

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Tuesday, May 26, 2020 12:18 PM  
**To:** RUTH SPETTER  
**Cc:** Edmunds, Sallie; Bischoff, Debbie  
**Subject:** RE: Action

Thanks for reaching out, Ruth. I hope this email finds you well. We discussed your property with PSC commissioner Jeff Bachrach (he was the commission member who expressed interest in talking further about your situation). Based on that discussion he decided that further discussion of our proposal with the entire commission was not warranted. We have a PSC work session tonight and will be adding another hearing on June 23rd to gather additional input before a final PSC vote.

Once the PSC has voted on the plan, we will update it per their direction and release the Recommended Draft, which will go to City Council. At this time, we haven't yet discussed the timetable for the release of the Recommended Draft. At City Council, we will hold another hearing where testimony will be taken, as well as additional work sessions following the hearing. You are welcome to provide testimony to the City Council at that hearing. We don't know the Council dates at this point but are hoping for some time in the late summer (August or September). Once we know the dates we will send out a notification.

If you wished to go down that path, any appeal of the plan would occur after the plan is adopted by City Council.

Let me know if you have additional questions.

-J

Jeff Caudill, River & Environmental Planner (he/him) City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

**From:** RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
**Sent:** Tuesday, May 26, 2020 7:59 AM  
**To:** Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
**Subject:** Action

Hi Jeff:

Has the planning commission acted? If I want to appear before council must I appeal? Would you be kind enough to point me to the applicable code sections.

Thank you. Ruth

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Thursday, January 16, 2020 5:43 PM  
**To:** RUTH SPETTER  
**Cc:** Edmunds, Sallie; Bischoff, Debbie; Brooks, Mindy  
**Subject:** RE: Changes?

Hi, Ruth.

Based on our additional analysis of your property, using the tools we have available to us, we did not update the proposal for your property from what you had seen previously. We are still open to doing a site visit to confirm what our GIS tools and other data are telling us about your property (and others nearby). As you know, we already adjusted the River Environmental overlay zone boundary based on the development on your property and we still think that that change was appropriate.

You can find information on the proposal for your property on our Map App, here:  
<https://www.portlandmaps.com/bps/mapapp/maps.html#mapTheme=rpsr>

Let us know if you would like to schedule a site visit. Otherwise, you can provide testimony to the Planning and Sustainability Commission on February 25, when the hearing will be held. Based on the current PSC schedule, the hearing will be held at 6 pm after another briefing starting at 5 pm. However, it is important to check back on the agenda as the date approaches because the time of topics frequently changes. You can find the PSC tentative agendas here: [https://beta.portland.gov/sites/default/files/2020-01/psc\\_tentative\\_schedule\\_3.pdf](https://beta.portland.gov/sites/default/files/2020-01/psc_tentative_schedule_3.pdf)

As for the trees across Highway 43, we have updated our Natural Resources Inventory to define those areas as Special Habitat Area, similar to your and Jeff's property. Mindy Brooks and her Environmental Overlay Zone Correction Project are evaluating whether, based on the adopted natural resource protection plan for the area. There may be updates on those properties in the future.

Let us know if you have additional questions. Thank you.

-J

Jeff Caudill, River & Environmental Planner (he/him) City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Sent: Thursday, January 16, 2020 11:19 AM  
To: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
Subject: Changes?

Hi Jeff:

It's hard for me to know the detail. What do these new documents change with regard to my and Jeff Hamilton's properties?

It appears to me that the big properties across 43 from me and along the river, tho resource rich, are still not being impacted with any environmental zoning as we are. Is that correct?

Thank you. Ruth

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Wednesday, January 8, 2020 10:43 AM  
**To:** ruth  
**Cc:** Edmunds, Sallie; Bischoff, Debbie; BPS River Plan  
**Subject:** RE: Ruth Spetter's comments

Ruth,

Thank you for the time you have invested in response to the River Plan/South Reach and your comments. We are in the process of reviewing them and will respond to them to the extent we can prior to the release of the Proposed Draft. You will receive notification of milestones via email (in the River Plan News) as we move forward with the project.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

**From:** ruth <rspetter@aol.com>  
**Sent:** Friday, January 3, 2020 5:14 PM  
**To:** Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
**Cc:** Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>  
**Subject:** Ruth Spetter's comments

Sallie and Jeff - thank you for your patience.

I've done the best I can at this point because this is so important to me. I have read as much as I could and still get you comments .

Please do not take any comments personally - I am just expressing my thoughts about what I have read and what I believe and what I wonder about in light of the facts as I understand them. I respect you and believe you are doing what you believe is right. I can only share with you my views and I have tried to do so in relationship to the documents upon which you are relying.

You have been responsive and patient.

Thank you. Ruth

## Caudill, Jeff

---

**From:** ruth <rspetter@aol.com>  
**Sent:** Friday, January 3, 2020 5:14 PM  
**To:** Caudill, Jeff  
**Cc:** Edmunds, Sallie  
**Subject:** Ruth Spetter's comments  
**Attachments:** comments docx.docx

Sallie and Jeff - thank you for your patience.

I've done the best I can at this point because this is so important to me. I have read as much as I could and still get you comments .

Please do not take any comments personally - I am just expressing my thoughts about what I have read and what I believe and what I wonder about in light of the facts as I understand them. I respect you and believe you are doing what you believe is right. I can only share with you my views and I have tried to do so in relationship to the documents upon which you are relying.

You have been responsive and patient.

Thank you. Ruth

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Tuesday, December 31, 2019 7:49 PM  
**To:** Caudill, Jeff  
**Subject:** Visit

Hi Jeff:

I want to be here when you guys come to visit and it turns out Friday (1/2) is not going to work. I need to visit the doctor, I got back from visiting family in the east late Saturday, other family just came to town today from Canada and I'll be with them, I have to get ready for an out of state trip I'm taking in a few days and I need to find and hire and get in a contractor to replace rotten boards on the steps to my front door. It's actually a dangerous situation I've put off too long. I have not even had time to unpack. I spent many hours working on comments for you Sunday and yesterday. I'd hoped to finish today but I work at the library and it closed early so I'll work at home tomorrow and get them to you. It's all too much.

I'll call you when I get back to Portland In a few weeks and we'll get it set up.

I'm sorry. Thank you, Ruth

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Monday, December 30, 2019 3:28 PM  
**To:** RUTH SPETTER  
**Cc:** Edmunds, Sallie; Bischoff, Debbie; BPS River Plan  
**Subject:** RE: Changes

Great. As we discussed, we'll do our best to incorporate your comments in our next draft. If you disagree with the proposals included in the Proposed Draft (out January 10), you can submit testimony to the Planning and Sustainability Commission (PSC).

We are not proposing any changes related to scenic resources (Vol 2) on your property. SW Riverside (Hwy 43) is already defined as a scenic drive. We are not proposing to make any changes to that designation. As stated in my email on Dec 4, I recommend that Volume 2 should be your lowest priority during your review.

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

---

**From:** RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
**Sent:** Monday, December 30, 2019 1:49 PM  
**To:** Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
**Subject:** Re: Changes

Look for my comments tomorrow.

Jeff- you have never addressed volume two of the plan. How could it be applicable to my property?

On Dec 30, 2019, at 12:24 PM, Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)> wrote:

Hi, Ruth.

I hope you are enjoying the holidays. We haven't made any changes to the proposed zoning for your property. As we discussed, we will make a site visit on the afternoon of Jan 2 to evaluate the trees and vegetation on your property. Based on that evaluation, we may make a change in the proposed extent of environmental zoning.

The Planning and Sustainability Commission (PSC) hearing will be held on February 25 and the River Plan/South Reach is scheduled to be discussed at 6 pm that day. You will be provided 2 minutes for oral testimony at the hearing but can submit the totality of your comments (assuming they don't easily fit into 2 minutes) in writing, as well.

If you are interested in providing oral testimony, you will need to sign up before the hearing. There is one other item on the agenda before us, which will begin at 5 pm. You can sign up to give oral testimony on the River Plan/South Reach at that time.

You can find tips for testifying to the PSC on this webpage (about half way down):

<https://www.portlandoregon.gov/bps/article/383947>

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

**From:** ruth <[rspetter@aol.com](mailto:rspetter@aol.com)>  
**Sent:** Saturday, December 28, 2019 3:55 PM  
**To:** Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
**Subject:** Changes

Jeff: Hello.

As I work on my comments, as best I can, I wondered whether, since our last meeting, there have been any changes to the proposed zoning for my property?

Can you remind me of the date and time for the Commission hearing.

How much time will we have to speak to them?

Is there anything we have to do to be allowed to speak to them - any special sign up ahead of time?

Thank you. Ruth



## Caudill, Jeff

---

**From:** ruth <rspetter@aol.com>  
**Sent:** Friday, December 20, 2019 2:35 PM  
**To:** Caudill, Jeff  
**Subject:** METRO Oak Survey.

Jeff - I went on line to METRO and called METRO. I could not find a METRO oak inventory on line at METRO and the METRO operator did not know anything about such an inventory and sent me to parks but they did not answer. I just wanted to read whatever opening statements or guiding statements with which METRO may have prefaced its inventory. Perhaps you can give me the name of the METRO contact for this work.

Thank you. Ruth

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

From: RUTH SPETTER <rspetter@aol.com>  
To: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
Sent: Thu, Dec 19, 2019 10:00 pm  
Subject: Re: Comment

As always- thank you. Ruth

On Dec 19, 2019, at 2:46 PM, Caudill, Jeff <Jeff.Caudill@portlandoregon.gov> wrote:

Ruth, see the attached.

-J

**From:** ruth <rspetter@aol.com>  
**Sent:** Thursday, December 19, 2019 2:35 PM  
**To:** Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
**Subject:** Re: Comment

Jeff - Thanks for the links. I went to the map but could not get it to show anything on my property. I'm probably too old fashioned to navigate well. If you can screen shot the page re my property and email to me that would be great.

Did you say something about just one tree last night?

