Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.

MEMO

DATE: May 19, 2020

TO: Mayor Ted Wheeler; Commissioner Amanda Fritz, Commissioner Chloe Eudaly; Commissioner Jo Ann Hardesty

FROM: Rachael Hoy, Senior Planner

CC: Andrea Durbin, Joe Zehnder and Sallie Edmunds

SUBJECT: Re-Adoption of the Central City 2035 Plan

Background

On May 28, 2020 at 2 pm City Council will hold a public hearing on the re-adoption of the Central City 2035 Plan (CC2035). This plan was adopted by City Council in June 2018 however, the plan was appealed to the Land Use Board of Appeals (LUBA) and, subsequently, the state Court of Appeals. LUBA found, and the Court of Appeals agreed, that the findings related to changes in allowed heights in the New Chinatown/Japantown Historic District were not adequate to show compliance with Comprehensive Plan Policy 4.48:

*"… **Continuity with established patterns**. Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resource...."*

On March 16, 2020, the Oregon Court of Appeals remanded Ordinance 189000 of the Central City 2035 Plan back to the City. According to the Court of Appeal's final order, the City will need to re-adopt CC2035 with changes to address this Comprehensive Plan policy.

Re-Adoption Package

The City must readopt 10 Central City 2035 Plan documents that were included in the remanded Ordinance 189000. While BPS has not proposed any changes to these documents, we have updated the Findings Report (Exhibit A) and added additional evidence into the record to address LUBA's main concern and the Court of Appeal's remand. Specifically, the

City has updated findings to show that changes in allowed heights in the New Chinatown /Japantown Historic District complied with Comprehensive Plan policy 4.48. The legislative record, including new evidence to address the remand, can be accessed on the BPS CC2035 website. The website will be updated with testimony and other new information until the City Council record closes

Proposed Schedule

The proposed re-adoption schedule includes:

May 1 — Public notices sent; public record reopened; 10 documents available for review. Public testimony may be submitted via the MapApp or a letter to City Council.
May 26, 4 pm — Deadline to register to testify at Council hearing
May 28, 2 pm — City Council re-adoption hearing; written testimony due
June 24 — City Council work session and vote on amended findings
July 1 — Second reading at Council and final vote
July 31 — Re-adopted CC2035 Plan goes into effect

View Testimony

The record has been open since May 1, 2020 to submit testimony. Commissioners may view this testimony on the MapApp. Staff will send a summary memo of written testimony received to Commissioners after the record closes.

Attachments

Attached to this memo are the following items:

- Ordinance;
- Backing Sheet;
- Exhibit A: Central City Findings of Fact Report (placeholder page);
- Other Exhibits B-K (placeholder page with links to PDF documents on project website);
- Exhibit L: Additional Amendments to the 2035 Comprehensive Plan;
- Exhibit M: 2035 Comprehensive Plan Map, CON-05, Significant Scenic Resources; and
- Impact Statement

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ORDINANCE No.

Re-adopt remanded Ordinance 189000 for the Central City 2035 Plan. Amend the Comprehensive Plan, Comprehensive Plan Map, Transportation System Plan, Willamette Greenway Plan, Scenic Resources Protection Plan, Zoning Map, and Title 33; authorize adoption of administrative rules; repeal and replace prior Central City plans and documents. (Ordinance)

The City of Portland ordains:

Section 1. The Council finds:

General Findings

1. In 1972, the Portland City Council adopted the *Planning Guidelines/Downtown Plan* as a policy statement to guide public and private decision-making in the Downtown area (adopted Motion on agenda item 3958, December 28, 1972). The plan addressed issues related to the loss of retail and housing, parking and the general character, livability and prosperity of Portland's downtown core. The plan included provisions to enhance the pedestrian environment, preserve and develop new housing, improve air quality, reinforce the retail core, preserve historic landmarks and districts, protect views and vistas, develop public transportation infrastructure, and recapture and reconnect the urban environment with the Willamette River waterfront. In 1980, the City Council updated and retitled the plan *Goals and Policies/Downtown Plan* (Resolution No. 32772).

2. In 1979, scenic resources were first designated and protected through building height limits as part of the implementation of the *Downtown Plan.* Additional scenic resources were identified and protected through the adoption of area plans between 1979 and 1988.

