

Portland Planning and Sustainability Commission

August 2, 2016

4:00 p.m.

Meeting Minutes

Commissioners Present: Jeff Bachrach, Andre' Baugh (by phone), Mike Houck, Gary Oxman, Michelle Rudd, Katherine Schultz, Chris Smith, Eli Spevak, Teresa St Martin, Maggie Tallmadge

Commissioners Absent: Katie Larsell

City Staff Presenting: Eric Engstrom, Barry Manning, Susan Anderson, Judith Gray, Grant Morehead, Deborah Stein, Nan Stark, Marty Stockton, Leslie Lum, Joan Frederiksen, Zef Wagner

Chair Schultz called the meeting to order at 4:01 p.m. and gave an overview of the agenda.

Documents and Presentations for today's meeting

Items of Interest from Commissioners

- *Chair Schultz* appreciated everyone's hard work and extra time over the summer. We will have a celebration for PSC members in the near future.

Director's Report

Susan Anderson

- We will have a PSC meeting on August 23, which will begin at 3 p.m. back at our regular commission meeting room.

Campus Institutions Transportation Demand Management

Briefing: Judith Gray, Grant Morehead

Presentation

Tonight's goal is to get the PSC's support for the proposal for the campus institutions TDM work.

Grant provided background and a refresher about the TDM proposal and how it fits into the larger Campus Institutions project. He walked through the updated code in Chapter 33.852 as well as the transportation impact review triggers and process.

Judith reviewed Title 17, which is where the TDM requirements are. There were a number of issues and themes staff heard about the TDM requirement in their outreach to the public (slide 11). The specific changes and clarifications about the TDM policy in Title 17 are shown in slides 12-13.

Specific to the TDM policy, it's about how we do it. If the PSC is in support, you can add this to the letter you're writing to Council about the overall TDM strategy.

Discussion

Commissioner St Martin noted testimony from the institutions. Do we now have a good solution for and with them?

- We are not sure that they all will be happy, but with the total package, there are definitely more benefits for them with this iteration.

Commissioner Smith: I understand we're not going to do enforcement if you don't meet mode split targets. For the change from a Type 3 to 2 review, that's initially a staff decision. Is there an opportunity for the neighborhood to give input?

- Yes, there is notification for any type of land use review. The geographic area is just a bit smaller for Type 2 reviews.

Commissioner Spevak: So we get pointed to 17.106 for institutional zones. But you could get pointed to the same code section for a 20-unit residential permit as well.

- Pre-approved isn't for the Campus Institutions. Some of the Title 33 code requirements that point to this will come before the PSC, but we won't have this finalized yet.

Commissioner Bachrach: There is a Phase 2 to go through some of the particulars. Are you looking for us to recommend that today?

- This is a briefing but not anything more for the Mixed Use Zones right now. We won't ask you to respond to the code today but to the continued requirement for the TDM for Campus Institutional Zones.

Chair Schultz: We're being asked if we recommend including TDM in Title 33 as a part of each of the code processes to say TDM is required. We're looking at endorsing Title 33 pointing to Title 17, but not the content within Title 17. This is in reaction to public testimony we received earlier.

Commissioner Bachrach hasn't seen a comment letter on MUZ. [It hasn't been drafted yet.] Because this is happening piece-meal, I can't support it until I support the full breadth of the regulations, particularly for a 10-unit apartment building. Right now this looks too onerous and ineffective for this smaller-size complex. You mentioned changes to Title 17. Do we have any input from the campus representatives about those changes? I can't opine on a package that isn't completed. I'm less concerned with the campuses than I am with the smaller apartments.

- We're past the public comment period, so they are now discussing at Council this fall. Lewis & Clark and Providence had provided differing opinions quite a while ago.

Commissioner Smith understands and respects *Commissioner Bachrach's* comments but noted we're not talking about 10-unit apartments at this point.

Commissioner Smith: I move to include our conceptual support for TDM requirements that we'll see in Title 17. Having a requirement is important to the campus institutions program. *Commissioner Houck* seconded.

Commissioner Baugh: What is the PSC's purview of TDM?

- We have an opportunity to weigh in, but at this point it's a Council decision.

Thank you, Judith, for your perseverance on this issue. I would encourage staff to come back to the PSC at Stage 2, but we know it's a Council issue at this point.

A majority of PSC members support including TDM in Title 33 as recommended by staff as a part of Campus Institutions Zones.