Thank you. Ruth

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

From: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>

To: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Cc: Edmunds, Sallie <[Sallie.Edmunds@portlandoregon.gov](mailto:Sallie.Edmunds@portlandoregon.gov)>; BPS River Plan <[riverplan@portlandoregon.gov](mailto:riverplan@portlandoregon.gov)>  
Sent: Thu, Dec 19, 2019 12:01 pm  
Subject: Re: Comment

Hi, Ruth.

The information I was referring to is an Oak inventory that was recently completed by Metro. We have incorporated the inventory into our natural resources inventory. You can find information on the project here: <http://www.theintertwine.org/projects/oak-prairie-work-group> (see the "Oak Mapping" section of the page).

You can also look at the interactive map that shows the locations of oaks that were identified here: <https://databasin.org/maps/06b9e1ffb404403fa6d0079c69989289/active>. You will see that there is an oak identified right at the northwest corner of your property.

That specific oak was not the sole basis of our determination to expand the environmental zoning on your property but, as we've discussed, the oaks and contiguous forest in the area are contributing characteristics to the determination of the area as Special Habitat Area (and Habitat of Concern for Metro). The determination of environmental zoning is based on our citywide Natural Resources Inventory protocols, which we discussed in our previous meeting.

Any information gathered during the County site visit you referenced (if it occurred) was not passed on to us so it played no role in our proposed environmental overlay extent determination.

Let us know if you have any more questions.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

---

**From:** RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
**Sent:** Wednesday, December 18, 2019 10:07:09 PM  
**To:** Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
**Subject:** Comment

Hi Jeff:

As we were breaking up tonight you said I had an oak on my property next to the house. Upon what information was that comment based?

Last year or the year before the county was working to kill mustard on my property and told me that a city employee wanted to come on my property. I was reluctant and can't recall if I said she could or not but I was assured it was no big deal and I certainly was not told about the South Reach study and the potential for increased environmental zoning.

Please tell me upon what you were relying when you made your comment. Please tell me what you heard and whether it led to the decision to encapsulate my property. In other words- what was your comment based upon and did whatever you heard trigger surrounding my home with environmental zoning?

Thank you. Ruth

<Metro\_Oaks\_Inventory\_Screen\_Capture.JPG>

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Thursday, December 19, 2019 12:01 PM  
**To:** RUTH SPETTER  
**Cc:** Edmunds, Sallie; BPS River Plan  
**Subject:** Re: Comment

Hi, Ruth.

The information I was referring to is an Oak inventory that was recently completed by Metro. We have incorporated the inventory into our natural resources inventory. You can find information on the project here: <http://www.theintertwine.org/projects/oak-prairie-work-group> (see the "Oak Mapping" section of the page).

You can also look at the interactive map that shows the locations of oaks that were identified here: <https://databasin.org/maps/06b9e1ffb404403fa6d0079c69989289/active>. You will see that there is an oak identified right at the northwest corner of your property.

That specific oak was not the sole basis of our determination to expand the environmental zoning on your property but, as we've discussed, the oaks and contiguous forest in the area are contributing characteristics to the determination of the area as Special Habitat Area (and Habitat of Concern for Metro). The determination of environmental zoning is based on our citywide Natural Resources Inventory protocols, which we discussed in our previous meeting.

Any information gathered during the County site visit you referenced (if it occurred) was not passed on to us so it played no role in our proposed environmental overlay extent determination.

Let us know if you have any more questions.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Wednesday, December 18, 2019 10:07:09 PM  
**To:** Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
**Subject:** Comment

Hi Jeff:

As we were breaking up tonight you said I had an oak on my property next to the house. Upon what

information was that comment based?

Last year or the year before the county was working to kill mustard on my property and told me that a city employee wanted to come on my property. I was reluctant and can't recall if I said she could or not but I was assured it was no big deal and I certainly was not told about the South Reach study and the potential for increased environmental zoning.

Please tell me upon what you were relying when you made your comment. Please tell me what you heard and whether it led to the decision to encapsulate my property. In other words- what was your comment based upon and did whatever you heard trigger surrounding my home with environmental zoning?

Thank you. Ruth

## Caudill, Jeff

---

**From:** Edmunds, Sallie  
**Sent:** Tuesday, December 17, 2019 4:47 PM  
**To:** Caudill, Jeff; Brown, Ethan  
**Cc:** Bischoff, Debbie  
**Subject:** Fwd: Meeting with Ruth Spetter

Sallie

Begin forwarded message:

**From:** RUTH SPETTER <rspetter@aol.com>  
**Date:** December 17, 2019 at 4:42:27 PM PST  
**To:** "Edmunds, Sallie" <Sallie.Edmunds@portlandoregon.gov>  
**Subject: Re: Meeting with Ruth Spetter**

It does in the sense that I can be there. It doesn't in the sense that I could have time to read Metro's Title 13 and hike around my property and take more photos and print them if 11. I only got back to the US at 11 last night. I leave oregon 12/20-28. I have a meeting until 9:39 tonight.

But you are not free so that is that. I can imagine your time is much in demand bi say this sincerely.

Sallie: as you heard from Jeff Hamilton, the amount of material we have to review in order to make a relevant comment is, especially in this holiday season, basically impossible to review. Every time we meet we learn of another layer of regulation or material which was relied upon.

You and Jeff and Mindy and Deb have been great and you have been deep into all of this material for a long time. We are just starting. I appreciate the time you've given but hour chunks are not enough and the public meetings do not suffice for any but the most superficial question and answer.

It's my firm belief that my property is being over zoned in terms of the facts on the ground and the animals and possible plants.

I've lived here for almost 40 years and I've never seen endangered wild animals or plants crossing my property or coming from your property. the cliff dwellings birds stay on the cliffs. My house is far far away from the cliffs. I have never seen them. Your staff has not presented facts to the contrary.

On the west, along the highway, I have few trees and instead seem to have the bushes you are exempting. I'll show a photo. I have no white oak.

The city Park abutting my property is a wide open, no access, slope containing nothing but dead blackberry stalks. It's trees, such as they are are down slope.

What might be called tree canopy exists down the hill- perhaps not even on my property. I'm not in a flood plain, recreation site, setback or trail area. If you must have conservation zoning then place where the trees are- down slope not around the house where there was no zoning before even tho the trees were already there and as visible as they are today.

The proposed zoning buttons up my property- greatly impacting me personally while not effecting real protection because the slopes all around me are mostly bare. Only down below are there some grouped trees.

The overhead shots of certain deciduous trees can make one tree seem like many but it is factually defective.

Properties close to the water are being treated much less restrictively based on what is not there. We upslope properties should be treated the same.

We should not be penalized for having a few, non- white oak trees by having our entire site heavily and restrictively zoned.

I'd ask again- why can't we also have until 1/31/2020 to provide comments? Is it necessary or just druthers and scheduling? I am not being sarcastic. Just trying to understand. I know you all are working real hard.

I'll see you tomorrow. Thank you very much for your and your staff's time. Ruth

On Dec 17, 2019, at 3:55 PM, Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov> wrote:

I have a conflict at 11. Does 10 not work?

Sallie

On Dec 17, 2019, at 3:21 PM, ruth <rspetter@aol.com> wrote:

**Jeff and Sallie: Does 11-12 work just as well for you two tomorrow?**

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

From: RUTH SPETTER <rspetter@aol.com>

To: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>

Cc: Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>

Sent: Tue, Dec 17, 2019 8:54 am

Subject: Re: Meeting with Ruth Spetter

See you at 10 on the 18th at your place. I got back to the states late last night. Ruth

On Dec 13, 2019, at 1:58 PM, Caudill, Jeff  
<Jeff.Caudill@portlandoregon.gov> wrote:

Hi, Ruth. Sorry to move this but Sallie and I have another person we need to meet with that is only available in the afternoon. Ssince you said you were available all day on the 18<sup>th</sup>, I'm hoping this isn't too much of an inconvenience.

See you next Wednesday.

-J

Ruth,  
Sallie and I are available at this time on the 18<sup>th</sup>.

See you then!

-J  
<mime-attachment.ics>



## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Wednesday, December 11, 2019 10:21 AM  
**To:** RUTH SPETTER; jeff hamilton  
**Cc:** Edmunds, Sallie; Brooks, Mindy  
**Subject:** River Plan/South Reach Meeting - Follow up

Hi, Ruth and Jeff.

Thank you for meeting with us yesterday to talk about the River Plan/South Reach and Ezone Map Correction Project. We really appreciate the time and effort you are putting into understanding the proposal.

At the end of the meeting, you asked us to summarize “what has changed”? Here is a short summary of what has changed related to our understanding of conditions on your property:

1. **Mapping of forest canopy** - Vegetation is being mapped using the mapping protocol from the City’s Natural Resources Inventory. The mapping is based on aerial photography, LiDAR (technology we did not have when we applied overlay zoning in the early 2000’s), and site visits.
2. **Criteria for designating Special Habitat Areas** - Special Habitat Area criteria are the criteria Metro used in Title 13 to designate Habitats of Concern. Oregon White Oak habitat is one of the criteria.
3. **Mapping of Special Habitat Area** - Metro mapped Habitats of Concern, which we call Special Habitat Areas, in 2005. Metro’s Habitats of Concern were therefore not defined at the time environmental zoning was originally applied to your property in 2001. Since then, the City has updated the mapping to reflect current data including aeriels, new information from technical sources like ODFW, and site visits.

A key goal of the River Plan / South Reach is to ensure that appropriate protections are placed on high- and medium-ranked natural resources (as defined in our citywide Natural Resources Inventory) and responsible floodplain development is achieved to effectively respond to a changing climate. Items 1-3 above provide us with data to make determinations of where to apply the River environmental overlay zone in the South Reach (including, of course, your property). We are continually updating the vegetation and Special Habitat Area mapping using the new aeriels, data provided by property owners and their consultants, site visits and other relevant sources. As we’ve discussed, we are happy to conduct a site visit to identify areas where the data we’re using for your properties’ recommendation could be improved.

Just let us know if you have additional questions. Thank you (and have a good trip, Ruth!).

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Sunday, December 8, 2019 8:55 PM  
**To:** Edmunds, Sallie; Caudill, Jeff  
**Cc:** jeff.hamilton@comcast.net  
**Subject:** Meeting Tuesday

Hi Sallie and Jeff:

In thinking it over let's use tomorrow's hour to let you guys hear from Jeff Hamilton, (I'll be there too,) and then maybe you can meet with me 12/17 or 18 to discuss my questions. Is that possible? I get back to the states 12/16.

