

Agency	Section, Policy, Page	Comment	Resolution
Parks	33.590.230.B.3.	Presently most of the west side study area is well-served by parks. PP&R has limited operations and maintenance budget and we would like to emphasize that any publicly-accessible open spaces would not be maintained by PP&R but rather the private property owner. We suggest changing the phrase “publicly accessible plaza or park” to “publicly-accessible plaza or open space” to help clarify this, and we are open to the project team’s suggestions also.	OK
BDS	Map 562-7	It is a little challenging to read that NW 23 rd Ave has both the Main Street and Streetcar Alignment symbols on it, and architects/developers not paying close attention may easily miss this. Is there a way to provide some visual separation or greater clarity here?	
BDS	33.590.010	The last sentence is a bit cumbersome. Should it read: “The floor area, use limits, height allowances, and bonuses also promote development that provides public benefits”? Can the desired “public benefits” be specifically identified?	
BDS	33.590.030.A	Where is the information for the applicant on the Industrial Supply Mitigation Fund, and the formula that is used to determine the amount that must be paid into that fund? How does paying into the fund balance with the Comp. Plan Amendment approval criteria for Industrial Sanctuary properties in 33.810.050? Section 33.590.030 reads that if you pay into the fund you are good to go, whereas the approval criteria in 33.810.050 are much more rigorous (and quantitative) and are intended to discourage changing properties out of the Industrial Sanctuary.	
BDS	33.590.120.B	A definition for “grocery store” should be included as part of the project to aid applicants and staff in identifying that use as distinct from other retail uses.	
BDS	33.590.200	There is not much in the purpose statement to guide the applicant or planner in reviewing Adjustments to maximum height. Suggest more descriptive language similar to what is in Section 33.140.210.A.	
BDS	33.590.210.C	The area limitation on commercial uses should be stated under the Use Regulations section of the code, as this seems to be more consistent with	

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		other code chapters.	
BDS	33.590.220.A & B	Should Adjustments to maximum height be prohibited given there are bonus heights allowed through 33.590.230? Why go for the bonus if you can get an Adjustment?	
BDS	33.590.210.C & 33.590.230	<p>The terminology in this section is confusing, particularly when read along with section 33.590.230.A.</p> <ul style="list-style-type: none"> • The term “overall maximum FAR with inclusionary housing bonus” in 33.590.210.C seems misleading, when 33.590.230.A.2 suggests that the full bonus of 2:1 may be earned by providing affordable commercial space. • 33.590.210.C says that the maximum FAR with inclusionary housing bonus in Subdistrict B is 4:1, but 33.590.230.A seems to contradict that; it states that “more than one bonus option may be used up to the maximum FAR with inclusionary housing bonus stated in Table 140-2”, which is 5:1. • 33.590.230.A may be better written as: “The following bonus options apply in addition to the FAR bonus option of the base zone and allow additional overall site FAR and additional height. More than one bonus option may be used, up to the maximum FAR with inclusionary housing bonus stated in Table 140-2 or as stated below, except that the maximum FAR with bonuses may not exceed 4:1 in Subdistrict B,” if that is the desired outcome. 	
BDS	33.590.230.B.2.b	<p>Consider omitting the following language from the paragraph – “PHB determines the fee per square foot and updates the fee at least every three years. The fee schedule is available from the Bureau of Development Services.”</p> <p>That PHB determines the fee is stated in the preceding sentence. Information about the location of the fee schedule (PHB rather than BDS?) and the update frequency seems better suited to the eventual program admin rule than the zoning code.</p>	
BDS	33.590.230.B.3	It needs to be clarified that this triggers a Type III PD review. Ideally, 33.270 and 33.854 would be updated to reflect the addition of PD allowances in this	