Task 5: Composite Zoning Map

Work Session / Recommendation: Deborah Stein, Eric Engstrom

Presentation

Disclosures

- *Commissioner Spevak* owns a commercial and residential property in Cully.
- *Commissioner St Martin* owns residential in Mississippi District.

Eric provided a quick introduction of both work session topics. Today we are discussing the Zoning Map and Mixed Use code. Originally we had wanted to talk solely about the Zoning Map, but we are going to focus on the non-mixed use mapping and mixed use conceptual issues. Mixed use mapping will be discussed next week, and on August 23 we will have the final MUZ and votes by topics and districts (to avoid potential conflicts).

We've tried to bundle decision into groups to help work through the process. The idea is to give you an understanding of the theory of why we acted how we did. Hopefully the whole bundle makes sense and we'll vote on each bundle individual, but we can break out parts if necessary.

Deborah noted that today's objective is for the PSC to provide staff general direction, not formal votes, in response to testimony about the Zoning Map. Your direction today will guide production of a Draft Recommended Zoning Map that you will vote on at your August 23 work session, following inclusion of your mapping direction on Mixed Use Zones next week.

The worksheet includes three color-coded recommendations:

- **Apply zone as requested** = Staff concurs with testimony and recommends a new zone, as noted.
- **Affirm May 2016 Proposal** = Staff recommends that you stick with the zone included in the May 2016 Proposed Composite Zoning Map, as noted.
- **Retain existing zoning** = Staff recommends that you retain the zoning that applies today. (These are situations in which there was no change proposed in May 2016.)

In the worksheet, there are checkmarks for items that we heard no testimony in opposition or where we propose this as a consent item because you can't change it based on Council already-made decisions.

Commissioner Houck noted that it would be helpful to hear if there was strong disagreement or conflicting testimony about each group or individual properties.

Group A: Testimony requesting changes from Residential to Mixed Use Zones

Group A 1A we considered both as consent and retaining R1. Mixed use would be inconsistent here. **Confirmed by PSC nods.**

Group A 2A could all be approved. **Confirmed by PSC nods.**

Group A 2B (slide 8) has an error as shown. The property outlined is actually vacant but the property owner has asked to change this. Council has changed this to Commercial, so we'd be following through on Council's decision. The rationale for upzoning is because this property is vacant where everything else has been developed with houses or apartments. **Confirmed by PSC nods.**

Group A 2B (slide 9) we're treating as vacant property, so we're seeing it as an opportunity size. The owner would like to see mixed use development. It hasn't developed as R1 since there is more mixed use opportunity. **Confirmed by PSC nods.**

Group A 2C on SE Division. Staff proposal is to retain existing residential zone (R1) because the site currently has middle-housing in this amenity-rich location. Staff recommends this for Group A 2D (SE Main) as well.

- *Commissioner Spevak* suggested we should go with the Comp Plan zoning because middle housing would be too low-scale at this location.

Marty noted we should change both properties, not just the ones we received testimony about.

- *Commissioner Spevak* concurred. *Chair Schultz* supports this as well.

Commissioner Bachrach noted a concern that we are almost doing spot zoning as we're understanding more about the individual uses at properties.

- When staff started the mapping process, we were quite conservative on recommendations. We think these areas are great in the 25-year time frame for mixed use. This set is distinguished from the previous groupings because they are occupied now and they are in an amenity-rich area.

Commissioner Smith asked if staff has done a review of everywhere Council has tweaked the Comp Plan map, or only where testimony has prompted this.

- Staff has reviewed all the changes Council made.

PSC members concurred with *Commissioner Spevak's* amendment to change to mixed-use for both properties.

Group A 2E from R1 to CM1 to recognize the non-conforming use. Staff concurs with testimony.
Confirmed by PSC nods.

Group A 2F and 2G: Mixed use urban center was applied. It is R5 today, and staff has proposed R1 and R2.5 but not mixed use to match the adjacent residential upzoning proposal but not all the way to the mixed use potential. We only received one piece of testimony that said the upzoning should meet the full mixed use potential.

Commissioner Spevak wants to see the development potential to what the Comp Plan calls for (mixed use). I am a proponent of middle housing, but this location could be further developed for more density. R1 isn't really that dense for this location, and these houses could come down; if they are, I'd like to see them rebuilt to CM2. A row-house project would not trigger inclusionary zoning whereas mixed use would.

