready to work closely with staff to help make the changes necessary to achieve the best mix of provisions to create a model ordinance for redevelopment in these critical parts of the city as they evolve in the coming years. Along with the Central City, these MUZ areas are where the new Portland will emerge. It is imperative that we get both the plans and the ordinances right to make sure we get the best results possible.

Sincerely,

Executive Committee of the Urban Design Panel

Dave Otte, AIA  
Robert Boileau, AIA, AICP

Brian Campbell, FAICP  
John Spencer, AICP

Mauricio Villarreal, ASLA  
Laurie Mathews, ASLA

cc: *American Institute of Architects/Portland Chapter, American Planning Association/Oregon Chapter  
American Society of Landscape Architects/Oregon Chapter*

403 NW Eleventh Avenue Portland, Oregon 97209  
Telephone 503 223 8757 Facsimile 503 220 0254  
E-Mail: [aiapdx@aiaportland.org](mailto:aiapdx@aiaportland.org) Internet: [www.aiaportland.org](http://www.aiaportland.org)

May 6, 2016

Ken Simon  
Managing General Partner  
Sandra Plaza No. 2  
711 Montana Ave. Suite C  
Santa Monica, CA 90403  
PH: 310-576-6666  
[ksimon@kfsproperties.com](mailto:ksimon@kfsproperties.com)

Portland Planning and Sustainability Commission  
City of Portland  
1900 SE 4<sup>th</sup> Avenue  
Suite 7100  
Portland, OR 97201

Dear Chair Schultz and Commission Members,

I am the managing general partner for Sandra Plaza No. 2. We are the owners of Foster Square located at 6730-6868 SE Foster Road; State ID # 1S2E17BA 11800.

Ours is a traditional shopping center with a commercial building set back from the street. Ample parking is provided on-site with four rows of parking in front of the commercial building. There is also a drive through coffee store in a pad building in front of the shopping center. The property has a landscape strip on the perimeter. There are bicycle racks and a bus stop for customers that do not use an automobile. There are visible pole signs that are important and beneficial for both retailers and consumers.

This type of traditional shopping center is functional, desirable and has high utility for retailers, service providers, drive through restaurants and area residents who are the customers of these establishments. The Center was developed to accommodate automobile parking for customers and also to accommodate drive through businesses. As currently configured our shopping center is the highest and best use for the site.

We heartily and fervently oppose the proposed zoning change from CG to CM2. It would be a disaster. The macro effect would turn an already difficult area into a ghost town. The micro effect would be to devalue our property. As you state in your literature the proposed zone change does not

Portland Planning and Sustainability Commission  
May 6, 2016  
Page 2

require me to sell my property, however, effectively this proposed zone change is an eminent domain taking without compensation.

There is not the demand nor is there an economic rationale to develop the type of high density, urban, flush with street development contemplated by the zone change in the immediate vicinity of where our shopping center is located. This cannot be changed by fiat.

We own properties in five states and I have seen this type of legislation before. The municipalities always say that the existing uses will be grandfathered in. However, there is always a trigger mechanism whereby spending money to improve the property above a certain threshold compels the Owner or Tenant to comply with the new zoning requirements. The unintended consequence is that Owners and Tenants have no incentive to improve their properties and in many cases are forced to go vacant as compliance is problematic. Once vacant, the properties negatively impacted by the zone change become a magnet for mischievous or illegal activity which leads to blight.

As an example, the City of West Valley in Utah, where we also own property, enacted similar legislation and the result has been that there are properties that have been vacant for upwards of seven years because complying with the ordinance is not economically feasible. The same thing could happen in SE Portland with this proposed zone change.

Please reconsider this zone change. It will have deleterious effects.

You may contact me if you have questions or wish to discuss in greater detail.

Sincerely,



Ken Simon  
Managing General Partner  
Sandra Plaza No. 2



# Papa Restaurant Management, LLC



PO Box 16757 • Portland, OR 97292 • Phone: 503-358-2824 • Fax: 1-888-765-5657  
E-Mail: francisco.rivera@partners.mcd.com

May 6, 2016

Katherine Schultz, Chair  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

## **Re: Mixed Use Zones Project - Request for CE Zoning for McDonald's Restaurants**

Dear Chair Schultz and Members of the Commission:

I am the Owner/Operator of the McDonald's restaurants, located at 12109 NE Glisan Street and at 8149 SE Stark Street. I understand that the City of Portland proposes to change the zoning of my locations such that a drive-through will no longer be permitted. I submit this letter requesting that the proposed zoning of my restaurants be Commercial Employment (CE) to ensure that my existing drive-through remains conforming with the Portland Zoning Code.

A large portion of our business derives from the operation of the drive-through facility component of the restaurants, without which they could not profitably operate. We are concerned that the proposed mixed use zones will greatly reduce our ability to maintain and modernize our drive-through facilities. As the only proposed mixed-use zone that does not prohibit drive-through facilities is the CE zone, we hereby request that our sites be zoned CE.

Even if McDonald's restaurants are zoned CE, we are also 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. [...] 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."

In addition to zoning our site(s) CE, 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.

Yours truly,

A handwritten signature in blue ink, which appears to read "Francisco Rivera-Giusti", is written over the typed name.

Francisco Rivera-Giusti

Owner/Operator

Cc: RTF/ICSC GR Committee





## City of Portland Historic Landmarks Commission

1900 SW Fourth Ave., Suite 5000 / 16  
Portland, Oregon 97201  
Telephone: (503) 823-7300  
TDD: (503) 823-6868  
FAX: (503) 823-5630  
[www.portlandonline.com/bds](http://www.portlandonline.com/bds)

May 6, 2016

Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Ave #7100  
Portland OR 97201

Dear Planning & Sustainability Commissioners,

The Historic Landmarks Commission (HLC) would like to offer some comments on the Mixed Use Zones Project that is before you. We thank BPS staff for briefing the HLC on 10/26/15 and 2/22/16. We understand these zoning changes will affect some commercially-zoned properties in the Ladd's Addition Historic District, Irvington Historic District, South Portland Historic District, Eliot Conservation District, and Piedmont Conservation District, as well as landmark properties within the MU zone. Please accept the following comments, which expand upon the comments that were provided to BPS staff during the briefings:

- The HLC is very supportive of the proposed zoning regulations and map changes that would limit building height to three stories in older "main street" areas that have concentrations of streetcar-era storefront buildings. We believe this change will allow for the retention of older buildings that are "little h" historic. These resources are not designated, but contribute to the livability and character of streets like SE Hawthorne, SE Belmont, NE Alberta, and others. Curtailing the development potential on these properties will help discourage the trend of demolishing and replacing these smaller structures with larger developments.
- The HLC supports provisions that provide more flexibility for parapets to exceed height limits above the roof. This added flexibility will allow for increased architectural variety, which is desirable in our MU-zoned commercial districts. Parapets will also be able to serve a screening purpose for rooftop equipment more easily.
- The HLC has concerns about the proposed changes to building articulation/massing. While we support the general idea of breaking long (200') building lengths in order to achieve more compatible articulation, the proposed solution of a 20' x 20' gap could result in undesirable outcomes. In commercial neighborhoods with an urban street wall condition, these gaps would result in a less compatible result and may be out of scale with the grain of the surrounding development. The continuity of the pedestrian landscape and strong, consistent retail presence is important to maintaining urban vibrancy. The HLC therefore supports a solution that allows for visual breaks in long façades, perhaps by a change in materials, a noticeable change in the pattern of the openings, and/or changes in cornice or parapet height.
- The HLC continues to be strongly opposed to the limiting the TDR radius to 1 mile and again requests that 2 miles be retained in the code. The one-mile distance is insufficient and will add an unnecessary barrier to the use of this preservation tool by lessening the pool of sending and receiving sites that can partner for a FAR transfer. While we are in favor of new provisions that allow contributing resources in historic and conservation districts to participate in this transfer program, as well as the new code's treatment of FAR calculations that should help bolster the use of this tool, we see no reason to take a step back by

limiting the transfer radius. The maps on the following page show a one- and two-mile radius drawn around an example contributing historic resource at 13<sup>th</sup> and SE Hawthorne. The map illustrates the relatively limited number of sending sites within that one-mile radius. While the two-mile radius has the potential of sending development to a different part of the City, it provides many more opportunities for this preservation tool to be put to use.

With thank the PSC and the staff at BPS for all your hard work in this important component of the Comprehensive Plan. We hope that you will seriously consider the few important comments that we have on these code amendments.

Sincerely,



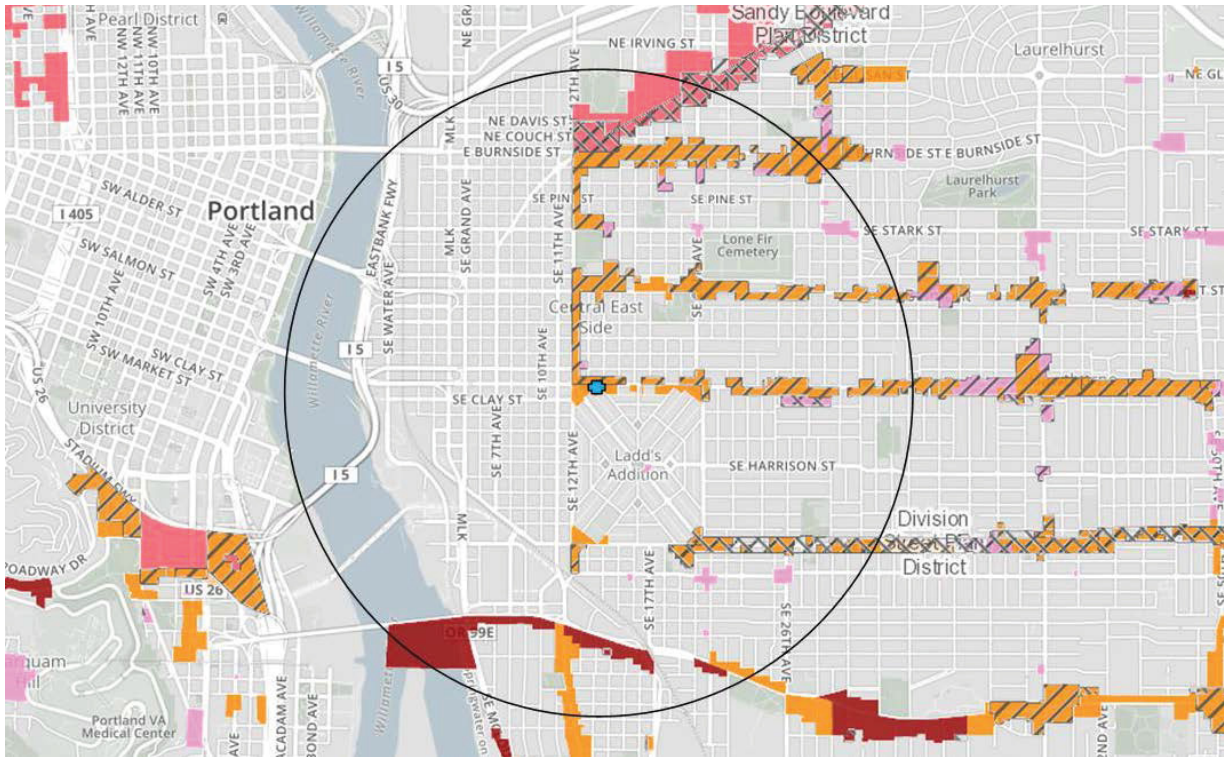
Kirk Ranzetta  
Chair



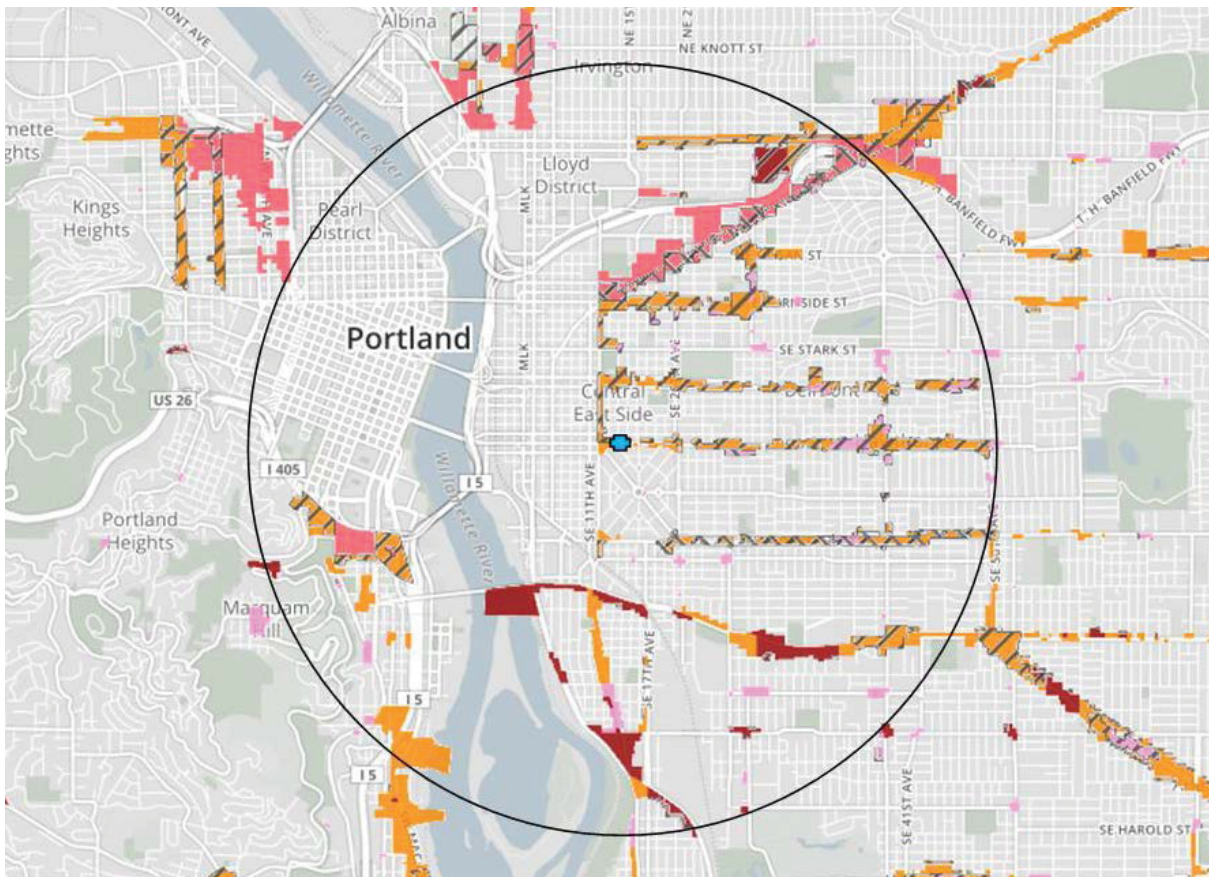
Paul Solimano  
Vice Chair

CC:

Bill Cunningham, BPS  
Barry Manning, BPS  
Brandon Spencer-Hartle, BPS  
Kara Fioravanti, BDS  
Hillary Adam, BDS



Map showing one-mile radius around a contributing historic resource at SE 13<sup>th</sup> & Hawthorne



Map showing two-mile radius around same historic resource and the increased number of sending sites.

**From:** Karen Eubanks [mailto:eubanks44@gmail.com]  
**Sent:** Friday, May 06, 2016 11:22 AM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony

## Mixed Use Zones Testimony

My family has lived in SE Portland for almost one hundred years. My grandfather and grandmother too the old Red Line street car to work. My grandfather worked as a carpenter and helped build houses in Lake Oswego. My grandmother cleaned the houses of the wealthy on the West Side. They could not afford to live in the same area where they worked.

60 years later, my wife and I took out a 2nd mortgage on our house and purchased a vacate building on Woodstock Blvd. and ran a furniture store there for 23 years. The street had almost no pedestrian traffic. The automobile was the major mode of travel to visit the various merchants and commercial buildings. Houses in the area were modestly priced and people working in the shops and businesses could afford to live in the area.

Now we fast-forward to today. Woodstock Blvd. has become a walking neighborhood. It is a small town within a city. You can walk to the hardware store to buy a nut and bolt to repair your widget, get a hair cut at a barber shop, or go wine tasting or have dinner at a number of good restaurants without the use of an automobile. You can even have a 'pint' with friends at a brew pub and discuss why the city refuses to pave the dirt roads 2 blocks behind the business district so that it won't look and feel like a third world country.

Many of our customers have proudly stated that they do not own a car. They say that public transportation and their bicycle fulfill their needs.

However, we have one serious problem in the neighborhood. We have no affordable housing on Woodstock Blvd. The average house is 1000 sq ft 2 or 3 bedroom 1 bath house sells for over \$300,000. The payment with taxes could exceed \$1600 per month. The average rental is over \$2100 per month. (see comparable listings attached). The average apartment rent is \$1280 per month. Landlords figure a prospective tenant must earn 4 times their gross income. A person would need the income of \$5100 monthly to qualify.

The people who work on Woodstock Blvd in the shops, groceries, and restaurants cannot afford to live nearby. There is economic segregation.

Our old building at 46th and Woodstock will probably be sold and redeveloped in the next few years by some enterprising developer who has the time and patience to jump through the hoops and go through the frustrations of dealing with the planning commission.

Under the new CM1 guide lines, our old building will be replaced with a new building that has retail spaces on the first floor and a few expensive apartments or condos on the second and third floors. (The third floor qualifying for the set-back option).



If the area were zoned CM2, it would allow an additional floor, which would make smaller, less expensive apartments on all floors above the retail space economically viable.

An information brochure that we received from the city states that the new zoning code should "more effectively encourage new building to have things that the community values, like affordable housing."

The only way that we can achieve affordable housing on Woodstock Blvd. is to raise building heights, not lower them. We can't build out, so we have to build up.

The Portland Planning Commission apparently agrees, because, while they were planning these zone changes, they allowed the New Seasons Market building, which is next to our property to be built 40 feet high, exceeding the CM1 building height restrictions by 5 feet.

We urge you to recommend that Woodstock Business District be zoned CM2, so that we can better serve our community.

Sincerely,

Ralph and Karen Eubanks

16515 NE 207th Ave.

Brush Prairie, WA 98606

Owners of:

4528 SE Woodstock Blvd,

Portland Or 97206





May 5, 2016

Portland Planning and Sustainability Commission  
Re: Mixed Use Zones Testimony - Woodstock

Dear Commissioners,

Woodstock Stakeholders Group, Inc. is a public benefit nonprofit corporation organized under the laws of Oregon. We have been organized for six years and a non-profit since 2015 and are comprised of commercial property owners in the Woodstock Business District. We promote the beautification, enhancement and maintenance of the Woodstock Business District to create and promote a business community which is livable, attractive, safe, socially diverse, thriving, and vital to the community it serves.

The Woodstock Stakeholder Group strongly opposes the down zoning recently proposed by the City for seven (7) properties in the Woodstock business district. These properties are currently zoned CS. The "crosswalk" or most equitable "lateral rezoning" for CS zoning should be to the new CM2 zone. Zone changes less than equivalent to this crosswalk is an unwelcomed down-zone in the Woodstock business district. We ask that this proposal for Woodstock be reversed and that Woodstock be exempted from further consideration as a Low-rise Commercial Storefront Area.

We feel strongly that the testimony that led to this decision was one-sided and did not include the voice of the Woodstock community or the commercial property owners.

This has resulted in the commercial property owners having to defend and fight for most of the rights they currently enjoy. To compound the burden, if the property owners fail in their effort to have this City decision reversed by testimony, legislatively, or by legal action, we have been told by the city that an option would be to apply for an up-zone to re-establish our current crosswalk zoning rights of CM2. This would negate the goal of this proposal, while taxing time, resources and thousands of dollars.

The Woodstock Stakeholders have the support of the Woodstock Neighborhood and Business Associations in opposition to this last minute change to the zoning map. Woodstock is unique and as a cohesive neighborhood, we reject the assumption that what other neighborhoods might think is best for them, is best for us.

Woodstock does not have buildings of the same quality, character or historic context. We are a small business district making these down-zones a significant burden and percentage of our district.



Woodstock Blvd's right-of-way spans eighty (80) feet. Eighty feet exceeds the benchmark for CM3 zoning. We find CM3 is inappropriate for Woodstock and argue that CM2 is very appropriate using this standard. Woodstock also has zero-vacancy in the affected commercial core and suffers significant consumer leakage. There is demand for additional retail and residential space. This proposal counteracts the goal for Woodstock to become a "20 minute neighborhood," while thwarting its economic growth and vitality.

We believe these proposals damage the property values by reducing and depriving existing property rights currently held by each of the property owners. Losing density, height, and FAR does not create additional housing choices, attract investment or enable businesses to thrive. Instead, opportunities for growth and creative vision will be stripped away with inappropriate zoning that is less dense and less developed in the very center of our business district. This moves Woodstock backward and further away from a more progressive Portland vision demonstrated in the 2035 Comprehensive Plan.

The proposed down-zoning does not accomplish or address the criteria of historic or main street preservation. Restricting building height, FAR and uses for a handful of properties by using zoning to achieve preservation fails on many levels. It is unreasonable and irresponsible to suggest that zoning can or will preserve historic character of buildings in any neighborhood. This proposal discourages redevelopment and in Woodstock's case, encourages non-historic buildings in Woodstock's core to further decay and create a dying center with diminished character.

We question the City's criteria and lack of thoughtful review of Woodstock's character, composition and goals before making these late hour changes to the zoning. The criteria of preserving 400 feet of "historic main street" just does not fit Woodstock. This is clearly evident by the City's attempt to rezone the south side of the 4600 block which includes a brand new (2015) New Season's store built to current CS code.

We charge that the properties selected for down-zoning are a mismatch to the overall vision of Woodstock and amounts to spot-zoning without consideration of thoughtful, consistent and sensible zoning design. Properties proposed to be down-zoned to CM1 while neighboring properties retain most of their existing rights with a CM2 zone is disproportionate and inequitable.

In 2014, in response to the Portland Comp Plan, the Woodstock community united to create a vision for their business district. An intense neighborhood effort and charrette of professional planners, economists, architects and City staff met with commercial property owners, business owners, churches and residents.

The community expressed desire for a more complete neighborhood with opportunities for local business owners to expand, to attract new business, and create a more vibrant commercial district. It was clear that Woodstock needs to grow if it wants to continue to thrive. The results of this charrette were given to the Planning Commission as testimony. It appears that this process has turned a deaf ear to Woodstock's work and vision with this most recent draft of proposed zoning changes as they appear to be in conflict with our community's vision and goals.

Woodstock is not just a line of buildings making up a business district. Woodstock is 57 commercial property owners of which 53 are local. We ask you to see that these proposals simply do not affect properties, they are affecting real people. These local property owners have invested and will continue to invest in Woodstock. These same individuals are proud of their community and want to advance the livability and economic vitality for the entire neighborhood.

We request that these seven properties affected by the recommended down-zone revert back to the originally proposed and entitled lateral rezoning from the current CS zoning to CM2

Block #1 - South Side (CS to CM2)

4404-4408 Don Hanna  
4410-4416 Tim and Angie Even  
4422-4430 Duane and Chad Cook

Block #2 - South Side (CS to CM2)

4500-4560 Bruce Ament (New Seasons)  
4526-4528 Jay and Karen Eubanks

Block #3 - North Side (CS to CM2)

4607-4617 Laurie Flynn  
4625-4639 Robert Kowalski and Jason Criswell



Page 4.

We anticipate that the Planning Commission will agree with our conclusions concerning the most recent recommendations for zone changes in our Woodstock business district. However, the City's most recent proposal also reflects several properties currently zoned CN2 to be rezoned CM1. While this is considered a lateral rezone, we feel that this would create additional "spot zoning" inconsistent with the vision of Woodstock.

Therefore, to protect the cohesiveness and vision in our business district, we also recommend that the following four properties in the core of our business district remain up-zoned from CN2 to CM2 as proposed in the prior zoning map draft so that they are not left behind to be an island (spot zoning) in the midst of CM2 zoning surrounding them.

Block #1 – North Side (CN2 to CM2)

4411 Gene Dieringer  
4415-4427 Don Hanna

Block #2 - South Side (CN1 to CM2)

4004 Mark and Jess Desbrow  
4012-4016 Melva Ball

Respectfully,



Angie Even  
Woodstock Stakeholder Group, Chair

4410 SE Woodstock #250  
Portland, Oregon 97206



# WOODSTOCK STAKEHOLDERS GROUP

*A Non-Profit for a Better Woodstock Community*

Page 5.

Signature Page



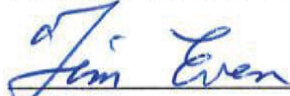
Eugene Dieringer  
4411 SE Woodstock Blvd.  
Portland, Oregon 97206

4138 SE Lambert Street (*Residence*)  
Portland, Oregon 97202



Gretchen Eichentopf  
4138 SE Woodstock Blvd.  
Portland, Oregon 97202

4155 SE Evergreen  
Portland, Oregon 97202



Tim Even  
4410-4416 SE Woodstock Blvd.  
Portland, Oregon 97206

\_\_\_\_\_  
Jess Desbrow  
4004 SE Woodstock Blvd.  
Portland, Oregon 97202

*see attached*

\_\_\_\_\_  
Laurie Flynn  
4607-4617 SE Woodstock  
Portland, Oregon 97206

Signature will follow to attach.

7858 SW 5th Avenue  
Portland, Oregon 97219



This signature page is attached to the Woodstock Stakeholders letter dated May 5, 2016, addressed to the Portland Planning and Sustainability Commission in testimony against the City's recommendation to rezone several properties in the Woodstock Business District from CS to CM1.

  
x Jess Desbrow

Print Name:

Address of Property Owned on Woodstock:

4004 SE Woodstock Blvd  
97202

Mailing Address:

3576 SE Woodward St.  
97202

This signature page is attached to the Woodstock Stakeholders letter dated May 5, 2016, addressed to the Portland Planning and Sustainability Commission in testimony against the City's recommendation to rezone several properties in the Woodstock Business District from CS to CM1.

x MARK DESBROW  
Print Name:



Address of Property Owned on Woodstock:

4004 SE Woodstock Blvd  
Portland, OR 97202

Mailing Address:

3576 SE Woodward St.  
Portland, OR 97202

This signature page is attached to the Woodstock Stakeholders letter dated May 5, 2016, addressed to the Portland Planning and Sustainability Commission in testimony against the City's recommendation to rezone several properties in the Woodstock Business District from CS to CM1.

X   
Print Name: Donald Hanna

Address of Property Owned on Woodstock:

4404-08 SE Woodstock  
4415-27 SE Woodstock  
5112 SE Woodstock  
5105 SE Woodstock  
6028 SE 51st  
6014 SE 51st  
5119 SE Martins

Mailing Address:

10001 SE Sunnyside Rd, Ste 200  
Clackamas, OR 97015

This signature page is attached to the Woodstock Stakeholders letter dated May 5, 2016, addressed to the Portland Planning and Sustainability Commission in testimony against the City's recommendation to rezone several properties in the Woodstock Business District from CS to CM1.

X LEON LIM

Print Name:

*Leon Lim*

Address of Property Owned on Woodstock:

*4324-4336 SE Woodstock Blvd.  
Portland, OR 97206*

Mailing Address:

*12350 SW Winterview Dr.  
Tigard, OR 97224*

This signature page is attached to the Woodstock Stakeholders letter dated May 5, 2016, addressed to the Portland Planning and Sustainability Commission in testimony against the City's recommendation to rezone several properties in the Woodstock Business District from CS to CM1.

X 

Print Name:

Ralph N Eubanks

Address of Property Owned on Woodstock:

4528 Se Woodstock Blvd.

Portland Or 97206

Mailing Address:

16515 NE 207th Ave.

Brush Prairie Wa 98606



**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this down-zoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,



Name: Eln Beauchamp

Address:

4528 SE WOODSTOCK  
PDX, OR. 97202

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this down-zoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

  
Name: Ben Berkowitz Portland Fish Market  
Address: 4404 SE Woodstock

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this down-zoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

Name: *Marta Baures*

Address: *6315 SE 43rd Ave, PDX, OR 97206*



**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this down-zoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,



Name: Michelle Maida, Managing Broker, John L Scott  
Real Estate

Address: 4111 SE Woodstock Blvd  
Portland OR 97202

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

Name: *Edwin G. Eichenkopf* owner *Otto's*  
Address: *4155 SE Evergreen* *Sausage Kitchen*  
*Portland, Oregon*  
*97202*



**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

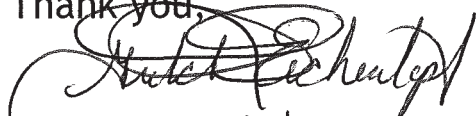
As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,



Name: *Gretchen L. Eichentopf* owner *Otto's Sausage Kitchen*

Address: *4135 SE Evergreen St  
Portland, OR 97202*

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

  
Name: Heidi L. Eichentopf, daughter

Address: 4445 SE Mason Hill Dr.  
Milwaukie, OR 97222

Future business owner of  
Otto's Sausage Kitchen

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

Thank you,

*Bereka Eichentopf*

Name: *Bereka Eichentopf, daughter of owner*

Address: *18860 Shenandoah drive  
Oregon City, Oregon 97045*

*Future business owner of  
Otto's Sausage Kitchen*

**Planning and Sustainability Commission**

**City of Portland Bureau of Planning and Sustainability**

**1900 SW 4th Ave, Suite 7100, Portland, OR 97201**

**Re: Woodstock Mixed-Use Zone Testimony**

The Mixed-Use Zoning project has recently proposed a map change that includes down-zoning commercial properties currently zoned CS in the core of Woodstock's business district from current CS zone to CM1 (a lateral move to the new Mixed Use Zone would be CM2).

As a Woodstock community member, I ask that the Planning Commission recommend reversal of this decision and exempt Woodstock in this downzoning plan. A zone change less than the most equivalent to current zoning diminishes property rights of the local commercial property owners and limits opportunities for Woodstock's growth and vitality.

The Woodstock community has worked together to create a vision for our neighborhood. I wish to voice that this decision was not based on our vision and is not in line with Portland's "20 minute neighborhood" goals.

Therefore, I ask that current level of zoning be restored to the proposed map prior to these latest revisions and that there is consistent zoning in the core of the Woodstock Business District.

Please add this to the record.

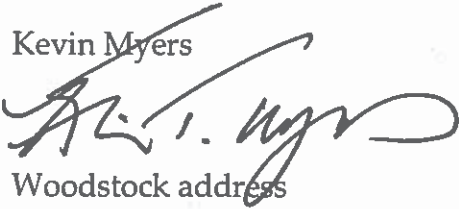
Thank you,

*Christie E Eichenkopf*  
Name: *Christie E Eichenkopf, daughter of owner*  
Address: *4909 SE 42nd*  
*Portland, Or 97206*

*Future business owner of Otto's Sausage Kitchen*

This signature page is attached to the Woodstock Stakeholders letter dated May 5, 2016, addressed to the Portland Planning and Sustainability Commission in testimony against the City's recommendation to rezone several properties in the Woodstock Business District from CS to CM1.

Kevin Myers

A handwritten signature in black ink, appearing to read "K. Myers", written over the printed name "Kevin Myers".

Woodstock address

5827 SE 43<sup>rd</sup> Ave  
Portland, Oregon 97206

Mailing Address

Same





Woodstock Community Center, 5905 SE 43rd Avenue, Portland, Oregon 97206

To: The Portland Planning and Sustainability Commission  
From: The Woodstock Neighborhood Association  
Re: Low-rise Commercial Storefront designation at SE Woodstock Blvd.

With this letter, the Woodstock Neighborhood Association wishes to speak against the proposed low-rise commercial storefront designation of a portion of the Woodstock Commercial corridor.