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		chapter because I think that the specific reference in 33.854.200.B, which specifically only says bonus for 33.130.212.E, will cause confusion for customers thinking that they could use the Type IIX procedure.	
BDS	33.590.250.B.3	<p>The Optional Artwork code language of 33.510 is difficult to work with, as planning staff are not necessarily qualified to determine the quality or public value of proposed artworks, particularly when working with only the Adjustment approval criteria. The Regional Arts & Culture Council are much more qualified in this respect, and the “Exception for PublicArt” in the base zone is a better template.</p> <p>Also, the language states Adjustments can be requested to use art in lieu of meeting the window standards. There are qualifications listed for when this option can be used for Design Review but no qualifications for when it can be used for Adjustments. Is the intent to also apply the same qualifications to Adjustments?</p>	
BDS	33.590.260.C	Although this code is clearly copied from the Northwest Plan District chapter, it may make sense to update the “ground floor wall area” to start from 10feet above grade to better align with the Ground Floor Windows standards (and potentially making the same change in 33.562).	
BDS	33.590.260.E.2.b	Consider raising the height of structured parking floors from 9 feet or more above grade to at least 10feet above grade and closer to 15 feet to more closely align with the 12-foot clear depth in 33.590.260.D.1 and best practices in urban design.	
BDS	Figure 590-1 33.590.260.E.1	33.590.260.E.1 states that surface parking is not allowed, but Figure 590-1 shows an area on the site where surface parking is allowed. Should this diagram be showing only options for structured parking?	
BES		See Document	
BES		Sewer System Risk. The proposed increased zoning density falls in areas where BES has identified as having capacity deficiencies and basement sewer backup risk. Streetcar tracks are being proposed over pipes that are in poor condition (Hansen grading of 4, with a grading of 5 being the worst), and over pipes with capacity deficiencies. BES will need to determine how to address the deficiency	Let’s see what analysis shows. Can this be addressed through engineering?

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		of those pipes during track design and construction. We will need to perform system analysis to assess the impact of proposed zoning on the sewer system and planned CIP project in the area. If currently planned CIP projects won't meet the needs of the proposed zoning changes, BES may need to pause or reassess our work. BES anticipated that the modeling work, which is the first step of this analysis, will take at least two months to complete.	
BES		Storm System risk. Parts of the proposed streetcar track alignment and areas where increased zoning density is proposed are in areas with medium-high landslide susceptibility. The southern portion of the 23rd Ave corridor streetcar track is located in an area with the potential for fairly high landslide risk due to unmanaged or ineffectively managed stormwater flows. Special consideration should be given to stormwater management strategies in this area to avoid exacerbating susceptible landslide conditions. Part of the track is located in an area with the potential for fairly high localized nuisance flooding risk. Special consideration should be given to stormwater management strategies in this area to minimize the likelihood of nuisance flooding.	Need more info
BES		<p>Resiliency. The 23rd Ave streetcar track alignment does not cross the critical, seismically vulnerable BES "backbone" assets that the 18th/19th Ave alignment would have, but there are seismically vulnerable assets adjacent to 23rd Ave we may need to evaluate. BES pipes with moderate to high fragility underlying emergency transit routes and serving critical infrastructure (such as hospitals) should be prioritized for reinforcement if resources are available. Given the history of fill in the area, soil conditions and proximity to the river, BES suggests geotechnical analysis be done to assess the potential risks in the area due to landslide or earthquake.</p> <p>The track segment along NW Wilson and a portion of NW York Street has a high existing risk of regular localized flooding, an access barrier for streetcar users. Flooding may periodically interrupt service, which could impede pedestrian access and safety and transit function. The northern part of the project area</p>	<p>Concerns about streetcar track and flooding.</p> <p>Need to address greening/stormwater issues. Possibly require ecoroof/option for at-grade landscape.</p>