PSC members concurred with *Commissioner Spevak's* amendment to change to mixed-use for both properties in Group A 2F and 2G.

Group A 2H: These have been Comp Plan commercial since 1980 but R1 use. One property owner requested a change to mixed use. Staff thinks this is a good place for mixed use, but we'd want the full stretch. We haven't talked to property owners yet, so we'd recommend retaining R1 for now.

Confirmed by PSC nods.

Group A 2I: Non-conforming uses along Fremont. Staff recommends to apply CM1 as requested by property owners. Confirmed by PSC nods.

Group A 2J: This is a similar situation as 2I. It is the area near the 60th Ave MAX station where we've added new mixed use zoning on the northern portion. We're concurring with testimony about having a more commercial designation here. Some properties are owner-occupied and some are rentals.

Confirmed by PSC nods.

Commissioner Bachrach would like to see us be completing blocks with upzoning instead of by single parcels.

- Most of staff's recommendations are for locations that are currently non-conforming, purely to bring them up to the Comp Plan designation.

Group A 2K: These sites are mixed use civic corridor and R2 zoning. Proposing to retain R2 because we think they are ultimately appropriate here on Barbur so we don't prematurely recommend a zone before we do a more comprehensive look at the corridor.

Commissioner Oxman asked about timing for the Barbur Corridor work.

- The main barrier right now is the planning process for high-capacity transit as it goes into the DEIS. We need the information about alignment and station areas before we look at rezoning individual properties. We'll come back when we look at the full corridor.

PSC confirmed staff's recommendation.

Group A 2L: Based on Comp Plan change to leave the R2.5. PSC confirmed staff's recommendation.

Chair Schultz: Where we are worried about misalignment with the Council approved Comp Plan and that's why staff is recommending we change the zoning on those properties, we can skip discussion on these.

Group B: Testimony requesting a change to an Employment, Industrial, or Campus Zone

Group B 1A-3A: Apply CM3 as request. One in NW and one on NE 21st. PSC confirmed staff's recommendation.

Group B 4A-B: University of Portland and Reed College. CI-1 applied but requests to retain today's existing zoning. Recommendation from staff is to apply CI-1. PSC confirmed staff's recommendation.

Group C: Residential Zoning Map changes

Group C 1A: This is one of the zoning review areas where staff has changed its recommendation. Community has asked to not have the zoning change, so staff is proposing to retain R5 here.

Commissioner Oxman was reviewing demographic data with the recommendations. Were there different impacts and decisions based on different populations? I think staff has done a very even-handed review of balancing effects on owners and renters and agree with their suggestions.

PSC confirmed staff's recommendation.

Group C 1B: In Richmond, R2.5. Testimony in opposition and in support. Staff proposes to upzone to R2.5 to be consistent with the confirmed Comp Plan designation. PSC confirmed staff's recommendation.

Group C 4B: This is a zoning review area. Testimony in opposition. HAND was well-informed and didn't weigh in as a neighborhood. Staff recommends affirming R1. PSC confirmed staff's recommendation.

Group C 5A: David Douglas School District downzones and parcels to exclude. PSC confirmed staff's recommendation.

Group C 5B: Staff's proposal was to go from R2 to R5. Properties are beyond the ¼-mile MAX station area. The proposal to retain R5.

Commissioner Spevak noted some properties here are adjacent to multi-dwelling development. I could see someone wanting to build to R2.5. My instinct is that we'd be listening to people squawking about downzoning. It feel like we should be sympathetic to people wanting to retain their ability to develop.

This goes back to the original discussion about using lack of school facilities as a growth tool. We are retaining Comp Plan designation as R2, so this is like an interim pause for the school capacity to catch up.

Commissioner Houck noted that downzoning does happen.

Commissioner Bachrach asked if there is a timeline for the DDSD downzoning.

- This isn't built into code, but we hope to have an IGA, so we could build in a time limit in this document so we have action on their part in exchange for our work.

PSC confirmed staff's recommendation.

Group C 6A: This was an area we had lots of testimony about. It's in Rose City Park near the 60th Ave MAX station. The neighborhood wants to see transportation improvements in a timely manner with any upzoning. The neighborhood would like a delay in implementing any upzoning.