The March 2016 Proposed Draft of the Mixed Use Zones Project (MUZ) introduced new mapping and Zoning Code regulations intended to continue the scale and characteristics of older main street areas where low-rise Streetcar Era storefront buildings are predominant. The Proposed Draft identifies some properties along Woodstock Blvd., between SE 44<sup>th</sup> Ave and SE 47<sup>th</sup> Ave to be rezoned Commercial Mixed Use 1 (CM1).

The Woodstock Neighborhood Association and its Land Use Committee believe that the CM1 designation does not meet the intent and criteria of the Low-rise Commercial Storefront Areas as the properties included do not have contiguous concentration of low-rise Streetcar Era storefront buildings. In fact, the buildings included in these blocks are utilitarian commercial structures built in the 1940's or later. Interesting to note, the proposed CM1 designation includes a New Season store that opened in late 2015. While we appreciate the city effort to preserve areas of the city with buildings of established historic character, we believe this does not apply to the Woodstock Commercial Core. Furthermore, the 80' width of Woodstock Blvd Right of Way is about 20' wider than most of the other locations within the city where the CM1 designation is being proposed, making the height of buildings to width of right of way ratio less of a concern.

Most of the properties within the proposed CM1 designation are currently zoned CS. Table VI-1 Zone Conversion Table (p.316) in the MUZ Project Proposed Draft indicates that for Mixed Use Neighborhood Comprehensive Plan Designation (such as Woodstock Blvd.), the conversion of the current CS zone would correspond to CM2 in the new MUZ Project. We believe that the CM2 designation is more appropriate for the subject properties, more consistent with the current zoning entitlements as well as with previous drafts of the MUZ Project that have been circulated over the course of the Comp Plan Update process.

Representatives of the Woodstock Stakeholders Group (commercial property owners), made their case against the CM1 designation at the WNA general meeting on April 6, 2016. At that meeting, the WNA board voted in support of the Stakeholders Group and gave the mandate to the Land Use Committee co-chairs to draft a letter of support for the Stakeholders Group and against the proposed CM1 designation. At the April 20, 2016 meeting, the Woodstock Land Use committee further discussed the matter and a straw poll vote showed again support for the Stakeholders Group.

The content of the above testimony was reviewed once again by the Woodstock Neighborhood Association board on May 4, 2016.

Respectfully submitted,  
Ben Bortolazzo and Terry Griffiths  
Co-Chairs, Woodstock Neighborhood Association Land Use Committee

**From:** wheekatielee@gmail.com [mailto:wheekatielee@gmail.com] **On Behalf Of** Katie Todd  
**Sent:** Thursday, May 05, 2016 9:41 AM  
**To:** BPS Comprehensive Plan Testimony <cputestimony@portlandoregon.gov>; Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Testimony - thank you!

Dear Members of the PSC,

The purpose of this letter is to provide testimony regarding treatment of small (less than 7500 sq. ft.) isolated Commercial Mixed Use 1 (CM1) zoned parcels contemplated under the Mixed Use Zones Project. City code section 33.130.100 B 2 c, adds a limitation to the CM1 zone for sites less than 7,500 sq. ft. that abut properties that are in a single family zone, and are operating as Retail Sales and Service, limiting hours of operation to 6AM - 11PM. Additional specific limitations for small isolated commercial zoned parcels in primarily residential areas need to be codified to make the Mixed Use Zones Project consistent with the intent of the proposed 2035 Comprehensive Plan update.

Section II of the Mixed Use Zones Project Proposed Draft (March 2016) describes the relationship of this project to the comprehensive plan. Specifically, Goal 10.1 (Land Use Designation) part 13 expresses the intent of a CM1 land use designation that I believe would be applicable to isolated commercially zoned parcels in residential neighborhoods as follows:

**13. Mixed Use — Dispersed.** *This designation allows mixed use, multi-dwelling, or commercial development that is small in scale, has little impact, and provides services for the nearby residential areas. Development will be similar in scale to nearby residential development to promote compatibility with the surrounding area. This designation is intended for areas where urban public services are available or planned. Areas within this designation are generally small nodes rather than large areas or corridors. The corresponding zones are Commercial Mixed Use 1 (CM1) and Commercial Employment (CE).*

I believe the intent of this element of Goal 10.1 is clear:

- small in scale
- has little impact
- provides services for the nearby residential areas

Under current CM1 zoning up to 29 micro housing units could be constructed on a parcel less than 7500 sq. ft. with no consideration of scale, impact or provision of services that I believe are inconsistent with the intent of the goals of the 2035 Comprehensive Plan.

Our residence is located across SE 21<sup>st</sup> Ave from Peoples Food Co-op (3029 SE 21<sup>st</sup>, Portland, OR), an isolated commercial site, which for 45 years has operated a retail grocery on a non-conforming residential parcel which is likely being rezoned as CM1. As a neighbor of this site and under current non-conforming use provisions - we currently are afforded protections against noise, redevelopment, and increased impacts that they stand to lose under the new rules and which are inconsistent with the intent of the planning goal described above. To address this inconsistency, I request consideration that code section 33.130.100 B 2 c be expanded to accommodate the following issues consistent with Goal 10.1 part 13.

1. **Loss of Neighborhood Commercial Resources:** With commercial zoning, it would be possible to redevelop these sites for high-density residential use with no commercial elements at all. This is in contrasted to the stated reason for making these isolated non-conforming use sites commercial is to retain commercial use on these sites so they can continue providing services to the surrounding residential areas. *The zoning rules need to require that, at a minimum, the ground floor must remain in commercial use should the site be redeveloped.* An alternative might be to specify that should these sites be developed as entirely residential, the

permitted density would be that of the highest density adjacent residential zone. *Without one of these proposals, we fear development pressure might cause the loss of the commercial function that is critical to maintaining a livable community.*

2. **Change of Use:** There are currently restrictions on change-of-use that would trigger review if the cumulative impacts of a site increase. This restriction is important to ensure a change in use would remain compatible with a neighborhood setting. *This existing review mechanism should be added back to the zoning code.* As an example, nearby residents are concerned that the quiet natural food grocery on SE 21<sup>st</sup> Ave currently in non-conforming use might someday be bought and converted into a bar, which would be possible under the proposed rules. This highlights the significant impact that a single isolated commercial property can have on its neighbors.
3. **Applicability of Use:** The proposed rules should apply to all commercial uses, not just Retail Sales and Service. The intent here is to limit nighttime noise and activity and to limit other impacts to neighbors from these sites; I believe these rules should apply to all commercial uses.
4. **Noise:** Existing regulations limit daytime noise emitted from non-conforming residential sites as measured on the property line of the nearest residential receiver to 55dBA (nighttime noise limits are lower) [City of Portland Charter Chapter 18.10.010], however if these properties are granted commercial status, permissible noise levels will increase to 60dBA. Given that a 10dBA increase represents a doubling of perceived volume, 5dBA is a significant increase. The code should specify that isolated commercial sites such as these have the same noise emission limits as residential sites, which is the rule today for non-conforming properties.

One other major shortcoming of the proposal as it stands is that it only affects properties adjacent to single family zones. This should be changed to include *any* residential zone; all residential uses should enjoy the protections this rule is intended to convey, especially now that home ownership is financially out of reach for many households in Portland.

I am not opposed to commercial uses' being interspersed throughout residential neighborhoods. I appreciate the benefit that commercial properties can provide to our neighborhoods, and the role they play in helping to create livable neighborhoods. These isolated commercial properties need to exist harmoniously with their residential neighbors, and are proposing these rule changes toward meeting that goal.

Proposed zoning code should be updated to include the additional restrictions that are in place today for non-conforming residential parcels that will be re-zoned to commercial parcels consistent with Goal 10.1 (Land Use Designation) part 13. The unique relationship between residential areas and the isolated commercial parcels embedded within them requires code modification to preserve the fabric of our neighborhoods.

Thank you for your consideration.

Katie Todd  
3126 SE 22nd Ave  
Portland OR 97202

VIA HAND DELIVERY - 12 COPIES

**To:** Planning and Sustainability Commission (PSC)

**From:** Darnell Jackie Strong and Luther Strong (Property owners in the N/NE Portland corridor/center)

**Address of properties:** 4931 N. Williams; 4937 N. Williams; 4939 N. Williams; 4947 N. Williams; 20 N. Alberta; 106 N. Alberta; 114 N. Alberta (Jointly these properties equal approximately 1 acre).

**Date:** 5/05/16

**Re:** Document requesting Zone designation be revised to CM2 on properties owned by the mentioned parties.

Dear committee members:

We the Strong brothers have been engaged in conversations with various members of PSC for several months. During the course of those conversations and related meetings we came to believe our property had a good chance to be zoned as CM2. However in the recent draft of the comprehensive plan it appears that you have proposed a CM1 designation, to our surprise and disappointment.

The purpose of this document is multiple, first it is to ask the Planning and Sustainability Commission to consider zoning our property to (CM2) versus the proposed zoning of (CM1) as outlined in your tentative plan.

The second purpose is to present our reasons why we are requesting this zone change to happen and to have those reasons documented with your office. The following bullet points details the reasons we are making this request:

- A review of your proposed draft summary reveals that the intent of the plan is to create zones of activity so that persons have the ability to walk or bike to get the things they need. Our properties have the unique position of being in the middle of the activity happening all around us. It is our belief that our property could be the center jewel in the middle of this activity.
- Our property is situated a mere 2 to 3 tenths of a mile from (Killingsworth) to the North, (Skidmore) to the South, (MLK) to the East and (Albina) to the West all short walking distances. There are also regular bus schedules and bike lanes that make our property easily accessible to community members. The high level of activity happening all around us reflects that we are not in a low density area and high density mixed use developments are going up within close proximity to our property regularly. Our properties are directly on the

- I have been in contact with several neighbors close to our properties and they are in agreement that a CM2 zone designation supports their vision of how this block should zoned.
- The Strong family, African American owners of the properties involved, have been long time neighborhood members dating back to 1956. The family is well known politically and is also known as being socially conscientious as represented by Luther Strong and Opal Strong, who is now 100 years of age. Both were community activists and mentors to leaders of color. Opal Strong was appointed by the late Governor Vic Atiyeh and served as a board member for the council of senior citizens, a state wide effort. She was also a founding member and active participant leading the Humboldt/King neighborhood associations dating back to model cities, which is now the N/Ne coalition of neighborhoods.

Their social work skills were passed on to their children and grandchildren who are also passionate about serving the community of Portland. The off springs have shown that same drive to help others and illustrate such by having positions of importance in the African American community and the community at large. For example her two sons who own these properties are concerned about how to address the issues of gentrification, affordable housing and job creation in N/NE Portland. Another one of her grandchildren is the Pastor of one of the largest predominantly African American churches in Portland, while yet another grandchild is a top administrator at the United Way.

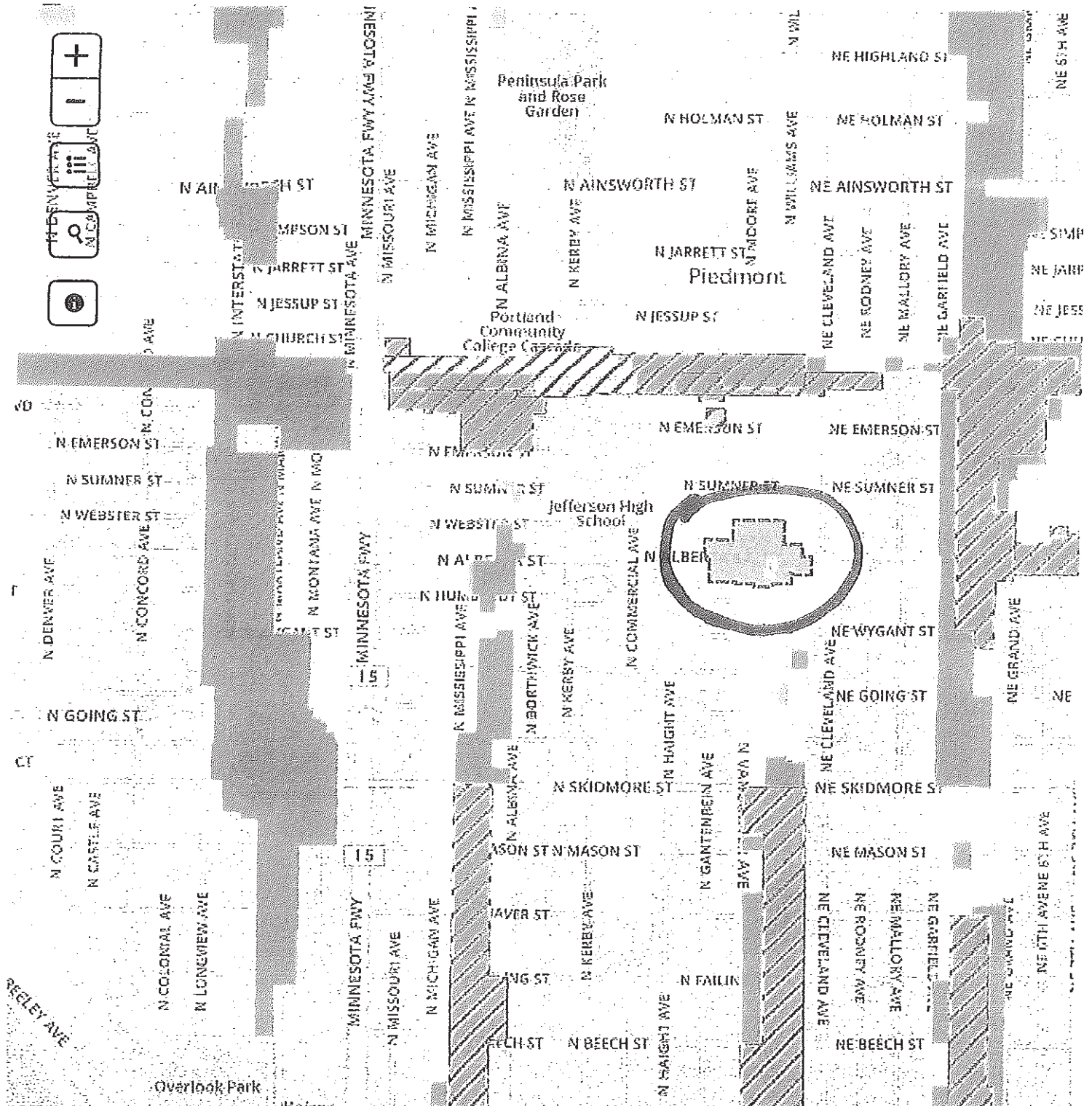
I believe that as long time residents of this neighborhood and as long time owners of these properties since 1976, we are uniquely positioned to give credible and sound input about future zoning in the community where we still live and care deeply about.

In conclusion I want to reiterate that it is the Strong brother's intent to pursue development opportunities for our properties. Additionally we are excited about the possibility of teaming with the City of Portland, the offices of the Commissioners, Private developers, Nonprofit housing programs like the Portland Housing Bureau and the African American community to quell the issue of gentrification and affordable housing.

Thank you for your time to receive and review our input about changing the proposed zone to CM2.

The Strong brothers  
Jackie Strong  
Luther Strong





Strong Property

Ashley Roscoe  
Roscoe and Roscoe, Inc.  
DBA Always-V-Dub  
1824 SE 50<sup>th</sup> Avenue  
Portland, OR 97215

May 5<sup>th</sup>, 2016

Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

Dear Planning and Sustainability Commission,

My name is Ashley Roscoe, I am the owner of Always-V-Dub. We have been serving the South East Portland community for 25 years with 17 years at our current location on SE 50<sup>th</sup> Avenue. I grew up in the upper Hawthorne neighborhood and have chosen continually to make an effort to be part of it. As our city continues to change and grow we at Always-V-Dub hope to be part of the evolution for years to come.

We founded our business in a building on SE 6<sup>th</sup> and Oak. As our business slowly took off, we looked to expand our offerings and we realized we would find a permanent home. When we bought the building at 1824 SE 50<sup>th</sup> Avenue in June of 1999 it was being used to warehouse C-Store retail items. Prior to that it was a commercial industrial magnet facility (Magnetic Specialties) for many years.

We are a specialty auto parts and vehicle repair business focusing on air-cooled Volkswagens. By the unique nature of these vehicles and their increasing age, we would be considered very low volume in comparison to many other repair facilities within the City of Portland. We offer routine maintenance as well as major overhauls. Where many of our contemporaries have closed in recent years we continue to be a viable part of our local and regional economy. Over 80% of our customers live on the east side of Portland with the vast majority of them here in South East Portland. It is true that many of the vehicles we service are no longer daily driven transportation, regardless they are still a part of their owners lives that they love and cherish. Our customers like that we are on a bus line and many take the bus or use bikes as their transportation when they drop their vehicles off at our facility.

Currently 90% of our repair activities are performed inside our facility. Weather permitting we do open our south facing roll up door while we conduct certain testing and adjustments but vehicles primarily stay within the confines our building. Upon occasion we perform some repairs in our parking area. The 10% of repair activities performed outside are considered exterior work activities in the Portland Zoning Code. Exterior work activities would become prohibited in the proposed Commercial Mixed Use 1 zone. There is also exterior storage onsite in the way of 3 storage containers on the property, one 28' semi-trailer, and parking for 12 cars and sometimes have as many as 18 within our gated lot. Exterior storage, as defined in the Portland Zoning Code, would become prohibited in the proposed Commercial Mixed Use 1 zone.

Our building is presently zoned as **General Commercial**.

The Proposed Zoning Map designation is **Commercial Mixed Use – 1**.

This zoning change would prohibit the primary purpose of our business - vehicle repair with exterior work activities and exterior storage. While we understand that we would be grandfathered

in under the zoning change and would be able to continue to be able to perform vehicle repair, our ability to continue to grow and to evolve with the needs of our customers would be severely restricted.

I would propose meeting you in the middle, asking to change our Proposed Zoning Map designation to **Commercial Employment**. The designation of **Commercial Employment** would allow us to feel secure in our ability to do business at this location for years to come. While it is my intention to continue my business at this location for any foreseeable future, the change to **Commercial Mixed Use - 1** offers too many possibilities for jeopardy.

Since the redevelopment along 50<sup>th</sup> really began to take off, I have been approached by many of my neighbors who have asked if I intend to sell. When I tell them I have no intention, they have thanked me for my commitment to the neighborhood. As the neighborhood changes, we understand we may need to change too. But we have seen too many businesses that were grandfathered in under new zoning eventually forced out by new neighbors displeased by the type of business they are adjacent to.

While not completely immune to economic downturns over our 25 years in business, we have weathered both the tech bubble in 2000 and the depression of 2008-2010. While some customers came and went, the nature of our business is not as fleeting as many restaurants or shops. We have continued to be a consistent source of tax revenue for the City of Portland and stand to do so for many years to come.

Like many repair, machining and manufacturing businesses we have found ourselves under incredible financial and regulatory pressures to remove our business from South East Portland. It would be less expensive to operate in Clackamas County. This is not what I want to do. This is not about the money. If I had wanted to “cash out” I could have already done that along with many of the other businesses along 50<sup>th</sup>. As I have stated: I am from here, my customers are here and I made it a point to build my business **here**. I want to keep my business here and I don’t want to do it under the shadow of a change of zoning that does not permit it.

Please consider our proposal for Commercial Employment.

Sincerely,

Ashley Roscoe

Address: 1824 SE 50TH AVE

Account #: R177108, R177109 and R177110

Existing Comprehensive Map designation: General Commercial

Recommended Comprehensive Plan Map designation: Mixed Use – Neighborhood

Proposed Zoning Map designation: Commercial Mixed Use – 1

Requested Zoning Map designation: Commercial Employment

RECEIVED  
PLANNING & SUSTAINABILITY

2016 MAY 10 A 9:02

UTB Enterprises, LLC  
20450 NW Amberwood Dr, STE 120  
Beaverton, OR 97007  
503-614-1922

May 5, 2016

Barry Manning  
Senior Planner  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

**Re: Mixed Use Zones Project  
Request for CE Zoning for McDonald's Restaurants**

Dear Mr. Manning:

I am the Owner/Operator of McDonald's restaurants here in the area and wish to comment on the proposed zoning for the McDonald's restaurants located within the City of Portland outside the Central City and Gateway Plan Districts.

We submit this letter requesting that the proposed zoning for all of McDonald's existing restaurants subject to the mixed use zones project be CE, for the reasons stated below.

A majority of our business derives from the operation of the drive-through facility component of the restaurants. This is a choice our customers make for many reasons that accommodate their needs.

Their choice to use the DT may be so they can take food home to a family or to work, access food overnight when inside dining is closed for safety concerns for our employees, managing small children/ infants in the car vs in restaurant, people with disabilities (my daughter is an example) who can access without managing a wheel chair. Elderly folks with mobility issues.

There are many other reasons that people choose the convenience this provides for their lifestyles. Our customers have a choice to dine in or use the DT. Clearly our DT provides access that would otherwise be denied with walk in only facilities.

We are concerned that the proposed mixed use zones greatly reduce our ability to maintain, modernize and develop new drive-through facilities. As we currently have a DT a misapplied designation might prevent us from making repairs or modernizing the area or the restaurant which promotes "old buildings" and outdated facilities that could become safety or neighborhood blights.

The only proposed mixed use zone which does not expressly prohibit drive-through facilities is the new CE zone. For that reason alone, we hereby request that all existing McDonald's restaurants be zoned CE.

Even if the McDonald's stores are zoned CE, we are concerned that the existing CE zone is not truly auto-accommodating, as currently defined in Portland Zoning Code.

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.

Two of my restaurants are located at 10050 SW Barbur Blvd, in Portland with existing and proposed zoning, is attached. We would appreciate the opportunity to further discuss our request prior to the issuance of your next staff report.

Yours truly,

  
Donald Armstrong

Owner  
Enclosure

Cc: RTF/ICSC GR Committee



	Official Name	Address	Existing Base Zone	Existing Overlay Zone	Existing Plan District	Proposed Base Zone	Proposed Overlay Zone	Plan District Changes
	Capital Hwy/Barbur	10050 SW Barbur Blvd.	CG	N/A	N/A	CM2	CMSO, (d)	N/A

May 5<sup>th</sup>, 2016

To: The Planning and Sustainability Commission,

The population is increasing on N. Interstate Ave. and the bordering neighborhoods. We are seeing increased traffic and other livability challenges that come with residential density. We need public space, retail space to provide residents with services and support pedestrian use. We would ask that the new Mixed Use Zones project require commercial uses on the ground level of all new development on the N. Interstate Corridor to support these goals.

We will soon lose a long time neighborhood establishment, The Interstate Lanes Bowling Alley (6049 N. Interstate Ave.), to new development. Fairfield Residential will build 175 apartments with limited parking and no mixed use, commercial or public space on the ground floor. This is a great concern for the neighborhood. We will gain a new population of residents, while we lose a community gathering space. The developer is not required at this time to include any mixed use or any green space, or public use area in this building.

N. Interstate Ave. is a major connecting street, bringing people to the Moda Center, Kaiser Permanente, Providence Health Clinic; bringing tourists and visitors from the airport to downtown. With the MAX line and transit center located on N. Interstate Ave. and its central location close-in to downtown and easy access to I-5, it is a city corridor ready to support a variety of new businesses and community services.

**We ask for new Mixed Use Zones project to require developers to:**

**Provide commercial space on the ground levels to allow for new retail and basic community services.**

**Provide some parking in residential buildings.**

**Use sustainable and environmentally friendly building practices.**

**Include natural and green space, public space, trees, and public use amenities at the street.**

As a city we must be active in our actions to deal with urban growth. We want to see immediate intervention by city zoning agencies to address the buildings being built today. Without the zoning that will require mixed use space in new development we are very concerned N. Interstate Ave. will become a densely populated major street with no space to hold the basic services that would support the coming population.

As the population increases with high density development we hope to see the city provide developers with incentives which support public use amenities like pocket parks, public benches, water features, space for trees, community gardens, farmer's markets and other amenities for public use. We hope Portland's inner city streets can develop in a way that will provide for future generations, safe sustainable, pedestrian friendly community centers.

Deborah and Bill Kalapsa

503 282 6697

Residents of the Overlook Neighborhood since 1985.

Job Hall  
Real Estate Consultant  
1010 Grant Street  
Eugene, OR 97402  
503-318-8149  
May 5, 2016

Planning and Sustainability Commission

Sent via Email to the PSC

Re: The Block of Land Within SW4<sup>th</sup> St, SW Sheridan St, 5<sup>th</sup> St., and SW Caruthers St.

Dear Commissioners:

I have been hired by the owners of the block described above to increase their proposed zoning from CM2 to CM3 to allow full development of the block. I have been retained by the owners of the Travel Lodge and have reached out to the remaining land owners in the block and have received positive feedback from the remaining land owners to join this petition for the land use change.

Presently the block is made up of the Travel Lodge and 5 homes that have primarily been turned into offices. The block is on the edge of the downtown free transit corridor for ease of getting to work without the need for a car. The land owners have agreed that the property should be developed into a 75' property with retail on the ground floor and housing above.

The owners of the property envision a residential makeup of rent controlled units, handicapped units and market priced units. The plan would provide much needed housing for the poor and disabled in walking distance to mass transit, while providing normal rental units to create a sustainable business venture. This project would also provide new places for people to live and work on the edge of downtown. The property has excellent access to mass transit, and the property owners feel a project of this type would help the city to create a healthy complete neighborhood.

This project would allow for multiple types of housing and retail on the street levels, and would reduce the need for automobiles as the property is on a mass transit line and is blocks away from

the transit free zone. This area is ripe for redevelopment due to its location, and the rezoning to CM3 would allow for growth right outside the downtown center. The new development would serve many types of residents, and is a mixed use project, just what is desired in the new plan. Additionally, the property is sandwiched between two developments that are at least 75' in height, so allowing the desired zone change would allow similar development to be placed in the area.

The proposed project would have attractive street level design and as already stated has active transportation options available. With the mix of residential uses the project would fulfill many of the stated desires of the new City of Portland Comprehensive Plan. The owners request the zoning of the property be changed to CM3 to allow this development to move forward.

Thank you,

Job Hall

Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

May 5, 2016

**VIA EMAIL**

Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

**Re: Portland Mixed Use Zones Project**

Dear Chair Schultz and Commission Members:

This letter is written on behalf of Fred Meyer, Inc. regarding the proposed zoning for Fred Meyer's Portland stores. I forward Fred Meyer's letter of March 30, 2016 and ask that it be placed into your hearing record. Fred Meyer intends to present additional testimony during the hearing process.

Very truly yours,



Mark D. Whitlow

MDW:sv  
Enclosure





**Corporate Real Estate**  
3800 SE 21<sup>st</sup> Ave.  
Portland, OR 97202

*Don Forrest*  
Division Real Estate Manager  
*don.forrest@kroger.com*

*Fax* (503) 797-3117  
(503) 797-3539

May 5, 2016

Portland Bureau of Planning and Sustainability Commission  
1900 SW 4th Avenue #7100  
Portland, OR 97201

**Re: Portland Mixed Use Zones Project**

Dear Commission Members:

I am the Division Real Estate Manager for Fred Meyer Stores, Inc. I write this letter in response to the City's proposed zoning for the Portland Fred Meyer grocery stores and fuel stations shown on the table below.

We request that the stores now zoned CG be zoned CE, as the most similar auto-accommodating zone. We also request that the other existing stores in the CS, CX and EX zones also be zoned CE, except for our Stadium store on NW 20th Place which was recently remodeled into a more urban footprint, to avoid nonconformity with the transit and pedestrian oriented purpose statement of the proposed CM2 or CM3 zones, which would impede auto-dependent store upgrades and re-developments. We note that 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, so we believe that is the basis for changing the zoning on site nos. 1, 2, 3, 7 and 9 in the chart below to CE.

	Address	Existing Base Zone	Proposed Base Zone
1.	3805 SE Hawthorne Blvd.	CS	CM2
2.	6615 NE Glisan St.	CG	CM2
3.	7555 SW Barbur Blvd.	CG	CM2
4.	100 NW 20th Pl.	CX	CX
5.	3030 NE Weidler St.	CG	CE
6.	6850 N. Lombard St.	CG	CE
7.	7404 N. Interstate Ave.	CX	CM3
8.	14700 SE Division St.	CG	CE
9.	5253 SE 82nd Ave.	EX	CM3



**Corporate Real Estate**  
3800 SE 21<sup>st</sup> Ave.  
Portland, OR 97202

The list shows that not all of our stores are being comparably zoned "to the most similar new zone", or to zones that recognize nonconforming situations for our existing grocery supermarkets that incorporate drive-through facilities in their store operations. For the six (6) Fred Meyer stores zoned CG, the "most similar" zone would be the new CE zone, which would be the current auto-accommodating CG zone converted to the new auto-accommodating CE zone as "the most similar". We request that all stores now zoned CG be zoned CE, except for the "Stadium" store at NW 20th Place.

The new zoning also needs to recognize the auto-accommodating nature of our existing store developments as existing nonconforming situations, which are inconsistent with the purpose of the pedestrian or transit oriented mixed use zones. For that reason, we request that the other stores now zoned CS, CX or EX should also be zoned CE.

For the stores being proposed for zoning as CM2 or CM3, the CM zoning will make them all more nonconforming to some degree, which will make grocery store or fuel station upgrades and remodels more difficult. Fred Meyer wishes to avoid mixed use zoning that will make its existing stores and fuel stations more non-conforming, as now proposed.

Further, all of the CM zones prohibit drive-through facilities. As you know, Fred Meyer offers fuel at many of its locations and would like to have the option of adding fuel to its other Portland stores in the future. Fred Meyer has recently initiated its ClickList program allowing customers to order online and pick-up their groceries at the store using a drive-through lane. Fred Meyer utilizes pick-up windows for its pharmacy department in various locations. Because of those operational features, Fred Meyer requests CE zoning (except for the Stadium store), the only new zone intended to be auto-accommodating, for its Portland stores. The CE zone does not prohibit drive-through facilities and has an appropriate purpose statement which is needed for expansions and store redevelopments.

If CE zoning is unavailable for all of Fred Meyer's existing auto-accommodating grocery store developments, to accommodate our need to expand or redevelop or add fuel or ClickList facilities, please exempt drive-through facilities in conjunction with grocery supermarkets in the mixed use zones. Grocery supermarkets routinely utilize drive-through facilities for fuel, pharmacy pick-up and grocery pick-up. Allowing multiple stops on one site in a single trip reduces vehicle trips and vehicle miles traveled.

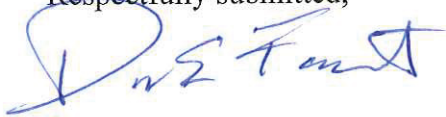
Thank you for the opportunity to comment. Please make this letter a part of the hearing record.



**Corporate Real Estate**  
3800 SE 21<sup>st</sup> Ave.  
Portland, OR 97202

We would appreciate the further opportunity to work with your staff at your direction regarding our issues. We remain available to answer their questions and to provide further comments.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Don Forrest". The signature is stylized with a large, looping initial "D".

Don Forrest

Cc: Mayor Charles A. Hales





## DIERINGER'S PROPERTIES, INC.

10505 SE 44<sup>th</sup> Ave, Milwaukie OR 97222  
503-659-1402 Fax 503-659-1625

May 5, 2016

To Portland Planning and Sustainability Commission  
RE: Mixed Use Zones Testimony

Dear Planning Commissioners,

The most recent zoning map reflects last minute zoning changes that came as a surprise to many. In the heart of the Woodstock Business District, properties currently zoned CS that should receive an unbiased and lateral change to the new CM2 zone were changed to CM1 which we consider a down-zone. Woodstock Business District should be exempt from these recent changes in proposed zoning recommendations as we don't believe that our community ever requested or wants to be included in these proposed changes.