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		has higher existing urban heat island risk due to extensive impervious area. To mitigate urban heat island impacts, investments in green infrastructure and tree planting should be prioritized, particularly when densifying land uses.	
BES		Maintenance. BES assets that intersect a 12' buffer originating from the edge of the track guideway are considered in conflict and will need to be relocated, replaced or reconstructed as necessary. We will need proposed street cross sections to evaluate the impact on individual pipe segments. The following pipe segments are of particular concern: the 24" sewer main in the block of NW 23rd Avenue between NW Raleigh and Xavier streets, the relatively new 12" sewer main in the west side of NW 23rd between NW Thurman and Vaughn, and the three blocks of NW 23rd Avenue between NW Vaughn and NW York that have 24", 30", and 36" sewer mains on the west side of the road. BES has received a high concentration of flooding complains at the intersection of NW 23rd & Thurman.	Streetcar specific engineering issues?
BES		Stormwater Management. Generally, infiltration facilities, such as green street facilities and underground injection controls/sumps, are challenging in this part of the city due to low soil infiltration rates and site contamination. Lined facilities may be needed where infiltration isn't feasible. The Central City provisions for ecoroofs are appropriate for this scale of development. BES will need proposed street cross sections to provide more feedback on how stormwater treatment options could fit into the ROW and on private property.	Ecoroofs/at-grade landscape areas
BES		Guiding Policies. The intention of the study would be clearer if the goals outlined in the Urban Design were also included in this document. Without them, it is difficult to evaluate proposals, preferred scenarios, and implementation strategies. While the study is understandably focused on the link between land use and streetcar investments, it provides less clarity about how the proposals would support the goals of environmental health, equity and resilience.	Include goals in report
BES		Neighborhood Greening. Development of this area should include ample parks, access to the river and Forest Park, abundant trees and greenery, and opportunities to enjoy nature. These elements are some of the most popular and energizing spaces in the River District/Pearl District, which serve as a	Ecoroofs or On-site landscaping areas

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		<p>counterpoint to urban living. Tanner Springs Park is a well-loved example of urban wilderness that provides a respite for people and habitat for native and migratory birds.</p> <p>Through thoughtful planning and design, these green elements can help achieve multiple and complementary outcomes, like mitigating stormwater flows, cooling the air and promoting public health. These benefits can be achieved through master plans, development agreements, design guidelines and character statements, tree and landscaping requirements for parks and plazas, and zoning provisions for bird-safe window glazing.</p> <p>The study should specifically address how the urban landscape will minimize the impacts of rising summer temperatures due to climate change. This is critical for reducing energy use and for protecting the health of community members. The vitality of the area and people's ability to use active transportation during summer months will be impacted by outdoor temperatures and air quality. To that end, the study should include zoning and investments that mitigate the urban heat island effect. In addition to the greening elements described above, we recommend that all properties zoned for urban densities include ecoroof requirements, as called for in the Central City Plan District.</p>	
BES		<p>Industrial Land Supply. The study proposes converting a considerable amount of industrial land, including industrial sanctuary, to urban density mixed use development. The 2016 Economic Opportunities Analysis identified a tight land supply for industrial lands through 2036, and the EOA update currently underway is expected to find a similarly constrained supply of industrial lands.</p> <p>Reducing the supply of industrial lands in an area that is already highly developed raises concerns about the potential implications for the City's ability to meet future industrial land needs, especially as the current EOA considers the potential to expand protections for riparian buffers, floodplains and wetlands in industrial areas.</p>	

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		<p>The MP2H study intersects with issues like brownfield redevelopment, industrial sanctuaries, public access to the river, and environmental protections. It is one of several plans and initiatives that moves Portland toward a tipping point in redefining the long-term vision for the Willamette River, economic diversity, racial justice, environmental justice, and climate resilience. As the MP2H study points out, there is a critical relationship between the MP2H study area and the Economic Opportunities Analysis, currently underway. The MP2H study and similar efforts should inform and be informed by a larger framework or vision that reflects existing and anticipated challenges and opportunities, so that public and private investments are aligned to achieve what Portlanders want for their future.</p> <p>If there is agreement that the study area should be rezoned to urban mixed use to meet critical public needs, we think that establishing a program to fund brownfield cleanups represents a promising opportunity to address the difficult issue of bringing contaminated sites back into active industrial use. We offer the following questions and considerations regarding developing and implementing such a program:</p> <ul style="list-style-type: none">• The current EOA assumes that the City will invest in brownfield cleanup to help meet long-term industrial lands goals, yet securing funding for that work has been challenging. In order for the MP2H fund to provide a lift in terms of our long-term industrial lands goals, it would need to add capacity beyond what is currently assumed in the EOA.• How will the brownfield fees be calculated? The study cites an average figure of \$1 million/acre for cleaning up industrial brownfield sites. It's important to know that the actual costs of cleanup are site specific and can vary considerably. It's unclear if the fund could assure that fees paid for industrial land conversion would result in mitigation on the same acreage of brownfield lands.	