3. Portland's first *Comprehensive Plan* was adopted by the Portland City Council in October 1980 and was acknowledged as complying with Oregon's Statewide Planning Goals by the Land Conservation and Development Commission (LCDC) in May 1981. The 1980 *Comprehensive Plan* was again deemed in compliance with the Statewide Planning Goals at the conclusion of Portland's first Periodic Review in January 2000. The 1980 plan was incrementally updated by post-acknowledgement plan amendments through November 2011. In June 2016, as part of Task IV of Portland's second Periodic Review, the Portland City Council completely replaced the 1980 plan by the adoption of Portland's new *2035 Comprehensive Plan*, but delayed the effective date of the new plan to allow the LCDC sufficient time to review and acknowledge the new plan. During the delay between adoption and effect, the 1980 plan continued to serve as the City's comprehensive plan. Portland's *2035 Comprehensive Plan* was approved by the LCDC on March 15, 2018 and became effective on May 24, 2018. Because this ordinance is adopted after the effective date of the *2035 Comprehensive Plan,* its provisions are gauged against the applicable provisions of the *2035 Comprehensive Plan,* not the 1980 plan.

4. In 1988, the City Council adopted the *Central City Plan*, which expanded the approach of the *Downtown Plan* to areas north of East Burnside (the Pearl and Old Town/Chinatown districts), west and south of Interstate 405 (the Goose Hollow and South Waterfront districts), and to the east side of the Willamette River (Lower Albina, Lloyd, and Central Eastside districts) (Ordinance No. 160606 and Resolution No. 34417). This plan addressed the preservation and development of new housing, expansion of transit, and other multi-modal improvements, enhancement of the Willamette River waterfront, views, the role of social services and affordable housing and environmental health, among other critical issues.

5. In 1987, the City Council adopted the *Willamette Greenway Plan* (Ordinance No. 160237). This plan implemented and was consistent with Statewide Planning Goal 15, Willamette River, for the City of Portland. This plan included goals, objectives, mapped boundaries with an inventory of property characteristics, Zoning Code regulations and special design guidelines that apply to properties along the Willamette River, including the Central City, and a list of public acquisition areas. The plan also updated information and regulations for scenic resources along the Willamette River.

6. In 1991, City Council adopted the *Scenic Resources Protection Plan* (SRPP) (Ordinance No. 163957). The SRPP includes a citywide inventory of scenic resources and an Economic, Social, Environmental and Energy Analysis (ESEE) as required by OAR 660-16-000 through 660-16-025. The SRPP consolidated and updated information about scenic resources from previous plans, including the *Downtown Plan, Central City Plan* and *Willamette Greenway Plan*. The SRPP implemented new regulations (Zoning Code Chapter 33.480) to protect designated scenic resources. The SRPP also amended the environmental regulations (Zoning Code Chapter 33.430) to allow for scenic resource management when the scenic and environmental resources overlap.

7. Following adoption and implementation of the *Central City Plan*, subsequent plans amended the policy and regulatory framework of the plan. These plans include, but are not limited to: *University District Plan* (1995); *River District Plan* (1995); *Goose Hollow Station Community Plan* (1996); *Downtown's West End* (2002); *South Waterfront Plan* (2002); and *North Pearl District Plan* (2008). These plans also provided the opportunity to address new and emerging issues not addressed by the Downtown and Central City plans, such as stormwater management, the enhancement of endangered species habitat, green building design, family compatible housing supply, and the role of bike and pedestrian infrastructure to support active transportation alternatives.

8. In 1995, the City Council adopted the *Central City Transportation Management Plan* (Ordinance No. 169535 and Resolution No. 35472). This plan amended the Central City's transportation and parking policies and regulations in order to maintain air quality, promote economic development, support an efficient transportation system and encourage the use of alternative modes of travel.

9. Recognizing a need to create a new long-range plan for the Central City, the Bureau of Planning and Sustainability, in collaboration with other City bureaus and public agencies, initiated the *Central City 2035 Plan* project (CC2035) in 2010. The goal of the project was to create a comprehensive new policy and regulatory framework for the Central City, including the Central Reach of the Willamette River, taking into consideration new and emerging issues such as sustainable development, climate change, resiliency and equity.

10. The first product was the *Central City 2035 Concept Plan*, which provided an overarching policy framework intended to guide the development of subsequent, more detailed quadrant plans, as well as updates to the Portland Zoning Code, *Willamette Greenway Plan* and *Transportation Systems Plan* (TSP). The *Central City 2035 Concept Plan* contained a new vision statement identifying the Central City as a regional asset and a center of "Innovation and Exchange." The plan also contained goals and policies addressing the following topics: Regional Center – Economy and Innovation; Housing and Neighborhoods; Willamette River; Urban Design; and, Health and the Environment. Lastly, the plan contained an Urban Design Concept and Framework. This plan was adopted by City Council on October 24, 2012 (Resolution No. 36970).