Among other testimonies heard about Woodstock today, here are points we feel are important:

1. The new CM2 zone is already considered to have fewer rights than the current CS zone. This recommended change to CM1 downgrades and reduces affected property owners' rights even further.
2. It doesn't take a genius to realize that more restrictive rights has a negative impact on a property's value. Property owners are not being compensated by the City for what should be considered a "taking" (a "taking of rights") without due process or compensation.
3. There is definitely an argument that this proposed change is not equitable to all properties in this effected area. Aside from the "taking" & reduction in value due to a down-zone, these properties (if zoned CM1), will be surrounded by CM2 zoned properties enjoying outright the benefits of a CM2 zone AND without having to argue, appeal, retain counsel and/or pay unreasonable costs to receive those rights simply by receiving a lateral zoning to the most comparable new Mixed Use Zone which is CM2.
4. There was no outreach to our Woodstock community to get feedback on what was important to OUR community. Instead, a broad brush approach based on criteria created to satisfy only a couple of noisy neighborhoods, most particularly Multnomah Village, was inconsistently applied to our Woodstock Blvd. In 2015, a brand new New Seasons Market opened at SE 45<sup>th</sup> & Woodstock - well before new CM1 zone was proposed. This brand new building was built to the current CS zoning and is just under the 45' height limit, yet the city proposes a zone change to this property "to preserve low-rise Streetcar Era buildings". It doesn't take a rocket scientist to see that this new development DOES NOT meet the criteria, would not be in compliance, and breaks up 400 contiguous lineal feet of what planners errantly saw as "low-rise Streetcar Era buildings". Furthermore, City Staff appears to ignore the response from the Woodstock Community outreach and visioning completed in a Charrette conducted in response and already given as testimony to Portland's Comprehensive Plan.

All that being said, our property located at 4411 SE Woodstock is not directly effected by this recent recommended change as our property would be receiving what is considered a lateral zone change from CN2 to CM1. HOWEVER, in anticipation that the Planning Commissioners

will agree with this and others' testimony on what is best for Woodstock, and be recommending that the zoning map for Woodstock revert back to the prior map reflecting all CM2 zoning in the core of the Woodstock Business District, then our property (and adjacent Hanna property) currently proposed to become CM1, and if not also changed to be reflect CM2 zoning, would then be an island in an ocean of CM2 zoned properties, which most planners & professionals we have talked to say call "poor planning". Therefore I respectfully request that the zoning for our property at 4411 SE Woodstock be changed to reflect the anticipated surrounding zoning of CM2.

Thank you for your consideration.



Eugene Dieringer  
President

Woodstock Neighborhood Resident  
4138 SE Lambert St.  
Portland OR 97202

and effected Woodstock Property Owner @  
4411 SE Woodstock  
Portland OR 97206



Mark D. Whitlow  
MWhitlow@perkinscoie.com  
D. +1.503.727.2073  
F. +1.503.346.2073

May 5, 2016

**VIA EMAIL**

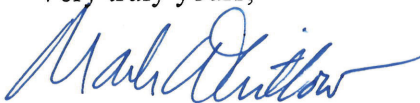
Portland Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

**Re: Portland Mixed Use Zones Project**

Dear Chair Schultz and Commission Members:

This letter is written on behalf of Albertsons Companies, Inc. regarding the proposed zoning for Albertsons and Safeway Portland stores. I forward Albertsons' letter of February 29, 2016 and ask that it be placed into your hearing record. Albertsons and Safeway intend to present additional testimony during the hearing process.

Very truly yours,



Mark D. Whitlow

MDW:sv  
Enclosure

February 29, 2016

Barry Manning  
Senior Planner  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

**Re: Mixed Use Zones Project  
Request for CE Zoning for Albertsons/Safeway Stores**

Dear Mr. Manning:

I am the Senior Real Estate Manager for Albertsons Companies, Inc. and wish to comment on the proposed zoning for the Albertsons and Safeway stores in the areas of Portland subject to the proposed mixed use zones. Our stores are all "auto-accommodating", as defined in the Portland Zoning Code (copy attached). None of the proposed mixed use zones provide development standards which are as auto-accommodating as the development standards (for access, parking and main entrance locations) contained in the definition, but the CE zone comes the closest. Also, we notice that the CE zone is the only new zone that doesn't prohibit drive-through facilities, which are part of our grocery supermarket operations. Therefore, we request that our store sites be zoned CE, without the CMSO overlay, because we need auto-accommodating development standards to continue to operate, modernize and grow our grocery supermarket business in Portland. A list of our existing Albertsons and Safeway stores impacted by the Mixed Use Zones Project is attached.

We are also concerned about the high degree of nonconformity which will be created for our existing Portland stores if they are zoned anything but CE. Nonconformity lowers market value, makes it more difficult to obtain financing and to sell and, finally, makes it difficult if not impossible to maintain and upgrade in the interim. Zoning the Albertsons and Safeway stores to CE, with no CMSO overlay, will be necessary to avoid excess nonconformity.

We are also concerned that the proposed CE zone is not truly "auto-accommodating". Accordingly, we would ask that consideration be given to softening the main entrance and glazing requirements of the CE zone's development standards to be consistent with the Code's definition of "auto-accommodating".

Finally, we are concerned with the City's proposal to greatly reduce, if not effectively eliminate, drive-through facilities in the City. Please remember that grocery supermarkets consist of a variety of drive-through facilities, including those for fuel, pharmacy and grocery pickup. In addition, grocery supermarkets frequently have pad users with drive-through facilities for restaurants, banks and coffee shops. Elderly citizens and people with disabilities rely on drive-through facilities to assist them in obtaining their daily goods and services. We request that fuel stations in conjunction with grocery supermarkets be exempted from any prohibition of drive-through facilities in any of the zones, especially the CE zone.

Working together to be the *favorite local supermarket™*

Thank you for the opportunity to present written comments. We would appreciate an opportunity to further discuss our recommendations with you prior to the issuance of your next staff report.

Yours truly,



Eric Holzer

Enclosure

Cc: RTF/ICSC GR Committee

Store			Current Zoning		Proposed Zoning	
Banner	Street Address	Sq. Ft.	Zoning	Zoning	Comp Plan	Overlay Zone
Safeway	3527 SE 122nd Ave	48,564	CG	CE	MU-C	No
Albertsons	5415 SW Beav.-Hillsdale Hwy	37,547	CG	CE	MU-C	No
Safeway	5920 NE Martin Luther King Blvd	39,064	CG	CM2	MU-C	No
Albertsons	5850 NE Prescott St	48,754	CG	CM2	MU-N	CMSO
Safeway	11919 North Jantzen Ave	54,975	CG	CE	MU-D	No
Safeway	6901 NE Sandy Blvd	51,602	CG	CM2	MU-C	CMSO
Safeway	221 NE 122nd Ave	52,568	CX	CM3	MU-C	CMSO
Safeway	4515 SE Woodstock	54,689	CN2	CM2	MU-N	CMSO
Safeway	3930 SE Powell Blvd	47,248	CG	CM2	MU-C	CMSO
Safeway	8336 N. Ivanhoe St	56,536	CN2	CM2	MU-UC	No
Safeway	2800 SE Hawthorne Blvd	55,787	CS	CM2	MU-UC	Design
Safeway	8145 SW Barbur Blvd	62,925	CG	CM2	MU-C	No

Working together to be the *favorite local supermarket™*



**From:** Mark Leece [mailto:mleece1@gmail.com]

**Sent:** Wednesday, May 04, 2016 10:54 PM

**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>

**Cc:** Stockton, Marty <Marty.Stockton@portlandoregon.gov>

**Subject:** Treatment of Isolated CM1 Parcels - Mixed Use Zones Proposed Draft Testimony

Dear Members of the PSC,

The purpose of this letter is to provide testimony regarding treatment of small (less than 7500 sq. ft.) isolated Commercial Mixed Use 1 (CM1) zoned parcels contemplated under the Mixed Use Zones Project. City code section 33.130.100 B 2 c, adds a limitation to the CM1 zone for sites less than 7,500 sq. ft. that abut properties that are in a single family zone, and are operating as Retail Sales and Service, limiting hours of operation to 6AM - 11PM. Additional specific limitations for small isolated commercial zoned parcels in primarily residential areas need to be codified to make the Mixed Use Zones Project consistent with the intent of the proposed 2035 Comprehensive Plan update.

Section II of the Mixed Use Zones Project Proposed Draft (March 2016) describes the relationship of this project to the comprehensive plan. Specifically, Goal 10.1 (Land Use Designation) part 13 expresses the intent of a CM1 land use designation that I believe would be applicable to isolated commercially zoned parcels in residential neighborhoods as follows:

**13. Mixed Use — Dispersed.** *This designation allows mixed use, multi-dwelling, or commercial development that is small in scale, has little impact, and provides services for the nearby residential areas. Development will be similar in scale to nearby residential development to promote compatibility with the surrounding area. This designation is intended for areas where urban public services are available or planned. Areas within this designation are generally small nodes rather than large areas or corridors. The corresponding zones are Commercial Mixed Use 1 (CM1) and Commercial Employment (CE).*

I believe the intent of this element of Goal 10.1 is clear:

- small in scale
- has little impact
- provides services for the nearby residential areas

Under current CM1 zoning up to 29 micro housing units could be constructed on a parcel less than 7500 sq. ft. with no consideration of scale, impact or provision of services that I believe are inconsistent with the intent of the goals of the 2035 Comprehensive Plan.

Our residence is located across SE 21<sup>st</sup> Ave from Peoples Food Co-op (3029 SE 21<sup>st</sup>, Portland, OR), an isolated commercial site, which for 45 years has operated a retail grocery on a non-conforming residential parcel which is likely being rezoned as CM1. As a neighbor of this site and under current non-conforming use provisions - we currently are afforded protections against noise, redevelopment, and increased impacts that they stand to lose under the new rules and which are inconsistent with the intent of the planning goal described above. To address this inconsistency, I request consideration that code section 33.130.100 B 2 c be expanded to accommodate the following issues consistent with Goal 10.1 part 13.

1. **Loss of Neighborhood Commercial Resources:** With commercial zoning, it would be possible to redevelop these sites for high-density residential use with no commercial elements at all. This is in contrast to the stated reason for making these isolated non-conforming use sites commercial is to retain commercial use on these sites so they can continue providing services to the surrounding residential areas. *The zoning rules need to require that, at a minimum, the ground floor must remain in commercial use should the site be redeveloped.* An alternative might be to specify that should these sites be developed as entirely residential, the permitted density would be that of the highest density adjacent residential zone. *Without one of these proposals,*

*we fear development pressure might cause the loss of the commercial function that is critical to maintaining a livable community.*

2. **Change of Use:** There are currently restrictions on change-of-use that would trigger review if the cumulative impacts of a site increase. This restriction is important to ensure a change in use would remain compatible with a neighborhood setting. *This existing review mechanism should be added back to the zoning code.* As an example, nearby residents are concerned that the quiet natural food grocery on SE 21<sup>st</sup> Ave currently in non-conforming use might someday be bought and converted into a bar, which would be possible under the proposed rules. This highlights the significant impact that a single isolated commercial property can have on its neighbors.
3. **Applicability of Use:** The proposed rules should apply to all commercial uses, not just Retail Sales and Service. The intent here is to limit nighttime noise and activity and to limit other impacts to neighbors from these sites; I believe these rules should apply to all commercial uses.
4. **Noise:** Existing regulations limit daytime noise emitted from non-conforming residential sites as measured on the property line of the nearest residential receiver to 55dBA (nighttime noise limits are lower) [City of Portland Charter Chapter 18.10.010], however if these properties are granted commercial status, permissible noise levels will increase to 60dBA. Given that a 10dBA increase represents a doubling of perceived volume, 5dBA is a significant increase. The code should specify that isolated commercial sites such as these have the same noise emission limits as residential sites, which is the rule today for non-conforming properties.

One other major shortcoming of the proposal as it stands is that it only affects properties adjacent to single family zones. This should be changed to include *any* residential zone; all residential uses should enjoy the protections this rule is intended to convey, especially now that home ownership is financially out of reach for many households in Portland.

I am not opposed to commercial uses' being interspersed throughout residential neighborhoods. I appreciate the benefit that commercial properties can provide to our neighborhoods, and the role they play in helping to create livable neighborhoods. These isolated commercial properties need to exist harmoniously with their residential neighbors, and are proposing these rule changes toward meeting that goal.

Proposed zoning code should be updated to include the additional restrictions that are in place today for non-conforming residential parcels that will be re-zoned to commercial parcels consistent with Goal 10.1 (Land Use Designation) part 13. The unique relationship between residential areas and the isolated commercial parcels embedded within them requires code modification to preserve the fabric of our neighborhoods.

Thank you for your consideration.

Mark Leece  
3100 SE 21<sup>st</sup> Ave  
Portland OR 97202



**From:** Don [mailto:[don@wolfpacktrack.com](mailto:don@wolfpacktrack.com)]  
**Sent:** Wednesday, May 04, 2016 7:30 AM  
**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>  
**Subject:** PSC Mixed use Zones Testimony

I think, The proposed change 1349 should be moved up to CM2 from CM1. This block of properties have been working together to be developed all together for the last year, which would give more options. The properties that have been working together for the last year as follows R217945, R217942, R217943, R217944. This is Almost 2 acres on Burnside. This Area is next to R217947 that already is CM2. This block of properties is also close to the same size of proposed 103 on SE 148th and Burnside which is proposed CM2. The proposed change 1349 has many advantages to go to CM2. 1. Advantage is that The city would be able to go forward with plans on putting a street through on the south side of properties R217943 and R217945 which will give more flow for the traffic. This would be buy it shelf, a big plus for the area. 2. More units with some commercial use which will be used by Light Rail. This means less traffic when Light Rail is used. another big Plus. 3. The proposed change at 1349 moving to CM2 is also on Burnside and light Rail which is a major corridor. I believe there will be some more jobs in this area if this is moved to CM2 which will help the local area also.

Thank you for your consideration

Don Good

112 Se 157th ave Portland Oregon 97233

**From:** Julie Cash [mailto:Julie.Cash@oregonmetro.gov]  
**Sent:** Wednesday, May 04, 2016 1:17 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Cc:** Stockton, Marty <Marty.Stockton@portlandoregon.gov>  
**Subject:** Written testimony - Julie Cash

Dear Planning and Sustainability Commissioners,

My name is Julie Cash. I am the owner and have occupied the property located at 4432 SE 28th Avenue, Portland, Oregon 97202, for the last 31+ years. Currently the property has the following land use and zoning status:

Current comprehensive plan designation: General Commercial - CG  
Recommended comprehensive plan designation: Mixed Use - Dispersed  
Current zoning: Residential 2,000 - R2  
Requested zone: Commercial Employment - CE

I'm told by staff at the City of Portland's Bureau of Planning and Sustainability that my property falls into one of the mismatched areas on the map, where the zone may not be automatically be updated in the new plan.

I am writing today to ask the Planning and Sustainability Commission to rezone my property to Commercial Employment - CE. This is the long-range vision for the property and would match the adjacent zoning to both the south and the west of my property at the intersection of SE 28th Avenue and SE Holgate Blvd.

The reasons for my request are primarily quality of life issues that I have experienced as a longtime resident of the neighborhood:

- I no longer feel my single family home belongs in the very busy hub my corner has become.
- Southeast Holgate is a freight route that will only get busier.
- My intersection has three separate bus lines with frequent schedules.
- The Shell gas station (kitty corner from me) operates all night, is very noisy and with lights that are way too bright.
- Commercial garbage service to the three businesses I'm surrounded by (next door and across the street) happens almost daily early in the morning, the most disruptive times.
- The Bird and Bear restaurant immediately next door serves alcohol and has very busy outside table service late at night - my hedge is the only separator - they may as well be in my front yard.

- The restaurant has caused street parking nightmares, unnecessary late night noise in my front yard and both the restaurant staff and patrons use my property as their smoking lounge, leaving butts and garbage and smoke at my front door.
- There is a lot of street work and upgrades happening in my area and the two streets people are redirected to use are SE 28th Avenue and SE Holgate, resulting in an even greater increase of traffic on my street.
- The Orange line was just finished - for two years my street was highly impacted.

Additionally, within the commercial area from SE 26th Avenue to SE Holgate Blvd, there are three single-family houses that have commercial zoning already:

- 4443 SE 28TH PL
- 4442 SE 28TH PL
- 4452 SE 28TH PL

Yet, there are three remaining properties, including mine, that remain residentially zoned:

- 4434 SE 26TH AVE
- 4432 SE 28TH AVE (**my property**)
- 4435 SE 28TH PL

Please consider this discrepancy in your review of my request.

Thank you so much for your time and attention to my request. I am happy to answer any questions or appear in person if needed.

best,  
 Julie Cash  
 Metro Parks and Nature communications  
[www.oregonmetro.gov/parks](http://www.oregonmetro.gov/parks)  
 503-797-1644

**From:** Bob Schatz [mailto:bob@allusaarchitecture.com]  
**Sent:** Tuesday, May 03, 2016 6:00 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Re: Mixed Use Zones Testimony

Please see attached evidence with my testimony. This is a graphic example as to why design review should not be allowed in our permitting process. It is unfair, unpredictable and inconsistent. Please I beg you, stop making more design review overlays!

I am an Architect with 26 years of permitting experience in Portland which adds up to over 1,200 projects that I have designed and permitted. Within this experience I have been through a design review process at least 50 times. With every single design review process I have been through, the owner of the property has ended up completely upset with how the permit went. They always felt like the city planners were never thinking of their own needs and always were considering the public concerns vs their own. Several of the owners wanted to sue the city of Portland but I point out the difficulty of that and they backed down. Is this how the city should treat their property owners? I would think not.

Back to the example I have provided. As you can see in this attachment we have a new commercial building that is designed by an Architect (myself) and proposed to be built in an area which has been struggling to get a foothold in modern society as it is plagued with dirt roads, vacant lots, homeless and drug users. I was proposing to take a chance in this section of Gateway and build a very nice 4-story office building in hopes of it being an icon for better things to come. This design was denied by the city planning department. Due to that decision, and the 15 months of time in design review, the building was never built.

On the right you see a plan book house, the design probably purchased for \$350. That design was approved by the city planning bureau. The only change they made the owners do was to recess the vinyl windows 2" into the wall. These two projects are literally across the street from each other. The house actually fails several planning codes but was still allowed. It doesn't have the appropriate amount of glazing facing the street. It is also too close to the side property lines but they also ignored those regulations. It also was allowed to be built without new sidewalks and driveway, again a slap in the face to me as I am required to provide that on my property.

If the plan book house is what you want then of course approve more design review. If you want interesting and creative structures in the city then you need to not have design review but encourage developers to do better and there are many ways for that to happen. It's your choice.

Bob Schatz  
2118 SE Division Street  
Portland, OR 97202

**AN EXAMPLE OF OUR PORTLAND DESIGN REVIEW DEPARTMENT AT WORK**

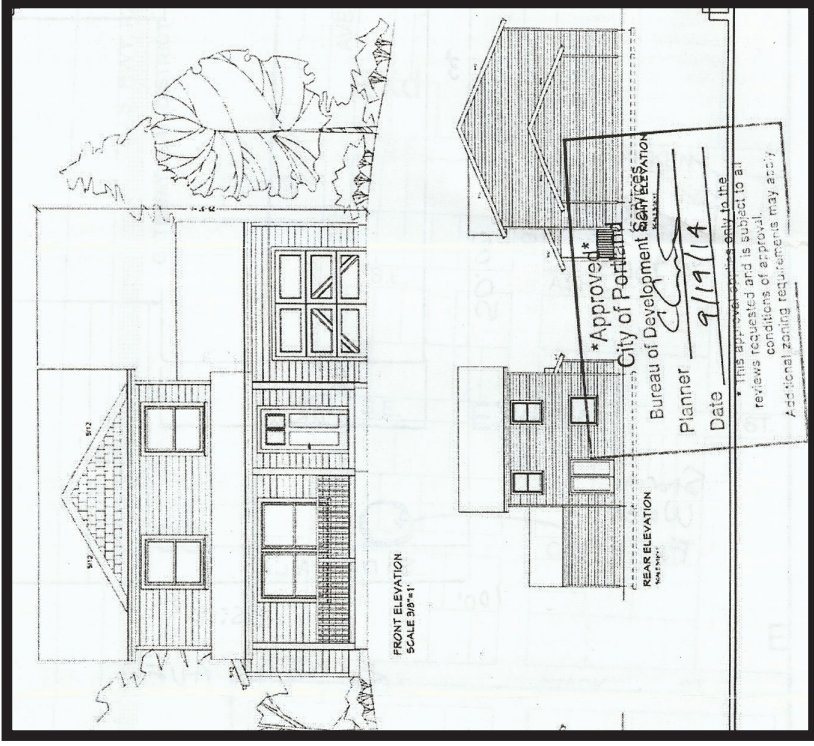


**METAL AND REAL STONE SIDING  
SOLAR PANELS  
HIGH QUALITY METAL WINDOWS  
NEW SIDEWALKS  
STORM WATER HARVESTING  
OVER INSULATED FOR ENERGY EFFICIENCY  
DESIGNED BY AN ARCHITECT**

**DESIGN DENIED**

**THESE TWO PROJECTS ARE ACROSS THE STREET FROM EACH OTHER IN GATEWAY.  
EACH OWNER SPENT THOUSANDS OF DOLLARS FOR DESIGN REVIEW.  
IS THIS WHAT WE ARE PAYING FOR? IS THIS POOR INTERPRETATION OF A 1920'S**

**HOUSE WHAT WE WANT PORTLAND TO LOOK LIKE?  
IF YOU DON'T LIKE THIS, TOO BAD. THERE IS NOTHING YOU CAN DO ABOUT IT.  
THE DESIGN REVIEW DEPARTMENT SUPERVISOR IS TIM HERON  
(503) 823-7726 OR [TIM.HERON@PORTLANDOREGON.GOV](mailto:TIM.HERON@PORTLANDOREGON.GOV). THE CITY THAT WORKS.**



**HARDIE-PLANK PAINTED SIDING  
LEAST EXPENSIVE VINYL WINDOWS  
DESIGNED BY PLAN BOOK**

**DESIGN APPROVED**



**From:** Brian [mailto:bhoch@teleport.com]  
**Sent:** Tuesday, May 03, 2016 11:22 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Testimony

Dear City of Portland officials,

As a resident of Portland, I would like to weigh in and add my testimony for the record.

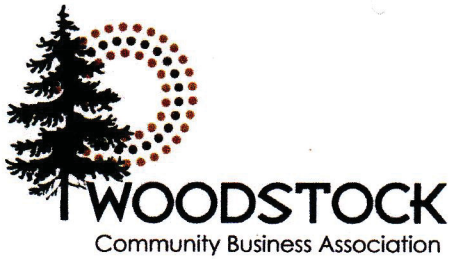
Brian Hochhalter  
2133 SE 32nd Ave, Portland, OR 97214

I support action related to the following:

1. Restore FAR Requirement for Mixed Use Buildings
2. Incorporate the Division Design Guidelines as proposed by the Division Design Initiative
3. Preserve some vintage low-rise commercial zones, some along old trolley lines.
4. Budget for Design Review & More Quadrant Design Commissions.
5. Southeast needs an area plan, a long time in the waiting

Thank you for your consideration.

Brian Hochhalter



4207 SE Woodstock Blvd., PMB# 130  
Portland, OR 97206  
[www.woodstockbiz.com](http://www.woodstockbiz.com)

May 2, 2016

RE: Testimony for proposed Mixed Use Zoning along Woodstock Blvd

Dear Planning Commission:

At the recent April meeting of the Woodstock Community Business Association meeting, the Woodstock Stakeholders Group, a formally organized group made up of commercial property owners in the Woodstock community, made a presentation regarding the current proposed Mixed Use Zoning map. The Woodstock Stakeholders shared their concerns about the "down-zoning" of several properties in the core of the business district and the negative effect they believe it would have on their existing property rights.

The Woodstock Business Association formally supports of the Woodstock Stakeholders' position on this matter. We felt that a rezoning of properties to CM1 in the core of the business district would not be appropriate or in the best interest of the Woodstock Community.

Sincerely,

Woodstock Community Business Association  
Eric Norberg, WCBA Secretary

**From:** hughhenderson@comcast.net [mailto:hughhenderson@comcast.net]

**Sent:** Monday, May 02, 2016 9:08 AM

**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>

**Cc:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; City Auditor Griffin-Valade <LaVonne@portlandoregon.gov>; Anderson, Susan <Susan.Anderson@portlandoregon.gov>; mnaLandUseCommittee@gmail.com

**Subject:** Re: Multnomah Village CS Zones

Planning and Sustainability Commission, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW 4th Ave, Suite 7100, Portland, OR 97201

Attn: Mixed Use Zones Testimony

**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request that the PSC change this designation to CM1 to limit building height to 35 feet (3 stories) in the business district of Multnomah Village with a D overlay.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

Hugh Henderson

3226 SW Dolph CT,

Portland, OR 97219

RECEIVED  
PLANNING & SUSTAINABILITY

2016 MAY -5 A 11: 10

The Ginocchio Family  
1033 SE Lambert St  
Portland, OR 97202  
(503) 944-9797

May 2, 2016

Barry Manning  
1900 SW 4<sup>th</sup> Avenue, #7100  
Portland, OR 97201

Dear Mr. Manning,

I live in the lovely Sellwood/Moreland neighborhood, and I am very concerned about the quantity and quality of recent construction and the proposed zoning changes. I have seen the livability and safety of our neighborhood erode over the past few years, and I want to try to change that. I am writing this letter to urge the city to:

- Keep the tallest buildings in the center of the busy intersections by restoring the CM2 designation at the corners of SE Bybee/Milwaukie and 13<sup>th</sup>/Tacoma.
- Reconsider the parking requirements for new construction. If developers are approved to build high in order to encourage density, please put in parking space requirements so that kids are safe and our local businesses can continue to thrive.
- Rethink low-income housing incentives so that everyone, regardless of income level, can enjoy the pleasures of our neighborhood.

When I looked around the planning and sustainability website, I continued to read that decisions were made 'with input from the community.' I don't know who is providing this input (our neighborhood association?) but it certainly does not represent the opinions of most Sellwood/Moreland families. I am writing to voice my dissent.

The city plans are ignoring what makes this neighborhood so special and unique. To find out more, PLEASE COME VISIT. I will personally take you on a tour and introduce you to my neighbors. You can also read Sunset magazine's description:

[http://www.oregonlive.com/travel/index.ssf/2016/01/the 5 best places to live in t.html](http://www.oregonlive.com/travel/index.ssf/2016/01/the_5_best_places_to_live_in_t.html)

They also wrote an article, titled, "One perfect day in Portland's Sellwood neighborhood"

<http://www.sunset.com/travel/northwest/day-trip-portland-sellwood-neighborhood>

I know that the city works hard to balance:

- New construction with maintenance of old-charm
- Encouraging the use of public transportation but understanding that cars are essential for the busy lives of today's modern families
- Wanting high density yet having no money to support the education, safety and community needs of a larger population
- What developers are promising and what the community members want

The Ginocchio Family,

1

Ord. 188177, Vol. 2.3.H, page 10263

But, we need to pause to discuss who is benefiting from the construction and zoning changes? And at what cost? And what do the changes mean for the overall safety and beauty of our neighborhood?

### **Can We Be Real about Cars?**

Sellwood is not Northwest (NW) Portland or the Pear District. It is a quaint neighborhood that has a Portland zip code, but does not want to see itself develop like downtown Portland. The intent for high-density is a good one, as is a push for use of public transportation; however, without the proper infrastructure we'll end up with an unlivable, unsafe neighborhood.

People will still own cars, and they need a place to park them—other than on the streets. Allowing developers to knock down single houses and replace them with 30 unit apartments with NO parking requirements, is taking its toll. Crowded streets means kids can't ride bikes, car break-ins and thefts rise, and local businesses suffers because customers can't find parking nearby.

In our modern world, folks can't hop on Max or the bus every time they need to take their kids to the myriad of activities kids are engaged in: language immersion and magnet school, soccer, doctor appointments, acting class, ballet performances. Public transit can be great for commuting to and from work, and going to the Zoo or OMSI on the weekend, but not when you have three kids that need to be at three different places throughout the day. We can judge our lifestyles all we want, but the reality remains. Public transportation is great, but as much as city planners hope, making parking frustrating is not going to get people to use public transportation more than they already are. [https://www.washingtonpost.com/opinions/use-of-public-transit-isnt-surgin/2014/03/20/0b44e522-b03b-11e3-95e8-39bef8e9a48b\\_story.html](https://www.washingtonpost.com/opinions/use-of-public-transit-isnt-surgin/2014/03/20/0b44e522-b03b-11e3-95e8-39bef8e9a48b_story.html)

### **High Density and then What?**

The push for density is coming without equivalent infrastructure. Llewellyn Elementary School is bursting at the seams – the class sizes are huge in part because there are no additional classrooms, kids have no music or art room, and speech therapy is in the copy room. They keep building apartment complexes where houses one stood, and our local schools can't handle the influx.

There seems to be no additional funding to support our community center, library or other public use buildings and spaces. The city is encouraging low income housing, yet at the same time, needs to close our community center where those very kids would have access to activities and the arts.

If you want to encourage more people into our neighborhood is the city planning additions and improvements for education and community services?

### **Tall Buildings in Residential Areas?**

In its attempt to change the zoning at the corners of SE Tacoma and 13<sup>th</sup> and SE Bybee and Milwaukie Ave from a CS(CM2) to a CM1, while maintaining the zoning (CM2) of the businesses to the north and south, seems totally inverted.

<https://www.portlandmaps.com/bps/mapapp/maps.html#mapTheme=mixedUse>



Why push the tallest buildings away from the two main thoroughfares? In doing so, the larger construction is pushed into the residential areas of the neighborhood.

Keeping larger construction in the center of the commercial areas keeps the residential areas safe, where kids cross the street to visit friends and babysit, bike, walk to and from school, walk their dogs and skateboard, scooter and jump rope.

I understand that some might feel that some of the old buildings need to be preserved, but many of them are not old or beautiful.

### **Dignity for the Elderly and Low Income Families?**

In addition, I am very concerned about the ability of construction to utilize one of two bonuses. It is my understanding, that if a certain percent (10 or 20%??) of development is for affordable commercial or residential construction, they can build even higher. Though I fully support making low-income housing more available, let's look at what the city's policies are doing?

If the sweet old houses remained in favor of tall, multi-family apartments, people of less financial means could afford to stay. Though I have no doubt to the good intent of these low-income incentives, wouldn't it be nicer for people to be able to stay in their smaller homes, rather than forcing them into 'low rent' apartment buildings? One of these such buildings, on Tacoma and Milwaukie, has no windows on the entire west side of the building. I am sure it keeps costs down to paint windows rather than have real windows, but why do we think this is OK?

This is also a diversity issue. Chasing the elderly and lower income families into apartment buildings or out of the neighborhood is not good for anyone.

I urge you - please keep the tall buildings at the main thoroughfares, think about the affect the push for density is having on our schools, and how much parking issues affect the safety well-being of our residential and business community, and what we are actually offering to our low-income families.

And please come see our neighborhood for yourselves, and talk to the residents. Many of us are angry and upset and feeling pretty helpless about what we can do, to make sure that all the proposed zoning changes and construction don't take away the uniqueness, livability and safety of our neighborhood.

Thank you for your time.

Sincerely,



Rachel Ginocchio

Electronically OK'd Co-Signature by Elizabeth Coleman, 1202 SE Malden St, Portland, OR 97202  
(503) 232-2881

**From:** Claire Coleman-Evans [mailto:eclair27@comcast.net]

**Sent:** Monday, May 02, 2016 6:50 AM

**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>

**Cc:** Hales, Mayor <mayorcharliehales@portlandoregon.gov>; Commissioner Fritz <amanda@portlandoregon.gov>; Commissioner Fish <nick@portlandoregon.gov>; Commissioner Novick <novick@portlandoregon.gov>; Commissioner Saltzman <dan@portlandoregon.gov>; City Auditor Griffin-Valade <LaVonne@portlandoregon.gov>; Anderson, Susan <Susan.Anderson@portlandoregon.gov>; James Peterson <mnalanduse@swni.org>

**Subject:** Multnomah Village CS Zones

Planning and Sustainability Commission, psc@portlandoregon.gov

1900 SW 4th Ave, Suite 7100, Portland, OR 97201

Attn: Mixed Use Zones Testimony

**Re: Multnomah Village CS Zones**

The Mixed-Use Zoning Project of the 2035 Comprehensive Plan's proposes to change the Commercial Storefront properties to Commercial Mixed Zone 2 (CM2). I request that the PSC change this designation to CM1 to limit building height to 35 feet (3 stories) in the business district of Multnomah Village with a D overlay.