If it is OK with you let's do that. If it's not "ok" you can let me know.

Thank you very much. Ruth

## **Caudill, Jeff**

---

**From:** ruth <rspetter@aol.com>  
**Sent:** Sunday, December 8, 2019 5:44 PM  
**To:** Edmunds, Sallie; Caudill, Jeff  
**Cc:** rspetter@aol.com  
**Subject:** Ruth's partial comments

Hello Sallie and Jeff:

This is what I could do tonight. I have more and will send as I can tomorrow.

Thank you. Ruth

### **RUTH SPETTER'S RECONSTRUCTED QUESTIONS AS FAR AS POSSIBLE** **AS OF 12/8/19**

#### **STATEWIDE LAND USE GOAL 15**

- **What is your understanding of how Goal 15 addresses existing uses of property 100s of feet from the river?**
- **33.475.050 – Where are “development and exterior alteration” defined?**
- **Why are the properties on Hwy 43 included when the goal’s focus is clearly on properties abutting the river?**
- **Why are the properties on Hwy 43 so heavily regulated when not in flood plain, on a river bank, riparian, without river contact, without docks, not in a recreation area, without any trails, separated from the river by railroad tracks and a tunnel, does not provide marine uses. Why do you believe Goal 15 requires this zoning of the property and if it is not Goal 15 what are you relying upon for direction?**

#### **RIVER PLAN ZONE QUESTIONS**

- **What does “others” mean in description of what will be regulated for the first time under the REZ?**
- **Where is the word “forest” defined for purposes of the proposed zoning?**
- **Where is the word “herbaceous” defined for purposes of the proposed zoning?**
- **Which “herbaceous” plants does the bureau say it is protecting on my property?**
- **Upon what information/report/data was this determination made?**
- **Affirm, my property is not considered “riparian.”**
- **Affirm that riparian functional values do not apply to my property.**
- **Where is the word “shrublands” defined for purposes of the proposed zoning?**

- **Where is the word “woodland” defined for purposes of the proposed zoning?**
- **How is the bureau using/referring to/addressing Statewide goal 15?**
- **Would my property be included in the River Plan if not in the GW?**
- **Affirm my property not in river setback, not in recreational area, not in river use area, 100s of feet from the river and separated by the river by land, other structures, railroad tracks and a tunnel.**
- **Do you believe that applying the regulations to my property is in compliance with Goal 15? If so, why?**
- **Affirm my property is not within a Riverfront Community**
- **Affirm my property is not part of the Dunthorpe riverfront properties.**
- **Where can I see the 20 year urban design concept for the south reach and how does it apply to my property?**
- **Where is this term defined?**
- **Is my property currently affected by any transportation planning related to this project? P77**
- **Is my property part of the South Portland Macadam Plan District area? P79**
- **Please explain the last paragraph on page 79 – does it apply to my property?**
- **How does my property fit within the definition of properties in Dunthorpe?**
- **How does the Dunthorpe community language support the extensive environmental zoning on my property?**
  
- **Part 2 – Implementation Tools**
- **Why are policies proposed for 2035 addressed here?**
- **Affirm that 33.10 does not apply to my property. P9**
- **Temporary Activities – P 11**
- **How and where is “construction staging area” defined? 10-11**
  
- **33.430 Environmental Overlay Zones p 13**
- **Affirm that all comments regarding trails do not apply to my property.**

- **Affirm that 33.440 does not apply to my property. 17-28.**
- **Affirm my property is not river recreational – 30**
- **33.475.020 A.3 – River Environmental**

**Does p 30 say that the only low value areas subject to the REZ are in the flood plain. Why is my property not low value**

- **How is my property designated and why**
- **Affirm that my property is not “along the river”**
- **Why is my property now encircled by environmental zoning now when not before?**
- **What are the natural resources you say exist on my property?**
- **What is the basis of that determination?**

**33.475.020 – River Overlay Zones**

- **What is the land use pattern identified in the SR area for my property? 31**

**River Environmental**

- **Affirm it only applies to conserve and enhance important natural resources and values**
- **How are “natural resource functions” defined and where are they defined?**
- **How is “development” defined for this code and where is it defined?**
- **What does the word “functions” mean here?**
- **What “important” NRFs are you saying exist on my property and based on what?**
- **What are “functional values” and where are they defined?**
- **What has changed on my property requiring the drastic change in zoning which has occurred? What has changed?**
- **If the City believes that there are highly important resources possible on my property because they exist on other property – why did the city kill all the vegetation on the property due north?**
- **How is “vegetation” defined**
-

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Thursday, December 5, 2019 10:30 AM  
**To:** Caudill, Jeff  
**Subject:** Re: Meeting

Thank you for the appointment 12/10 at 11.

The questions came up for me as I read the materials. There are about 40 of them tho it is my belief that many will be answered as we speak.

They are not in a computer but maybe I can screen shot them. I can try to organize by topic. If I can I'll do some today and then some Sunday.

Sallie is of course welcome to join us but I'm pretty sure you can answer everything. It won't take too long.

Thank you for your email of yesterday. I will read it today. It may answer quite a few questions.

Thank you for your time and patience. Ruth

MOOn Dec 5, 2019, at 9:42 AM, Caudill, Jeff <Jeff.Caudill@portlandoregon.gov> wrote:

Hey, Ruth. Dec 10th at 11 am would work for me. I don't currently have access to Sallie's calendar so will let her respond with her availability & we can confirm.

Sallie said you have a list of questions that you are hoping to have answered. If you want to send those along before the meeting (maybe at least give us a day to review, if possible), that would be great.

Thanks.

-J

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Thursday, December 5, 2019 8:35:16 AM  
**To:** Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
**Subject:** Meeting

Hi Jeff. Sallie was kindly going to set up a meeting with you.

Since I just got volume 3 I'm thinking the morning of the 9th or at your convenience the 10th rather than today. Ruth

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Wednesday, December 4, 2019 4:48 PM  
**To:** RUTH SPETTER  
**Cc:** Bischoff, Debbie; Edmunds, Sallie  
**Subject:** RE: Extension

Ruth,

We understand that there are a lot of pieces that are coming together and that it can be a challenge to understand how they inter-related and determine which regulations apply to your property. I am hopeful that a bit of a summary email can help to narrow your review efforts during your busy month of December. Below is a list of the project documents that are most relevant to your property.

### Background/New Info

- *Archaeological Resources Requirement* – After discussing specific portions of the study area, including your property, with our consultant, we determined that your property (and others near you) should be removed from the “High Sensitivity Area” for archaeological resources. Therefore, you will no longer be required to conduct sampling prior to development to determine the presence of archaeological resources.
- *Standards vs. Review* – Standards are a set of criteria established for specific development activities that, when met, will be approved by the City with no land use review. If the standards can not be met or if there are no standards for a development activity, a land use review is required.

### Volume 1 – Policies, Objectives and Recommendations

Part 1 – Provides the overall vision and direction for project area, describes the rationale and intent of the code changes presented in Part 2, and includes objectives and actions under the four areas of focus in the plan, Watershed Health and Resilience, Recreation, Tribal Engagement and Collaboration and Riverfront Communities. Priority sections recommended for your review include:

- Chapter II, pgs 17-24
- Chapter II
  - Watershed Health & Resilience, pgs 26-32
  - Riverfront Communities, pgs 71 (1. Overview) and 82 (Dunthorpe)

Part 2 – Presents the proposed changes to existing policies and regulations, as well as an action plan for actions we have determined to be necessary to achieve the objectives identified in Part 1. Priority sections recommended for review include:

- 33.475, River Overlay Zones
  - Introduction, pg 28
  - 33.475.200s River General and River Recreational Overlay Zones – Because you are no longer subject to the archaeological resources requirement, the only requirements that would be relevant to your property are Nonconforming Uses and Development (33.475.250) and Property Line Adjustments (33.475.260) on pg 77. The “commentary” on pg 76 describes the proposed changes to this section.
  - 33.475.400s, River Environmental Overlay Zone

- Pgs 78-83 for items when the regulations apply (i.e., when the regulations are triggered) and which actions are exempt from the regulations (i.e., requirements do not apply).
- Pg 89 – 33.475.440.B, Standards for utility lines and .C, Standards for stormwater outfalls.
- Pg 95 – 33.475.440.I, Standards for site investigative work
- Pgs 94-99 – 33.475.440.K, Standards for removal or pruning of vegetation
- Pgs 98-103 – 33.475.440.L, Standards for mitigation
- Pgs 106-109 – 33.475.440.O., Standards for residential development
- 33.865, River Review
  - Pgs 163-165 – 33.865.010, Purpose, and 33.865.020, When River Review is Required
  - Pgs 178-183 – 33.865.100, Approval Criteria
- D. Action Items – This is a consolidation of the action items included in Part 1. It is a handy reference for all of our action items but most of them don't directly impact you. If you want to review them, they are located on pgs 285-307

Vol 2, Scenic Resources Protection Plan – This does not affect your property so probably should be a low priority.

Vol 3, Natural Resources Protection Plan – This is the analysis conducted to characterize natural resources within the study area. Generally, it is very technical and draws on substantial research and data from both City of Portland bureaus and outside sources.

- Chapter I, Introduction – pgs 1-5
- Chapter III, Inventory Approach and Methodology – pgs 40-54 (this is pretty technical but describes the steps we take to determine the ranking of natural resources in the area, and the rest of the city)
- Chapter IV, Inventory Site WR23 Dunthorpe – pgs 186-206

As always, let me know if you have additional questions. I look forward to seeing you tonight at Riverdale High School.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
 City of Portland Bureau of Planning and Sustainability  
 503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>

Sent: Wednesday, December 4, 2019 2:07 PM

To: RUTH SPETTER <rspetter@aol.com>

Cc: Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>; Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>

Subject: RE: Extension

Hi Ruth,



I recall meeting you many years ago when you were a City Attorney.