11. On October 25, 2012, Council adopted the CC2035 *N/NE Quadrant Plan* (Resolution No. 36972). This was the first of three quadrant plans that would identify more detailed and specific land use, urban design, and transportation policies and implementing actions, including potential zoning proposals, for specific parts of the CC2035 plan area. The *N/NE Quadrant Plan* covered the Lloyd and Lower Albina districts. This plan, created in partnership with the Oregon Department of Transportation (ODOT), also included the *I-5 Broadway/Weidler Interchange Improvements Facility Plan*, which identifies improvements to safety and operations on the Interstate 5 freeway and multimodal local transportation facilities in the vicinity of the Broadway/Weidler interchange.

12. In October 2014, the City Council adopted the *Willamette River Greenway Inventory* (Ordinance No. 186858). The *Willamette River Greenway Inventory* is an update to the inventory contained in the *Willamette Greenway Plan* and is consistent with Statewide Planning Goal 15. The updated inventory provides information about public recreation, historic and archaeological sites, significant natural and scenic areas, vegetative cover, fish and wildlife habitats, floodplains and flooding, hydrologic conditions, ecologically fragile areas, land uses and zoning, agricultural lands, timer resources, aggregate resources, property ownership and acquisition areas.

13. On March 5, 2015, Council adopted the CC2035 *West Quadrant Plan* (Resolution No. 37115). This plan identified more detailed and specific land use, urban design, and transportation policies and implementing actions, including potential zoning proposals, for the western half of the Central City. One of the outcomes of this plan was a reorganization of the area into seven districts, including: Downtown; West End; Goose Hollow; Pearl District; Old Town/Chinatown; South Waterfront; and, University District/South Downtown.

14. On July 29, 2015, Council adopted the CC2035 *Southeast Quadrant Plan* (Resolution No. 37147), which focused on the Central Eastside District. As with the other plans, it addressed land use, urban design, and transportation, and also expanded the Central City to include the new Clinton Station Area located on the far southeast corner of the plan area.

15. The *Concept Plan* and three quadrant plans also contained policy guidance and other recommendations for a comprehensive update of the *Willamette Greenway Plan* for the Central Reach of the Willamette River.

16. Guided by the policies, urban design diagrams, code concepts and other elements of the *Concept Plan* and three quadrant plans, the Bureau of Planning and Sustainability, in collaboration with other City bureaus, developed the *Discussion Draft Central City 2035 Plan*, released for public review on February 8, 2016. Additional guidance for the development of the *Discussion Draft Central City 2035 Plan* came from the *Central Reach Urban Design Concept* (2014), updates to the Natural and Scenic Resource inventories (2015), the *Central City Floor Area Ratio Bonus and Transfer Study* (2015), and other studies. A review period of approximately four months included open houses and presentations to interested groups, organizations, and appointed commissions. Written and verbal comments and proposed amendments were reviewed and considered by staff.

17. The *Proposed Draft Central City 2035 Plan* was released on June 20, 2016 for review by the public and the Portland Planning and Sustainability Commission (PSC). The PSC conducted an extensive review and plan revision process, including public hearings on July 26 and August 9, 2016 and work sessions on September 27 and November 16, 2016 and January 10, January 24, February 14, February 28, March 14, April 11 and May 23, 2017. The PSC voted on May 23, 2017 to forward to City Council their *Recommended Draft Central City 2035 Plan*.

18. On June 20, 2016 notice of the *Proposed Draft Central City 2035 Plan* was mailed to the Department of Land Conservation and Development in compliance with the post-acknowledgement review process required by OAR 660-18-020. A revised notice, reflecting Planning and Sustainability Commission and City Council amendments to the plan, was sent to the Department of Land Conservation and Development on March 13, 2018.

19. On June 24, 2016, a notice of the July 26, 2016 Planning and Sustainability public hearing on the *Proposed Draft Central City 2035 Plan* was sent to the project's mailing list, individuals and organizations who requested such notice, and other interested parties.

20. On June 24, 2016, approximately 21,000 notices of the *Proposed Draft Central City 2035 Plan* and Planning and Sustainability Commission hearing were sent to all property owners potentially affected by proposed zoning map and code changes, as required by ORS 227.186. Property owners received a separate notice for each property potentially affected by the proposal.

