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**Sent:** Friday, October 20, 2017 2:47 PM  
**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Code Reconciliation Testimony

Below is testimony I recently submitted on the Map Refinement Project. Should you propose a CM2 zone on Marquam Hill in that project, the Homestead Neighborhood Association requests that you also make the changes to the Marquam Hill Plan District boundaries recommended by your staff in Code Chapter 33.555. This will help alleviate the adverse impacts of a CM2 zone as described below.

Thank you,

Milt Jones  
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----- Original Message -----  
Subject: Map Refinement Testimony  
From: <[mjones@miltjones.com](mailto:mjones@miltjones.com)>  
Date: Fri, October 20, 2017 2:28 pm  
To: "Planning Sustainability" <[psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)>

Please accept these comments concerning proposed changes to the CM1 zone on Marquam Hill. They represent the position of the Homestead Neighborhood Association as well as my own comments.

At the end of the Comprehensive Plan update process, the Portland City Council directed BPS staff to reexamine the CM1 zone. In response, BPS staff has now proposed a mix of RH and CM2 zoning to replace the CM1 zone.

### **Proposed RH Zone**

The RH zone designation proposal for the area appears appropriate as proposed. It will encourage the multi-family development needed in this underutilized residential area to promote the walk-to-work neighborhood on the top of Marquam Hill that has been a long-standing goal of the Homestead neighborhood. With respect to building height, I suggest that a fine-grained approach be taken; using applicable floor area ratios to adjust for where extra height can be accommodated (at the base of the hill, for example), and for where lower height is desirable (as a step-down to lower density, for example).

### **Proposed CM2 Zone**

A full-fledged CM2 zone is inappropriate as proposed. A CM1 zone as originally planned for is preferred. This is because the CM2 zone allows types of development to occur as a matter of right that are inappropriate for this location:

- Commercial parking is completely inappropriate. It could be located across the street from an area where parking development of all types is currently restricted by the City as a partial solution to immense commuter traffic volume problem on Marquam Hill residential streets. The presence of commercial parking would defeat the City's own traffic control measures. There is no doubt that there is a demand for commuter parking on the Hill. OHSU has a long waiting list of commuters wanting parking spaces. To their credit, OHSU and Tri-Met have implemented significant and successful public transportation initiatives. Currently, approximately 40% of OHSU employees commute using public transportation. A CM2 designation allowing commercial parking to be built would be an impediment to the continued success of these initiatives.
- Vehicle repair services (trucks, motorcycles, automobiles) are also allowed to be built as a matter of right in the CM2 zone and are out of character for this hospital/residential area.
- The same objection applies to industrial service and wholesale sales developments.

It appears that the primary objection to the CM1 zone is to its more restrictive height limits. This is a problem that could be solved in three ways:

- With a CM1 zone modified to allow for greater height.
- With a CM2 zone modified to disallow offending uses.
- With a CM2 zone but Extending the Marquam Hill District boundaries as described in the Code Reconciliation Project This would disallow commercial parking (a partial solution which ignores the other inappropriate uses allowed by the CM2 zone).

A CM3 zone would be inappropriate because it would allow not only the offending uses of a CM2 zone, but would allow development at a large scale attracting increased commuter traffic from off hill.

### **Traffic**

I want to make it clear that the Homestead Neighborhood is not opposed to development on the Hill. We welcome development of increased multi-family residential housing. In truth, our hilltop multifamily areas are currently underdeveloped. Further developing them would take positive advantage of the walk-to-work neighborhood adjacent to our large medical facility employers.

We also welcome commercial development that will better serve this growing neighborhood and its employers.

What we do not want to see are additional automobile magnets (commercial parking or destination-size commercial development) that will attract traffic from off-hill, exacerbate our already obscene traffic problem, and necessitated parking development restrictions in the first place. We already have almost 10000 car trips per day on small down-hill residential streets used as commuter cut-throughs and traffic that is 3-6 times more than plan-recommended target volumes. Scenic Terwilliger Boulevard is now a parking lot during rush hours. We simply do not want to see planning that will make this situation worse.

Thank you for considering these comments.

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