It sounds like you are very busy. While I would like to offer you an extension to December 30, I can only do that with the caveat that we are scheduled to release the Proposed Draft of the River Plan / South Reach on January 10 so we cannot promise that we be able to review and fully consider all of your comments by that date. We will do what we can.

We would be happy to set up a time to get together with you in mid-January to go over any changes that we make to the sections that are of interest to you so that you will not need to review the whole draft plan again in order to prepare for the Planning and Sustainability review and public hearing process.

Whatever comments you have before you leave the country on December 12 would be welcome. We will review those with the understanding that they are not your final or complete comments.

Also, Jeff is going to send you a list of the key parts of the plan (with page numbers) that we believe are most relevant to your situation, to help you prioritize your review. We hope that will be helpful.

Sincerely,

Sallie

Sallie Edmunds, Central City, River and Environmental Planning Manager she/her/hers City of Portland Bureau of Planning and Sustainability  
503-823-6950  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
Sent: Wednesday, December 4, 2019 11:52 AM  
To: RUTH SPETTER <rspetter@aol.com>  
Cc: Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>; Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>  
Subject: RE: Extension

Hello, Ruth.

Sorry for the delay on this. We need to discuss request internally and will get back to you within a few hours.

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him) City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <rspetter@aol.com>

Sent: Wednesday, December 4, 2019 11:40 AM

To: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>

Subject: Extension

Hi Jeff. Please let me know about the extension so I can reach out to someone else. Ruth

## Caudill, Jeff

---

**From:** Edmunds, Sallie  
**Sent:** Wednesday, December 4, 2019 4:41 PM  
**To:** Caudill, Jeff; Bischoff, Debbie  
**Subject:** Fwd: Extension

Sallie

Begin forwarded message:

**From:** ruth <rspetter@aol.com>  
**Date:** December 4, 2019 at 3:54:08 PM PST  
**To:** "Edmunds, Sallie" <Sallie.Edmunds@portlandoregon.gov>  
**Subject:** Re: Extension

Hi Sally -

I want my comments considered and so I appreciate the extension. I'll work on my comments during the later part of the month while away - I've needed a laptop anyway - and then get right on them. If it is possible to get partial comments to you before then I will do so. Submit to Jeff?

I appreciate getting together in January too, after your submission (?). That would be very helpful.

Very kind of Jeff to do this extra work.

I understand you all are trying to do laudable work but I am deeply concerned about the extent of overlay on my property. I have no idea why it went from partially being covered to being completely encircling my home. It was pretty shocking to recently get a copy of the extent of change in property covered by environmental zoning when there has been no change in use or vegetation.

I think there has been some broad brush determinations which will have a tremendous, negative impact on me without bringing the City closer to its river goals. My property sits between a highway and ends downhill somewhere close to a train tunnel and train tracks. It sits 100s to 1000s of feet above the river.

I have quite a few questions for staff tonight - it will be late for all of us I fear. I worry that if there is a big turnout we won't have time to address our questions but

I'll go and maybe it will work out. It is only with the questions answered that any of us can provide you with decent feedback.

Thank you.

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

From: Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>  
To: RUTH SPETTER <rspetter@aol.com>  
Cc: Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>; Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
Sent: Wed, Dec 4, 2019 2:07 pm  
Subject: RE: Extension

Hi Ruth,

I recall meeting you many years ago when you were a City Attorney.

It sounds like you are very busy. While I would like to offer you an extension to December 30, I can only do that with the caveat that we are scheduled to release the Proposed Draft of the River Plan / South Reach on January 10 so we cannot promise that we be able to review and fully consider all of your comments by that date. We will do what we can.

We would be happy to set up a time to get together with you in mid-January to go over any changes that we make to the sections that are of interest to you so that you will not need to review the whole draft plan again in order to prepare for the Planning and Sustainability review and public hearing process.

Whatever comments you have before you leave the country on December 12 would be welcome. We will review those with the understanding that they are not your final or complete comments.

Also, Jeff is going to send you a list of the key parts of the plan (with page numbers) that we believe are most relevant to your situation, to help you prioritize your review. We hope that will be helpful.

Sincerely,

Sallie

Sallie Edmunds, Central City, River and Environmental Planning Manager  
she/her/hers  
City of Portland Bureau of Planning and Sustainability  
503-823-6950  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
Sent: Wednesday, December 4, 2019 11:52 AM  
To: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Cc: Edmunds, Sallie <[Sallie.Edmunds@portlandoregon.gov](mailto:Sallie.Edmunds@portlandoregon.gov)>; Bischoff, Debbie <[Debbie.Bischoff@portlandoregon.gov](mailto:Debbie.Bischoff@portlandoregon.gov)>  
Subject: RE: Extension

Hello, Ruth.

Sorry for the delay on this. We need to discuss request internally and will get back to you within a few

hours.

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him) City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Sent: Wednesday, December 4, 2019 11:40 AM  
To: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
Subject: Extension

Hi Jeff. Please let me know about the extension so I can reach out to someone else. Ruth

## Caudill, Jeff

---

**From:** Edmunds, Sallie  
**Sent:** Wednesday, December 4, 2019 2:07 PM  
**To:** RUTH SPETTER  
**Cc:** Bischoff, Debbie; Caudill, Jeff  
**Subject:** RE: Extension

Hi Ruth,

I recall meeting you many years ago when you were a City Attorney.

It sounds like you are very busy. While I would like to offer you an extension to December 30, I can only do that with the caveat that we are scheduled to release the Proposed Draft of the River Plan / South Reach on January 10 so we cannot promise that we be able to review and fully consider all of your comments by that date. We will do what we can.

We would be happy to set up a time to get together with you in mid-January to go over any changes that we make to the sections that are of interest to you so that you will not need to review the whole draft plan again in order to prepare for the Planning and Sustainability review and public hearing process.

Whatever comments you have before you leave the country on December 12 would be welcome. We will review those with the understanding that they are not your final or complete comments.

Also, Jeff is going to send you a list of the key parts of the plan (with page numbers) that we believe are most relevant to your situation, to help you prioritize your review. We hope that will be helpful.

Sincerely,

Sallie

Sallie Edmunds, Central City, River and Environmental Planning Manager she/her/hers City of Portland Bureau of Planning and Sustainability  
503-823-6950  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
Sent: Wednesday, December 4, 2019 11:52 AM  
To: RUTH SPETTER <rspetter@aol.com>  
Cc: Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>; Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>  
Subject: RE: Extension

Hello, Ruth.

Sorry for the delay on this. We need to discuss request internally and will get back to you within a few hours.

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him) City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>

Sent: Wednesday, December 4, 2019 11:40 AM

To: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>

Subject: Extension

Hi Jeff. Please let me know about the extension so I can reach out to someone else. Ruth

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Wednesday, December 4, 2019 5:57 AM  
**To:** Caudill, Jeff  
**Subject:** Extension

Hi Jeff, good morning.

The amount of material that must be reviewed and absorbed is huge. I'm going through volume one page by page and then dealing with Title 33 and Goal 15. There is so much more to review including your other volumes.

I have a whole day meeting Friday for which I must prepare all day Thursday meaning no time to write written comments for your project and the meeting is out of town meaning I can't work in your project again until late Saturday afternoon.

I have another meeting for part of Sunday and Monday and a doctor's appointment Tuesday taking up about 4 hours.

I'm out of the country 12/12-16.

I've already spent more than four days reading just some of the material. There are probably more than 1000 pages of existing and proposed regulations to read, take notes on and try to coordinate and try to determine whether applicable to my property.

Every free moment has been spent on this. The proposed change in application to my property is so extreme I have no choice but to perform this in depth review. I'm taking it very seriously.

I am out of state 12/20-28.

I'm requesting an extension for submission of comments to the end of the day next December 30, 2019. I must spend a good deal of time preparing for my trips. Due to the holidays this is a tough time to find free time to research and write.

If you cannot authorize this please tell me, AS EARLY AS POSSIBLE TODAY, who can authorize this and I'll contact that person right away. Here is my number if you want to call is 593-830-5768.

Just FYI- if Riverwood in Multnomah County is within the South reach area I know of at least one person who had no idea about all of this. This suggests there may be others. Just FYI.

Thank you. Hope to hear from you soon and see you tonight. Ruth



## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Tuesday, December 3, 2019 4:17 PM  
**To:** Caudill, Jeff  
**Subject:** Re: Volumes

Thanks Jeff. I'll come with questions too.

Before you begin tomorrow eve can you lay out the process from here. Thank you. Ruth

On Dec 3, 2019, at 3:38 PM, Caudill, Jeff <Jeff.Caudill@portlandoregon.gov> wrote:

Hi, Ruth.

We actually got a copy of Vol 3 back today so I will bring that copy for you to take with you tomorrow evening. We ask that you return it within a week (which hopefully isn't too much of an issue since the comment period ends on Friday).

Looking forward to seeing you at tomorrow's event.

-J

---

**From:** Caudill, Jeff  
**Sent:** Monday, December 2, 2019 4:42 PM  
**To:** ruth <rspetter@aol.com>  
**Cc:** Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>; Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>  
**Subject:** RE: Volumes

Hi, Ruth.

I hope you had a good Thanksgiving weekend. As you know, you can always review the Natural Resources Protection Plan at our website here: <https://www.portlandoregon.gov/bps/79958> Unfortunately, except for a few that we'll need for our event on Wednesday, our hard copies are currently out on loan to others. We will likely be able to loan one out after Wednesday's event, if that works for you.

Related to background materials for the protection plan, I would refer you to the Natural Resources Inventory that we released for public review late last year. It is located here: <https://www.portlandoregon.gov/bps/78311> Much of what is in that document is incorporated into the protection plan.

The meeting on the 4<sup>th</sup> will be an open house format with staff dedicated to particular topics of interest so that folks can discuss the topics of interest to them. We won't be doing a presentation but would be happy to continue conversations with you about your property there.

The event is a joint event with another project here in our bureau that is updating the environmental zone boundaries throughout the city to be sure that the zones are actually located on important natural resources.

Let me know if you have additional questions. Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

**From:** ruth <[rspetter@aol.com](mailto:rspetter@aol.com)>  
**Sent:** Saturday, November 30, 2019 12:44 PM  
**To:** Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
**Subject:** Volumes

Hello Jeff:

How can I get a copy of the Natural Resources protection plan and the Background Materials? How many pages would you estimate those are together?