There are some "cut outs" where, since 1980, individual property owners have gone through the quasi-judicial process to rezone. **PSC confirmed staff's recommendation.**

Group C 7A: Properties on SW 45th, across from Gabriel Park. Staff recommends R1 as proposed even though there was testimony against this. **PSC confirmed staff's recommendation.**

Group C 7B: SW 58th. We heard testimony about the two properties in red... they've had a Comp Plan designation of R2 since 1980, but zoning of R20. Staff recommends staying with R20 zoning because the street infrastructure is underdeveloped and not near a center. Changes through a quasi-judicial process are appropriate here.

Commissioner Bachrach noted the rationale being presented now [for the staff recommendation] is transportation issues, but the rationale presented at the public hearing was preservation of viable single family houses.

- The street could get improved, but it could also get a waiver so it wouldn't get improved with redevelopment. A quasi-judicial review would give a more holistic way to review the transportation improvements. Also, these are two properties but there are other properties with this similar designations, and we'd want to review all of them without the benefit of transportation infrastructure analysis.

Commissioner Bachrach suggested to upzone and supports the testimony requests.

Commissioner Baugh: If an individual property owner develops on their own, do they have to do transportation improvements?

- They may be required to do so, but we also do lots of waivers and there are fee-in-lieu programs. The only way to be sure is to have the land use review.

Chair Schultz is more comfortable with being consistent and agrees with staff's recommendation. **PSC confirmed staff's recommendation.**

Group D: Testimony requesting a change to an Open Space Zone

These items are all proposed by staff as consent items.

Group D 1A: Glencoe Elementary. Any consideration of school zoning should be deferred to look at comprehensively. **PSC confirmed staff's recommendation.**

Group D 1B: This is the McCormick & Baxter site with a request to change to Open Space. Staff suggests keeping EG2 as a placeholder for now. If they fulfill long-range plans, we can change the zoning at that time. This is the property University of Portland is looking at purchasing, but it's not completed yet. **PSC confirmed staff's recommendation.**

Group E: Miscellaneous Overlay Requests

Group E 1A: We have not opened the door to changing e-zones anywhere in this process, so we suggest keeping this as zoned for now. **PSC confirmed staff's recommendation.**

Group E 1B: *Commissioner Oxman* noted it's an intriguing proposal but I support staff's recommendation. This should be a citywide review to be an equitable and effective process.

Task 5: Mixed Use Zones Project

Work Session: Eric Engstrom, Barry Manning

Presentation

Commissioner disclosures of potential conflicts

- *Commissioner St Martin* owns commercial in Mississippi.
- *Commissioner Spevak* owns commercial in Cully.

Topic 6.2: CE zoning building orientation and development standards.

You're allowed to have more auto-accommodating uses but there are still building orientation and set-back standards that are applied.

Staff recommendation (no change to the proposed language)

- 6.2.A Retain building orientation standards in CE zones
- 6.2.B Retain proposed alternative setback size threshold of 60,000 square feet.

Commissioner Baugh asked about where sites are located in 6.2B.

- It would take a large site to accommodate a retailer of this size. Though you could find sites in the inner ring that could accommodate. The key is the building over 60,000 square feet. If you're redeveloping over this threshold you can use this alternate standard as a different way to set up the site as more urban versus the typical more suburban model.

PSC confirmed staff's recommendation.

Topic 7.1: Operating hours and required commercial uses in CM1.

Staff Recommendation:

- Topic 7: Tentatively approve staff recommendations shown in items 7.1 to 7.5.
- Items 7.1.E and 7.1.F: confirm staff approach for Commercial Residential (CR) zone
- Item 7.1.G: confirm staff approach for windows
- Item 7.5.A: confirm staff approach for Agricultural uses
- Review final code prior to August 23, 2016 work session

Item 7.1.A

Chair Schultz supports an Open Space requirement. But what I'm concerned about is the 48 square feet per unit because of the block size in [inner] Portland. Projects I've worked on for half- and quarter-blocks have a really hard time getting to this requirement. I'd amend this down to 36 square feet per unit. Step-downs or step-backs can help with the open space requirement, but not all that area will count depending on the size of step-back.

Commissioner Smith: Could the standard be based on the floor plate of the planned area? Or number of units?

Commissioner Baugh: Can the developer ask for an adjustment off the 48 square feet?

- Yes, with the development review process there is an opportunity to ask for an adjustment or a design review assessment.