With the exception of one 3-story building, Multnomah Village consists of predominantly 2-story buildings, many of which are historic. The Village has a design district overlay under the current Comprehensive Plan and this overlay states that new development must be consistent with the scale and character of the existing businesses. The new CM1 designation is a better fit for the historic Village, which appears to be the last remaining cluster of locally-owned businesses in the City.

Please add this to the record.

Thank you,

Claire Coleman-Evans

6260 SW Hamilton Way

Portland Oregon 97221

cc: Mayor Charlie Hales, mayorcharliehales@portlandoregon.gov

Commissioner Amanda Fritz, Amanda@portlandoregon.gov

Commissioner Nick Fish, nick@portlandoregon.gov

Commissioner Steve Novick, novick@portlandoregon.gov

Commissioner Dan Saltzman, dan@portlandoregon.gov

City Auditor, La Vonne Griffin-Valade, LaVonne@portlandoregon.gov

Susan Anderson, Susan.Anderson@PortlandOregon.gov

MNA Land Use Committee, [mnaLandUseCommittee@gmail.com](mailto:mnaLandUseCommittee@gmail.com)

**Claire Coleman-Evans**

**503-740-7460 cell**

**503-452-4149 fax**

**eclair27@comcast.net**

**From:** Dr. Bohnstedt [mailto:dr.bohnstedt@comcast.net]  
**Sent:** Sunday, May 01, 2016 9:10 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Dear PSC,

I am writing to express my strong support for your proposed zone changes that would effect my property located at 15012 SE Stark Street. The proposed CM2 medium-scale zone makes a lot of sense for a number of reasons. Perhaps one of the most important, is that Stark Street is a transit corridor, and the new zoning will allow for a better and higher use of the effected properties along Stark. In addition, it is my hope that the new zoning will promote the redevelopment of the area. I would love to see Stark Street start looking like Williams Avenue north of Emanuel Hospital. That has been a truly remarkable transformation. I thought that the public outreach at the Midland Library was very well done. My wife and I appreciate the time Sara Wright took to explain the changes to us.

Sincerely,

Stanley W. Bohnstedt, DMD, PC  
15012 SE Stark Street  
Portland, OR 97233  
503-367-2434

4/29/16

Dear Commissioners

As a commercial property owner in the Woodstock area I support the views of the Stakeholders Group.

A lot of effort has gone in to planning the area to make the best use of the area's unique character and it seems wrong to change what is working well.

Thank you

Peter K McGill 

For PKM Properties II

RECEIVED  
PLANNING & SUSTAINABILITY

2016 MAY -5 A 11:10

**Peter K McGill**  
**27929 se Haley Road**  
**Boring Oregon. 97009**

ATTN: MICRO USE  
PLANNING & SUSTAINABILITY  
CITY OF PORTLAND  
1900 SW 4th Ave  
PORTLAND OR 97201

97201538075



4/29/16  
April 20, 2016

Portland Planning and Sustainability Commission  
Re: Mixed Use Zones Testimony

Dear Commissioners,

Woodstock Stakeholders Group, Inc. is a public benefit nonprofit corporation organized under the laws of Oregon. We have been organized for six years and are comprised of commercial property owners in the Woodstock Business District. We promote the beautification, enhancement and maintenance of the Woodstock Business District to create and promote a business community which is livable, attractive, safe, socially diverse, thriving, and vital to the community it serves.

The Woodstock Stakeholder Group strongly opposes the spot zoning recently proposed by the City for several properties in the Woodstock business district. These changes down-zone seven (7) individual properties from the originally proposed CM2 (CS) zone to CM1 in the attempt to "preserve main street historic character" in Woodstock's core.

A notice dated April 4, 2016 from the BPS received by each owner states that this "may affect the permissible uses of your property...change the shape and size of new buildings that could be built on your property..." and "These changes may affect the value of your property." We believe these proposals damage the property values by reducing and depriving existing property rights currently enjoyed by each of the property owners.

The notice continues to describe that the new mixed-use zone will "create more vibrant places, increase housing choices and enable businesses to thrive." Loosing density, height, and FAR does not necessarily create additional housing choices or enable businesses to thrive. Instead, opportunities for growth and creative vision will be stripped away with inappropriate zoning that is less dense and less developed in the very center of our business district. This moves Woodstock backward and further away from the progressive Portland vision demonstrated in the 2035 comp plan and impedes the attractive and thriving boulevard we want Woodstock to become.

To compound the burden on property owners due to this government down-zoning, we learned that if owners fail to have this City decision reversed through testimony or legal action, an option would be to take the matter to LUBA or apply for an up-zone change to reestablish zoning to CM2 that is the new equivalent to the property's current CS zone. This would take time, require thousands of dollars and is unfair. This not only is unfair, but punitive.

We believe that the proposed down-zoning does not accomplish or address the criteria of historic or main street preservation. Restricting building height, FAR and uses for a handful of properties by using zoning to achieve preservation fails on many levels. It is unreasonable and irresponsible to suggest that zoning can or will preserve historic character of buildings in any neighborhood.



Woodstock is different than other business districts. We do not have buildings of the same quality, character or historic context. We are a fraction of the size of other business districts. Our public right-of-way spans eighty (80) feet. We have a zero-vacancy factor in the affected core and there is a demand for additional retail and residential space. This proposal counteracts Woodstock's needs and thwarts economic growth.

We question the City's criteria and lack of thoughtful review of Woodstock's character, composition and goals before making these last minute changes to the zoning. The criteria of preserving 400 linear feet of "historic main street" just does not fit Woodstock. This is clearly evidenced by the City's attempt to rezone the south side of the 4600 block which includes a brand new (2015) New Season's store. This clearly does not fit 400 feet of "historic main street". Applying a one-size-fits-all down-zone infers that what might be "best" for other business districts is "best" for Woodstock. What is best for Woodstock is to allow our community to have our own vision, to speak for itself and not be prescribed what other districts think they may or may not want.

We charge that the properties selected for down-zoning are a mismatch to the overall vision of Woodstock and amounts to spot-zoning without consideration for thoughtful, consistent and sensible zoning design. Properties proposed to be down-zoned to CM1 while neighboring properties retain most of their existing zoning rights with a CM2 zone creates a disproportionate and unfair practice. City staff did not identify buildings for historic significance, character or by community request. In fact, the inclusion of the brand new New Seasons building shows that these decisions were made haphazardly. These important decisions can create positive impact or they can damage property values and take rights away from property owners.

In 2014, in response to the Portland Comp Plan, the Woodstock community united to create a vision for their business district. An intense neighborhood effort and charrette of professional planners, economists, architects and City staff met with commercial property owners, business owners, churches and residents. The community expressed desire for a more complete neighborhood with opportunities for local business owners to expand, to attract new business, and create a more vibrant commercial district. It was clear that Woodstock needs to grow if it wants to continue to thrive. The results of this charrette were given to the Planning Commission as testimony. It appears that City Planners have turned a deaf ear to Woodstock's work and vision with this most recent draft of proposed zoning changes as they appear to be in conflict with our community's vision and goals.

Woodstock is not just a line of buildings making up a business district. Woodstock is 57 commercial property owners of which 53 are local. We ask you to see that these proposals simply do not affect properties, they are affecting real people. These local property owners have invested and will continue to invest in Woodstock. These same individuals are proud of their community and want to advance the livability and economic vitality for the entire neighborhood.

We request that these seven properties affected by the recommended down-zone revert back to the originally proposed and entitled lateral rezoning from the current CS zoning to CM2

**Block #1 - South Side (CS to CM2)**

4404-4408 Don Hanna

4410-4416 Tim and Angie Even

4422-4430 Duane and Chad Cook

**Block #2 - South Side (CS to CM2)**

4500-4560 Bruce Ament (New Seasons)

4526-4528 Jay and Karen Eubanks

**Block #3 - North Side (CS to CM2)**

4607-4617 Laurie Flynn

4625-4639 Robert Kowalski and Jason Criswell

We anticipate that the Planning Commission will agree with our conclusions concerning the most recent recommendations for zone changes in our Woodstock business district. However, the City's most recent proposal also reflects several properties currently zoned CN2 to be rezoned CM1. While this is considered a lateral rezone, we feel that this would create additional "spot zoning" inconsistent with the vision of Woodstock. Therefore, to protect the cohesiveness and vision in our business district, we also recommend that the following four properties in the core of our business district remain up-zoned from CN2 to CM2 as proposed in the prior zoning map draft so that they are not left behind to be an island (spot zoning) in the midst of CM2 zoning surrounding them.

**Block #1 - North Side (CN2 to CM2)**

4411 Gene Dieringer

4415-4427 Don Hanna

**Block #2 - South Side (CN1 to CM2)**

4004 Mark and Jess Desbrow

4012-4016 Melva Ball

Respectfully,

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

From: Don Hayner [mailto:dhayner@comcast.net]

Sent: Friday, April 29, 2016 1:54 PM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>; Cunningham, Bill  
<Bill.Cunningham@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

Dear Mr. Cunningham: I live in the Irvington district of Portland at 2515 NE 16th, directly behind the commercial property at the NE corner of 15th and Brazee st.. It has been brought to my attention that the city is revising the city zoning and has issued a Mixed Zone Project Report that would change the zoning of this property from R5 to CM-1 which means it loses non conforming restrictions it has retained for decades, of opening and closing times. As you know this is a residential neighborhood and our close proximity means we would not have a quiet residential neighborhood if this area becomes commercial with no night- time quiet hours. So please do your rezoning, but keep the required residential restrictions necessary to preserve our good quiet neighborhood.

I understand you have made this change for areas that are under 7500 square feet. The plot I refer to is over 15,000 square feet so I would like you to raise the 7500 limit to include this property or leave it at the current R5 zone.

sincerely yours  
Don Hayner  
503 287 8832  
2515 NE 16th ave  
Portland, OR 97212

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

From: David Hallberg [mailto:captdavey@comcast.net]

Sent: Friday, April 29, 2016 9:55 AM

To: Planning and Sustainability Commission <psc@portlandoregon.gov>

Subject: PSC Mixed Use Zones Testimony

Greetings,

I am former resident of Lair Hill, and still have property interest in the neighborhood.

I oppose the reduction in FAR that is proposed for the conversion of CS to CM2 zone.

The reduction from 3:1 to 2.5:1 takes both value and potential utility from parcels in the effected zone.

David Hallberg  
1800 NE 17th, #2  
Portland, Oregon 97212  
503-358-3098

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)

Council Clerk , [cputestimony@portlandoregon.gov](mailto:cputestimony@portlandoregon.gov)

1221 SW Fourth Avenue, Room 130

Portland, Oregon 97204

Chair PSC Katherine Schultz, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

Planning and Sustainability Commission, [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)

1900 SW 4th Ave, Suite 7100,

Portland, OR 97201

RE: 2035 Comprehensive Plan

PSC Hearings Mixed Use Project

The Portland Planning and Sustainability Commission hearings on the 2035 Comprehensive Mixed Use Project needs to be postponed at least 45 days until after the City Council adopts the 2035 Comprehensive Plan Policies and Mixed Use Project staff provides the citizens with the basic required information needed to analyze the effect of the project on their neighborhoods. Projections made over a year ago by the BPS staff on the changes the Mixed use Project would have on Multnomah Neighborhood showed a 28 % increase in capacity. The Mixed Use Project has significantly changed since the projections were made and the Multnomah Neighborhood Association has not received needed information to determine the effect of the Mixed Use Project will have on the neighborhood. Below is an email exchange showing that needed information will not be available until after City Council adopts the Comprehensive Plan Policies. The hearings for the Comprehensive Plan have been put on a fast track, basic information is not being provided and there is not enough time for citizens, neighborhood associations and neighborhood coalitions to respond to plan for the long term future growth of the city. The PSC hearing for the Mixed Use Project is now scheduled for May 10, 2016 and public testimony on the Comprehensive Plan Policies is closing today April 28, 2016. Provisions of Goal 1, Metro's citizen involvement policies, the existing Comprehensive Plan and the city code are not being followed.

Please add these to the record.

Thank you,

James F. Peterson

Multnomah

Land Use Chair

2502 SW Multnomah Blvd.

Portland, Oregon 97219

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)



From: Barry.Manning@portlandoregon.gov  
To: mnalanduse@swni.org  
CC: Joan.Frederiksen@portlandoregon.gov; Eric.Engstrom@portlandoregon.gov  
Subject: RE: Mixed Use Project  
Date: Fri, 8 Apr 2016 19:02:24 +0000

Hi Mr. Peterson:

BPS has not yet finalized capacity modeling on the proposed zoning. We will be doing that soon, but are waiting on final City Council plan amendment outcomes before we do so. It will probably be May before this happens. I will follow up when we have that information and will also look back at my meeting notes regarding any additional analysis/information we have for Multnomah Village.

On the topic of the Low-rise Storefront Area proposal that led to CM1 zoning in selected neighborhood centers, please refer to the Proposed Draft (<https://www.portlandoregon.gov/bps/70425>), specifically pages 40, 41 (building scale issues), 43, and implementing code on pages 228-229. For additional background you should also review the slideshow we presented to the Project Advisory Committee in January, as well as the notes from that meeting

1/20/16 PAC Meeting Presentation: <https://www.portlandoregon.gov/bps/article/562090>

1/20/16 PAC Meeting Notes: <http://www.portlandoregon.gov/bps/article/572097>

Please give me a call if you wish to discuss the Mixed Use Zones Proposed Draft (<https://www.portlandoregon.gov/bps/70425>); I will follow up with additional information on the modeling (or work with Joan on this) as soon as we have that information.

Thanks.

Barry

Barry Manning | Senior Planner

Portland Bureau of Planning and Sustainability

1900 SW 4th Avenue #7100, Portland, OR 97201

503.823.7965 (p) | 503.823.7800 (f)

[barry.manning@portlandoregon.gov](mailto:barry.manning@portlandoregon.gov)

**From:** customwoodworking@msn.com [mailto:customwoodworking@msn.com] **On Behalf Of** James Peterson

**Sent:** Thursday, April 07, 2016 1:24 PM

**To:** Manning, Barry <Barry.Manning@portlandoregon.gov>

**Cc:** mnachair@gmail.com; martie sucec <martie.sucec@gmail.com>; Claire Coleman-Evan <eclair27@comcast.net>; Michael Miliucci <michaelmcterry@hotmail.com>; Jan Wilson <jannett.wilson@gmail.com>; Frederiksen, Joan <Joan.Frederiksen@portlandoregon.gov>; Jim Redden <jredde@portlandtribune.com>; anne.debbaut@state.or.us

**Subject:** Mixed Use Project

Hi Barry

You were going to forward the analysis of the increase in capacity that is the outcome of the Mixed Use Project. Now that the project is going to the planning commission the numbers should have changed from the early analysis that Joan provided us some time ago.

Some members of the MNA were at one of your recent meetings and it was stated that there had been some analysis of the Mixed Use Zones in the village. Please forward this information

Some of the CM2 in the village was change to CM1 please forward the policies and the analysis of staff that resulted in these changes.

Thank you of your attention to this matter

James Peterson

Please add these to the record.

Thank you,

James F. Peterson  
2502 SW Multnomah Blvd.  
Portland, Oregon 97219

cc: City Auditor, La Vonne Griffin-Valade, [LaVonne@portlandoregon.gov](mailto:LaVonne@portlandoregon.gov)

# AMERCO<sup>®</sup>

## REAL ESTATE COMPANY

2727 NORTH CENTRAL AVENUE, 5-N • PHOENIX, ARIZONA 85004  
PHONE: 602.263.6555 • FAX: 602.277.5824 • EMAIL [sarah\\_nowaczyk@uhaul.com](mailto:sarah_nowaczyk@uhaul.com)

April 28, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201

Dear Portland Planning and Sustainability Commission,

AMERCO Real Estate Company (AREC), the parent company of U-Haul International, has prepared this testimony in regards to the proposed zoning changes to the properties located at:

8816 W/SE Foster Road (State ID# 1S2E16CA 13700)  
8816 SE Foster Road (State ID# 1S2E16CA 12800)  
7345 NE Sandy Blvd (State ID# 1N2E20DC 13100)  
6408 N Lombard Street (State ID# 1N1E07AC 7500)  
4831 SE Powell Blvd (State ID# 1S2E07BD 11000)

### U-Haul Store Use Parameters by Zoning Designation

	EXISTING USE: GC	PROPOSED: CM2	DESIRED: CE
Retail Sales and Service (Truck and Trailer Rental)	Permitted	Permitted	Permitted
Exterior Storage	Permitted	Not Permitted	Permitted
Self-Service Storage	Permitted	Not Permitted	Permitted

The proposed rezoning will alter the base zone for these U-Haul Stores from General Commercial (GC) to the Commercial Mixed Use 2 (CM2) district. U-Haul has been serving your community since 1976 as a one-stop shop for moving and storage. The proposed rezoning would limit our ability to serve our community members. The status of being a grandfathered use in CM2 will limit the future redevelopment of these properties. In turn, affecting our ability to serve these areas as they transform into desired neighborhood centers.

We would like to propose the alternative base zone of Commercial Employment (CE) for these properties due to the auto-oriented nature of our existing U-Haul stores. U-Haul is an automotive related commercial type use that serves the residential communities within a 3-5 mile radius. In addition to serving the community with moving truck and trailer rental, we offer self-storage at many locations; in particular, the U-Haul Stores located at 8816 SE Foster Road and 7345 NE Sandy Blvd. The proposed zoning of CM2 does not permit self-storage and we would like to continue providing this use to the neighborhood. The CE district is equivalent to the existing zoning of General Commercial in how it regulates the uses of Self-Storage, Retail Sales and Service, and the Exterior Storage on the property.

I would be happy to answer any questions or hear any concerns that you may have regarding this proposal. You may reach me at (602)263-6555 or [sarah\\_nowaczyk@uhaul.com](mailto:sarah_nowaczyk@uhaul.com) or by fax at (602) 277-5824.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Nowaczyk". The signature is written in black ink and is positioned above the printed name and company.

Sarah Nowaczyk  
Amerco Real Estate Company



From: Nora Mullane [mailto:irvingst1@comcast.net]  
Sent: Monday, April 25, 2016 8:42 AM  
To: Planning and Sustainability Commission <psc@portlandoregon.gov>  
Cc: Nora Mullane <irvingst1@comcast.net>  
Subject: PSC MIXED USE ZONES TESTIMONY

Greetings,

I have received notification of a proposed zone change at 3225 SW 1st.

The notification contains a significant error, in that it states there is no overlay zone at this property. Does this mean the Historic District has been abolished?

Further, we have received no notice regarding another property, 3215 SW 1st.

Does this mean that the zoning at 3215 will remain unchanged?

According to the notice, the proposed change will take .5 from the existing base FAR for 3225, (and possibly 3215) reducing the base from 3 to 2.5.

Under existing zoning (if indeed, 3215 and 3225 SW 1st are both effected) the properties could be developed with 27,000 square feet. The proposed zone would allow only 22,500 square feet. This proposal takes both utility and value from the properties.

Because of the decrease in utility and value, I oppose the reduction in FAR.

Sincerely,  
Nora Mullane  
Owner, 3215 and 3225 SW 1st Avenue

**From:** Xiaoli Deng [mailto:homedengs@yahoo.com]  
**Sent:** Sunday, April 24, 2016 4:26 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony

Hello, my name: Xiao Li Deng. My mailing address: 13727 SE Sierra drive Clackamas OR 97015. The house I am testifying about the proposed changes at: 2335 SE 162nd Ave Portland OR 97233. opposite my house, there is a huge commercial center. My house is very close to Divison street. On the south side of my house. they are all businesses. my house was built in 1935, the house next to mine toward north built in 1930. houses are very old. Beside, 162 ne street is a very busy street. It is more suitable for commercial than residencial. Sooner or later, I need to tear down my house to build something for commercial. For fully utilising the land, I would apply for a CM2 or a CE medium-scale Zone. I thanks you all the decision-makers for your help and time.

Xiao Li Deng

971-404-5288

April 22, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201  
[pcs@portlandoregon.gov](mailto:pcs@portlandoregon.gov)

Subject Address: 8012 SE 13<sup>th</sup> Avenue, Portland

Owners: Kristl Bridge, ttee Albert B. Knudsen Living Trust

Current Zoning: **CS**

Proposed Zoning: **CM1**

Subject: **Protest of Proposed Zoning Change of CS Properties in Sellwood/Westmoreland to CM1**

**Our position: Zoning, if changed, to be CM2**

We are the property owners on record of 8012 SE 13<sup>th</sup> Ave Portland, OR. This property is located at on 13<sup>th</sup> Avenue between SE Spokane and SE Nehalem. Our immediate neighbor is the new 4 story project by Vic Remmers at 8020 SE 13<sup>th</sup> Avenue.

On October 13<sup>th</sup>, 2015 we received a Notice of Proposed Zoning change that indicated that our zoning would change from Urban Commercial (CS) to "Mixed use-neighborhood". When we looked online at Zone Conversion Table, it showed a CS zoned property in a Mixed Use Neighborhood moving to CM2. As this was a logical progression we had no cause to dispute this change.

On Thursday April 6, 2016, however, we received a new Notice indicating a change from CS to CM1. This makes no sense. The summary of Proposed Mixed Use Zones provided with the Notice, including a grid diagram and zoning code description, show the entire stretch of SE 13<sup>th</sup> Avenue north of SE Nehalem is to be zoned CM2. The only two blocks to the north of SE Tacoma to be zoned CM1 already have a 45' building under construction.

It is completely unreasonable to limit the size of our property to two stories while allowing a four story building currently under construction immediately to the south of our property. Any preservation of aesthetic has already been lost on this block. This proposed change does nothing more than devalue our property.

I ask that you please reconsider the decision to zone this area as CM1 and zone it CM2 to correspond to the rest of the neighborhood.

Regards,

Kristl Bridge, Owner

Portland Homestead Supply Co.  
8012 SE 13<sup>th</sup> Avenue  
Portland OR 97202



RECEIVED  
PLANNING & SUSTAINABILITY

2016 MAY -5 A 11:11

Ocean Inc.  
P.O. Box 90608  
Portland, Oregon 97290-0608  
(503) 449-5856  
Fax: (503) 722-5398  
E-mail: mcdot\_2000@yahoo.com

April 22, 2016

Barry Manning  
Senior Planner  
Portland Bureau of Planning and Sustainability  
1900 SW Fourth Avenue #7100  
Portland, OR 97201

**Re: Mixed Use Zones Project  
Request for CE Zoning for McDonald's Restaurants**

Dear Mr. Manning:

I am the Owner/Operator of several McDonald's restaurants and wish to comment on the proposed zoning for the McDonald's restaurants located within the City of Portland outside the Central City and Gateway Plan Districts. We submit this letter requesting that the proposed zoning for all of McDonald's existing restaurants subject to the mixed use zones project be CE, for the reasons stated below.

We are first concerned that the proposed mixed use zones greatly reduce our ability to maintain, modernize and development new drive-through facilities. As you could reasonably expect, a large portion of our business derives from the operation of the drive-through facility component of the restaurants, without which they could not profitably operate. The only proposed mixed use zone which does not expressly prohibit drive-through facilities is the new CE zone. For that reason alone, we hereby request that all existing McDonald's restaurants be zoned CE.

Even if the McDonald's 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.

My restaurants are located at 9100 Se Powell Blvd, and 18320 Se Stark street with existing and proposed zoning, is attached. We would appreciate the opportunity to further discuss our request prior to the issuance of your next staff report.

Yours truly,

James Dotson

Owner/Operator  
Enclosure

Cc: RTF/ICSC GR Committee



	Official Name	Address	Existing Base Zone	Existing Overlay Zone	Existing Plan District	Proposed Base Zone	Proposed Overlay Zone	Plan District Changes
1.	91/Powell	9100 SE Powell Blvd.	CG	N/A	N/A	CE	N/A	N/A
2.	Port-122nd & Glisan	12109 NE Glisan St.	CS	(d)	N/A	CM2	CMSO, (d)	N/A
3.	Portland-Jantzen Beach	12005 N Center Ave.	CG	(h)(x)	Hayden Island	CE	(h)(x)	N/A
4.	Portland/82nd	5613 SE 82nd Ave.	EX	(d)	N/A	CM3	CMSO, (d)	N/A
5.	Capital Hwy/Barbur	10050 SW Barbur Blvd.	CG	N/A	N/A	CM2	CMSO, (d)	N/A
6.	82nd/Stark	8135 SE Stark St.	CG-CS	N/A	N/A	CM2	CMSO	N/A

**From:** Carol Gossett [mailto:gossett.carol@gmail.com]  
**Sent:** Thursday, April 21, 2016 8:19 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Public Comment: Comprehensive Plan 2035 - MUZ Project

By way of this email, I present my support of the City of Portland recommendations within the Comprehensive Plan 2035 MUZ Project. The Sullivan's Gulch neighborhood will be positively impacted by these recommendations and as a resident in this community I understand that if the City of Portland is to accommodate the growth projected and its lovely residential neighborhoods sustained, growth must occur along our commercial corridors, such as NE Broadway/Weidler, now designated a Civic Corridor within the plan.

Recently, Sullivan's Gulch was reported to be the "hottest" neighborhood in the city in an Oregonian article. This designation comes from an understanding that our community and our city are changing and the success of our neighborhood system relies on understanding change and considering potential options that did not exist in the past. We cannot perpetuate old ideas, it is time for fresh, creative planning and community solutions.

I believe our neighborhood makes thoughtful and well informed decisions that are respectful of the small, single family sector of the area while addressing the change and excitement of an evolving marketplace and growth potential along our corridors.

Thank you for recording my support of the MUZ Project recommendations.

--

CAROL GOSSETT  
2533 NE Clackamas Street 97232  
(503) 449-1253  
[gossett.carol@gmail.com](mailto:gossett.carol@gmail.com)

From: [jimchoilaw@hotmail.com](mailto:jimchoilaw@hotmail.com)

To: [pcs@portlandoregon.gov](mailto:pcs@portlandoregon.gov); [mixedsuezones@portlandoregon.gov](mailto:mixedsuezones@portlandoregon.gov)

Subject: 16955 SE Division Street, Portland, Oregon (Comprehensive plan)

Date: Thu, 14 Apr 2016 11:38:09 -0700

Dear Counsel Clerk,

I am writing on half of the owner of the property located at 16955 SE Division Street, Portland, Oregon 97236. This site has had a business on it for in excess of 40 years via grandfather clause. They were interested in changing the zoning to commercial and wanted to know how they would accomplish this. Thank you.

**Jim Choi**  
Attorney at Law

16323 SE Stark St. Suite 3  
Portland, OR 97233  
503-255-1074

April 13, 2016

Mayor Charlie Hales  
Portland City Council  
1221 SW 4th Avenue, Room 130  
Portland, OR 97214

Re: **2035 Comprehensive Plan - Mixed Use Zones**  
*Transportation Analysis*  
Project Number 2160034.01

Dear Mayor Hales and Council Members:

Mackenzie has prepared this transportation analysis on behalf of the Retail Task Force and the International Council of Shopping Centers (ICSC) to address the potential traffic impacts of proposed mixed use zoning changes in the City of Portland.

Specifically, we have considered the impacts of reducing the opportunities for auto accommodating development as it pertains to larger grocery and discount stores. These uses are important for lower income residents and typically are accessed by automobiles. While some alternate travel occurs for these uses, customers are limited to what they can carry when biking or riding transit. Even with current zoning requirements, many of these users have located to the fringes of the City of Portland along 82nd Avenue and locations to the east or into the suburbs.

The analysis prepared by Eric Hovee identifies that many Portland residents travel outside of their local neighborhoods to access these types of retail uses – referred to as retail leakage. Not only does this result in retail dollars leaving the City, but can result in increased automobile travel distances, which leads to more congestion and greenhouse gas emissions. Impacts on congestion are difficult to measure without addressing specific locations, but the travel distances are more readily quantifiable.

We have considered two examples of existing retail uses that are located in or around the City of Portland where residents of the City are currently driving outside of the City or out to the fringes.

One user we considered was Costco. Costco serves the needs of consumers to buy bulk goods and groceries. At one point Costco had proposed locating a store in Northwest Portland but was unsuccessful in siting the store. Currently, residents of Portland shop at Costco stores located in Beaverton, Tigard, Clackamas, and Northeast Portland on 138th Avenue near Airport Way. Costco confirmed a significant number of City residents shop at these stores, and that these are all automobile trips.

In order to assess the potential reduction in travel distances, or vehicle miles traveled (VMT), we made an assessment of average travel distances for areas of Portland to each of the stores that residents would likely shop at. We then compared that distance to the distance they would have driven to a store in Northwest Portland. See the attached maps showing the location of existing Costco stores, the previously planned store location, and travel distances.



On average, a trip to Costco for a Portland resident would be 6.2 miles less each way with the proposed Northwest Portland store location. Nearly all trips to a Costco are made by private vehicles. With an average of 14,000 daily trips for a Costco store, the VMT is estimated to be reduced by up to 86,800 miles per day or approximately 32 million miles annually.

We also looked at a number of other grocery retailers currently located along the 82nd Avenue corridor within Southeast Portland and Clackamas. We were able to obtain customer information from one of these retailers to confirm the effective service area of a store. The information is not included with this letter, as it is proprietary, but in general, the data show a market area extending west to the Willamette River in the area of Southeast Portland.

For this one store in particular, the percentage of customers traveling from the west or inner Southeast Portland is higher than those traveling from the east. This clearly shows customers are driving from inner Southeast Portland out to less dense areas of the city for these shopping opportunities. Again, we would note most customers buying groceries or large bulk items travel in automobiles.

For residents living between downtown Portland and the 82nd Avenue corridor, there is not an opportunity for pass-by trips during an evening commute. Instead, these customers would need to travel beyond their residence for these shopping opportunities, resulting in additional congestion and VMT.

In summary, by limiting the opportunity for locating auto-accommodating retail uses in close-in areas of the City and along high density corridors, City residents will continue to drive to the fringes of the City or to other nearby Cities for these shopping opportunities. The result will be increased congestion, increased VMT, increased greenhouse gas emissions, and loss of retail dollars for these neighborhoods of Portland.