How will the meeting on the 4th work? Presentation and questions? I have questions about the rezone on my property.

Thank you. Ruth

## Caudill, Jeff

---

**From:** ruth <rspetter@aol.com>  
**Sent:** Monday, November 25, 2019 5:33 PM  
**To:** Caudill, Jeff  
**Subject:** Re: More questions

Thank you for all your help. I know you all are working hard. I know you are trying to do good things. It's just that they have big impacts for the properties with certain overlay zones - like mine and I'm feeling some of the overlay proposals will impact my property w/out getting you the protections you are after as I read the code - I guess I'm saying over broad and perhaps some should be removed from environmental overlays - like mine which has a highway on one side and a tunnel and train tracks on the other and does not go anywhere close to the water . Things to consider as this review process goes on.

I just got this so I will review. I sent you a question about a definitions section for 33.475 if you can tell me.

Have a very good Thanksgiving and see you at the Riverdale School. Thank you. Ruth

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

From: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
To: RUTH SPETTER <rspetter@aol.com>  
Cc: Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>; Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>; BPS River Plan <riverplan@portlandoregon.gov>  
Sent: Mon, Nov 25, 2019 5:13 pm  
Subject: RE: More questions

Hi, Ruth.

I apologize for not getting these responses to you on Friday, as I'd hoped. We understand that how the layers of regulation function and interact can be complicated. As we discussed at our meeting, the Environmental Conservation (c) and Greenway River General (g) overlay zones currently apply to your property. The River General (g) applies to your entire site and the Environmental Conservation (c) applies to approximately 9,000 square feet of your property. Under these existing regulations, most changes to your property would require either an Environmental Review or a Greenway Review, or both concurrently.

We are proposing to replace these overlay zones with the River Environmental and River General (g\*) overlay zones. The River Environmental overlay zone is proposed to be applied to valuable natural resources and the River General (g\*) will be applied to your entire property, similar to your current situation. Under the proposed zoning, a River Review would only be required for activities in the River Environmental overlay zone that do not meet applicable standards and are not exempt (the current regulations don't include standards). The standards available in the River Environmental overlay zone provide a set of criteria that can be met for specific development activities to receive approval without undergoing a land use review. Normal maintenance, repair, and replacement of existing development would continue to be allowed, as it is now.

As we mentioned in our meeting, your base zone, R20, which allows one dwelling unit per 20,000 square feet, represents the primary limitation on the amount and type of development allowed on site. Your site is 14,400 square feet so only one dwelling unit is allowed on the site.

Responses to your specific questions comments in your previous email are below in [blue](#).

Thank you for your emails and questions. Let me know if you have additional questions. We are happy to meet again to go over all of this information if it isn't clear.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Sent: Thursday, November 21, 2019 10:22 AM  
To: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
Subject: More questions

Jeff. Sorry to bombard you but this is huge for me. I can meet tomorrow if you prefer to email.

The proposed change takes my property from river general to river environmental. This is a massive impact and not at all just a regrouping of zones as i understood you suggested. [Actually, we are proposing the River Environmental overlay zone to replace the Conservation overlay zone. The two overlay zones are similar. One of the overall goals of the switch from the Greenway overlay zones to the River overlay zones is to make the environmental regulations more consistent, whether you are along the Willamette River or elsewhere in the city. Unless the proposed development activity is exempted, the Greenway overlay zones require a land use review \(i.e., Greenway Review\). The new River overlay zones will allow for some activities to be approved via standards, rather than requiring a land use review \(River Review\). As described above, the existing Greenway River General \(g\) will be replaced with the River Overlay River General \(g\\*\). The proposed River General \(g\\*\) allows for more activities to utilize standards and would change very little on your property. The most significant change would be the additional of the archaeological resource requirements, which we are re-evaluating and may remove from your property.](#)

As proposed the city wants, for the first time, to regulate residential development, removal and pruning of vegetation (defined as?), mitigation, utilities, storm water out falls and "others" which means what? [All of these activities are currently regulated in the Greenway and Conservation overlay zones. The change we are proposing as a part of the River Environmental overlay zone is the establishment of standards that could be met for approval, rather than requiring a land use review. All of the items identified in the document I provided you could be approved with a straightforward plan check, if the criteria in the standard is met.](#)

[In the document I provided you I tried to highlight the standards that were most relevant to your site. However, other standards includes all of the following: rail rights of way; placement of piles \(in the river\); public trails; public viewing areas; view corridors; resource enhancement projects; site investigative work; development in a City of Portland park; application of soil amendments; placement of temporary floating structures for a seasonal public swimming area; and existing seawalls. The details of all of these River Environmental standards can be found on pages 87-109 in Volume 1, Part 2.](#)

[If there are no applicable standards you have to go through a costly review. What? Yes, if there is no established standard for a specific type of development activity then applicants must undergo review. As described above, any non-exempt development activity you proposed under your current zoning would have to undergo a land use review.](#)

[Ditto E review. Yes. Again, if we do not have an established standard in the River Environmental for a proposed development activity it would be required to go through review. Any River General \(g\\*\) and River Environmental review would be completed together for a development proposal. You wouldn't pay separate fees for each.](#)

This is outrageous. This is what leads to bankruptcy for land owners.

I'm working with the chart you provided to me. Thank you for it. Helps to see what is proposed.

I am deeply concerned about these changes and feel the zoning brush has been overly broad in terms of the stated objectives as applied to the property at issue and most specifically my property.

You are talking about a property with a steady slope which does not go to the river but ends above a train tunnel and train tracks both in use As they have been. My property is hundreds and hundreds and hundreds of feet from the river. You can see that. [You are correct. We define your property as steep slope \(greater than 20% slope\) and as a Potential Landslide Hazard Area. These characteristics actually make slope stability – which trees contribute significantly to – more important on the site. Although the River Environmental overlay zone focuses significantly on the riverbank and river setback areas, it is also structured to address environmental resources beyond the river setback.](#)

A site abutting a state highway. A site abutting property on which the city has just destroyed all existing vegetation. Your photo needs to be updated to show this massive, dead landscape directly north of my property and the open air above it- no forest canopy. Hasn't been any tree canopy for more than 40 years when I first moved in. [I reached out to the Bureau of Environmental Services and they are aware of the removal by Portland Parks and Recreation of invasive Himalayan blackberry that occurred north of your property. The City supports the removal of plants listed on the Nuisance Plants List in the \*Portland Plant List\* \(I sent you the link to this document\). Himalayan blackberry is on the Nuisance Plants List. The long-term goal of this removal is to replace those invasive species with native ones.](#)

Why is all property zoned the same when huge portions of it do not further your objectives? [We apply the River General \(g\\*\) to properties within our established Willamette River Greenway boundary and the River Environmental \(e\) to sites with valuable natural resources. The overlay zones have been correctly applied on your property.](#)

Why are the properties in Dunthorpe, which abut a state park, exempt? In terms of potential impact on the river, and tree canopy, those abutting the highway have the same potential as the part of mine currently under residential use. [We have not exempted other properties in Dunthorpe. Our study area includes properties along and adjacent to the river so we are proposing changes on those properties. Properties outside of our study area may warrant changes to their zoning but would need to be evaluated as a part of a separate \(future\) project.](#)

Clearly, you all have worked hard but it's not fair to impacted homeowners for there to be anything so broadly determined and reliant on data from areas far away nor can you say the regulations are sufficiently connected to legitimate objectives. [As I emailed, we are happy to make a site visit to confirm the location and quality of vegetation on your site to ensure we are mapping it correctly. Just let us know if you would like to schedule a site visit. Related to our overall objectives, State Planning Goal 15, Willamette River Greenway, contains a specific aim to "protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway." Within the City's established Greenway area, we must ensure the qualities listed are maintained. We believe the components of the River overlay zones achieve those aims. Additionally, our \*2035 Comprehensive Plan\*, which the River Plan/South Reach implements, includes policies focused on habitat connectivity \(Policy 7.10\), preserving the urban forest \(Policy 7.11\), natural resource protection \(Policy 7.19\), connected upland and river habitats along the Willamette River \(Policy 7.40\) and others.](#)

At a minimum any overlay zoning on my property should be drastically reduced to the lower part of the parcel. Why is mine so massively overlaid? [The River Environmental overlay zone follows key natural resources identified in our Natural Resources Inventory, which evaluates vegetation, water features, wetlands, and other characteristics. If you want more information on the reasoning for applying the River Environmental overlay zone to your property \(and those around you\), please see pages 186-206 in Volume 3, Natural Resources Protection Plan. A site visit may provide additional information to modify the vegetation characterization on your site and, consequently, the overlay zone.](#)

Please- let me know if you can meet tomorrow. If comments are due 11/27 I will have to work all weekend to prepare.

This is, or course, personally important to me but my comments are not intended to be aimed at you personally.

I'll keep working with the documents.

Thank you, Ruth

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Monday, November 25, 2019 5:13 PM  
**To:** RUTH SPETTER  
**Cc:** Bischoff, Debbie; Edmunds, Sallie; BPS River Plan  
**Subject:** RE: More questions  
**Attachments:** 12410\_SW\_Riverside\_draft\_River\_e\_overlay.pdf; 12410\_SW\_Riverside\_existing\_enviro\_overlays.pdf

Hi, Ruth.

I apologize for not getting these responses to you on Friday, as I'd hoped. We understand that how the layers of regulation function and interact can be complicated. As we discussed at our meeting, the Environmental Conservation (c) and Greenway River General (g) overlay zones currently apply to your property. The River General (g) applies to your entire site and the Environmental Conservation (c) applies to approximately 9,000 square feet of your property. Under these existing regulations, most changes to your property would require either an Environmental Review or a Greenway Review, or both concurrently.