Commissioner Bachrach: What is the purpose for requiring open space?

- An amenity, but a community space to make a living situation more tenable.

Commissioner Houck isn't happy with the suggestion to decrease open space. Why couldn't you do a "sliding scale" option? Balconies can incorporate green features, which I'd prefer on the ground, but green is green.

Staff could look at this option. On the larger sites it would be easier to meet the 48. We do see some small sites, so maybe there is a cut-off.

Commissioner Tallmadge likes the tiered approach based on the size of the site and developable area.

Commissioners support a tiered approach for review based on lot size or pattern area.

Topic 7.1.B. Staff recommends retaining the proposed 10-foot set-back. Outer Division, outer Stark, and Barbur. We are not including 82nd Ave because of ODOT restrictions. Also, staff concluded that 82nd Ave is more of an inner Portland block-sized street than with outer Division or outer Stark. It can count toward open space.

At this time, we require about half the building to be zero to 10 feet from the street.

Commissioner Spevak feels like this is too much space to foster a comfortable pedestrian environment. I feel like it works well being closer to the street.

- Staff generally agrees with this for inner streets, but for larger and wider streets, where traffic is going faster, we're inclined to go with the broader set-back.
- *Chair Schultz* is concerned with creating a bigger space and if that encourages faster traffic.

An alternate approach is more dedication for the ROW, but this seemed like a middle-ground approach for some of the larger streets. You could have a patio or something in the 10-foot area but you just can't build.

Commissioner Smith had flagged testimony about this topic that described the "cruise-way effect". My sense is that we should be more prescriptive about what we need in that set-back.

Commissioner Baugh's concern is about 82nd and PBOT's proposal there. How does this change the view of the set-back not being applied to 82nd if this is City-owned versus the ODOT ownership?

- Parcel patterns on 82nd are an inner neighborhood pattern more so than outer Portland.

Commissioner Smith noted the PSC has three choices on this topic:

- Require set-backs as proposed at 10 feet.
- Don't require set-backs.
- Require the set-backs with more prescriptive standards.

Commissioner Spevak wants to reject the staff recommendation so there is a zero minimum with a maximum of 10 feet from the property line (sidewalk) citywide. Landscaping is allowed in a portion of this area.

Commissioner Spevak suggested the staff proposal with more prescriptive standards about allowing green but like the PCC slide. **Commissioners support this suggestion.**

Topic 7.1.C. We want to be sure the specific mention of a LEED standard [only] is not included in the code (but it could be one of the standards used). This only applies in the plan development bonus opportunity areas.

Topic 7.1.D. Staff recommends retaining the current standard regarding Sandy Blvd step-down transitions.

Chair Schultz noted that since this has been implemented, nothing has been built that has the double step-down standard on Sandy. In the future I'd like to look at why.

PSC confirmed staff's recommendations.

Topic 7.1.E and 7.1.F.

There may be a fifth zone applied to commercial zones in residentially-based areas. This would be applied very sparingly to have a tighter limit on the scale of the commercial building in a mostly residential area.

Proposed Commercial Residential (CR) Zone Parameters:

- Apply to isolated commercial sites in residential areas, particularly those that are currently nonconforming.
- Maximum height: 30 feet
- Maximum FAR of 1:1
- No bonuses
- Limit size of commercial uses to 5,000 square feet (like CN1 zone)
- Limit hours of operation to 6:00 a.m. to 11:00 p.m.
- Limit residential density to 1 unit per 2500 of site area if no commercial on site

There are about 15-20 sites citywide that would be included in this type of zone; the tentative map is shown in slide 7.

Commissioner Smith likes this approach but wants to be a bit cautious about where this applies.

Commissioner Spevak also likes this proposal. It could be the "Jane Jacobs zone". I would like to have this as an option to be created in residential zones more generally (not just in the context of those that already have these features) through a zone change (or similar) process, but short of requiring a full comp plan map amendment. *Commission St Martin* also likes this proposal.

- In the short-term we're looking at just the already-designated commercial zones, but we could look at this finer commercial grain at other neighborhoods in the future.

PSC confirmed staff's recommendation.

Topic 7.1.G Ground floor windows

Staff recommends to revise code to address issues commented on in testimony, and incorporate changes to ensure windows relate to pedestrian viewing areas.

PSC confirmed staff's recommendation.

Topics 7.2

All sub-topics under 7.2 were confirmed by PSC for staff to move forward as proposed.