Sincerely,



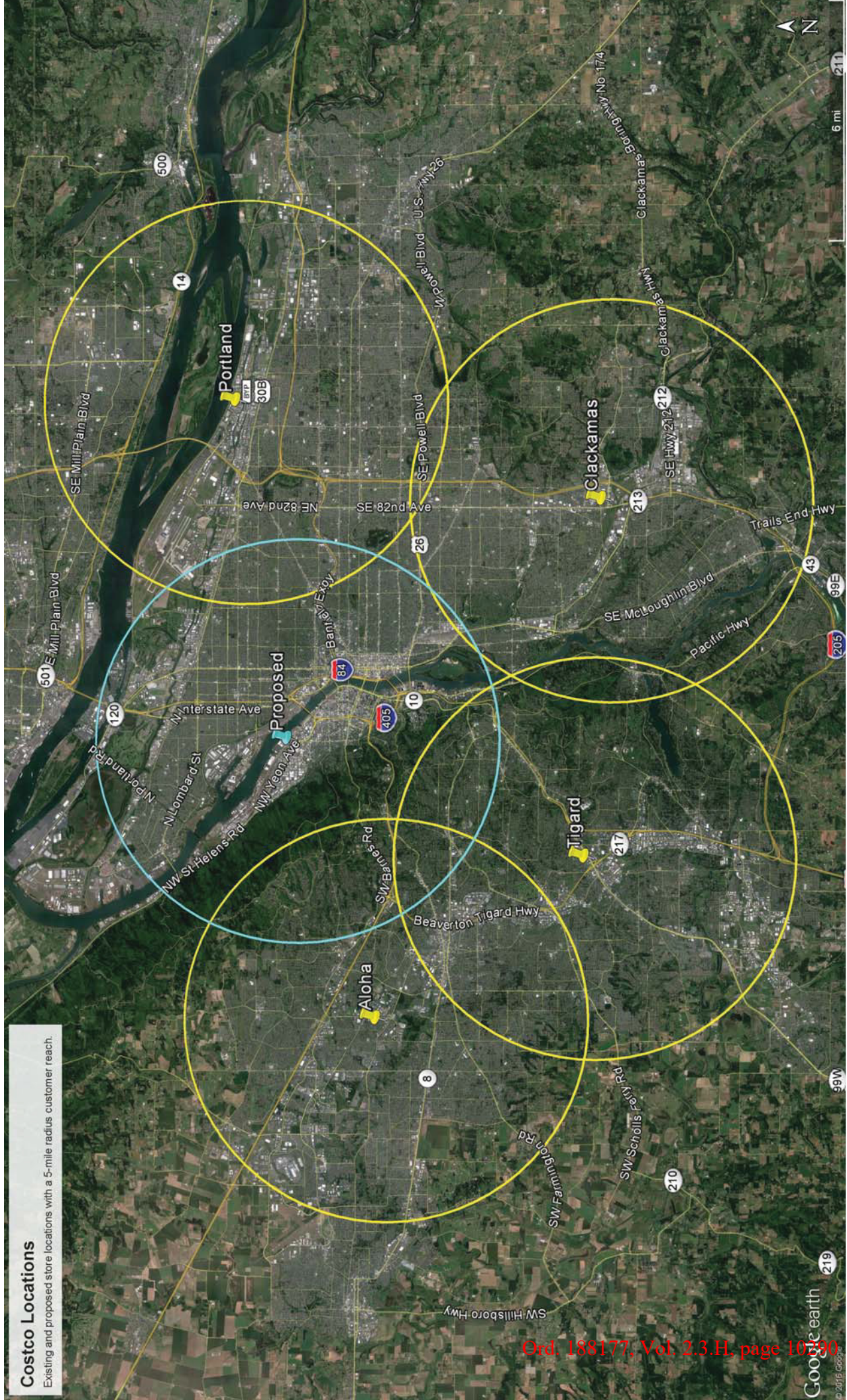
Brent Ahrend, PE  
Traffic Engineer | Senior Associate

Enclosure: Costco Location and Travel Distance Information



## Costco Locations

Existing and proposed store locations with a 5-mile radius customer reach.





Travel Distances for Costco Locations					
To/From	Aloha	Tigard	Portland	Clackamas	Proposed
N Portland	14.9		9.3		4.7
Downtown	10.4	9.5			1.7
SE Portland			9.0	9.2	6.1
					3.0

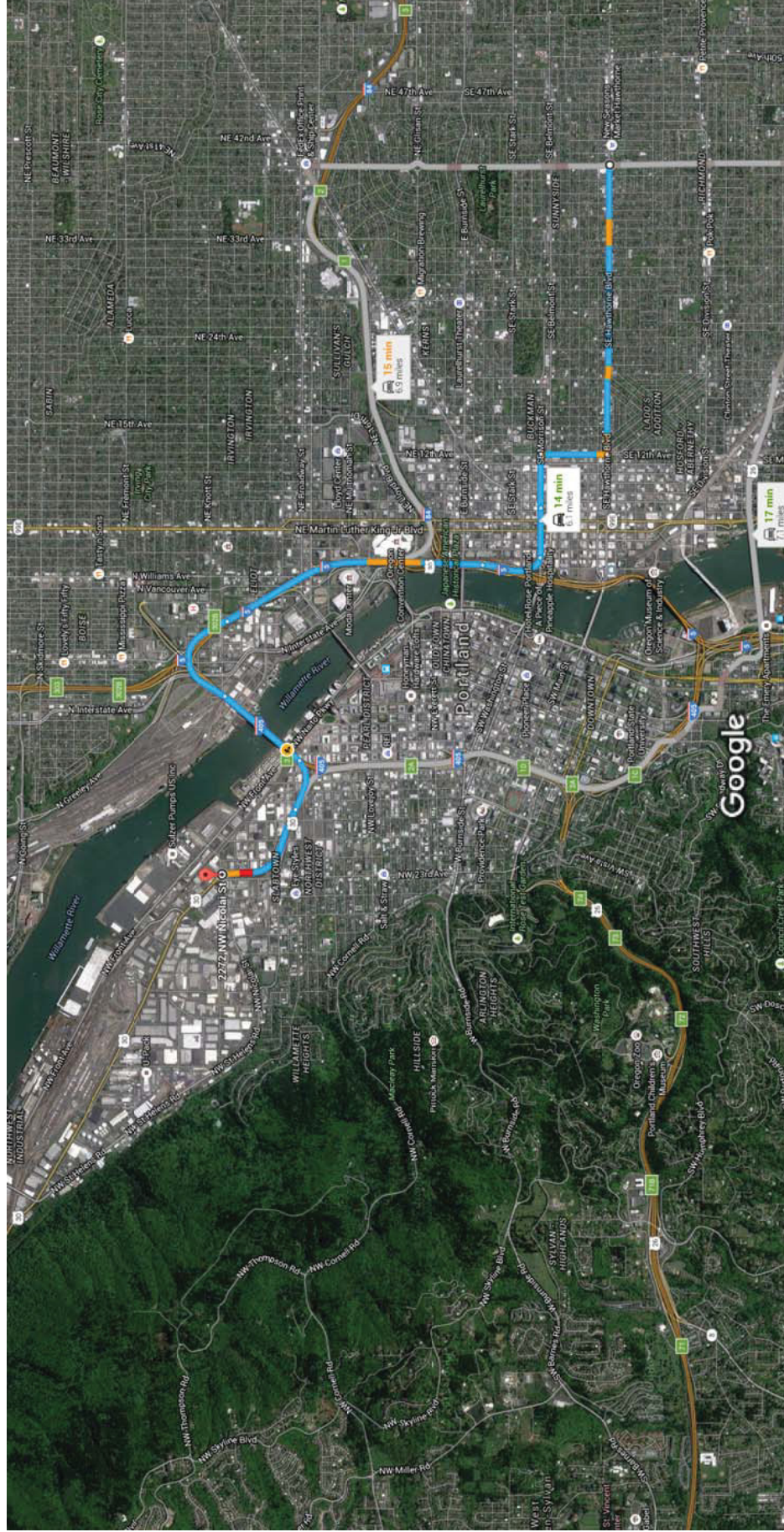
Proposed Location Vehicle Miles Traveled Average Reduction	6.2
--	-----



1500-1576 SE Cesar Estrada Chavez Blvd, Portland, OR 97214 to 2272 NW Nicolai St

Drive 6.1 miles, 14 min

SE Portland Customers Traveling to Proposed Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

via SE Hawthorne Blvd

12 min without traffic

14 min

6.1 miles

via I-84

12 min without traffic

15 min6.9 miles

via SE Powell Blvd

15 min without traffic

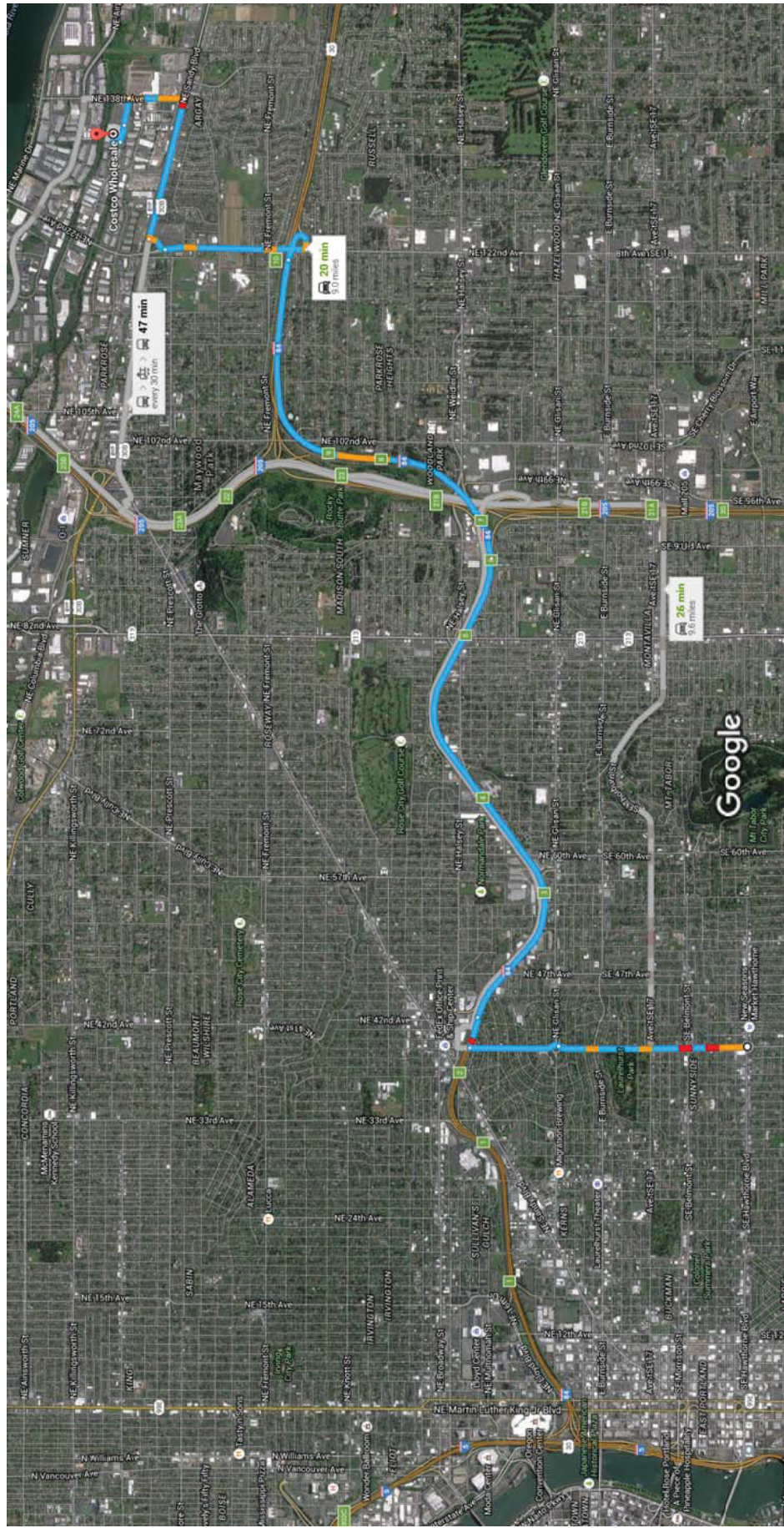
17 min7.1 miles

Google Maps



**Google Maps** 1500-1576 SE Cesar Estrada Chavez Blvd, Portland, OR 97214 to Costco Wholesale Drive 9.0 miles, 20 min

SE Portland Customers Traveling to NE Portland Location



via I-84 E

17 min without traffic

20 min

9.0 miles



26 min

9.6 miles

47 min



21

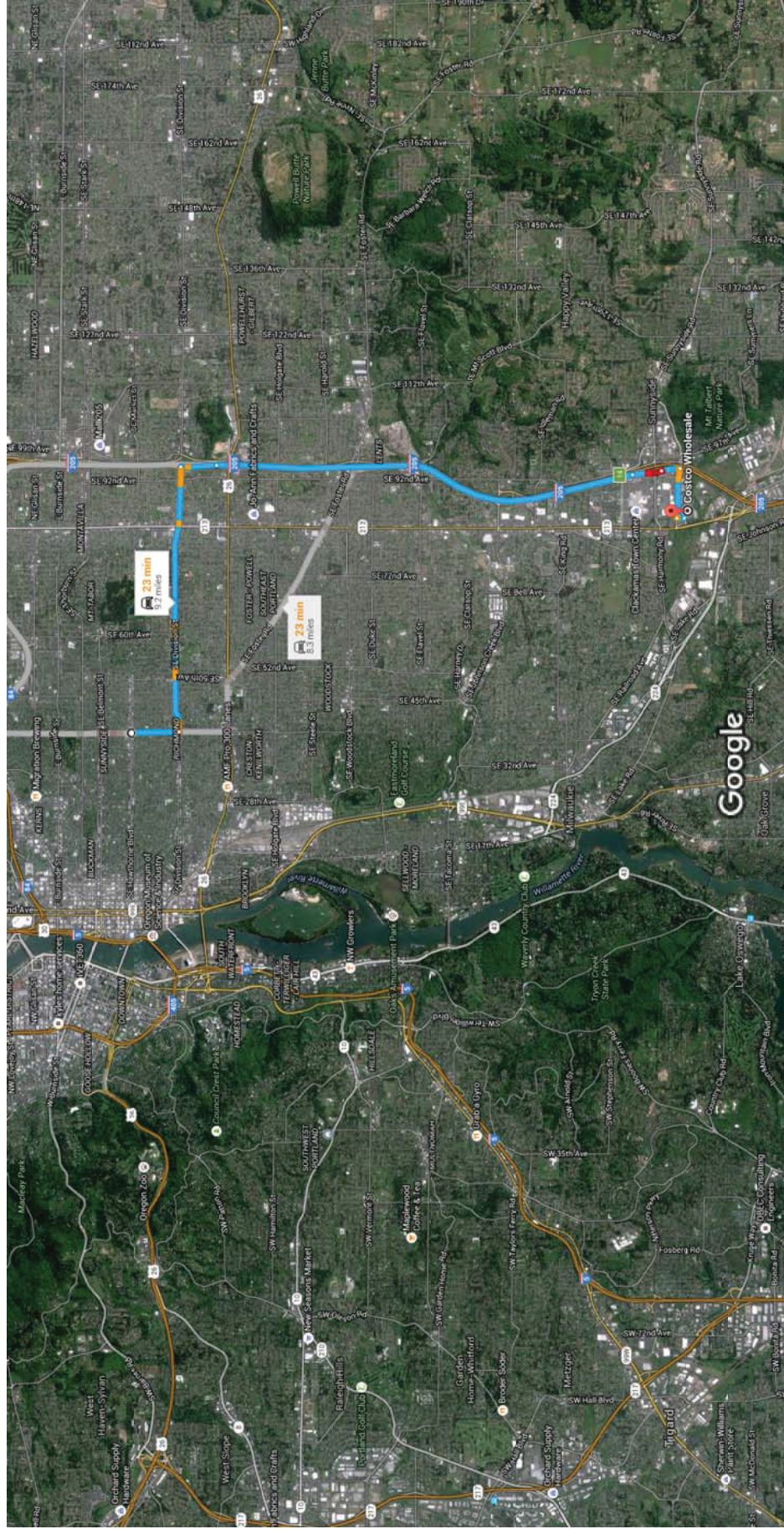




1500-1576 SE Cesar Estrada Chavez Blvd, Portland, OR 97214 to Costco Wholesale

Drive 9.2 miles, 23 min

SE Portland Customers Traveling to Clackamas Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

via I-205 S

23 min

18 min without traffic

12.4 miles

via SE Foster Rd and I-205 S  
18 min without traffic

23 min  
8.3 miles

via SE Division St and I-205 S  
19 min without traffic

23 min  
9.2 miles

Google Maps

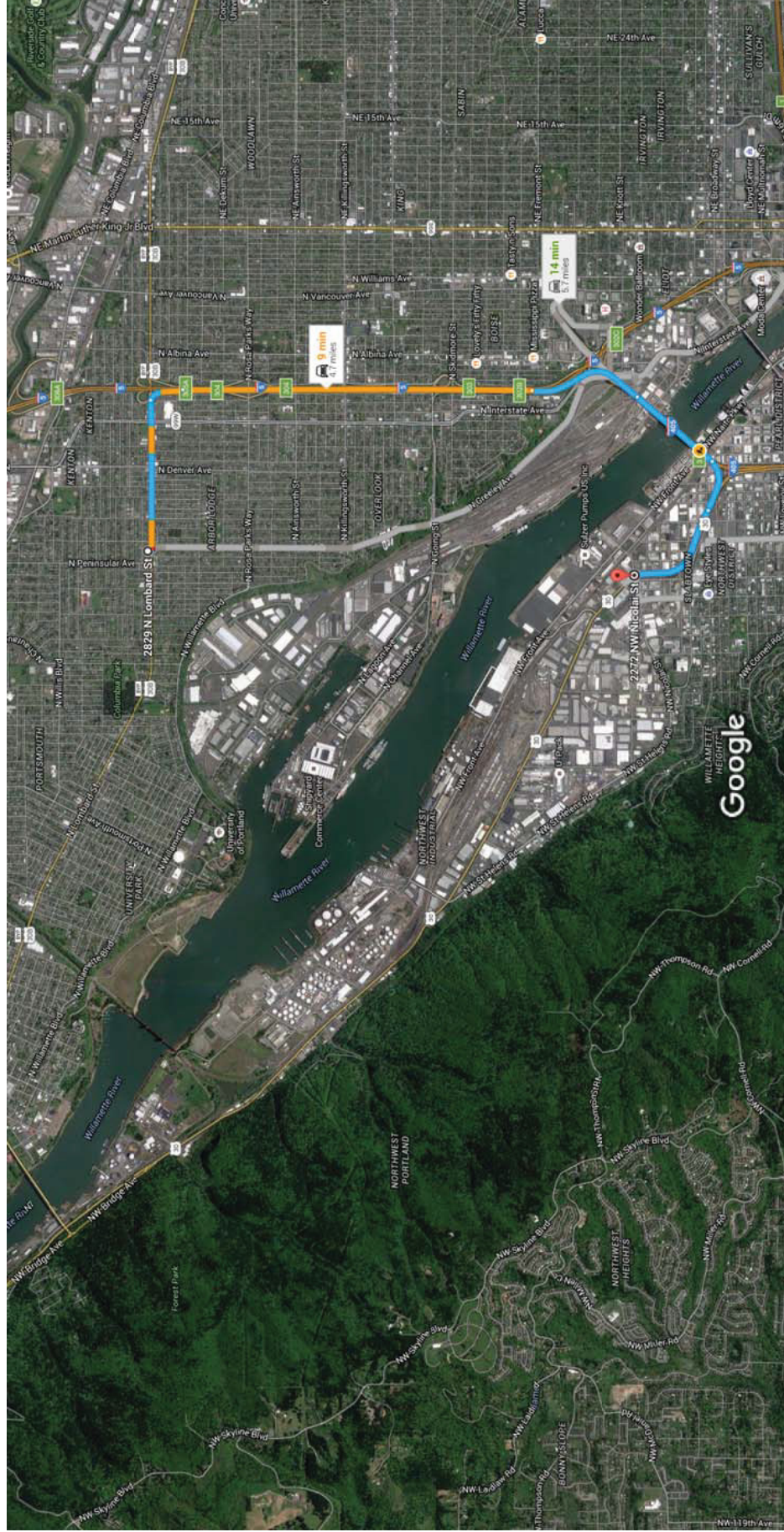




2829 N Lombard St, Portland, OR 97217 to 2272 NW Nicolai St, Portland, OR 97210

Drive 4.7 miles, 9 min

North Portland Customers Traveling to Proposed Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

via I-5 S  
7 min without traffic  
9 min  
4.7 miles

via N Greeley Ave

12 min without traffic

14 min

5.7 miles

 12:09 PM—1:03 PM

  35 / 77 

54 min

Google Maps

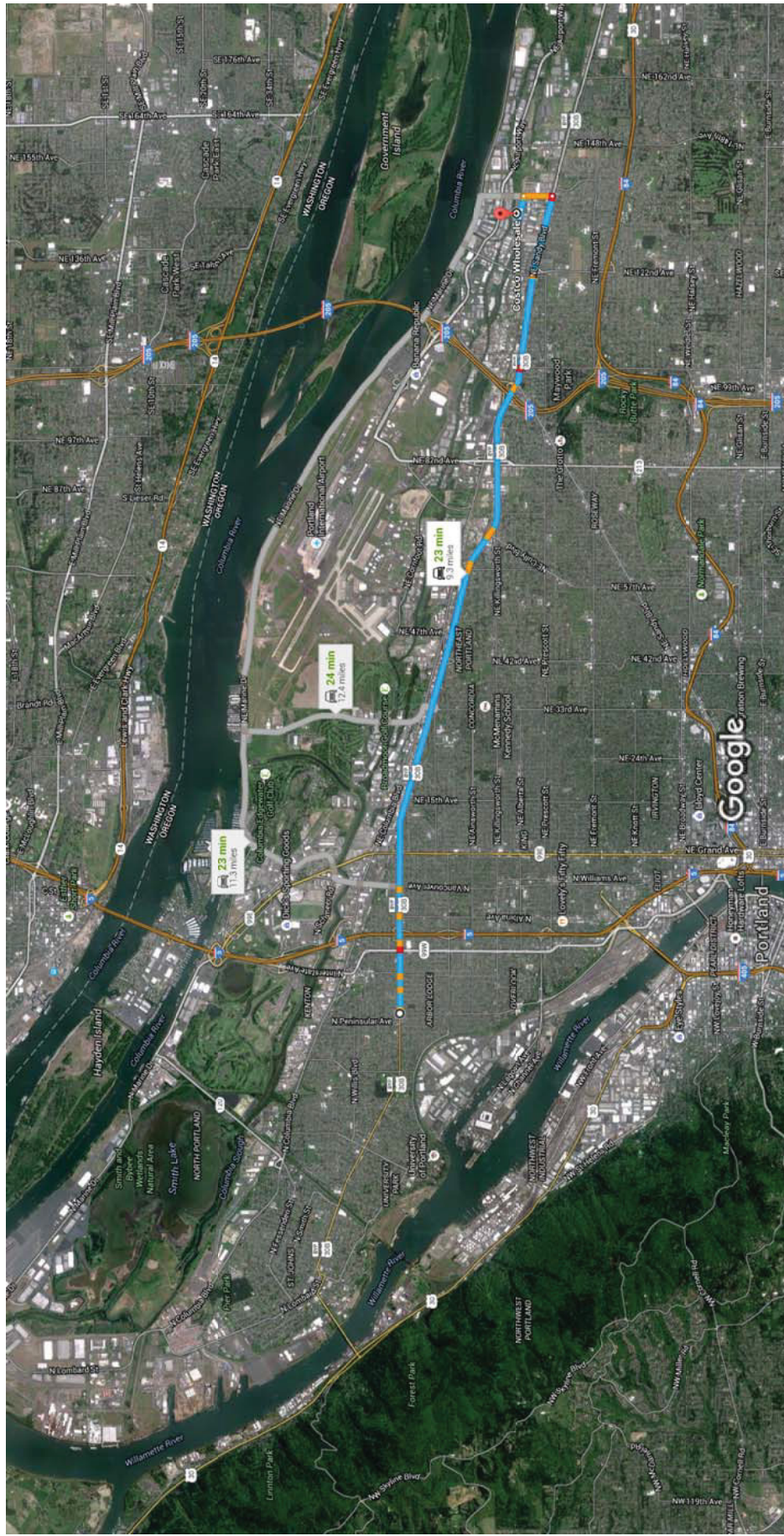




2747-2829 N Lombard St, Portland, OR 97217 to Costco Wholesale

Drive 9.3 miles, 23 min

North Portland Customers Traveling to NE Portland Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

5000 ft

via US-30BYP E

21 min without traffic

23 min

9.3 miles

via NE Marine Dr  
21 min without traffic

23 min  
11.3 miles

via N Lombard St and NE Marine Dr  
22 min without traffic

24 min  
12.4 miles

Google Maps

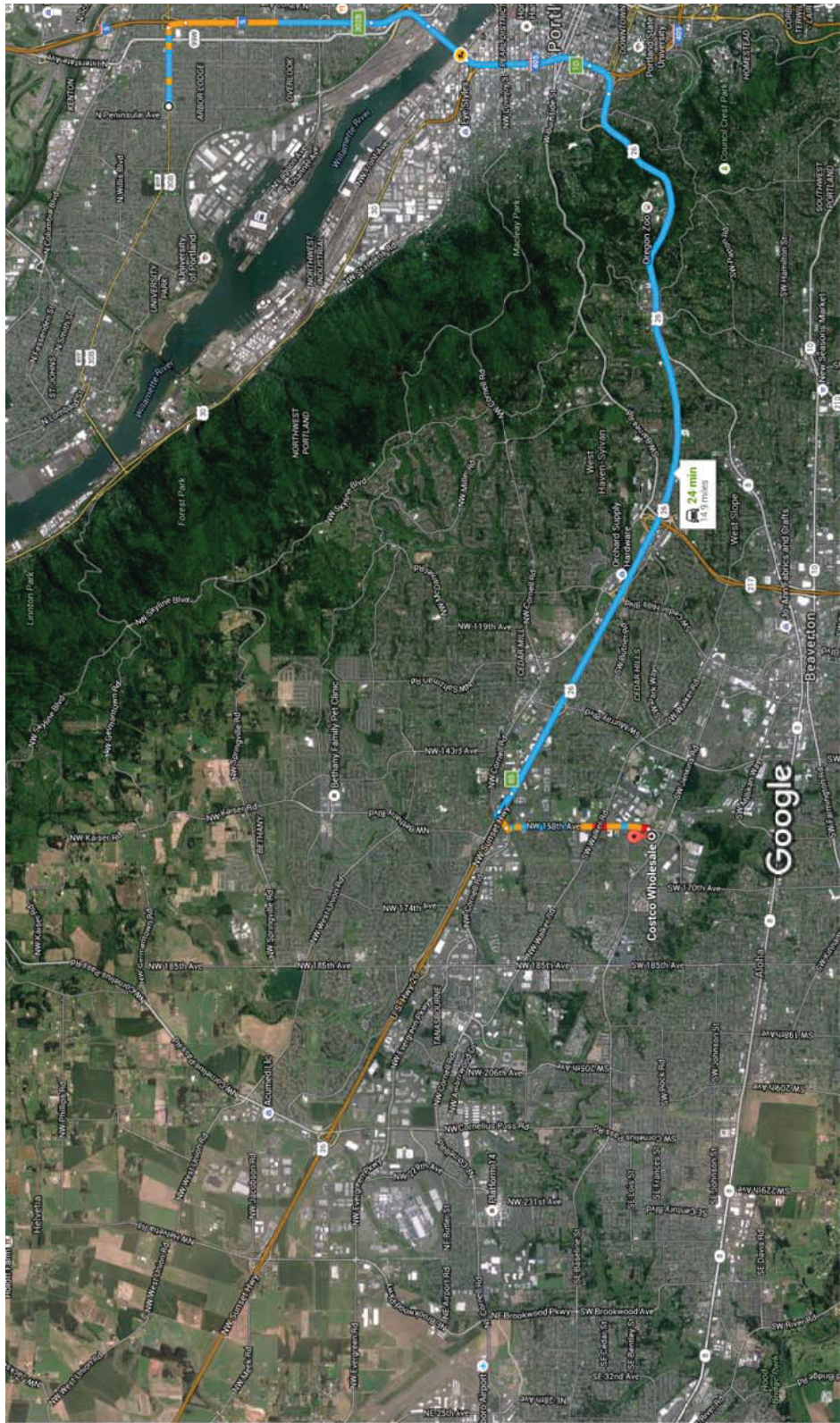




2747-2829 N Lombard St, Portland, OR 97217 to Costco Wholesale, Beaverton, OR

Drive 14.9 miles, 24 min

North Portland Customers Traveling to Aloha Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

via US-26 W

21 min without traffic

24 min

14.9 miles

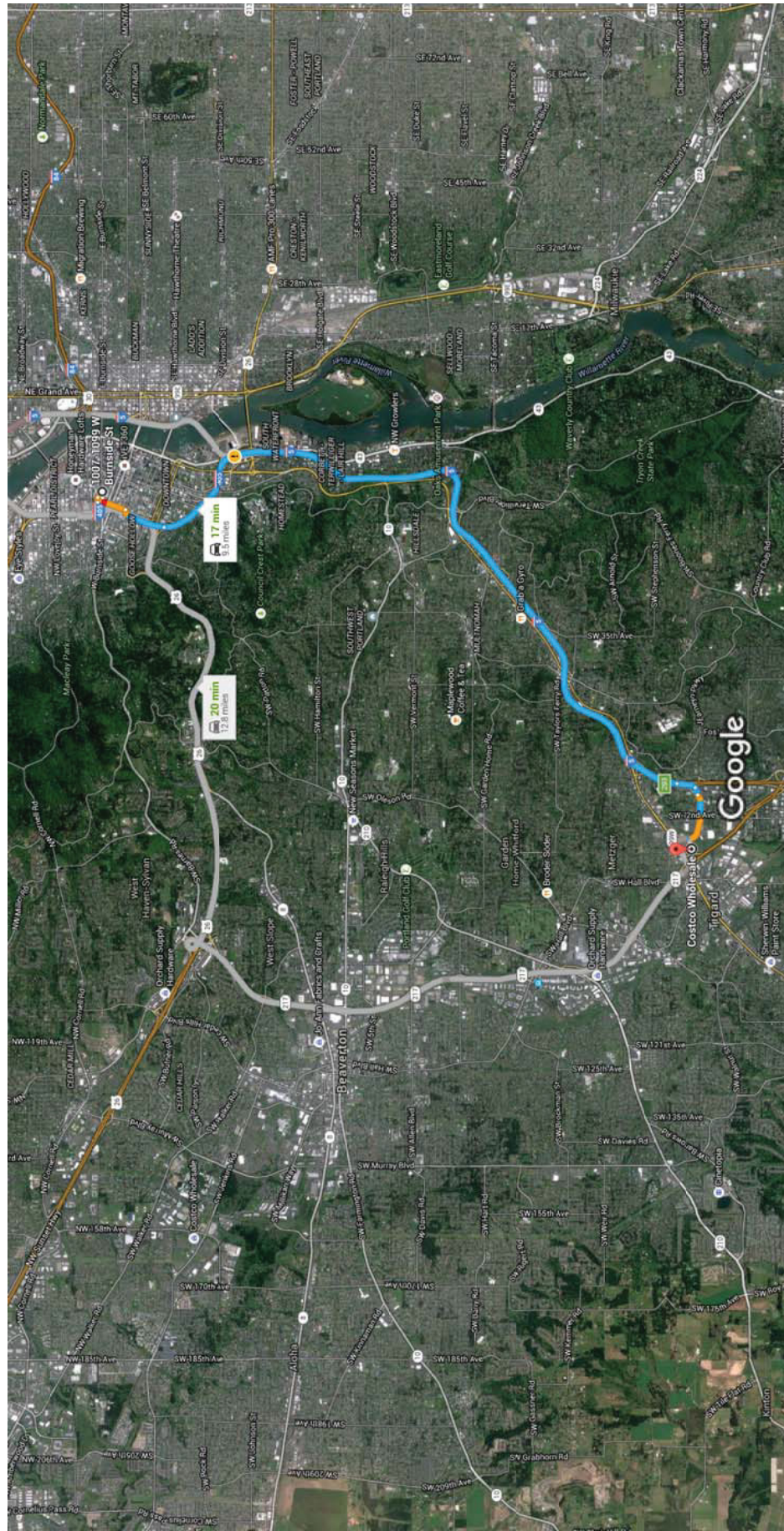
Google Maps



1007-1099 W Burnside St, Portland, OR 97209 to Costco Wholesale

Drive 9.5 miles, 17 min

## Downtown Portland Customers Traveling to Tigard Location



Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google 5000 ft

via I-5 S

14 min without traffic

17 min

9.5 miles



via I-405 N and I-5 S  
16 min without traffic

18 min  
12.4 miles

via US-26 W and OR-217 S  
18 min without traffic

20 min  
12.8 miles

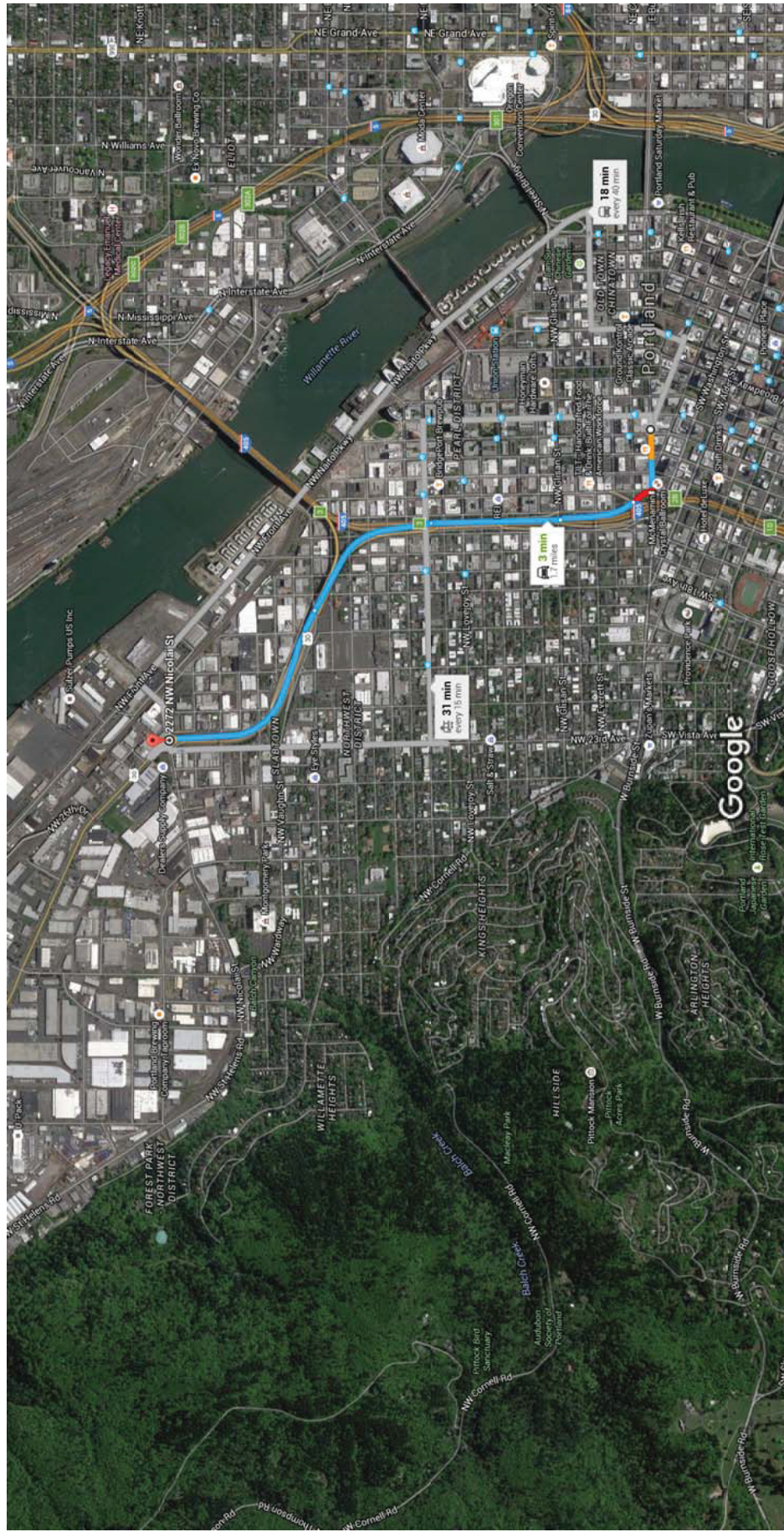
Google Maps



1007-1099 W Burnside St, Portland, OR to 2272 NW Nicolai St, Portland, OR 97210

Drive 1.7 miles, 3 min

Downtown Portland Customers Traveling to Proposed Location



Imagery ©2016 DigitalGlobe, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

via US-30 W

3 min

3 min without traffic

1.7 miles

[illegible]