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		<ul style="list-style-type: none"> • It is unclear how the program could result in brownfield cleanup at the scale the MP2H study seeks to achieve. Are these inactive industrial sites not already being counted towards available industrial acreage? While costs are significant issue for the development, there can be a variety of other constraints that hamper cleanup and ultimate reuse of industrial lands. Would the program also address those issues? How can we be confident that a sufficient number of property owners would be interested in participating? How would we address potential participation of current property owners who are directly responsible for contamination? • Establishing and administering the fund would have staffing implications and would have administrative costs that would also need to be funded. An Industrial Mitigation Fund could have benefits beyond those outlined in the MP2H project. It could serve as a mechanism for soliciting grant funding, including anticipated federal relief funding, and could be utilized elsewhere in the City, if needed. <p>Before the MP2H project Discussion Draft is released, we would welcome the opportunity to meet with BPS staff working on the MP2H project and the EOA analysis to discuss and hone the basic elements of the concept before the idea is vetted publicly.</p>	
BES		<p>Public Benefits. The study recognizes that public investments in streetcar and proposed rezonings would add considerable value to privately-owned land. We agree that these public investments should be done in a way that supports broad public goals and offset the impacts of redevelopment, especially brownfield investment to offset impacts to industrial land supply, and affordable housing and parks for people living and working in the area. The proposal estimates that about 10% of additional housing expected through redevelopment would be affordable. Given the City's existing zoning inclusionary zoning requirements, this target seems too modest, especially given the limited supply of affordable housing in the surrounding neighborhood and the city overall</p>	<p>We are proposing more than IH. This should/will be addressed in the process.</p>

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BPS- Pastor	7-8	Equity index analysis- Narrative does not match numbers on map. Area north of Thurman and below Nicolai is a 4 and the part west of 19 th which is an 8 and a 6, much higher than citywide averages and that's not mentioned. Would be good to include a bit more of an explanation of the tool.	
BPS- Pastor		<p>Scenario alternatives:</p> <ul style="list-style-type: none"> • It would have been nice to have the Do Nothing scenario included. • Scenario 2 - define 'high-density employment'. Maybe a quick explanation of how many people work in an area per acre in the different types of land uses • Scenario 3 . . . allows the continuation of many of the area's industrial uses, but would allow for development of residential, commercial and mixed-use buildings over time." This language again doesn't explain the market reality that while IG uses might be allowed, they would become increasingly unlikely 	
BPS- Pastor	26-27	Typos: pages 26, 27 (ancho should be anchor), page 54 under use prohibitions (commerca should be commercial)	
BPS- Pastor	32	Map on page 32 is difficult to decipher, especially the zoomed in portion.	
BPS- Pastor	49	The estimate of cost mitigation for contaminated sites should include a range, not a maximum figure, which seems high.	
BPS- Pastor	Section 6	Section 6- Why doesn't this cover Equity in Hiring/Contracting practices or other Public Amenities.	
BPS- Pastor	57	It would be nice to include more detail on possible public benefits, perhaps citing elements that are included in other plan districts with negotiated CBAs. This is the main point that the rest of the anti-displacement team was hoping to see. Possibly include examples and references for future negotiations if and when the streetcar is built and city money is used to make needed improvements to the ROW. This would potentially serve as an aid for any community groups who did eventually want to try to get involved in advocacy with developers.	
BPS - Armstrong		Document buries the lead and buries the details. Move all the concept development to an appendix. Move the preferred scenario upfront and add	