We are proposing to replace these overlay zones with the River Environmental and River General (g\*) overlay zones. The River Environmental overlay zone is proposed to be applied to valuable natural resources and the River General (g\*) will be applied to your entire property, similar to your current situation. Under the proposed zoning, a River Review would only be required for activities in the River Environmental overlay zone that do not meet applicable standards and are not exempt (the current regulations don't include standards). The standards available in the River Environmental overlay zone provide a set of criteria that can be met for specific development activities to receive approval without undergoing a land use review. Normal maintenance, repair, and replacement of existing development would continue to be allowed, as it is now.

As we mentioned in our meeting, your base zone, R20, which allows one dwelling unit per 20,000 square feet, represents the primary limitation on the amount and type of development allowed on site. Your site is 14,400 square feet so only one dwelling unit is allowed on the site.

Responses to your specific questions comments in your previous email are below in [blue](#).

Thank you for your emails and questions. Let me know if you have additional questions. We are happy to meet again to go over all of this information if it isn't clear.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>

Sent: Thursday, November 21, 2019 10:22 AM  
To: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
Subject: More questions

Jeff. Sorry to bombard you but this is huge for me. I can meet tomorrow if you prefer to email.

The proposed change takes my property from river general to river environmental. This is a massive impact and not at all just a regrouping of zones as i understood you suggested. [Actually, we are proposing the River Environmental overlay zone to replace the Conservation overlay zone.](#) The two overlay zones are similar. One of the overall goals of the switch from the Greenway overlay zones to the River overlay zones is to make the environmental regulations more consistent, whether you are along the Willamette River or elsewhere in the city. Unless the proposed development activity is exempted, the Greenway overlay zones require a land use review (i.e., Greenway Review). The new River overlay zones will allow for some activities to be approved via standards, rather than requiring a land use review (River Review). As described above, the existing Greenway River General (g) will be replaced with the River Overlay River General (g\*). The proposed River General (g\*) allows for more activities to utilize standards and would change very little on your property. The most significant change would be the additional of the archaeological resource requirements, which we are re-evaluating and may remove from your property.

As proposed the city wants, for the first time, to regulate residential development, removal and pruning of vegetation (defined as?), mitigation, utilities, storm water out falls and “others” which means what? [All of these activities are currently regulated in the Greenway and Conservation overlay zones.](#) The change we are proposing as a part of the River Environmental overlay zone is the establishment of standards that could be met for approval, rather than requiring a land use review. All of the items identified in the document I provided you could be approved with a straightforward plan check, if the criteria in the standard is met.

In the document I provided you I tried to highlight the standards that were most relevant to your site. However, other standards includes all of the following: rail rights of way; placement of piles (in the river); public trails; public viewing areas; view corridors; resource enhancement projects; site investigative work; development in a City of Portland park; application of soil amendments; placement of temporary floating structures for a seasonal public swimming area; and existing seawalls. The details of all of these River Environmental standards can be found on pages 87-109 in Volume 1, Part 2.

If there are no applicable standards you have to go through a costly review. [What? Yes, if there is no established standard for a specific type of development activity then applicants must undergo review.](#) As described above, any non-exempt development activity you proposed under your current zoning would have to undergo a land use review.

[Ditto E review. Yes. Again, if we do not have an established standard in the River Environmental for a proposed development activity it would be required to go through review.](#) Any River General (g\*) and River Environmental review would be completed together for a development proposal. You wouldn't pay separate fees for each.

This is outrageous. This is what leads to bankruptcy for land owners.

I'm working with the chart you provided to me. Thank you for it. Helps to see what is proposed.



I am deeply concerned about these changes and feel the zoning brush has been overly broad in terms of the stated objectives as applied to the property at issue and most specifically my property.

You are talking about a property with a steady slope which does not go to the river but ends above a train tunnel and train tracks both in use As they have been. My property is hundreds and hundreds and hundreds of feet from the river. You can see that. [You are correct. We define your property as steep slope \(greater than 20% slope\) and as a Potential Landslide Hazard Area. These characteristics actually make slope stability – which trees contribute significantly to – more important on the site. Although the River Environmental overlay zone focuses significantly on the riverbank and river setback areas, it is also structured to address environmental resources beyond the river setback.](#)

A site abutting a state highway. A site abutting property on which the city has just destroyed all existing vegetation. Your photo needs to be updated to show this massive, dead landscape directly north of my property and the open air above it- no forest canopy. Hasn't been any tree canopy for more than 40 years when I first moved in. [I reached out to the Bureau of Environmental Services and they are aware of the removal by Portland Parks and Recreation of invasive Himalayan blackberry that occurred north of your property. The City supports the removal of plants listed on the Nuisance Plants List in the \*Portland Plant List\* \(I sent you the link to this document\). Himalayan blackberry is on the Nuisance Plants List. The long-term goal of this removal is to replace those invasive species with native ones.](#)

Why is all property zoned the same when huge portions of it do not further your objectives? [We apply the River General \(g\\*\) to properties within our established Willamette River Greenway boundary and the River Environmental \(e\) to sites with valuable natural resources. The overlay zones have been correctly applied on your property.](#)

Why are the properties in Dunthorpe, which abut a state park, exempt? In terms of potential impact on the river, and tree canopy, those abutting the highway have the same potential as the part of mine currently under residential use. [We have not exempted other properties in Dunthorpe. Our study area includes properties along and adjacent to the river so we are proposing changes on those properties. Properties outside of our study area may warrant changes to their zoning but would need to be evaluated as a part of a separate \(future\) project.](#)

Clearly, you all have worked hard but it's not fair to impacted homeowners for there to be anything so broadly determined and reliant on data from areas far away nor can you say the regulations are sufficiently connected to legitimate objectives. [As I emailed, we are happy to make a site visit to confirm the location and quality of vegetation on your site to ensure we are mapping it correctly. Just let us know if you would like to schedule a site visit. Related to our overall objectives, State Planning Goal 15, Willamette River Greenway, contains a specific aim to “protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.” Within the City's established Greenway area, we must ensure the qualities listed are maintained. We believe the components of the River overlay zones achieve those aims. Additionally, our \*2035 Comprehensive Plan\*, which the River Plan/South Reach implements, includes policies focused on habitat connectivity \(Policy 7.10\), preserving the urban forest \(Policy 7.11\), natural resource protection \(Policy 7.19\), connected upland and river habitats along the Willamette River \(Policy 7.40\) and others.](#)

At a minimum any overlay zoning on my property should be drastically reduced to the lower part of the parcel. Why is mine so massively overlaid? [The River Environmental overlay zone follows key natural resources identified in our Natural Resources Inventory, which evaluates vegetation, water features, wetlands,](#)



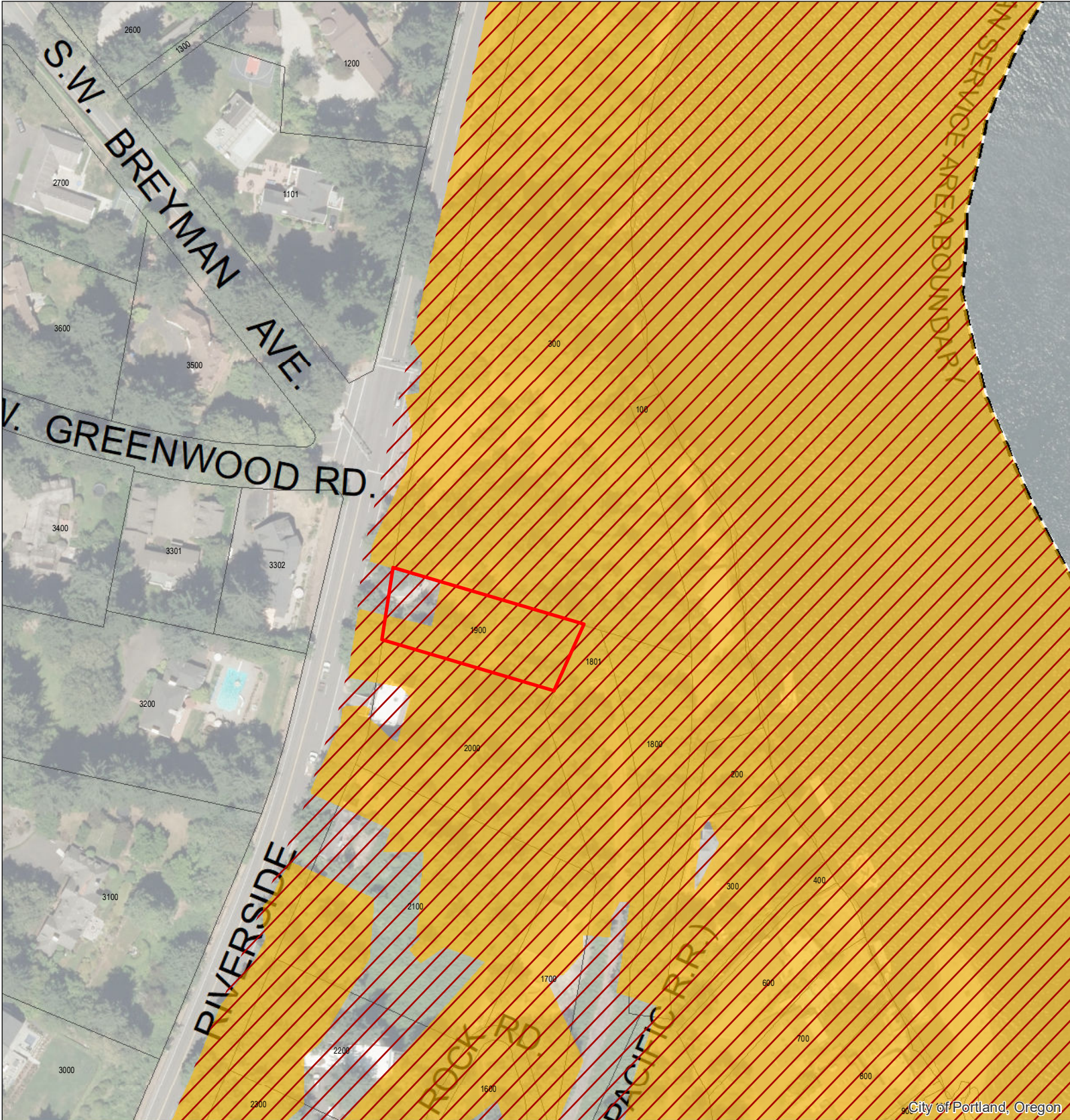
and other characteristics. If you want more information on the reasoning for applying the River Environmental overlay zone to your property (and those around you), please see pages 186-206 in Volume 3, Natural Resources Protection Plan. A site visit may provide additional information to modify the vegetation characterization on your site and, consequently, the overlay zone.