# Google Maps

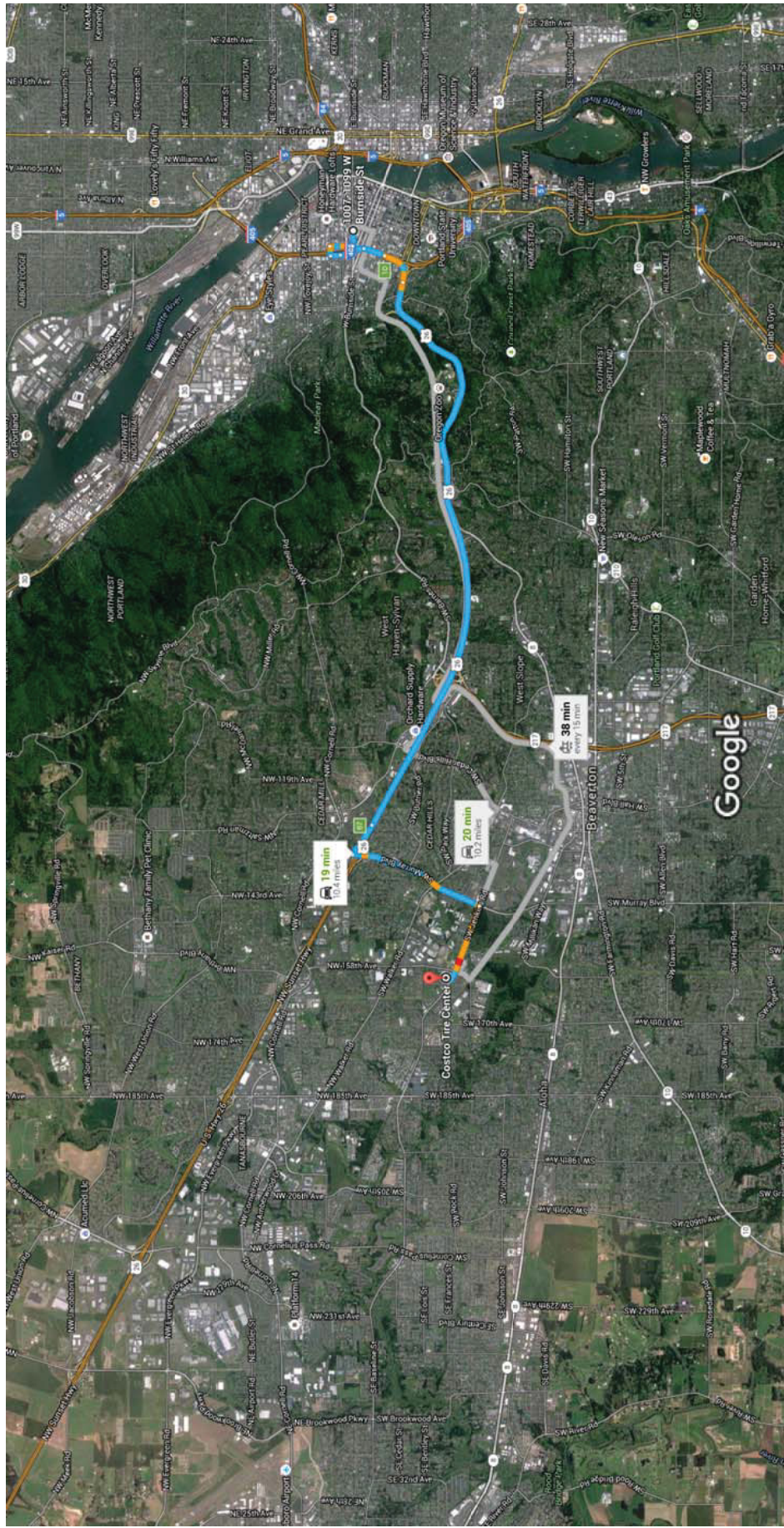




1007-1099 W Burnside St, Portland, OR 97209 to Costco Tire Center

Drive 10.4 miles, 19 min

Downtown Portland Customer Traveling to Aloha Location



via US-26 W

16 min without traffic




19 min

10.4 miles

Imagery ©2016 DigitalGlobe, Landsat, Metro, Portland Oregon, State of Oregon, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2016 Google

via US-26 W and SW Jenkins Rd  
18 min without traffic

20 min  
10.2 miles

12:13 PM—12:51 PM  
  MAX Blue Line 

38 min

Google Maps



April 12<sup>th</sup>, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201  
[pcs@portlandoregon.gov](mailto:pcs@portlandoregon.gov)

Subject Address: 8071 and 8075-8085 SE 13<sup>th</sup> Avenue, Portland, OR 97202

Owners: 13<sup>TH</sup> & TACOMA LLC

Current Zoning: CS

Proposed Zoning: CM1

**Subject: Protest of Proposed Zoning Change of CS Properties in Sellwood/Westmoreland to CM1**

**Our position: Zoning, if changed, to be CM2**

We are the property owners on record of 8071 and 8075-8085 SE 13<sup>th</sup> Avenue, Portland, OR. This property is located at the northwest corner of SE 13<sup>th</sup> Avenue and SE Tacoma Street in Sellwood. Immediate neighbors include: New Seasons Market, 2 major banks (On-Point Credit Union, who is in the building, and Key Bank), Starbucks, Columbia Sport Outlet, Grand Central Bakery, and many other commercial entities.

On October 13<sup>th</sup>, 2015 we received a Notice of Proposed Zoning change that indicated that our zoning would change from Urban Commercial (CS) to "Mixed use-neighborhood". When we looked online at Zone Conversion Table, it showed a CS zoned property in a Mixed Use Neighborhood moving to CM2. As this was a logical progression we had no cause to dispute this change.

On Thursday April 6, 2016, however, we received a new Notice indicating a change from CS to CM1. This makes no sense. The summary of Proposed Mixed Use Zones provided with the Notice, including a grid diagram and zoning code descriptions, all support our property changing from CS to CM2 and, based on city of Portland data, over 98% of current CS zoned properties are moving to CM2 or CM3. It is unreasonable that an area that currently supports strong commercial retail uses and has no direct impact on residential properties, be down-zoned from CS to CM1. Our position is that the appropriate zoning for current CS zoned properties in Sellwood/Westmoreland be CM2.

Regards,



Jeffrey Weitz  
Managing Member, 13<sup>th</sup> & Tacoma LLC  
819 SE Morrison St, Suite 110  
Portland, OR 97214

**From:** Dean P. Gisvold [<mailto:deang@mcewengisvold.com>]  
**Sent:** Monday, April 11, 2016 3:25 PM  
**To:** Cunningham, Bill <[Bill.Cunningham@portlandoregon.gov](mailto:Bill.Cunningham@portlandoregon.gov)>  
**Cc:** Hodgson, Robert <[r\\_elan@comcast.net](mailto:r_elan@comcast.net)>; [holberg@comcast.net](mailto:holberg@comcast.net); Thompson, Courtenay <[courtenaythompson@comcast.net](mailto:courtenaythompson@comcast.net)>; Lucy Shanno <[lucyminettshanno@hotmail.com](mailto:lucyminettshanno@hotmail.com)>; Justin Hirsch <[justin@hirschfamily.com](mailto:justin@hirschfamily.com)>; Marcos Barnatan <[mbarnatan1@gmail.com](mailto:mbarnatan1@gmail.com)>; elan, r <[r\\_elan@comcast.net](mailto:r_elan@comcast.net)>; Leslie Chigbrow <[leslie99@mac.com](mailto:leslie99@mac.com)>; Les Christianson <[leschristianson@mac.com](mailto:leschristianson@mac.com)>; Dana Griggs <[griggsg@windermere.com](mailto:griggsg@windermere.com)>; Gary Griggs <[griggsg@windermere.com](mailto:griggsg@windermere.com)>; Julie Perko <[julieperko@yahoo.com](mailto:julieperko@yahoo.com)>; Mitch Thomas <[mitch.thomas@gmail.com](mailto:mitch.thomas@gmail.com)>; Glen Gilbert <[glen@thegilbert4.com](mailto:glen@thegilbert4.com)>; Tori Gilbert <[tori@thegilbert4.com](mailto:tori@thegilbert4.com)>; Kevin Chigbrow <[klc55@me.com](mailto:klc55@me.com)>; Lynn and Dave Kemper <[djk@alum.mit.edu](mailto:djk@alum.mit.edu)>; Anne and JT Thompson <[oregon.thompsons@comcast.net](mailto:oregon.thompsons@comcast.net)>; Kristen and Mark Solberg/VanderZanden <[kirsten@surroundinc.com](mailto:kirsten@surroundinc.com)>; Alina Alexander <[alinajg21@yahoo.com](mailto:alinajg21@yahoo.com)>; Richardson, Helen <[gsgram@comcast.net](mailto:gsgram@comcast.net)>; Timothea Barnatan <[timotheab@msn.com](mailto:timotheab@msn.com)>; 'Jim Heuer' ([jsheuer@easystreet.net](mailto:jsheuer@easystreet.net)) <[jsheuer@easystreet.net](mailto:jsheuer@easystreet.net)>; Barb Christopher <[barbfc@comcast.net](mailto:barbfc@comcast.net)>; Nathan Corser <[Nathan.Corser@ch2m.com](mailto:Nathan.Corser@ch2m.com)>; Nikki Johnston <[ndjz@yahoo.com](mailto:ndjz@yahoo.com)>; Dean P. Gisvold <[deang@mcewengisvold.com](mailto:deang@mcewengisvold.com)>; Bob Dobrich <[bobedh@me.com](mailto:bobedh@me.com)>; Donald Wood <[bendoreg@msn.com](mailto:bendoreg@msn.com)>; Ed Abrahamson <[endanseur@comcast.net](mailto:endanseur@comcast.net)>; Jeff Jones <[jcjones@pacifier.com](mailto:jcjones@pacifier.com)>; Jim Barta <[jim.barta@yahoo.com](mailto:jim.barta@yahoo.com)>; Meryl Logue <[meryllogue@comcast.net](mailto:meryllogue@comcast.net)>; Mickey Bishop <[mikefbishop@gmail.com](mailto:mikefbishop@gmail.com)>; Peter O'Neil <[peteroneil@cbseal.com](mailto:peteroneil@cbseal.com)>; Sean <[saetas@me.com](mailto:saetas@me.com)>; Stephen Doubleday <[stephendoubleday@me.com](mailto:stephendoubleday@me.com)>; Steven Cole <[stevencole86@gmail.com](mailto:stevencole86@gmail.com)>; Tiffanie Shakespeare <[tshakesp@gmail.com](mailto:tshakesp@gmail.com)>; William Archer <[archerwilliam26@gmail.com](mailto:archerwilliam26@gmail.com)>  
**Subject:** Mixed Use Zoning Report

Bill,

Below please find the comments of the Irvington Community Association regarding the draft report (Report) issued by the Mixed Use Zoning Project (Project).

Our comments were first raised during the comment period on the 2035 Comp Plan, but were not made part of the amendment package submitted recently by the City Council, its staff, and BPS. However, the three issues identified below have been treated in the Project and the Report, and are the focus of these comments. We asked that you enter them into the record; if you cannot do that, please advise as to the proper method. Thanks for answering my several questions and being available to discuss issues. I appreciate it very much.

### **Corner lot at 15<sup>th</sup> and NE Brazee**

For nearby residents, this is a significant change in zoning. The 2035 comp plan amends the R-5 zoning that has applied for decades to the 15,000 square foot property at the northeast corner of NE 15<sup>th</sup> and NE Brazee (the Property). All surrounding property retains the R-5 zoning designation, which predominates throughout most of the Irvington Historic District. The Comp Plan amendment makes this 15,000 sq foot property CM 1, which is a new mixed use zone designation. This means that the Property becomes a commercial zone and the Property loses its

nonconforming status. Similar amendments are being made elsewhere in the City as part of the Comp Plan process, since the City does not like nonconforming uses.

However, the Report indicates that small commercial properties surrounded by single family zoning, will retain the limitation on hours of use that such property enjoyed as a nonconforming use, close by 11pm and no morning activity until 6 am. The rub is that this limitation, as presently drafted, only applies to sites of 7,500 sq feet or less.

**Thus, the ICA proposes that the threshold for this limitation found on page 69 of the Report, Section 33.130.100 B 2 (c) be amended to 15,000 sq feet.  
If this amendment is not made, the ICA proposes that the rezoning for the Property be eliminated the Comp Plan map such that the zoning remains an R-5 zone.**

### **Broadway Strip from NE 16<sup>th</sup> to NE 28<sup>th</sup>**

The Comp Plan changed the zoning on this portion of the Broadway strip from its current zoning to CM-2, a new mixed use zoning designation that carries with it an allowed height of 45 feet as a base height, and possible bonus height up to 55 feet, and a base FAR of 2.5 to 1, and possible bonus FAR up to 4 to 1. The base height and FAR for CM-2 is similar to the current zoning, but the bonuses are not. We noted this problem in the ICA comments on the 2035 Comp Plan.

Under the regulations proposed by the Report, the bonuses (including additional height and FAR) cannot be used for properties within the Irvington Historic District, which would include the north side of Broadway from NE 16<sup>th</sup> to NE 28<sup>th</sup>. Such properties are not eligible for the bonus height and bonus FAR. Code section 33.130.212.B.1 (page 93 of the Report), provides in part: “Sites located within Historic or Conservation districts are not eligible to use bonus options.”

**Thus, the base height and base FAR are acceptable, provided that the restriction cited above remains in place and part of the Report.**

### **7<sup>th</sup> and Hancock Area**

The 2035 Comp Plan proposed to change this area to CM-3, a new commercial zone designation, with a base height of 65 feet and a base FAR of 3 to 1, plus a bonus height of up to 75 feet and a bonus FAR of up to 5 to 1. We objected to this new mixed use zoning designation.

The Report recommends that this property be designated EG 1 rather than CM-3. An EG 1 zone has a maximum height of 45 feet and a maximum FAR of 3-to-1. Once again, the Report contemplates that no bonuses would be allowed for the EG1 zone. The primary differences between the EG1 zone and the various commercial/mixed use zones are in the uses allowed in the zones, including prohibition of new residential uses in the EG zones. The Employment Zoning Project draft includes the Primary Use table as Table 140-1. In the current Zoning Code, Table 140-3 provides that the existing/continuing height and FAR standards for the EG1 zone: <http://www.portlandoregon.gov/bps/article/53298>

**The proposed designation of EG 1 with no bonuses is acceptable provided there are no changes during the hearing process.**

Please let us know if there are any changes made to the Report as it goes through the review process that affect the comments above. Thanks.

Dean Gisvold,  
ICA Land Use Chair and Board member"

**Dean P. Gisvold | Attorney at Law | Senior Partner**

**MC EWEN GISVOLD LLP - EST. 1886**

1600 Standard Plaza, 1100 SW Sixth Avenue, Portland, Oregon 97204

Direct: 503-412-3548 | Office: 503-226-7321 | Fax: 503-243-2687

Email: [deang@mcewengisvold.com](mailto:deang@mcewengisvold.com)

Website: <http://www.mcewengisvold.com>

RECEIVED  
PLANNING & SUSTAINABILITY

April 11, 2016

2016 MAY 13 A 9 17

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201  
[pcs@portlandoregon.gov](mailto:pcs@portlandoregon.gov)

Subject Address: 8000 - 8002 SE Thirteenth Ave.

Owners: Chrisman Family Trust, Richard & Heather Chrisman, trustees

Current Zoning: CS

Proposed Zoning: CM1

Subject: **Protest of Proposed Zoning Change of CS Properties in Sellwood/Westmoreland to CM1**

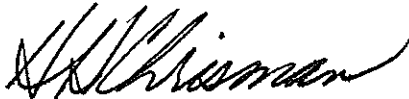
**Our position: Zoning, if changed, to be CM2**

We are the property owners on record of 8000 - 8002 SE Thirteenth Ave Portland, OR. This property is located at the corner of Thirteenth and Nehalem. Immediate neighbors include: Grand Central Bakery, 2 major banks (On-Point and Key Bank), Starbucks, Ugly Mug, Columbia Sport Outlet, and many other commercial entities.

On October 13<sup>th</sup>, 2015 we received a Notice of Proposed Zoning change that indicated that our zoning would change from Urban Commercial (CS) to "Mixed use-neighborhood". When we looked online at Zone Conversion Table, it showed a CS zoned property in a Mixed Use Neighborhood moving to CM2. As this was a logical progression we had no cause to dispute this change.

On Thursday April 6, 2016, however, we received a new notice indicating a change from CS to CM1. This makes no sense. The summary of Proposed Mixed Use Zones provided with the Notice, including a grid diagram and zoning code descriptions, all support our property changing from CS to CM2 and, based on city of Portland data, over 98% of current CS zoned properties are moving to CM2 or CM3. It is unreasonable that an area that currently supports strong commercial retail uses and has no direct impact on residential properties, be down-zoned from CS to CM1. Our position is that the appropriate zoning for current CS zoned properties in Sellwood/Westmoreland be CM2.

Regards,



Heather H. Chrisman, trustee



April 10, 2016

Barry Manning  
Nan Stark  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, #7100  
Portland, OR 97201

**Re: Improper Zone Assignment, Mixed Use Zones Project on NE Killingsworth St**

Dear Nan and Barry:

Hello, I am a commercial property owner in NE Portland at 30th and Killingsworth and I am writing to testify against the proposed CM-1 Zoning designation at that intersection. I feel it is demonstrably inappropriate to zone this intersection at CM-1 for reasons that include the nature of the corridor, the nature of the surrounding zoning, and the nature of future growth. (For these same reasons, it is also inappropriate to take a portion of the development at 33rd and Killingsworth and zone it CM-2 and take another portion and assign it CM-1, which we will address herein, as well.)

I am requesting a CM-2 designation for these locations, which more closely translates to the old CS zone, which is most appropriate for these commercial nodes.

Please find my arguments in detail below:

**CS to CM-2.** The majority of Killingsworth's commercial nodes are zoned CS, a few are CG, and a small number are CN-1/CN-2. The city's stated intentions were to generally take existing CS zoning and convert it to CM-2 zoning. So let's examine what happened to all CS zoning on all of Killingsworth as a part of the proposed rezone. As shown in the table below, **ALL of the CS zoned properties on Killingsworth were either cross-zoned to CM-2, expanded into residential zoning, or were up-zoned**, except for one case, the down-zone that happened at 30th and Killingsworth, see the table below.

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
Denver to Interstate	CS	CM-3 Up-Zone
Interstate to Kerby	CS	CM-2 Cross-Zone
Commercial to Mallory	CS	CM-2 Cross Zone Extended Further East into Residential Zoning
14th to 17th	CS	CM-2 Cross-Zone

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
30th	CS	CM-1 <b>Down-Zone</b>
Cully	CS	CM-2 Cross-Zone

Let's compare the commercial infrastructure on Killingsworth at 15th and at 30th, as an example. As you can see below, it's pretty much exactly the same. In fact, the commercial infrastructure at all of the nodes on Killingsworth is pretty much the same, so why should one be singled out for a down-zone?



Also, consider the cross-zone just 3 blocks away that occurred at NE 33rd and NE Emerson. The New Season's site went from CS to CM-2, even though it borders on R5 zoning. But the corner at 33rd and Killingsworth that serves as its gateway is zoned CM-1, even though it borders on more high density zoning and one corner is technically part of the CS-zoned development.

**The Corridor.** NE Killingsworth St. is one of our longest, continuous, in-city east-west corridors. It is not a neighborhood street, it is not a street zoned with R5, single family homes. It is a busy, cross-Portland serving arterial.

Consider city zoning descriptions for the new zones:

Language describing CM-1: *“This small-scale commercial mixed use zone is intended for...lower density residential areas...”*

Language describing CM-2: *“This medium-scale commercial mixed use zone is intended for sites in a variety of centers and corridors...or within an area zoned for multi-dwelling development...”*

It would seem that CM-2 describes the Killingsworth situation more closely because the majority of residential zoning on Killingsworth is listed as multi-dwelling zoning under current zoning code at the City of Portland.

Additionally, all surrounding residential at the intersections of 30th and 33rd have a bonus density overlay, which will bring even more people and concentration of activity. In the future, it will be a busy corridor with a lot of density.

### **Surrounding Scale.**

All of the zoning of the lots that immediately border on the commercial properties at the 30th and Killingsworth node are either R2.5a or R2a. Let’s look at what building height and lot coverage are like on those parcels:

R2: Allows for 40 foot height construction and 50% maximum lot coverage.

R2.5: Allows for 35 foot height construction and 50% maximum lot coverage.

Overlay (a): Allows for “bonus density,” as Portland code puts it, calling for: “Fifty percent more dwelling units than allowed by the base zone is granted.”

Now let’s compare that to the allowances for CM-1, the proposed plan for 30th and Killingsworth:

CM-1: Allows for a 35 foot height building, and 50% lot coverage at maximum height.

This means that eventually, everything around the commercial node on 30th and Killingsworth is going to potentially be 35 to 40 feet covering half the lot. But under the

CM-1 zoning, with a base FAR of 1:1.5, if I was to maximize the 35 foot height limit, I would only be allowed to have 50% lot coverage. So new commercial development would be **at or below** the same density as the residential, which makes no sense. Usually, commercial nodes are taller and more dense than surrounding residential zoning, which is appropriate.

In fact, in the proposed zoning report issued by the city to describe these zone changes, there are four examples of projects that are shown as examples for CM-1 zoning, which are pictured below. All of these buildings appear to have at least between 75%-100% lot coverage. If that is true, then none of these buildings except the single story Umpqua Bank building in the upper left corner would be able to be constructed under CM-1 zoning.



On 33rd and Killingsworth, a similar thing is happening. That node is surrounded by R2, R2.5, and R5, all of which have the (a) overlay allowing for more density. And, it is the gateway for the heavily used CS-zoned commercial development immediately to the south, which includes the grocery store anchor. It makes much more sense for that entire



node to be a single zone so future commercial development is at an appropriate, and consistent scale.

### **Historic Preservation.**

It is not uncommon for communities to want to use down-zoning to try to preserve historic infrastructure. However, it is a heavy handed tool that has unintended consequences, and besides, it doesn't work.

The market, and people's desire to live in Portland, are what are driving changes to the built environment. Not owners of properties wanting to tear down historic buildings. The city is going to have to become more dense to accommodate population growth because it has an urban growth boundary.

An increase in density and a replacement of buildings has always been a part of a growing city's urban landscape for as long as we have built cities. For instance, Portland's population tripled between 1900 and 1937 — it would be interesting to look at a time lapse photograph of the buildings that got replaced to bring more density throughout Portland during that time!

If this down-zone is being used as a means of historic preservation at the corner of NE 30th & NE Killingsworth, why is just this corner being singled out? Does that mean that the buildings in other commercial nodes along Killingsworth are not worth saving? Are the buildings on the corner of 30th and Killingsworth more special, or more historic than elsewhere on Killingsworth? I would answer "no" to all of these questions.

The bottom line is that generally, buildings that have good lot coverage, that cash flow well, have high value tenants, and exist as a part of a commercial node with a strong brand identity — the very buildings the neighborhood likes — probably aren't going to flip to a new, denser construction project over the next few years. Why? Because the amount of money that a developer would have to pay for a high-performing property, and then be able to build something on it that would achieve a return, is a real estate market that does not reflect current realities in NE Portland.

In the meantime, for the properties that are not well tenanted, or that don't have good lot coverage, don't we want those to be replaced with denser buildings that have appropriate lot coverage for a commercial district that are of a scale in line with where the city is going, instead of the scale this neighborhood was designed for one hundred years ago? For example, the Northeast corner of 30th and Killingsworth, or the two auto focused large lot/small building sites on the northern corners of 33rd and Killingsworth. These are places that feature very auto focused, low density development. They are exactly the candidates we should be looking toward to introduce much needed density, which calls for CM-2 zoning.



Down-zoning as a means of historic preservation won't stop buildings from being torn down — eventually that will happen, but only when the market supports rents that justify tearing down a building that cash flows. When, or if that time comes to these nodes, a CM-1 zone will mean that the neighborhood will end up with product that is not as nice as other areas of the city because owners will have less money to spend on construction/finishes since they will have less of an economy of scale to their building site. And, the neighborhood will end up with product that is inappropriately sized compared to the surrounding residential projects that will arise around it. Lastly, when new construction comes to these nodes, developers will likely try to assemble lots in order to achieve a better economy of scale, which will result in larger structures to overcome the lower density restrictions. This will ruin the small lot appeal of these commercial nodes, and the very ambiance the neighborhood likes so much.

Regards,

Elisa Smith ELISA SMITH (30TH AVE LLC)  
Owner (Signature/Print)

\_\_\_\_\_  
Owner (Signature/Print)

\_\_\_\_\_  
Owner (Signature/Print)

5501-5519 NE 30TH  
Address of Building

PO BOX 6614 PORTLAND OR 97228  
Address for Notices

503.221.7722  
Contact Phone

April 10, 2016

Barry Manning  
Nan Stark  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, #7100  
Portland, OR 97201

**Re: Improper Zone Assignment, Mixed Use Zones Project on NE Killingsworth St**

Dear Nan and Barry:

Hello, I am a commercial property owner in NE Portland at 30th and Killingsworth and I am writing to testify against the proposed CM-1 Zoning designation at that intersection. I feel it is demonstrably inappropriate to zone this intersection at CM-1 for reasons that include the nature of the corridor, the nature of the surrounding zoning, and the nature of future growth. (For these same reasons, it is also inappropriate to take a portion of the development at 33rd and Killingsworth and zone it CM-2 and take another portion and assign it CM-1, which we will address herein, as well.)

I am requesting a CM-2 designation for these locations, which more closely translates to the old CS zone, which is most appropriate for these commercial nodes.

Please find my arguments in detail below:

**CS to CM-2.** The majority of Killingsworth's commercial nodes are zoned CS, a few are CG, and a small number are CN-1/CN-2. The city's stated intentions were to generally take existing CS zoning and convert it to CM-2 zoning. So let's examine what happened to all CS zoning on all of Killingsworth as a part of the proposed rezone. As shown in the table below, **ALL of the CS zoned properties on Killingsworth were either cross-zoned to CM-2, expanded into residential zoning, or were up-zoned**, except for one case, the down-zone that happened at 30th and Killingsworth, see the table below.

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
Denver to Interstate	CS	CM-3 Up-Zone
Interstate to Kerby	CS	CM-2 Cross-Zone
Commercial to Mallory	CS	CM-2 Cross Zone Extended Further East into Residential Zoning
14th to 17th	CS	CM-2 Cross-Zone

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
30th	CS	CM-1 <b>Down-Zone</b>
Cully	CS	CM-2 Cross-Zone

Let's compare the commercial infrastructure on Killingsworth at 15th and at 30th, as an example. As you can see below, it's pretty much exactly the same. In fact, the commercial infrastructure at all of the nodes on Killingsworth is pretty much the same, so why should one be singled out for a down-zone?



Also, consider the cross-zone just 3 blocks away that occurred at NE 33rd and NE Emerson. The New Season's site went from CS to CM-2, even though it borders on R5 zoning. But the corner at 33rd and Killingsworth that serves as its gateway is zoned CM-1, even though it borders on more high density zoning and one corner is technically part of the CS-zoned development.

**The Corridor.** NE Killingsworth St. is one of our longest, continuous, in-city east-west corridors. It is not a neighborhood street, it is not a street zoned with R5, single family homes. It is a busy, cross-Portland serving arterial.

Consider city zoning descriptions for the new zones:

Language describing CM-1: *“This small-scale commercial mixed use zone is intended for...lower density residential areas...”*

Language describing CM-2: *“This medium-scale commercial mixed use zone is intended for sites in a variety of centers and corridors...or within an area zoned for multi-dwelling development...”*

It would seem that CM-2 describes the Killingsworth situation more closely because the majority of residential zoning on Killingsworth is listed as multi-dwelling zoning under current zoning code at the City of Portland.