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		more detail – especially about the why. Why are we doing this? How does it help achieve our goals?	
BPS - Armstrong		Hides too many details in other documents – add a summary to this document, especially the Opportunities and Challenges report.	Agree
BPS - Armstrong		Benefits agreement lacks detail. Needs more discussion of why we would seek a benefits agreement. Where is the discussion of the value created by the upzoning and the need to capture/share those benefits with the public that creates it?	How much should we share?
BPS - Armstrong		uncomfortable with the assumption that the EOA can solve the conversion issues. It sets up false expectations	Agree
BPS - Armstrong		needs more of discussion of what is currently allowed by the Guilds Lake subdistrict. There is not enough detail here about the incremental change. The Guilds Lake subdistrict allows for office development – discuss what is allowed, it narrows the gap. It is not prime Prime Industrial land because the no change alternative is a 3-4 story office park or corporate HQ	Discuss
BPS - Armstrong		Needs a Housing Needs Analysis. Portland has an oversupply of development capacity for this type of housing. No discussion about the demand for this type of housing units, what is the supply elsewhere and how these changes will negatively impact the buildout of other areas like the Lloyd District or Central Eastside	Agree
BPS - Zehnder		See Document	
City Attorney	CP Policies 6.36, 6.37, 6.38, and 6.46	Concerns about ability to make findings regarding industrial policies 6.36, 6.37, 6.38, and 6.46	
City Attorney		Revise Action Chart timeframes LU 1-3 to longer timeframe	
City Attorney	33.590.030	Delete 33.590.030 – and ensure the conditions (adequate industrial land supply and funding for streetcar) are met before applying new comp plan designations to property currently designated industrial	
City Attorney	33.590.120	why limit manufacturing and production in EX? (33.590.120)	Agree.

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PBOT – Jeffries		See Document	
PBOT - Wagner		<ul style="list-style-type: none"> • Page 2: It's a bit confusing to still be talking about streetcar "or another high quality transit investment". Can we just say we're talking about a streetcar extension and leave it at that? • Page 13: Please add mention that a portion of Thurman St east of 19th Ave is also a Major City Bikeway. Also mention that Northwest in Motion has proposed changes to the bikeway classifications and that would modify this map when the TSP is next updated, and will need to be reconciled with any further changes we propose. The same is true for Traffic and Transit Classifications. • Page 14: May be worth mentioning TriMet's adopted service change, which will split the Thurman tail of the Line 15 into a new line 26 serving 18th/19th and Thurman. • Page 16: This is supposed to be Freight Classifications, but is instead a repeat of the Traffic Classifications. • Pages 12 to 16: Add legends to maps, add Emergency Response Classifications, add Street Design Classifications, always capitalize classifications (e.g. Major City Bikeway) • Page 18: Add mention in NW in Motion that it contains classification updates that in some cases extend into this study area and will need to be reconciled. • Page 41: There seems to be a missing section here that describes why we chose Alignment D. Instead we just have a description of the four alignments with considerations (pros and cons), then we move right into a discussion of York/Wilson couplet, and then we get to the overall "preferred scenario" including land use. I think there should be a section describing why Alignment D is the preferred streetcar alignment before moving on. • Page 46: "Complete and improve" doesn't really make sense for 23rd Ave. It already exists. Maybe just say "improve the public street" like it says for 26th Ave. Would also be nice to say we will "improve the public street" on 23rd all 	<p>P 2. Yes P 13 PBOT should update this P 14 PBOT P 16 PBOT P12-16 PBOT P 18 PBOT P 41 PBOT P 46 PBOT</p> <p>All: PBOT</p>