Topic 7.3 Urban Forestry Commission comments

Staff recommends that they will meet with the Urban Forestry Commission and staff to review and discuss the MUZ, as well as future proposed changes to Title 11.

Commissioner Houck strongly feels that BES should be involved in this conversation. BES and Friends of Trees often have different opinions than the Urban Forester.

Topic 7.4

Our intent at this point is, as we get direction from PSC, to provide BDS a copy of the code at the same time as we give this to the PSC so we have BDS' nods when the PSC votes on August 23.

Generally, the PSC recommendations from today have resolved issues that BDS had raised. We are continuing to work with them on the outstanding issues.

Topic 7.4.B Setback requirements for residential windows.

Chair Schultz noted the building and zoning code requirements are quite similar but not the same. I'd propose we go with BDS' requirements in this situation so we aren't working with the differences both codes. We should just go with the building code standards (3 foot window setback from property line).

PSC members support staff's recommendation.

Topic 7.5 Agricultural issues

This is being driven by the recreational marijuana industry's growth. Agriculture is allowed in EX but is a conditional use in other zones. As we shift EX to CM3, we will be creating more and more non-conforming uses. It's not all just about marijuana growing, but all kinds of indoor agriculture are increasing. We have an allowance for indoor small-scale manufacturing.

Staff recommends revising code to allow limited agriculture use in CM3 and CE zone up to the size limits allowed for industrial uses so we are being consistent and taking pressure off industrial zones. CM3 = 1:1 FAR; CE: 40,000 square feet.

Lots of these uses are being set up with a retail unit, which wouldn't be allowed in the industrial zone necessarily.

Commissioner Spevak questioned why you can't do agriculture in commercial zones.

- In general, agriculture in the UGB is quite restricted because of state land use laws. It's allowed as a non-conforming use (e.g. Rossi Farms site).

Commissioner Houck: There has been a food policy group, and I'm curious if they have been engaged in this conversation. There are definitely good arguments to have more food production where people live... that's why I brought up the question of CSAs.

The urban agriculture code project we did to legalize smaller-sized urban agriculture applies to all zones. But that doesn't apply to indoor growing.

PSC members support staff's recommendation.

Topic 10: Design Overlay Zone – Recap the proposal for design overlay zone expansion, and consider the requests to apply the Design Overlay zone in Sellwood.

Staff recommends to not expand the Design overlay zone beyond the areas identified in the Proposed Draft at this time. We can reconsider applying this zone to Sellwood and other Neighborhood Centers at the conclusion of the Design Overlay Zone Assessment (DOZA) project.

Commissioner Smith noted the number of people who testified from Sellwood. I would guess what those people are trying to do is protect the character of their neighborhood. Is a better path for them to pursue a historic designation?

- We'd want to check in with our historic resources team. Our suggestion is to let the DOZA project play out so they we'd look at Sellwood and other neighborhood centers at the same time.

Commissioner Rudd: We had controversy with the historic designation in other neighborhoods, so I wouldn't advise that route.

Staff will outline the DOZA study in a memo for PSC members next week.

- The initial DOZA study will be done by December. We're looking at case studies to see if, and what kind, of difference the overlay makes. One of the reasons we didn't want to expand design review too fast is because it's not necessarily delivering results that meet the neighborhood needs or development goals. We'll then develop a work program based on which parts make a difference and will move forward. The code parts are about 12-18 months.
- We'd like to have this completed before the new Comp Plan goes into effect in 2018.

PSC members support staff's recommendation.

Chair Schultz noted a point that *Commissioner Spevak* will bring as an amendment at the next meeting. If other commissioners have potential amendments, please get those to staff by early next week.

- *Commissioner Spevak*: It's about the affordable commercial FAR bonus is not yet ready for prime time and should be fleshed out further before including it. It's a fantastic idea, but I want to get it right.

Commissioner Rudd asked about Title 33 cross-referencing to other code: If I am an applicant, where do I go if I want to appeal? Does everything go to LUBA?

- There is usually an outline in the other title or rule that outlines how to appeal.

Commissioner Bachrach asked about the revised language to 33.852 that we got a couple days ago.

- This will be in the draft you will receive next week but was part of the TDM topic today.

Adjourn

Chair Schultz adjourned the meeting at 7:46 p.m.

Submitted by Julie Ocken