Please- let me know if you can meet tomorrow. If comments are due 11/27 I will have to work all weekend to prepare.

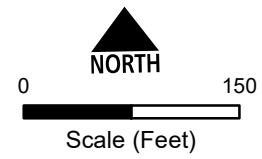
This is, of course, personally important to me but my comments are not intended to be aimed at you personally.

I'll keep working with the documents.

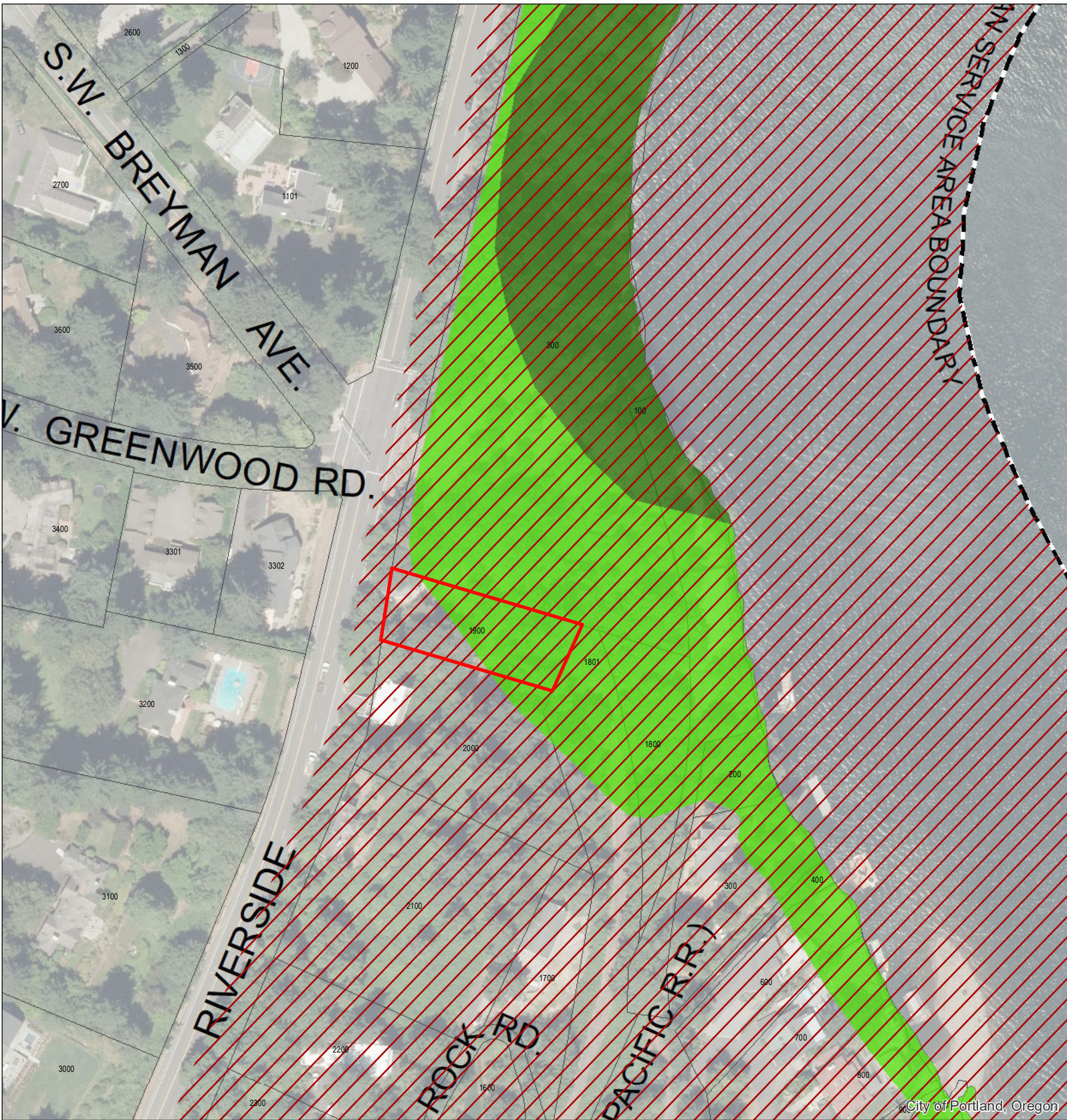
Thank you, Ruth







-  12410 SW Riverside Dr
-  Draft River Environmental (e) overlay
-  River General\* (g\*) overlay

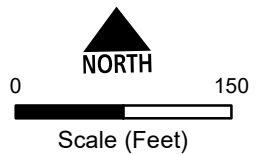






City of Portland, Oregon

-  12410 SW Riverside Dr
-  Conservation zone (c)
-  Protection zone (p)
-  River General (g) overlay





## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Thursday, November 21, 2019 3:32 PM  
**To:** Caudill, Jeff  
**Subject:** Re: More questions

Thank you !

On Nov 21, 2019, at 2:41 PM, Caudill, Jeff <Jeff.Caudill@portlandoregon.gov> wrote:

Hi, Ruth.

We have given an extension to Dec 6 for folks who have requested it. You are welcome to take until then to provide us comments. As we said in our meeting, we are releasing the next draft the week of Dec 16 so we can't go past Dec 6 for comments.

We look forward to your comments. Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

**From:** ruth <rspetter@aol.com>  
**Sent:** Thursday, November 21, 2019 2:33 PM  
**To:** Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
**Subject:** Re: More questions

Thank you Jeff - I will probably want to meet again but wonder whether my comments are due 11/27? I will review what you send. I'm about 1/2 way through the volume you gave to me.

Thank you and have a good evening. Ruth

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

From: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
To: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Cc: Bischoff, Debbie <[Debbie.Bischoff@portlandoregon.gov](mailto:Debbie.Bischoff@portlandoregon.gov)>; Edmunds, Sallie <[Sallie.Edmunds@portlandoregon.gov](mailto:Sallie.Edmunds@portlandoregon.gov)>; BPS River Plan <[riverplan@portlandoregon.gov](mailto:riverplan@portlandoregon.gov)>  
Sent: Thu, Nov 21, 2019 2:27 pm  
Subject: RE: More questions

Hi, Ruth.

Thanks for the questions. We are happy to provide additional clarifications so that you fully understand any implications of the proposed zone changes on your property. Today we are preparing for an event we have this evening so I will have to get back to you on the questions below tomorrow.

At that time, I will provide you with maps showing your existing zoning (with a clear legend) and proposed zoning (we've been working on doing some final modifications to the extent of the River Environmental) so that you can see the differences. I'll also specifically provide responses to each of your comments below. If, after reviewing those materials, you would like to meet with us again, we are happy to schedule a time, either next week (it is a short week due to Thanksgiving) or the following week after. We can determine the best timing after I send you the information tomorrow.

Related to your other questions, here are my responses:

**1. Site visit** - We would do a site visit to make sure that the proposal for River Environmental zoning was accurate, based on the vegetation on your site. We do these to ground-truth our understanding of the site (developed using GIS maps and other data). Though we haven't done any to-date for the South Reach, we are happy to do them as needed. I was giving you the option so that we can be sure we have the right information on your property. We would only do a site visit if you ask us to do so.

**2. Card color** – I believe the three postcards we sent out (at different times in our process) were a light blue so should have been easily differentiated from other mail but will consider something more visible for future mailings.

**3. Email list/Electronic Newsletter** – You have already been added to our South Reach contact list and should be receiving all updates on the project moving forward. The next time we send out a River Plan News (our email updates), I'll confirm you received it.

Look for an email from me tomorrow. Thanks again.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <[rspetter@aol.com](mailto:rspetter@aol.com)>  
Sent: Thursday, November 21, 2019 10:22 AM  
To: Caudill, Jeff <[Jeff.Caudill@portlandoregon.gov](mailto:Jeff.Caudill@portlandoregon.gov)>  
Subject: More questions

Jeff. Sorry to bombard you but this is huge for me. I can meet tomorrow if you prefer to email.

The proposed change takes my property from river general to river environmental. This is a massive impact and not at all just a regrouping of zones as I understood you suggested.

As proposed the city wants, for the first time, to regulate residential development, removal and pruning of vegetation (defined as?), mitigation, utilities, storm water out falls and "others" which means what?

If there are no applicable standards you have to go through a costly review. What?

Ditto E review.

This is outrageous. This is what leads to bankruptcy for land owners.

I'm working with the chart you provided to me. Thank you for it. Helps to see what is proposed.

I am deeply concerned about these changes and feel the zoning brush has been overly broad in terms of the stated objectives as applied to the property at issue and most specifically my property.

You are talking about a property with a steady slope which does not go to the river but ends above a train tunnel and train tracks both in use As they have been. My property is hundreds and hundreds and hundreds of feet from the river. You can see that.

A site abutting a state highway. A site abutting property on which the city has just destroyed all existing vegetation. Your photo needs to be updated to show this massive, dead landscape directly north of my property and the open air above it- no forest canopy. Hasn't been any tree canopy for more than 40 years when I first moved in.

Why is all property zoned the same when huge portions of it do not further your objectives?

Why are the properties in Dunthorpe, which abut a state park, exempt? In terms of potential impact on the river, and tree canopy, those abutting the highway have the same potential as the part of mine currently under residential use.

Clearly, you all have worked hard but it's not fair to impacted homeowners for there to be anything so broadly determined and reliant on data from areas far away nor can you say the regulations are sufficiently connected to legitimate objectives.

At a minimum any overlay zoning on my property should be drastically reduced to the lower part of the parcel. Why is mine so massively overlaid?

Please- let me know if you can meet tomorrow. If comments are due 11/27 I will have to work all weekend to prepare.

This is, or course, personally important to me but my comments are not intended to be aimed at you personally.

I'll keep working with the documents.