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		<p>the way from Lovejoy to Nicolai, not just north of Vaughn. Lovejoy to Vaughn is the portion that needs to be reconstructed.</p> <ul style="list-style-type: none"> • Page 47: I'm concerned that we're not saying anything about York St east of Hwy 30. I know it's not strictly needed for the streetcar project, but for the traffic and bike network to truly function for the district as a whole, we need the old railroad tracks removed, the street repaved, and sidewalk added along that portion of York as well. • Page 55: Discussion of streetcar funding doesn't mention operating funds, only construction. Should clarify whether or not new operating funding is needed. I think Dan said the answer was no, but it's not clear in this section. • Page 56: We should include maps of classification changes for all modes, or at least any that we would be changing, as well as a circulation map labeling proposed one-way vs two-way streets, new signals, etc. These descriptions are too vague and it would be better to have maps. I know that's a PBOT responsibility, and it's something we can prioritize for the next draft. • Page 58: Under T1, change "funding scheme" to "funding strategy". I think we also need another action with something like "explore creation of an LID for street improvements on York St east of Hwy 30" to capture that need, even if it's not core to the streetcar project. 	
PHB	6	What is the status of OEHR's participation in this project?	
PHB	9	Define what is meant by equitable development in the project purpose so that there is a shared understanding at what is intended.	Agree – include equitable development definition
PHB	Multiple; examples on 9 & 10	<p>The first few pages of the draft reference streetcar and other transit options, but I do not see other transit options included in the development scenarios and I do not see the rationale in the draft of any decisions made as to why these other options were not included and streetcar was seen as the best option. Include this rationale for clarity and transparency. Without this information I am very hesitant to offer a fully formed opinion or position. If the information exists elsewhere then making that connection would be great. Because if streetcar has always been the option, then remove reference to "other options" because this statement is then misleading.</p>	Agree – discuss w/ PBOT

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PHB	13	That the existing conditions report analysis is cited throughout this document and yet does not include analysis of the preferred alignment option and is highly problematic. This means that all subsequent data presented is not accurate and does not represent the path that this project wants to take. I would not recommend that PHB take a position on a policy or program where data is available and not used. Once publically available, the community will certainly notice this as well.	Explore – how much data would we need to add to cover the current alignment?
PHB	14 – 15	Considering the current climate of racial and social justice, housing affordability, and economic inequality, proposing a project in an area with low poverty, higher white population, and higher median incomes than the city as a whole, there should be a more apparent rationale about why this project should happen in this neighborhood at this particular time and who benefits.	Yes – better “why here, why now”?
PHB	15	I am not clear on what this data is or should be telling us and I don’t see the connection anywhere in the narrative. Are these folks travelling in, out, or through the area? But then again, this might be found in other related reports so finding a way to tie it in would be helpful.	We may delete the commute data.
PHB	22	As a novice I could use some help understanding this piece: If frequent transit service to Montgomery Park is the goal, then why wouldn’t we make the 15 and 77 frequent lines? The NW portion of Line 15 is already a frequent transit line with the portion beyond Thurman as standard service. The report also does not describe the impact to the #15 if the street car also runs on NW 23 rd . The 77 also runs standard service and right through Montgomery Park. Maybe these are in here, but calling them out for the lay person would be really helpful in understanding impacts and the rationale for decision making.	This is the transit class description. Agree that it begs the question. Need a better “why streetcar” up front.
PHB	26	Draft is not clear on how it meets this Comp Plan goal and policy.	This will be done in findings.
PHB	27	The affordable housing bonus and additional IH bonus options and affordable commercial options seem like the mitigating impact actions for this plan. It is unclear at this time if the bonuses offered match the anticipated impacts. BPS has acknowledge the need for this analysis and PHB would like to review this analysis before weighing in.	Agree – we need to more squarely address the industrial job impacts. As also recommended by Prosper.