Additionally, all surrounding residential at the intersections of 30th and 33rd have a bonus density overlay, which will bring even more people and concentration of activity. In the future, it will be a busy corridor with a lot of density.

### **Surrounding Scale.**

All of the zoning of the lots that immediately border on the commercial properties at the 30th and Killingsworth node are either R2.5a or R2a. Let’s look at what building height and lot coverage are like on those parcels:

R2: Allows for 40 foot height construction and 50% maximum lot coverage.

R2.5: Allows for 35 foot height construction and 50% maximum lot coverage.

Overlay (a): Allows for “bonus density,” as Portland code puts it, calling for: “Fifty percent more dwelling units than allowed by the base zone is granted.”

Now let’s compare that to the allowances for CM-1, the proposed plan for 30th and Killingsworth:

CM-1: Allows for a 35 foot height building, and 50% lot coverage at maximum height.

This means that eventually, everything around the commercial node on 30th and Killingsworth is going to potentially be 35 to 40 feet covering half the lot. But under the



CM-1 zoning, with a base FAR of 1:1.5, if I was to maximize the 35 foot height limit, I would only be allowed to have 50% lot coverage. So new commercial development would be **at or below** the same density as the residential, which makes no sense. Usually, commercial nodes are taller and more dense than surrounding residential zoning, which is appropriate.

In fact, in the proposed zoning report issued by the city to describe these zone changes, there are four examples of projects that are shown as examples for CM-1 zoning, which are pictured below. All of these buildings appear to have at least between 75%-100% lot coverage. If that is true, then none of these buildings except the single story Umpqua Bank building in the upper left corner would be able to be constructed under CM-1 zoning.



On 33rd and Killingsworth, a similar thing is happening. That node is surrounded by R2, R2.5, and R5, all of which have the (a) overlay allowing for more density. And, it is the gateway for the heavily used CS-zoned commercial development immediately to the south, which includes the grocery store anchor. It makes much more sense for that entire



node to be a single zone so future commercial development is at an appropriate, and consistent scale.

### **Historic Preservation.**

It is not uncommon for communities to want to use down-zoning to try to preserve historic infrastructure. However, it is a heavy handed tool that has unintended consequences, and besides, it doesn't work.

The market, and people's desire to live in Portland, are what are driving changes to the built environment. Not owners of properties wanting to tear down historic buildings. The city is going to have to become more dense to accommodate population growth because it has an urban growth boundary.

An increase in density and a replacement of buildings has always been a part of a growing city's urban landscape for as long as we have built cities. For instance, Portland's population tripled between 1900 and 1937 — it would be interesting to look at a time lapse photograph of the buildings that got replaced to bring more density throughout Portland during that time!

If this down-zone is being used as a means of historic preservation at the corner of NE 30th & NE Killingsworth, why is just this corner being singled out? Does that mean that the buildings in other commercial nodes along Killingsworth are not worth saving? Are the buildings on the corner of 30th and Killingsworth more special, or more historic than elsewhere on Killingsworth? I would answer "no" to all of these questions.

The bottom line is that generally, buildings that have good lot coverage, that cash flow well, have high value tenants, and exist as a part of a commercial node with a strong brand identity — the very buildings the neighborhood likes — probably aren't going to flip to a new, denser construction project over the next few years. Why? Because the amount of money that a developer would have to pay for a high-performing property, and then be able to build something on it that would achieve a return, is a real estate market that does not reflect current realities in NE Portland.

In the meantime, for the properties that are not well tenanted, or that don't have good lot coverage, don't we want those to be replaced with denser buildings that have appropriate lot coverage for a commercial district that are of a scale in line with where the city is going, instead of the scale this neighborhood was designed for one hundred years ago? For example, the Northeast corner of 30th and Killingsworth, or the two auto focused large lot/ small building sites on the northern corners of 33rd and Killingsworth. These are places that feature very auto focused, low density development. They are exactly the candidates we should be looking toward to introduce much needed density, which calls for CM-2 zoning.

Down-zoning as a means of historic preservation won't stop buildings from being torn down — eventually that will happen, but only when the market supports rents that justify tearing down a building that cash flows. When, or if that time comes to these nodes, a CM-1 zone will mean that the neighborhood will end up with product that is not as nice as other areas of the city because owners will have less money to spend on construction/finishes since they will have less of an economy of scale to their building site. And, the neighborhood will end up with product that is inappropriately sized compared to the surrounding residential projects that will arise around it. Lastly, when new construction comes to these nodes, developers will likely try to assemble lots in order to achieve a better economy of scale, which will result in larger structures to overcome the lower density restrictions. This will ruin the small lot appeal of these commercial nodes, and the very ambiance the neighborhood likes so much.

Regards,

Earl E Reeves EARLE REEVES  
Owner (Signature/Print)

Sheila E. Reeves Sheila E. REEVES  
Owner (Signature/Print)

Mike Reeves MICHAEL REEVES  
Owner (Signature/Print)

Thomas F. Offermann Thomas Offermann

2921 NE KILLINGSWORTH  
Address of Building

401 NW FLANDERS ST # 610  
Address for Notices

503-568-2999  
Contact Phone



April 10, 2016

Barry Manning  
Nan Stark  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, #7100  
Portland, OR 97201

**Re: Improper Zone Assignment, Mixed Use Zones Project on NE Killingsworth St**

Dear Nan and Barry:

Hello, I am a commercial property owner in NE Portland at 30th and Killingsworth and I am writing to testify against the proposed CM-1 Zoning designation at that intersection. I feel it is demonstrably inappropriate to zone this intersection at CM-1 for reasons that include the nature of the corridor, the nature of the surrounding zoning, and the nature of future growth. (For these same reasons, it is also inappropriate to take a portion of the development at 33rd and Killingsworth and zone it CM-2 and take another portion and assign it CM-1, which we will address herein, as well.)

I am requesting a CM-2 designation for these locations, which more closely translates to the old CS zone, which is most appropriate for these commercial nodes.

Please find my arguments in detail below:

**CS to CM-2.** The majority of Killingsworth's commercial nodes are zoned CS, a few are CG, and a small number are CN-1/CN-2. The city's stated intentions were to generally take existing CS zoning and convert it to CM-2 zoning. So let's examine what happened to all CS zoning on all of Killingsworth as a part of the proposed rezone. As shown in the table below, **ALL of the CS zoned properties on Killingsworth were either cross-zoned to CM-2, expanded into residential zoning, or were up-zoned**, except for one case, the down-zone that happened at 30th and Killingsworth, see the table below.

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
Denver to Interstate	CS	CM-3 Up-Zone
Interstate to Kerby	CS	CM-2 Cross-Zone
Commercial to Mallory	CS	CM-2 Cross Zone Extended Further East into Residential Zoning
14th to 17th	CS	CM-2 Cross-Zone

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
30th	CS	CM-1 <b>Down-Zone</b>
Cully	CS	CM-2 Cross-Zone

Let's compare the commercial infrastructure on Killingsworth at 15th and at 30th, as an example. As you can see below, it's pretty much exactly the same. In fact, the commercial infrastructure at all of the nodes on Killingsworth is pretty much the same, so why should one be singled out for a down-zone?



Also, consider the cross-zone just 3 blocks away that occurred at NE 33rd and NE Emerson. The New Season's site went from CS to CM-2, even though it borders on R5 zoning. But the corner at 33rd and Killingsworth that serves as its gateway is zoned CM-1, even though it borders on more high density zoning and one corner is technically part of the CS-zoned development.



**The Corridor.** NE Killingsworth St. is one of our longest, continuous, in-city east-west corridors. It is not a neighborhood street, it is not a street zoned with R5, single family homes. It is a busy, cross-Portland serving arterial.

Consider city zoning descriptions for the new zones:

Language describing CM-1: *"This small-scale commercial mixed use zone is intended for...lower density residential areas..."*

Language describing CM-2: *"This medium-scale commercial mixed use zone is intended for sites in a variety of centers and corridors...or within an area zoned for multi-dwelling development..."*

It would seem that CM-2 describes the Killingsworth situation more closely because the majority of residential zoning on Killingsworth is listed as multi-dwelling zoning under current zoning code at the City of Portland.

Additionally, all surrounding residential at the intersections of 30th and 33rd have a bonus density overlay, which will bring even more people and concentration of activity. In the future, it will be a busy corridor with a lot of density.

### **Surrounding Scale.**

All of the zoning of the lots that immediately border on the commercial properties at the 30th and Killingsworth node are either R2.5a or R2a. Let's look at what building height and lot coverage are like on those parcels:

R2: Allows for 40 foot height construction and 50% maximum lot coverage.

R2.5: Allows for 35 foot height construction and 50% maximum lot coverage.

Overlay (a): Allows for "bonus density," as Portland code puts it, calling for: "Fifty percent more dwelling units than allowed by the base zone is granted."

Now let's compare that to the allowances for CM-1, the proposed plan for 30th and Killingsworth:

CM-1: Allows for a 35 foot height building, and 50% lot coverage at maximum height.

This means that eventually, everything around the commercial node on 30th and Killingsworth is going to potentially be 35 to 40 feet covering half the lot. But under the



CM-1 zoning, with a base FAR of 1:1.5, if I was to maximize the 35 foot height limit, I would only be allowed to have 50% lot coverage. So new commercial development would be ***at or below*** the same density as the residential, which makes no sense. Usually, commercial nodes are taller and more dense than surrounding residential zoning, which is appropriate.

In fact, in the proposed zoning report issued by the city to describe these zone changes, there are four examples of projects that are shown as examples for CM-1 zoning, which are pictured below. All of these buildings appear to have at least between 75%-100% lot coverage. If that is true, then none of these buildings except the single story Umpqua Bank building in the upper left corner would be able to be constructed under CM-1 zoning.



On 33rd and Killingsworth, a similar thing is happening. That node is surrounded by R2, R2.5, and R5, all of which have the (a) overlay allowing for more density. And, it is the gateway for the heavily used CS-zoned commercial development immediately to the south, which includes the grocery store anchor. It makes much more sense for that entire

node to be a single zone so future commercial development is at an appropriate, and consistent scale.

### **Historic Preservation.**

It is not uncommon for communities to want to use down-zoning to try to preserve historic infrastructure. However, it is a heavy handed tool that has unintended consequences, and besides, it doesn't work.

The market, and people's desire to live in Portland, are what are driving changes to the built environment. Not owners of properties wanting to tear down historic buildings. The city is going to have to become more dense to accommodate population growth because it has an urban growth boundary.

An increase in density and a replacement of buildings has always been a part of a growing city's urban landscape for as long as we have built cities. For instance, Portland's population tripled between 1900 and 1937 — it would be interesting to look at a time lapse photograph of the buildings that got replaced to bring more density throughout Portland during that time!

If this down-zone is being used as a means of historic preservation at the corner of NE 30th & NE Killingsworth, why is just this corner being singled out? Does that mean that the buildings in other commercial nodes along Killingsworth are not worth saving? Are the buildings on the corner of 30th and Killingsworth more special, or more historic than elsewhere on Killingsworth? I would answer "no" to all of these questions.

The bottom line is that generally, buildings that have good lot coverage, that cash flow well, have high value tenants, and exist as a part of a commercial node with a strong brand identity — the very buildings the neighborhood likes — probably aren't going to flip to a new, denser construction project over the next few years. Why? Because the amount of money that a developer would have to pay for a high-performing property, and then be able to build something on it that would achieve a return, is a real estate market that does not reflect current realities in NE Portland.

In the meantime, for the properties that are not well tenanted, or that don't have good lot coverage, don't we want those to be replaced with denser buildings that have appropriate lot coverage for a commercial district that are of a scale in line with where the city is going, instead of the scale this neighborhood was designed for one hundred years ago? For example, the Northeast corner of 30th and Killingsworth, or the two auto focused large lot/small building sites on the northern corners of 33rd and Killingsworth. These are places that feature very auto focused, low density development. They are exactly the candidates we should be looking toward to introduce much needed density, which calls for CM-2 zoning.



Down-zoning as a means of historic preservation won't stop buildings from being torn down — eventually that will happen, but only when the market supports rents that justify tearing down a building that cash flows. When, or if that time comes to these nodes, a CM-1 zone will mean that the neighborhood will end up with product that is not as nice as other areas of the city because owners will have less money to spend on construction/finishes since they will have less of an economy of scale to their building site. And, the neighborhood will end up with product that is inappropriately sized compared to the surrounding residential projects that will arise around it. Lastly, when new construction comes to these nodes, developers will likely try to assemble lots in order to achieve a better economy of scale, which will result in larger structures to overcome the lower density restrictions. This will ruin the small lot appeal of these commercial nodes, and the very ambiance the neighborhood likes so much.

Regards,

  
Owner (Signature/Print)

\_\_\_\_\_  
Owner (Signature/Print)

\_\_\_\_\_  
Owner (Signature/Print)

3009 NE Killingsworth Portland, OR 97221  
Address of Building

P.O. Box 87908 Vancouver, WA 98687  
Address for Notices

360-256-9432  
Contact Phone

April 10, 2016

Barry Manning  
Nan Stark  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, #7100  
Portland, OR 97201

**Re: Improper Zone Assignment, Mixed Use Zones Project on NE Killingsworth St**

Dear Nan and Barry:

Hello, I am a commercial property owner in NE Portland at 30th and Killingsworth and I am writing to testify against the proposed CM-1 Zoning designation at that intersection. I feel it is demonstrably inappropriate to zone this intersection at CM-1 for reasons that include the nature of the corridor, the nature of the surrounding zoning, and the nature of future growth. (For these same reasons, it is also inappropriate to take a portion of the development at 33rd and Killingsworth and zone it CM-2 and take another portion and assign it CM-1, which we will address herein, as well.)

I am requesting a CM-2 designation for these locations, which more closely translates to the old CS zone, which is most appropriate for these commercial nodes.

Please find my arguments in detail below:

**CS to CM-2.** The majority of Killingsworth's commercial nodes are zoned CS, a few are CG, and a small number are CN-1/CN-2. The city's stated intentions were to generally take existing CS zoning and convert it to CM-2 zoning. So let's examine what happened to all CS zoning on all of Killingsworth as a part of the proposed rezone. As shown in the table below, **ALL of the CS zoned properties on Killingsworth were either cross-zoned to CM-2, expanded into residential zoning, or were up-zoned**, except for one case, the down-zone that happened at 30th and Killingsworth, see the table below.

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
Denver to Interstate	CS	CM-3 Up-Zone
Interstate to Kerby	CS	CM-2 Cross-Zone
Commercial to Mallory	CS	CM-2 Cross Zone Extended Further East into Residential Zoning
14th to 17th	CS	CM-2 Cross-Zone



LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
30th	CS	CM-1 Down-Zone
Cully	CS	CM-2 Cross-Zone

Let's compare the commercial infrastructure on Killingsworth at 15th and at 30th, as an example. As you can see below, it's pretty much exactly the same. In fact, the commercial infrastructure at all of the nodes on Killingsworth is pretty much the same, so why should one be singled out for a down-zone?



Also, consider the cross-zone just 3 blocks away that occurred at NE 33rd and NE Emerson. The New Season's site went from CS to CM-2, even though it borders on R5 zoning. But the corner at 33rd and Killingsworth that serves as its gateway is zoned CM-1, even though it borders on more high density zoning and one corner is technically part of the CS-zoned development.



**The Corridor.** NE Killingsworth St. is one of our longest, continuous, in-city east-west corridors. It is not a neighborhood street, it is not a street zoned with R5, single family homes. It is a busy, cross-Portland serving arterial.

Consider city zoning descriptions for the new zones:

Language describing CM-1: *"This small-scale commercial mixed use zone is intended for...lower density residential areas..."*

Language describing CM-2: *"This medium-scale commercial mixed use zone is intended for sites in a variety of centers and corridors...or within an area zoned for multi-dwelling development..."*

It would seem that CM-2 describes the Killingsworth situation more closely because the majority of residential zoning on Killingsworth is listed as multi-dwelling zoning under current zoning code at the City of Portland.

Additionally, all surrounding residential at the intersections of 30th and 33rd have a bonus density overlay, which will bring even more people and concentration of activity. In the future, it will be a busy corridor with a lot of density.

### **Surrounding Scale.**

All of the zoning of the lots that immediately border on the commercial properties at the 30th and Killingsworth node are either R2.5a or R2a. Let's look at what building height and lot coverage are like on those parcels:

R2: Allows for 40 foot height construction and 50% maximum lot coverage.

R2.5: Allows for 35 foot height construction and 50% maximum lot coverage.

Overlay (a): Allows for "bonus density," as Portland code puts it, calling for: "Fifty percent more dwelling units than allowed by the base zone is granted."

Now let's compare that to the allowances for CM-1, the proposed plan for 30th and Killingsworth:

CM-1: Allows for a 35 foot height building, and 50% lot coverage at maximum height.

This means that eventually, everything around the commercial node on 30th and Killingsworth is going to potentially be 35 to 40 feet covering half the lot. But under the



CM-1 zoning, with a base FAR of 1:1.5, if I was to maximize the 35 foot height limit, I would only be allowed to have 50% lot coverage. So new commercial development would be **at or below** the same density as the residential, which makes no sense. Usually, commercial nodes are taller and more dense than surrounding residential zoning, which is appropriate.

In fact, in the proposed zoning report issued by the city to describe these zone changes, there are four examples of projects that are shown as examples for CM-1 zoning, which are pictured below. All of these buildings appear to have at least between 75%-100% lot coverage. If that is true, then none of these buildings except the single story Umpqua Bank building in the upper left corner would be able to be constructed under CM-1 zoning.



On 33rd and Killingsworth, a similar thing is happening. That node is surrounded by R2, R2.5, and R5, all of which have the (a) overlay allowing for more density. And, it is the gateway for the heavily used CS-zoned commercial development immediately to the south, which includes the grocery store anchor. It makes much more sense for that entire



node to be a single zone so future commercial development is at an appropriate, and consistent scale.

### **Historic Preservation.**

It is not uncommon for communities to want to use down-zoning to try to preserve historic infrastructure. However, it is a heavy handed tool that has unintended consequences, and besides, it doesn't work.

The market, and people's desire to live in Portland, are what are driving changes to the built environment. Not owners of properties wanting to tear down historic buildings. The city is going to have to become more dense to accommodate population growth because it has an urban growth boundary.

An increase in density and a replacement of buildings has always been a part of a growing city's urban landscape for as long as we have built cities. For instance, Portland's population tripled between 1900 and 1937 — it would be interesting to look at a time lapse photograph of the buildings that got replaced to bring more density throughout Portland during that time!

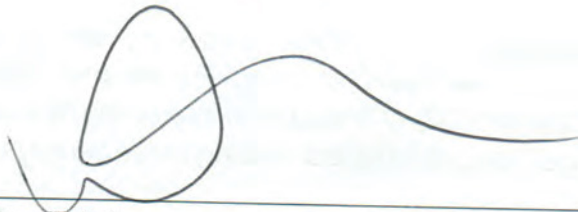
If this down-zone is being used as a means of historic preservation at the corner of NE 30th & NE Killingsworth, why is just this corner being singled out? Does that mean that the buildings in other other commercial nodes along Killingsworth are not worth saving? Are the buildings on the corner of 30th and Killingsworth more special, or more historic than elsewhere on Killingsworth? I would answer "no" to all of these questions.

The bottom line is that generally, buildings that have good lot coverage, that cash flow well, have high value tenants, and exist as a part of a commercial node with a strong brand identity — the very buildings the neighborhood likes — probably aren't going to flip to a new, denser construction project over the next few years. Why? Because the amount of money that a developer would have to pay for a high-performing property, and then be able to build something on it that would achieve a return, is a real estate market that does not reflect current realities in NE Portland.

In the meantime, for the properties that are not well tenanted, or that don't have good lot coverage, don't we want those to be replaced with denser buildings that have appropriate lot coverage for a commercial district that are of a scale in line with where the city is going, instead of the scale this neighborhood was designed for one hundred years ago? For example, the Northeast corner of 30th and Killingsworth, or the two auto focused large lot/ small building sites on the northern corners of 33rd and Killingsworth. These are places that feature very auto focused, low density development. They are exactly the candidates we should be looking toward to introduce much needed density, which calls for CM-2 zoning.

Down-zoning as a means of historic preservation won't stop buildings from being torn down — eventually that will happen, but only when the market supports rents that justify tearing down a building that cash flows. When, or if that time comes to these nodes, a CM-1 zone will mean that the neighborhood will end up with product that is not as nice as other areas of the city because owners will have less money to spend on construction/finishes since they will have less of an economy of scale to their building site. And, the neighborhood will end up with product that is inappropriately sized compared to the surrounding residential projects that will arise around it. Lastly, when new construction comes to these nodes, developers will likely try to assemble lots in order to achieve a better economy of scale, which will result in larger structures to overcome the lower density restrictions. This will ruin the small lot appeal of these commercial nodes, and the very ambiance the neighborhood likes so much.

Regards,



Itioness LLC

Dayna McErlean

Owner (Signature/Print)

Owner (Signature/Print)

Owner (Signature/Print)

5417 NE 30<sup>th</sup> Av

Address of Building

+ 5425 NE 30<sup>th</sup> Av

Address for Notices

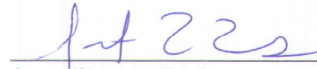
503-939-2949

Contact Phone



Down-zoning as a means of historic preservation won't stop buildings from being torn down — eventually that will happen, but only when the market supports rents that justify tearing down a building that cash flows. When, or if that time comes to these nodes, a CM-1 zone will mean that the neighborhood will end up with product that is not as nice as other areas of the city because owners will have less money to spend on construction/finishes since they will have less of an economy of scale to their building site. And, the neighborhood will end up with product that is inappropriately sized compared to the surrounding residential projects that will arise around it. Lastly, when new construction comes to these nodes, developers will likely try to assemble lots in order to achieve a better economy of scale, which will result in larger structures to overcome the lower density restrictions. This will ruin the small lot appeal of these commercial nodes, and the very ambiance the neighborhood likes so much.

Regards,



Owner (Signature/Print)

Owner (Signature/Print)

Owner (Signature/Print)

3000 N.E. Killingsworth Portland O.R.  
Address of Building

3347 S.E. Belmont #1 Portland OR 97214  
Address for Notices

503-804-2132  
Contact Phone



node to be a single zone so future commercial development is at an appropriate, and consistent scale.

#### **Historic Preservation.**

It is not uncommon for communities to want to use down-zoning to try to preserve historic infrastructure. However, it is a heavy handed tool that has unintended consequences, and besides, it doesn't work.

The market, and people's desire to live in Portland, are what are driving changes to the built environment. Not owners of properties wanting to tear down historic buildings. The city is going to have to become more dense to accommodate population growth because it has an urban growth boundary.

An increase in density and a replacement of buildings has always been a part of a growing city's urban landscape for as long as we have built cities. For instance, Portland's population tripled between 1900 and 1937 — it would be interesting to look at a time lapse photograph of the buildings that got replaced to bring more density throughout Portland during that time!

If this down-zone is being used as a means of historic preservation at the corner of NE 30th & NE Killingsworth, why is just this corner being singled out? Does that mean that the buildings in other commercial nodes along Killingsworth are not worth saving? Are the buildings on the corner of 30th and Killingsworth more special, or more historic than elsewhere on Killingsworth? I would answer "no" to all of these questions.

The bottom line is that generally, buildings that have good lot coverage, that cash flow well, have high value tenants, and exist as a part of a commercial node with a strong brand identity — the very buildings the neighborhood likes — probably aren't going to flip to a new, denser construction project over the next few years. Why? Because the amount of money that a developer would have to pay for a high-performing property, and then be able to build something on it that would achieve a return, is a real estate market that does not reflect current realities in NE Portland.

In the meantime, for the properties that are not well tenanted, or that don't have good lot coverage, don't we want those to be replaced with denser buildings that have appropriate lot coverage for a commercial district that are of a scale in line with where the city is going, instead of the scale this neighborhood was designed for one hundred years ago? For example, the Northeast corner of 30th and Killingsworth, or the two auto focused large lot/ small building sites on the northern corners of 33rd and Killingsworth. These are places that feature very auto focused, low density development. They are exactly the candidates we should be looking toward to introduce much needed density, which calls for CM-2 zoning.

CM-1 zoning, with a base FAR of 1:1.5, if I was to maximize the 35 foot height limit, I would only be allowed to have 50% lot coverage. So new commercial development would be at or below the same density as the residential, which makes no sense. Usually, commercial nodes are taller and more dense than surrounding residential zoning, which is appropriate.

In fact, in the proposed zoning report issued by the city to describe these zone changes, there are four examples of projects that are shown as examples for CM-1 zoning, which are pictured below. All of these buildings appear to have at least between 75%-100% lot coverage. If that is true, then none of these buildings except the single story Umpqua Bank building in the upper left corner would be able to be constructed under CM-1 zoning.



On 33rd and Killingsworth, a similar thing is happening. That node is surrounded by R2, R2.5, and R5, all of which have the (a) overlay allowing for more density. And, it is the gateway for the heavily used CS-zoned commercial development immediately to the south, which includes the grocery store anchor. It makes much more sense for that entire

**The Corridor.** NE Killingsworth St. is one of our longest, continuous, in-city east-west corridors. It is not a neighborhood street, it is not a street zoned with R5, single family homes. It is a busy, cross-Portland serving arterial.

Consider city zoning descriptions for the new zones:

Language describing CM-1: *"This small-scale commercial mixed use zone is intended for...lower density residential areas..."*

Language describing CM-2: *"This medium-scale commercial mixed use zone is intended for sites in a variety of centers and corridors...or within an area zoned for multi-dwelling development..."*

It would seem that CM-2 describes the Killingsworth situation more closely because the majority of residential zoning on Killingsworth is listed as multi-dwelling zoning under current zoning code at the City of Portland.

Additionally, all surrounding residential at the intersections of 30th and 33rd have a bonus density overlay, which will bring even more people and concentration of activity. In the future, it will be a busy corridor with a lot of density.

#### **Surrounding Scale.**

All of the zoning of the lots that immediately border on the commercial properties at the 30th and Killingsworth node are either R2.5a or R2a. Let's look at what building height and lot coverage are like on those parcels:

R2: Allows for 40 foot height construction and 50% maximum lot coverage.

R2.5: Allows for 35 foot height construction and 50% maximum lot coverage.

Overlay (a): Allows for "bonus density," as Portland code puts it, calling for: "Fifty percent more dwelling units than allowed by the base zone is granted."

Now let's compare that to the allowances for CM-1, the proposed plan for 30th and Killingsworth:

CM-1: Allows for a 35 foot height building, and 50% lot coverage at maximum height.

This means that eventually, everything around the commercial node on 30th and Killingsworth is going to potentially be 35 to 40 feet covering half the lot. But under the



LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
30th	CS	CM-1 Down-Zone
Cully	CS	CM-2 Cross-Zone

Let's compare the commercial infrastructure on Killingsworth at 15th and at 30th, as an example. As you can see below, it's pretty much exactly the same. In fact, the commercial infrastructure at all of the nodes on Killingsworth is pretty much the same, so why should one be singled out for a down-zone?



Also, consider the cross-zone just 3 blocks away that occurred at NE 33rd and NE Emerson. The New Season's site went from CS to CM-2, even though it borders on R5 zoning. But the corner at 33rd and Killingsworth that serves as its gateway is zoned CM-1, even though it borders on more high density zoning and one corner is technically part of the CS-zoned development.

April 10, 2016

Barry Manning  
Nan Stark  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, #7100  
Portland, OR 97201

**Re: Improper Zone Assignment, Mixed Use Zones Project on NE Killingsworth St**

Dear Nan and Barry:

Hello, I am a commercial property owner in NE Portland at 30th and Killingsworth and I am writing to testify against the proposed CM-1 Zoning designation at that intersection. I feel it is demonstrably inappropriate to zone this intersection at CM-1 for reasons that include the nature of the corridor, the nature of the surrounding zoning, and the nature of future growth. (For these same reasons, it is also inappropriate to take a portion of the development at 33rd and Killingsworth and zone it CM-2 and take another portion and assign it CM-1, which we will address herein, as well.)

I am requesting a CM-2 designation for these locations, which more closely translates to the old CS zone, which is most appropriate for these commercial nodes.

Please find my arguments in detail below:

**CS to CM-2.** The majority of Killingsworth's commercial nodes are zoned CS, a few are CG, and a small number are CN-1/CN-2. The city's stated intentions were to generally take existing CS zoning and convert it to CM-2 zoning. So let's examine what happened to all CS zoning on all of Killingsworth as a part of the proposed rezone. As shown in the table below, **ALL of the CS zoned properties on Killingsworth were either cross-zoned to CM-2, expanded into residential zoning, or were up-zoned**, except for one case, the down-zone that happened at 30th and Killingsworth, see the table below.

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
Denver to Interstate	CS	CM-3 Up-Zone
Interstate to Kerby	CS	CM-2 Cross-Zone
Commercial to Mallory	CS	CM-2 Cross Zone Extended Further East into Residential Zoning
14th to 17th	CS	CM-2 Cross-Zone



April 10, 2016

Barry Manning  
Nan Stark  
Portland Bureau of Planning and Sustainability  
1900 SW 4th Ave, #7100  
Portland, OR 97201

**Re: Improper Zone Assignment, Mixed Use Zones Project on NE Killingsworth St**

Dear Nan and Barry:

Hello, I am a commercial property owner in NE Portland at 30th and Killingsworth and I am writing to testify against the proposed CM-1 Zoning designation at that intersection. I feel it is demonstrably inappropriate to zone this intersection at CM-1 for reasons that include the nature of the corridor, the nature of the surrounding zoning, and the nature of future growth. (For these same reasons, it is also inappropriate to take a portion of the development at 33rd and Killingsworth and zone it CM-2 and take another portion and assign it CM-1, which we will address herein, as well.)

I am requesting a CM-2 designation for these locations, which more closely translates to the old CS zone, which is most appropriate for these commercial nodes.

Please find my arguments in detail below:

**CS to CM-2.** The majority of Killingsworth's commercial nodes are zoned CS, a few are CG, and a small number are CN-1/CN-2. The city's stated intentions were to generally take existing CS zoning and convert it to CM-2 zoning. So let's examine what happened to all CS zoning on all of Killingsworth as a part of the proposed rezone. As shown in the table below, **ALL of the CS zoned properties on Killingsworth were either cross-zoned to CM-2, expanded into residential zoning, or were up-zoned**, except for one case, the down-zone that happened at 30th and Killingsworth, see the table below.

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
Denver to Interstate	CS	CM-3 Up-Zone
Interstate to Kerby	CS	CM-2 Cross-Zone
Commercial to Mallory	CS	CM-2 Cross Zone Extended Further East into Residential Zoning
14th to 17th	CS	CM-2 Cross-Zone

LOCATION ON KILLINGSWORTH ST	EXISTING ZONING	NEW ZONING
30th	CS	CM-1 <b>Down-Zone</b>
Cully	CS	CM-2 Cross-Zone

Let's compare the commercial infrastructure on Killingsworth at 15th and at 30th, as an example. As you can see below, it's pretty much exactly the same. In fact, the commercial infrastructure at all of the nodes on Killingsworth is pretty much the same, so why should one be singled out for a down-zone?



Also, consider the cross-zone just 3 blocks away that occurred at NE 33rd and NE Emerson. The New Season's site went from CS to CM-2, even though it borders on R5 zoning. But the corner at 33rd and Killingsworth that serves as its gateway is zoned CM-1, even though it borders on more high density zoning and one corner is technically part of the CS-zoned development.

**The Corridor.** NE Killingsworth St. is one of our longest, continuous, in-city east-west corridors. It is not a neighborhood street, it is not a street zoned with R5, single family homes. It is a busy, cross-Portland serving arterial.