Thank you, Ruth

## Caudill, Jeff

---

**From:** Caudill, Jeff  
**Sent:** Thursday, November 21, 2019 2:27 PM  
**To:** RUTH SPETTER  
**Cc:** Bischoff, Debbie; Edmunds, Sallie; BPS River Plan  
**Subject:** RE: More questions

Hi, Ruth.

Thanks for the questions. We are happy to provide additional clarifications so that you fully understand any implications of the proposed zone changes on your property. Today we are preparing for an event we have this evening so I will have to get back to you on the questions below tomorrow.

At that time, I will provide you with maps showing your existing zoning (with a clear legend) and proposed zoning (we've been working on doing some final modifications to the extent of the River Environmental) so that you can see the differences. I'll also specifically provide responses to each of your comments below. If, after reviewing those materials, you would like to meet with us again, we are happy to schedule a time, either next week (it is a short week due to Thanksgiving) or the following week after. We can determine the best timing after I send you the information tomorrow.

Related to your other questions, here are my responses:

- 1. Site visit** - We would do a site visit to make sure that the proposal for River Environmental zoning was accurate, based on the vegetation on your site. We do these to ground-truth our understanding of the site (developed using GIS maps and other data). Though we haven't done any to-date for the South Reach, we are happy to do them as needed. I was giving you the option so that we can be sure we have the right information on your property. We would only do a site visit if you ask us to do so.
- 2. Card color** – I believe the three postcards we sent out (at different times in our process) were a light blue so should have been easily differentiated from other mail but will consider something more visible for future mailings.
- 3. Email list/Electronic Newsletter** – You have already been added to our South Reach contact list and should be receiving all updates on the project moving forward. The next time we send out a River Plan News (our email updates), I'll confirm you received it.

Look for an email from me tomorrow. Thanks again.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

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

From: RUTH SPETTER <rspetter@aol.com>  
Sent: Thursday, November 21, 2019 10:22 AM  
To: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
Subject: More questions

Jeff. Sorry to bombard you but this is huge for me. I can meet tomorrow if you prefer to email.

The proposed change takes my property from river general to river environmental. This is a massive impact and not at all just a regrouping of zones as i understood you suggested.

As proposed the city wants, for the first time, to regulate residential development, removal and pruning of vegetation (defined as?), mitigation, utilities, storm water out falls and "others" which means what?

If there are no applicable standards you have to go through a costly review. What?

Ditto E review.

This is outrageous. This is what leads to bankruptcy for land owners.

I'm working with the chart you provided to me. Thank you for it. Helps to see what is proposed.

I am deeply concerned about these changes and feel the zoning brush has been overly broad in terms of the stated objectives as applied to the property at issue and most specifically my property.

You are talking about a property with a steady slope which does not go to the river but ends above a train tunnel and train tracks both in use As they have been. My property is hundreds and hundreds and hundreds of feet from the river. You can see that.

A site abutting a state highway. A site abutting property on which the city has just destroyed all existing vegetation. Your photo needs to be updated to show this massive, dead landscape directly north of my property and the open air above it- no forest canopy. Hasn't been any tree canopy for more than 40 years when I first moved in.

Why is all property zoned the same when huge portions of it do not further your objectives?

Why are the properties in Dunthorpe, which abut a state park, exempt? In terms of potential impact on the river, and tree canopy, those abutting the highway have the same potential as the part of mine currently under residential use.

Clearly, you all have worked hard but it's not fair to impacted homeowners for there to be anything so broadly determined and reliant on data from areas far away nor can you say the regulations are sufficiently connected to legitimate objectives.

At a minimum any overlay zoning on my property should be drastically reduced to the lower part of the parcel. Why is mine so massively overlaid?



Please- let me know if you can meet tomorrow. If comments are due 11/27 I will have to work all weekend to prepare.

This is, of course, personally important to me but my comments are not intended to be aimed at you personally.

I'll keep working with the documents.

Thank you, Ruth

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Thursday, November 21, 2019 10:22 AM  
**To:** Caudill, Jeff  
**Subject:** More questions

Jeff. Sorry to bombard you but this is huge for me. I can meet tomorrow if you prefer to email.

The proposed change takes my property from river general to river environmental. This is a massive impact and not at all just a regrouping of zones as i understood you suggested.

As proposed the city wants, for the first time, to regulate residential development, removal and pruning of vegetation (defined as?), mitigation, utilities, storm water out falls and "others" which means what?

If there are no applicable standards you have to go through a costly review. What?

Ditto E review.

This is outrageous. This is what leads to bankruptcy for land owners.

I'm working with the chart you provided to me. Thank you for it. Helps to see what is proposed.

I am deeply concerned about these changes and feel the zoning brush has been overly broad in terms of the stated objectives as applied to the property at issue and most specifically my property.

You are talking about a property with a steady slope which does not go to the river but ends above a train tunnel and train tracks both in use As they have been. My property is hundreds and hundreds and hundreds of feet from the river. You can see that.

A site abutting a state highway. A site abutting property on which the city has just destroyed all existing vegetation. Your photo needs to be updated to show this massive, dead landscape directly north of my property and the open air above it- no forest canopy. Hasn't been any tree canopy for more than 40 years when I first moved in.

Why is all property zoned the same when huge portions of it do not further your objectives?

Why are the properties in Dunthorpe, which abut a state park, exempt? In terms of potential impact on the river, and tree canopy, those abutting the highway have the same potential as the part of mine currently under residential use.

Clearly, you all have worked hard but it's not fair to impacted homeowners for there to be anything so broadly determined and reliant on data from areas far away nor can you say the regulations are sufficiently connected to legitimate objectives.

At a minimum any overlay zoning on my property should be drastically reduced to the lower part of the parcel. Why is mine so massively overlaid?

Please- let me know if you can meet tomorrow. If comments are due 11/27 I will have to work all weekend to prepare.

This is, of course, personally important to me but my comments are not intended to be aimed at you personally.

I'll keep working with the documents.

Thank you, Ruth

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Thursday, November 21, 2019 9:47 AM  
**To:** Caudill, Jeff  
**Subject:** Illustration of proposed zoning

Hi Jeff: you were going to get me this as applied to my property and Jeff's property. I'm not sure I've seen that.

Are both the overlay zones you addressed, conservation and environmental applicable to my property?

Is the C zone the yellow and the E zone the Green on what you gave me at the meeting.

Are they both Greenway overlays?

Thank you. Ruth

## Caudill, Jeff

---

**From:** RUTH SPETTER <rspetter@aol.com>  
**Sent:** Thursday, November 21, 2019 8:26 AM  
**To:** Caudill, Jeff  
**Subject:** Hi Jeff

Jeff: I'll be spending this morning with the planning docs.

Can you tell me why you suggested coming on the property- your purpose.

Am I correct- all comments due 11/27?

Thank you. Ruth

## Caudill, Jeff

---

**From:** ruth <rspetter@aol.com>  
**Sent:** Tuesday, November 19, 2019 5:38 PM  
**To:** Caudill, Jeff  
**Cc:** rspetter@aol.com  
**Subject:** Re: Meeting with Ruth Spetter - Follow up

I'll get back to you tomorrow. Thank you Jeff.

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

From: Caudill, Jeff <Jeff.Caudill@portlandoregon.gov>  
To: rspetter@aol.com <rspetter@aol.com>; webfootss@gmail.com <webfootss@gmail.com>  
Cc: Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>; Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>  
Sent: Tue, Nov 19, 2019 5:23 pm  
Subject: RE: Meeting with Ruth Spetter - Follow up

Hi again, Ruth and Jeff.

Just wanted to follow up on this last email I sent. If you would like for us to do a site visit, it would be best to get it scheduled soon so that any changes to the extent of the River Environmental overlay zone can be incorporated into our next draft, which is currently expected to be released the week of Dec 16.

Let us know if you would like us to do a site visit and we can schedule a time.

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

---

**From:** Caudill, Jeff  
**Sent:** Friday, November 15, 2019 11:21 AM  
**To:** rspetter@aol.com; webfootss@gmail.com  
**Cc:** Bischoff, Debbie <Debbie.Bischoff@portlandoregon.gov>; Edmunds, Sallie <Sallie.Edmunds@portlandoregon.gov>  
**Subject:** RE: Meeting with Ruth Spetter - Follow up

Hi, Ruth and Jeff (got your email from our South Reach contact list).

Wanted to follow up with you on the proposed zoning code changes for your property. After looking at your properties (and the properties surrounding you), we thought it would be good, if you are open to it, for us to do a site visit to take a look at the vegetation and determine where we think applying the River Environmental is appropriate.

You can either be present during the site visit or not, it is up to you. Let us know if you are open to that and we can schedule it.

Thanks.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.

---

**From:** Caudill, Jeff  
**Sent:** Wednesday, November 13, 2019 5:41 PM  
**To:** [rspetter@aol.com](mailto:rspetter@aol.com)  
**Cc:** Bischoff, Debbie <[Debbie.Bischoff@portlandoregon.gov](mailto:Debbie.Bischoff@portlandoregon.gov)>; Edmunds, Sallie <[Sallie.Edmunds@portlandoregon.gov](mailto:Sallie.Edmunds@portlandoregon.gov)>  
**Subject:** Meeting with Ruth Spetter - Follow up

Hi, Ruth.

Thank you for a good discussion today. As we discussed, I wanted to pass along links to a handful of documents you may find helpful.

River Plan/South Reach Discussion Draft: <https://www.portlandoregon.gov/bps/79958>  
Natural Resources Inventory (City-wide): <https://www.portlandoregon.gov/bps/article/744621> (Special Habitat Areas are addressed on page 48)  
Portland Plant List (defines Native species in Portland): <https://www.portlandoregon.gov/citycode/?c=34460&a=322280>

I will follow up with more specifics on your property, including a map showing the location of the proposed River Environmental overlay zone.

Let me know if you have additional questions.

-J

Jeff Caudill, River & Environmental Planner (he/him)  
City of Portland Bureau of Planning and Sustainability  
503-823-4572  
[www.portlandoregon.gov/bps/](http://www.portlandoregon.gov/bps/)

The City of Portland is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact 503-823-7700 or use City TTY 503-823-6868.