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PHB	28	I do not see the analyses for these two policies. Please provide so that PHB can use these in considering this project.	To be addressed in findings.
PHB	29	Clarify how this project aligns with this transportation policy considering the data that has been presented so far.	To be addressed in findings.
PHB	31	The preliminary racial equity analysis and the subsequent challenges and recommendations provided only includes those for the original study area and does not include analysis for the preferred alignment option. The paragraph does not mention this and reads as misleading. Please amend the paragraph with this notation. Recommend that a new racial equity analysis and data analysis be performed that includes the entire study area with the preferred alignment option prior to public release and so the bureau may use this in considering its position.	The equity analysis covers a broader area. We may need to augment some existing conditions info though.
PHB	33	The report data shows that 70% of the residents in the original study area are renters but this stakeholder group does not seem to be represented in either the project working group or the CBO outreach groups. Identify how this demographic was included in the engagement and outreach efforts.	OK – mention CBO work.
PHB	65	In order to take advantage of an affordable housing bonus, a planned development site needs to be at least 5 acres. How many parcels in the area are over 5 acres with current zoning or proposed zoning that would allow the possibility of a planned development?	Affordable bonus tiered: linked to added height (first step) and to the PD option (next step). MP and 1535 sites are over 5 acres.
PHB	65	Just a flag for bureaus that based on this section any option with a land dedication will likely get a d-overlay designation.	Everything gets a design overly
PHB	69	Change this number to be a range of potential units. This number is assuming that based on what is possible under the land use scenario that the most IH units that can be built, will be built. It does not take in to account projects that do not build to the max and it does not take in to account projects that will use reconfiguration which results in a lower number of units overall. Also IH projects can send off-site and so units produced won't necessarily end up in the area. Unless this limitation will be built in to the plan district guidelines. If that is the case, PHB will want to review that as well.	Consider using range rather than minimum. Should we require IH units to be built here?

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PHB	113	<ol style="list-style-type: none"> 1. Half the of the plan district is overlayed by the historic alphabet district. How will the ability to have additional height play in to feasibility? 2. Sections 1.a. and b. should include a reference to the Housing Bureau as the program administrator so that we can be clear that this additional % of units will use the standard IH program requirements. 3. For 1.a. Is 5% the right percentage? What does the feasibility for other numbers look like? Is 10 feet the right amount? What does the feasibility look like? How about for different heights? 4. Same questions for 1.b. <p>BPS has acknowledge the need for this analysis as well and we support that.</p>	<ol style="list-style-type: none"> 1. No historic in new PD 2. Check with SB 3. Working on analysis 4. Working on analysis
PHB	115 (Planned Developments)	Same questions about PDs mentioned earlier: In order to take advantage of an affordable housing bonus, a planned development site needs to be at least 5 acres and not located in a historic district. How many parcels in the area are not in the Alphabet District, over 5 acres with current zoning or proposed zoning that would allow the possibility of a planned development? What is the potential these parcels will take the PD path and not something else?	Not sure. A development/benefits agreement would be preferred.
PHB	115	Am I reading this right: PD's that use this bonus option get additional 65 feet of height?	Yes
PHB	115	<ol style="list-style-type: none"> 1. If allowed to provide IH units off-site, does this include providing them outside of the plan district? If so, then this would ultimately lower the number of affordable units projected for the area in the plan. 2. Support not allowing a fee-in-lieu for this bonus, but I imagine we will get push back. <p>How does the additional FAR fit in to the feasibility of a project within their overall allowances?</p>	<ol style="list-style-type: none"> 1. Not sure I am tracking this comment. 2. Agree, but yes.
PHB	115 B.2.b	<p>I'm confused. 2.a. just said you can't pay a fee in lieu to get additional square footage for commercial use but 2.b. says you can buy it. What am I missing?</p> <p>Supportive of payments in to the affordable housing fund for commercial uses, but interested to hear Prosper's thoughts.</p>	Need clarification. This is commercial bonus. We may will eliminate this.

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PHB	129	Section should clarify when in the process this letter is required. We've had a few issues in the past with the timing of these letters, so we would just want to get it right at the outset.	OK
PSI		Document 'buries the lead' a bit in getting to the preferred scenario...my concern would be a reader would have to get a ways in to the document to understand what is actually being proposed.	
PSI		Says the use of TSDCs would be predicated on a community benefits agreement...I'm not fundamentally opposed to that but I also hadn't heard that...and since the TSDC list of eligible projects is built out with its own public process I guess I'm wondering if that's appropriate? Also, come up with another term other than community benefits agreement – I think that carries a lot of assumptions built up from the post office site that may not apply here	
PWB	7	Slabtown is mentioned. We should probably define what and where Slabtown is. Slabtown is mentioned again on page 8, but it is still unclear just what part of the subject area is known as Slabtown	
PWB		Sometimes Guilds Lake includes an apostrophe and sometimes it doesn't. Should be consistent.	