Consider city zoning descriptions for the new zones:

Language describing CM-1: *“This small-scale commercial mixed use zone is intended for...lower density residential areas...”*

Language describing CM-2: *“This medium-scale commercial mixed use zone is intended for sites in a variety of centers and corridors...or within an area zoned for multi-dwelling development...”*

It would seem that CM-2 describes the Killingsworth situation more closely because the majority of residential zoning on Killingsworth is listed as multi-dwelling zoning under current zoning code at the City of Portland.

Additionally, all surrounding residential at the intersections of 30th and 33rd have a bonus density overlay, which will bring even more people and concentration of activity. In the future, it will be a busy corridor with a lot of density.

### **Surrounding Scale.**

All of the zoning of the lots that immediately border on the commercial properties at the 30th and Killingsworth node are either R2.5a or R2a. Let’s look at what building height and lot coverage are like on those parcels:

R2: Allows for 40 foot height construction and 50% maximum lot coverage.

R2.5: Allows for 35 foot height construction and 50% maximum lot coverage.

Overlay (a): Allows for “bonus density,” as Portland code puts it, calling for: “Fifty percent more dwelling units than allowed by the base zone is granted.”

Now let’s compare that to the allowances for CM-1, the proposed plan for 30th and Killingsworth:

CM-1: Allows for a 35 foot height building, and 50% lot coverage at maximum height.

This means that eventually, everything around the commercial node on 30th and Killingsworth is going to potentially be 35 to 40 feet covering half the lot. But under the

CM-1 zoning, with a base FAR of 1:1.5, if I was to maximize the 35 foot height limit, I would only be allowed to have 50% lot coverage. So new commercial development would be **at or below** the same density as the residential, which makes no sense. Usually, commercial nodes are taller and more dense than surrounding residential zoning, which is appropriate.

In fact, in the proposed zoning report issued by the city to describe these zone changes, there are four examples of projects that are shown as examples for CM-1 zoning, which are pictured below. All of these buildings appear to have at least between 75%-100% lot coverage. If that is true, then none of these buildings except the single story Umpqua Bank building in the upper left corner would be able to be constructed under CM-1 zoning.



On 33rd and Killingsworth, a similar thing is happening. That node is surrounded by R2, R2.5, and R5, all of which have the (a) overlay allowing for more density. And, it is the gateway for the heavily used CS-zoned commercial development immediately to the south, which includes the grocery store anchor. It makes much more sense for that entire



node to be a single zone so future commercial development is at an appropriate, and consistent scale.

### **Historic Preservation.**

It is not uncommon for communities to want to use down-zoning to try to preserve historic infrastructure. However, it is a heavy handed tool that has unintended consequences, and besides, it doesn't work.

The market, and people's desire to live in Portland, are what are driving changes to the built environment. Not owners of properties wanting to tear down historic buildings. The city is going to have to become more dense to accommodate population growth because it has an urban growth boundary.

An increase in density and a replacement of buildings has always been a part of a growing city's urban landscape for as long as we have built cities. For instance, Portland's population tripled between 1900 and 1937 — it would be interesting to look at a time lapse photograph of the buildings that got replaced to bring more density throughout Portland during that time!

If this down-zone is being used as a means of historic preservation at the corner of NE 30th & NE Killingsworth, why is just this corner being singled out? Does that mean that the buildings in other commercial nodes along Killingsworth are not worth saving? Are the buildings on the corner of 30th and Killingsworth more special, or more historic than elsewhere on Killingsworth? I would answer "no" to all of these questions.

The bottom line is that generally, buildings that have good lot coverage, that cash flow well, have high value tenants, and exist as a part of a commercial node with a strong brand identity — the very buildings the neighborhood likes — probably aren't going to flip to a new, denser construction project over the next few years. Why? Because the amount of money that a developer would have to pay for a high-performing property, and then be able to build something on it that would achieve a return, is a real estate market that does not reflect current realities in NE Portland.

In the meantime, for the properties that are not well tenanted, or that don't have good lot coverage, don't we want those to be replaced with denser buildings that have appropriate lot coverage for a commercial district that are of a scale in line with where the city is going, instead of the scale this neighborhood was designed for one hundred years ago? For example, the Northeast corner of 30th and Killingsworth, or the two auto focused large lot/ small building sites on the northern corners of 33rd and Killingsworth. These are places that feature very auto focused, low density development. They are exactly the candidates we should be looking toward to introduce much needed density, which calls for CM-2 zoning.

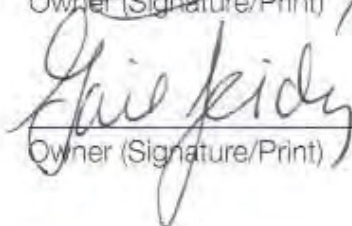


Down-zoning as a means of historic preservation won't stop buildings from being torn down — eventually that will happen, but only when the market supports rents that justify tearing down a building that cash flows. When, or if that time comes to these nodes, a CM-1 zone will mean that the neighborhood will end up with product that is not as nice as other areas of the city because owners will have less money to spend on construction/finishes since they will have less of an economy of scale to their building site. And, the neighborhood will end up with product that is inappropriately sized compared to the surrounding residential projects that will arise around it. Lastly, when new construction comes to these nodes, developers will likely try to assemble lots in order to achieve a better economy of scale, which will result in larger structures to overcome the lower density restrictions. This will ruin the small lot appeal of these commercial nodes, and the very ambiance the neighborhood likes so much.

Regards,

  
Owner (Signature/Print)

Ron Jeidy

  
Owner (Signature/Print)

Gail Jeidy

\_\_\_\_\_  
Owner (Signature/Print)

2928 NE Killingsworth  
\_\_\_\_\_  
Address of Building

2237 NE Stanton, Portland, 97212  
\_\_\_\_\_  
Address for Notices

503-422-0838  
\_\_\_\_\_  
Contact Phone

April 8<sup>th</sup>, 2016

Portland Planning and Sustainability Commission  
Mixed Use Zones Testimony  
1900 SW 4<sup>th</sup> Ave, Suite 7100  
Portland, OR 97201

Subject Address: 8113 SE 13<sup>th</sup> AVE

Owners: Aaron & Cynthia Brown

Current Zoning: CS

Proposed Zoning: CM1

Subject: **Protest of Proposed Zoning Change of CS Properties in Sellwood/Westmoreland to CM1**

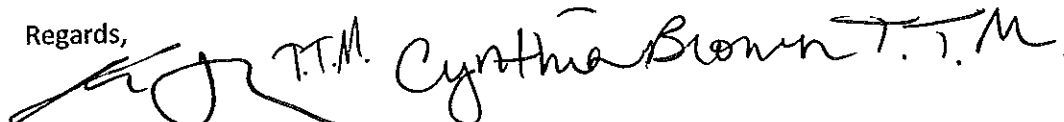
**Our position: Zoning, if changed, to be CM2**

We are the property owners on record of 8113 SE 13<sup>th</sup> Ave Portland, OR which we purchased in 2006. At that time we had been looking for 4 years throughout Portland for property that had location and commercial zoning for investment. This property is located at the SW corner of SE 13<sup>th</sup> & Tacoma intersection. We are surrounded by commercial uses and our land is not adjacent to any single family residential property. Being at the primary intersection servicing the Sellwood Bridge and the Sellwood community we are at the heart of the Neighborhood Center. Immediate neighbors include: New Seasons, 2 major banks (On-Point and Key Bank), Starbucks, Columbia Sport Outlet, and many other commercial entities.

On October 13<sup>th</sup>, 2015 we received a Notice of Proposed Zoning change that indicated that our zoning would change from Urban Commercial (CS) to "Mixed use-neighborhood". When we looked online at Zone Conversion Table, it showed a CS zoned property in a Mixed Use Neighborhood moving to CM2. As this was a logical progression we had no cause to dispute this change.

On Thursday April 6, 2016, however, we received a new Notice indicating a change from CS to CM1. This makes no sense. The summary of Proposed Mixed Use Zones provided with the Notice, including a grid diagram and zoning code descriptions, all support our property changing from **CS to CM2** and, based on city of Portland data, over 98% of current CS zoned properties are moving to CM2 or CM3. It is unreasonable that an area that currently supports strong commercial retail uses and has no direct impact on residential properties, be down-zoned from CS to CM1. Our position is that the appropriate zoning for our property, as well as, current CS zoned properties in Sellwood/Westmoreland be zoned CM2.

Regards,

A handwritten signature in black ink that reads "T.T.M. Cynthia Brown T.T.M." with a stylized flourish at the end.

Aaron and Cynthia Brown, TTM  
Brown Sellwood, LLC  
4206 NE Glisan Portland, OR 97213  
503 708-9083

**From:** Tate [mailto:robert.h.tate@gmail.com]  
**Sent:** Wednesday, April 06, 2016 7:30 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Zones Testimony - State ID # 1N1E28CC 90028

Dear Sir or Madam,

I received today your April 4, 2016 Notice of Proposed Zoning Changes, and want to register my disagreement and objection to the proposed 'new' base zone for our property at 2341 NW Quimby Street Unit 28, in the NW 23rd district of Portland.

I do understand the simplification and standardization merits of your proposal, but take issue with your proposed CM2 re-classification of the Quimby Street District west of NW 23rd Street, and extending to Wallace Park and beyond. Except for Stepping Stones cafe, and the nearby Kia Cafe, this area is consistently residential primarily with single family homes, and the townhouse complex in which our property is situated. There are other higher density multi-family options and commercial operations on Raleigh Street, along NW 23rd and east on Quimby Street — but this neighborhood is residential and should remain at the lowest 'development' level allowed by commercial zoning.

The CM1 designation is much more suitable for this location, as described by your definition of Commercial Mixed Use 1: "... small scale commercial mixed use zone is intended for sites in smaller mixed use nodes within lower density residential areas, as well as on neighborhood corridors, and at the edges of neighborhood centers, town centers and regional centers". This is precisely what this neighborhood has been, is today and should remain.

We will oppose the redesignation of this property to Commercial Mixed Use 2 (CM2) at every opportunity.

Sincerely,

Robert (Bob) H. Tate for

TATE ROBERT H TR & TATE ANN-MARIE TR (Owners)  
2341 NW Quimby Street  
Portland OR 97210

(513) 368-2257

**From:** BobbiSue McCollum [mailto:bobbisuemc@gmail.com]  
**Sent:** Wednesday, April 06, 2016 12:05 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** PSC Mixed Use Testimony

To Whom It May Concern:

Since I bought my home at 301 SE 83rd Avenue, I have been aware that someday there may be a several story building just beyond my back fence line. In fact, I even believe it is every neighborhood's duty to absorb some of the high-density housing.

However, it is also important to maintain the integrity of existing neighborhoods. This is what the buffer zone does. Do NOT remove the buffer zone. Now you are asking to build taller buildings even closer to existing homes. NO!

Commercial Mixed Use with a buffer zone is perfect. It allows for growth and development while maintaining the integrity of the existing neighborhood.

Also know that our backyard is not for sale. I will be just like that old man in UP. The only way I am moving or selling any of my property is if my house floats away attached to a rainbow of helium balloons. Seriously.

Concerned Citizen,  
Bobbi Sue McCollum  
301 SE 83rd Ave., Portland OR 97216

Keith Dieringer  
7315 SE 152nd Ave.  
Port, OR 97236

Today's Date 4/8/16

Dated 4/4/2016

Subject: Proposed Zoning Changes

Sited Address: 5851 SE Foster Rd.

State ID #: 152E07DD 18200

Base zone from: CG to proposed  
CE.

If these changes reduce  
value or impair current use  
in any way, I hold the city  
of Portland and State law accountable.

I am still at question why  
the city refuses to communicate  
with its other departments and  
get owners of properties involved  
before the decisions they make.

Sincerely, Keith Dieringer  
cc: file

Example: Community water Community vote!



**From:** Tom Gihring [mailto:tagplan@gmail.com]

**Sent:** Thursday, March 31, 2016 4:28 PM

**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>; Manning, Barry <Barry.Manning@portlandoregon.gov>

**Cc:** Bump, Tyler <Tyler.Bump@portlandoregon.gov>; Lum, Leslie <Leslie.Lum@portlandoregon.gov>

**Subject:** Mixed Use Zones Proposed Draft Testimony

Barry Manning

Attn: Mixed Use Zones testimony

Planning and Sustainability Commission

City of Portland Bureau of Planning and Sustainability

Barry:

I will be out of town at the time of the Commission public hearing, so I'll just make a couple of comments regarding the Performance Bonus Options.

1. From what I can tell from the proposed draft, not much has changed from the original concept report. It still appears that developers would have the possibility to opt out of the housing option by choosing two of the (now) four other public benefit features. Perhaps there is a rule that precludes choosing more than one feature, but I haven't seen evidence of that. If housing is the top priority, then it seems fair that other benefit features ought not add up to the maximum bonused FAR.
2. I see no reference to a regular update of the calculation of cash bonus value per sq. ft. of floor space achieved, as we once discussed. This would seem to be an important step, particularly in light of the new Inclusionary Zoning law that passed in the state legislature. An in lieu fee is also included as an option, and I would expect that the finance-based incentives will be structured along similar lines as the bonus option under the MUZ ordinance. Operating two BMR set-aside housing programs simultaneously, we surely wouldn't want to lose track of what the incentives given to developers are worth.

These comments are preliminary, as it appears that final rules are still to be added into the final. Nevertheless, please let me know if I have misconstrued the draft language. We at Common Ground-ORWA want to support the City's efforts to leverage affordable housing by sharing the benefits of rising real estate values.

TOM

Tom Gihring, Ph.D.

Director of Research

**Common Ground -  
Oregon / Washington**

Portland, Oregon (503) 360-1147

[www.commongroundorwa.org](http://www.commongroundorwa.org)

[research@commongroundorwa.org](mailto:research@commongroundorwa.org)

**From:** Ted Grund [mailto:grund@mca-architects.com]  
**Sent:** Wednesday, March 23, 2016 4:28 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Mixed Use Zones Proposed Draft Testimony

To Whom It May Concern,

On cursory review, the proposed Mixed Use Zones Project is laudable, though the devil is always in the details. In general, I am highly supportive of fewer, well defined but more flexible zones, so that is a definite plus (this thinking should also carry over to commercial zoning, which has far too many sub-variations). The concept of incentives for affordable housing and commercial space is also, in general, laudable if implemented properly. I would make the following two points and strongly encourage the incorporation of these concepts into the project:

- Condominiumized Commercial Space – With respect to affordability of commercial space (office and retail) for small businesses, there can be no better alternative than the potential for ownership. Commercial leases roll over regularly and rates, with rare exception, cycle upward – sometimes precipitously – with the market. This alone, as it is generally a large share if not the lion’s share of a small business’ operating cost, can introduce a difficult degree of uncertainty in the cost of starting/running a small business. With little prospect of the lease doing anything but go up, space leases can exert great pressure on small businesses and adversely affect failure rates – bad for small businesses, bad for the City.

Conversely, the opportunity for a small business to purchase space in a commercially viable part of the City generally has the opposite effect, affording the small business owner predictable, fixed space costs, with the promise of dramatically curtailed cost upon complete payment of any associated financing. Ownership provides the simultaneous benefits of increased profitability and the accrual of real assets for small businesses. These conditions tend to reduce financial pressure on small businesses and thus help to reduce failure rates – good for small businesses and good for the City. Incentive programs for space ownership thus have great potential for enhancing the stability and success of small businesses in the City, while increasing the local tax base, improving its stability and ensuring a greater sense of “investment” in the City for these businesses.

It is difficult to encourage and maintain the small increment of real estate that once existed in the City and do so much to facilitate space ownership for small businesses (although this too should be incentivized); the general trend is consolidation of real estate, both in terms of tax lots and their ownership. The next best thing is for the City to give developers meaningful incentives to offer modestly sized, affordable, business condominium space (both ground floor retail and office space). This could prove to be an attractive model for those developers wishing to “cash out” rather than hold, maintain and manage properties. Some version of this type of incentive, along with other compatible strategies such as enhanced transit service, district parking, small business incubation support, etc. would greatly enhance the small business environment.

- With respect to affordable housing, the same holds true; ownership is, in the long term, is the best path to affordability and stability (as an aside, the potential for Condominiumized ADUs is a worthy consideration in this regard). But specifically with respect to affordable rental housing, apart from better matching supply with demand, qualitative issues are crucial but rarely discussed or articulated/codified in the context of City code. When I first moved into the City in 1988, I was able to find a very suitable large one-bedroom apartment at the margin between Irvington

and the Lloyd District for \$300/month. It just happened to be in a solid, well designed and built brick 3-story that was built in the 20s and was likely paid for 50years prior (this building, incidentally, at NE 14<sup>th</sup> & Schuyler, like many of its kind around the City, is still in service). That was a great example of affordable rental housing!

When there is, as we currently have, a great shortage of affordable housing, there is a compellingly seductive incentive to build as much purpose-built affordable housing as possible, as cheaply as possible. The City should resist the temptation and focus instead on how to build as much really good quality housing as possible. It is informative to ask how much of the housing stock we are building now will be around for 70, 100 or more years, providing all the while good affordable places to live for successive new generations moving into the City. If we are not building that kind of housing now (as I do not think we are), then we should be looking at every possible way to incentivize that endeavor because, as I found out, some of the best affordable/low income housing is actually very good quality middle income housing that has just been around for a long time.

Respectfully,

**Ted Grund, Associate**

**MCA Architects, PC**

812 SW Washington Street, Suite 800 Portland Oregon 97205

P 503/226-0622 Direct 503-746-9115 C 503-754-5662

[grund@mca-architects.com](mailto:grund@mca-architects.com)

[www.mca-architects.com](http://www.mca-architects.com)

**From:** [vinshel@comcast.net](mailto:vinshel@comcast.net) [<mailto:vinshel@comcast.net>]

**Sent:** Monday, March 21, 2016 1:09 PM

**To:** Planning and Sustainability Commission <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>

**Subject:** comments

Business's all over the city are experiencing customer complaints about parking and it is directly related to the .36 parking space per unit of these mixed use buildings with multiple rental units or condos on top of retail. They are not providing enough parking so they fill up the street parking causing business's to struggle. The city can't force use of the light rail especially where the light rail is many times far from these units.

Sincerely,

Vince Huffstutter, Manager Huffco LLC & Huffco Multnomah LLC  
7741 SW Capitol Hgwy Portland, Or. 97219

January 7, 2016

RE: Portland Solar Equity & Innovation Policy

Portland City Council members:

As an urban designer, former comprehensive planner, and sustainability and environmental policy professional for over 17 years, I would like to advocate for your attention to a critical environmental and urban planning issue that needs attention now as part of your policy adoption efforts being considered while undertaking the Comprehensive Plan update: **Solar equity, energy efficiency, climate protection, and community resiliency.**

As our populations grow, and our urban sphere expands upwards to maintain our urban growth boundary, we are in need of more policy tools in our toolbox to ensure we are supporting our goals for both livability and density. From the hundreds of survey responses received from the Division Perceptions Survey about the negative impacts of recent development, there is a deep and widely held concern that we are moving backwards on livability, something we are so famous for that is indeed part of our brand and identity here in this great City.

The attached draft “Solar Equity and Innovation Policy” recommendations (while still in progress) should be considered for inclusion in the Comprehensive Plan Update and the Mixed Use Zoning proposals. As supporting background, I have also including some the preliminary solar analysis which demonstrates that:

- **Buildings built too tall on narrow east-west streets create a significant solar impact.**
- **A significant amount of radial benefit is lost when blocking 20-35 degree sun angles on narrow E-W streets with 60’ ROW.**

A solar policy like the attached draft recommendations could help achieve more context-sensitive development and will go a long way towards engendering more broad support of mixed use density by existing communities as well as supporting more energy savings and resilience within our residential neighborhoods as well. Given Comprehensive Planning goals for increased density, as well as resiliency and livability, and existing precedents in other Oregon communities, it is recommended that there be further consideration of a solar equity and innovation policy for Portland.

The attached Climate Action Plan letter from NBI also documents the OR state statute that allows for solar access policies to be enacted by cities and counties and lists some recommendations for next steps.

Thank you for your attention to these draft policy recommendations. I encourage you to continue to be bold in your approach to livability and to further advance our national legacy of leadership in Portland.

Thank you so much for your community dedication and long-term vision,

Heather Flint Chatto, LEED AP, Urban Planner & Designer  
2121 SE 32<sup>nd</sup> Avenue Portland, OR 97214



# 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

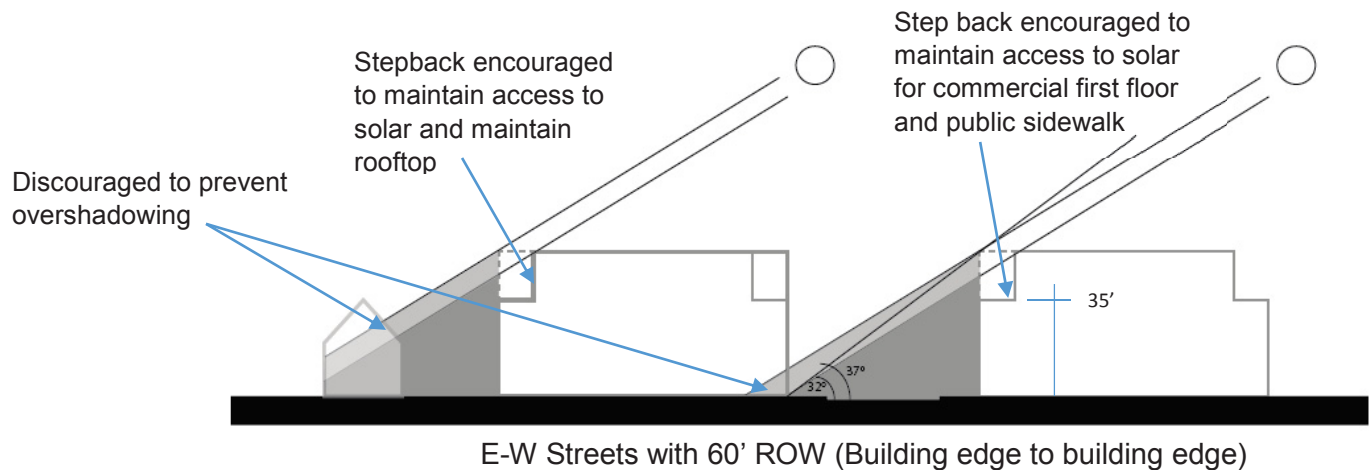
### Comprehensive Plan

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

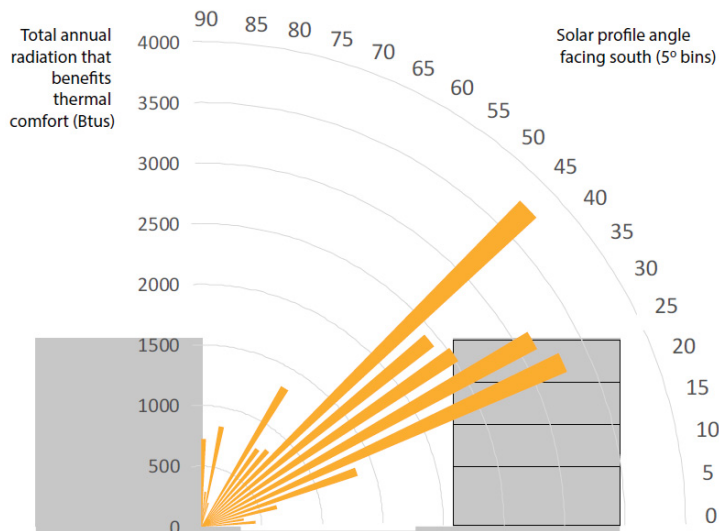
### Mixed Use Zoning Recommendations:

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)

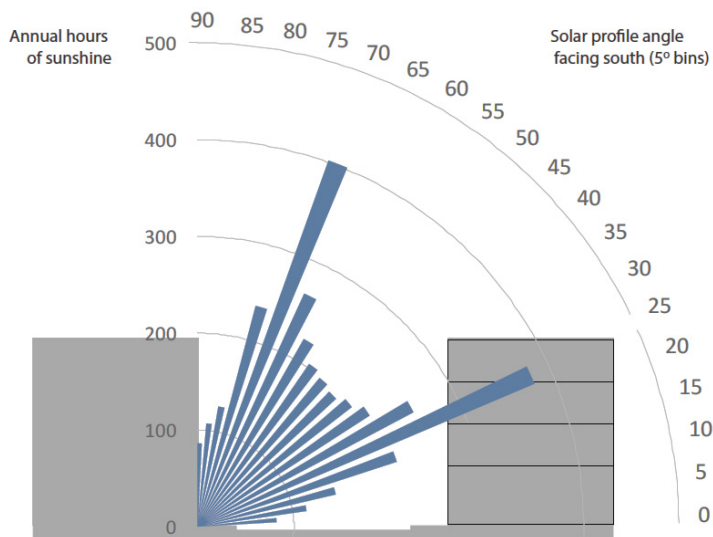


### The Radial charts:

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.

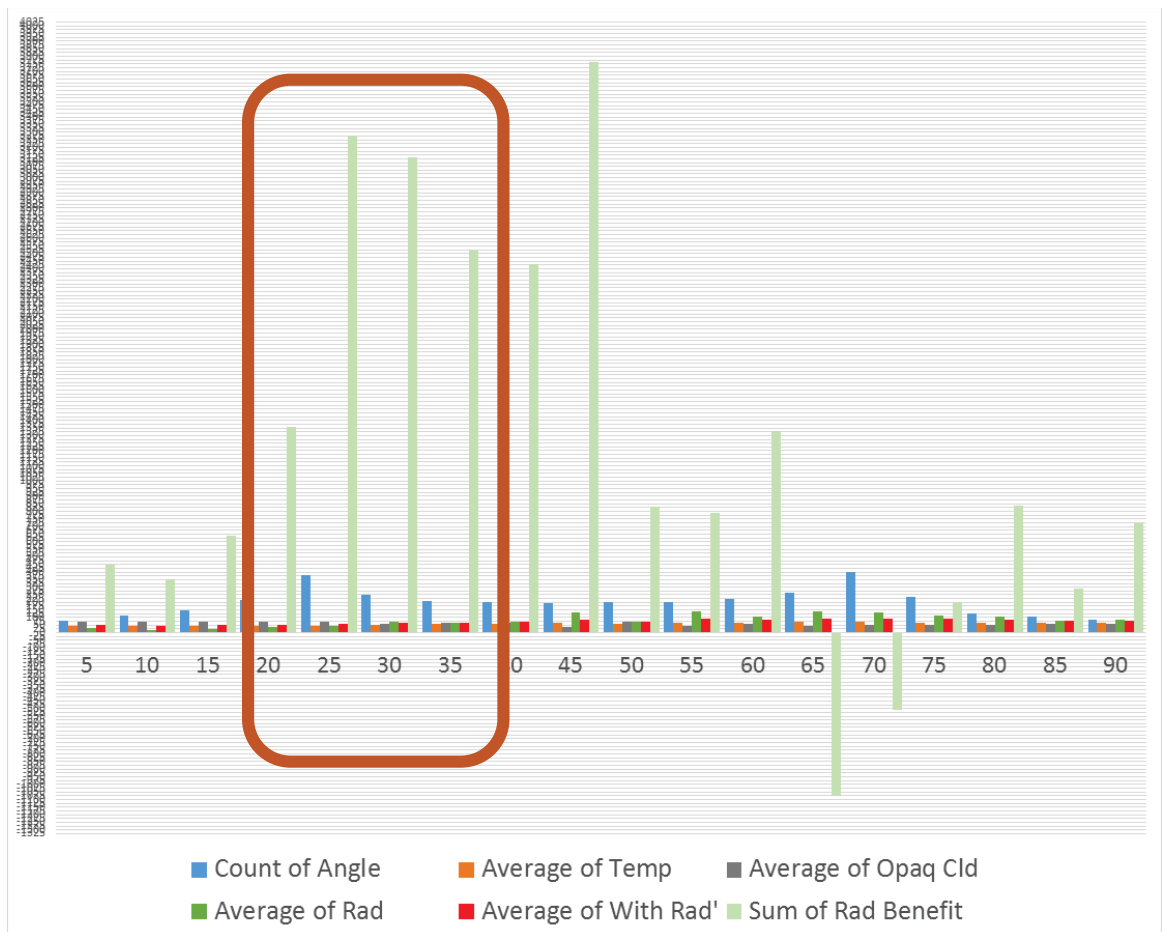
The sum of radiation is the number of useful BTUs (to bring effective temperature for a person outside up to 75F comfort), with the same southern angle binning.

## 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 has experienced a significant amount of new development recently, with wide community concerns expressed about loss of solar access to adjacent properties. To accomplish the objectives in 3B Installed Solar and as it relates to desired urban form in item 4Q Better Multifamily Buildings, it is necessary to address solar access protection. With the knowledge that increased density allows protection of the urban growth boundary and provides great efficiencies in land use, transportation and overall sustainability, we support infill development, adaptive reuse of existing buildings and higher density development goals. Increases in development can help meet these goals, but they may also result in greater impacts to existing neighborhoods and adjacent properties that are not fully documented or analyzed. These impacts may include loss of solar access, which reduces the capability of adjacent properties to independently generate energy through onsite renewables. Other cities in Oregon such as Clackamas and Ashland have adopted policies for solar access protection. Ashland's policy ensures that a shadow on the north property line shall not exceed a minimum level as measured on December 21st.

Oregon state law states the following:

**227.190 Solar access ordinances; purpose; standards**

(1) City councils may adopt and implement solar access ordinances. The ordinances shall provide and protect to the extent feasible solar access to the south face of buildings during solar heating hours, taking into account latitude, topography, microclimate, existing development, existing vegetation and planned uses and densities. The city council shall consider for inclusion in any solar access ordinance, but not be limited to, standards for:

- (a) The orientation of new streets, lots and parcels;
- (b) The placement, height, bulk and orientation of new buildings;
- (c) The type and placement of new trees on public street rights of way and other public property; and
- (d) Planned uses and densities to conserve energy, facilitate the use of solar energy, or both.

Given Comprehensive Planning goals for increased density, as well as resiliency and livability, and existing precedents in other Oregon communities, it is recommended that there be further consideration of solar access protection policies. We would encourage the Climate Action Plan to include the following direction that will help support more zero energy and low-energy buildings, protect solar access and help mitigate any significant impacts.

Specific recommendations:

- 1) Work with the City of Portland to adopt a solar access protection ordinance consistent with state policy **227.190** above and other leading cities and counties in Oregon (e.g. Ashland)
- 2) Coordinate with the BPS and BDS to addresses the topics in state statute **227.190 (a)-(d)** above by incorporating, zoning code provisions, building design standards, and solar setbacks that help mitigate impacts to adjacent development, support livable and resilient communities, as well as energy self-sufficiency.
- 3) Integrate these policies with current Mixed Use Zoning project efforts to help ensure new zoning codes and policies for the placement, and allowed height and bulk of new buildings do not

significantly reduce the potential solar access of adjacent development and protects access to sunlight for both electricity generation systems and passive solar heating.

- 4) Require solar shading analysis as part of permit submittal requirements to assess impacts of new development to existing adjacent development.
- 5) Require mitigation for any significant impacts to loss of solar access. Below is the suggested language NBI provided in our comments on the Comprehensive plan:

*Mitigate impacts from new development that substantively reduces solar access on adjacent properties and public rights-of-way.* To balance goals for increased density in the Comprehensive Plan with the potential impacts from loss of solar access, all new development projects over 10,000 s.f. or over 35' in height should include a solar shading and impact analysis as well as a recommendation for mitigation of any substantive impacts on solar access.

Mitigation measures should include at least one of the following:

- a. Transfer of solar development credits
- b. Compensation to impacted individuals
- c. Development of (or contribution towards) shared community solar or other renewable projects.

\*If solar access impacts are de minimis, then no mitigation would be required