21. On June 22, 2017, BPS published the Planning and Sustainability Commission's *Recommend Draft Central City 2035 Plan*. The plan contains the following elements, some of which were amended by City Council:

- Volume 1, Goals and Policies. This document includes the policies and goals for the Central City as a whole, and each individual district within the Central City. The document also contains a vision statement and urban design concept diagrams. Volume 1, as amended by City Council and dated May 2018, is attached as Exhibit B. The urban design diagrams will be adopted by a separate Resolution.

- Volume 2A, Zoning Code & Map Amendments, Part 1: Central City Plan District. This document includes amendments to Title 33, Planning and Zoning, that implement the land use and transportation policies of the plan. It also contains amendments to the Comprehensive Plan Map and official Zoning Map for the CC2035 plan area. Volume 2A, Part 1, as amended by City Council and dated May 2018, is attached as Exhibit C.

- Volume 2A, Part 1 contains new Zoning Code provisions that require certain new development and alteration projects to use bird-safe glazing treatment patterns and application techniques (33.510.223, Bird-Safe Exterior Glazing) and register for an approved green building certification program (33.510.244, Low-Carbon Buildings). The Bureau of Planning and Sustainability will adopt, administer and periodically amend Administrative Rules that identify objective standards, including specific products or programs that can be used, to meet the code requirements.

- Volume 2A, Zoning Code & Map Amendments, Part 2: Willamette River and Trails. This document includes amendments to Title 33, Planning and Zoning, related to the Central Reach of the Willamette River, along with miscellaneous citywide code amendments related to trails, definitions and measurements. It also contains amendments to the overlay zones shown on the official Zoning Map. Volume 2A, Part 2, as amended by City Council and dated May 2018, is attached as Exhibit D.

- Volume 2A, Zoning Code & Map Amendments, Part 3: Environmental and Scenic Overlay Zones. This document includes amendments to Title 33, Planning and Zoning, and the official Zoning Map related to the environmental and scenic resource overlay zones. These amendments apply outside the Central City and will be adopted by a separate ordinance.

- Volume 2B, Transportation System Plan Amendments. This document includes amendments to the *Transportation System Plan*, including amendments to policies, project and study lists, and street classification maps. The document also includes the *Portland Central City Multimodal Mixed Use Area Agreement between the City of Portland and the Oregon Department of Transportation,* dated June 15, 2016. Also included is a letter dated June 15, 2016 from the Oregon Department of Transportation to the Portland Bureau of Transportation providing written concurrence with the designation of the Central City as a Multi-Modal Mixed-Use Area (MMA), subject to

City adoption of the agreement. Volume 2B, as amended by City Council and dated May 2018, is attached as Exhibit E.

- Volume 3A, Scenic Resources Protection Plan, Part 1: Summary, Results and Implementation. This document includes a summary of the Scenic Resources Inventory, a summary of the Economic, Social, Environmental and Energy analysis, and a description of the Zoning Code changes and maps that implement the CC2035 Scenic Resources Protection Plan. Volume 3A, Part 1, as amended by City Council and dated May 2018, is attached as Exhibit F.

- Volume 3A, Scenic Resources Protection Plan, Part 2: Scenic Resources Inventory. This document is an updated inventory of views, viewpoints, view streets, scenic corridors, focal points and scenic sites in the Central City and an updated inventory of views and viewpoints surrounding the Central City for which buildings in the Central City could block the view. The inventory includes maps and descriptions of the location, geometry and relative quality of the scenic resources. Volume 3A, Part 2 is attached as Exhibit G.

- Volume 3A, Scenic Resources Protection Plan, Part 3: Economic, Social, Environmental & Energy Analysis. This document includes a trade-off analysis of the relative economic, social, environmental and energy consequences associated with different levels of scenic resources protection. This document includes maps and descriptions of the recommendations to protect specific scenic resources. Volume 3A, Part 3, as amended by City Council and dated May 2018, is attached as Exhibit H.

- Volume 3B, Willamette River Central Reach Natural Resources Protection Plan. This document presents an overview of the regulatory context for the river, an inventory approach and methodology, an analysis of protection options and recommendations, inventory results, and implementation tools. Volume 3B is attached as Exhibit I.

- Volume 4, Background Materials. This document references a number of background reports and documents used to develop the *Central City 2035 Plan*, including the CC2035 *Concept Plan*, the three quadrant plans, *Willamette River Greenway Inventory* and other studies and planning documents. Volume 4 is attached as Exhibit J.

- Volume 5A, Implementation: Performance Targets and Action Plans. This document includes performance targets that provide aspirational objectives by which to measure progress towards achieving the goals and policies of the *Central City 2035 Plan*. This document also includes action items that describe future projects and programs that will help implement the goals and policies of the plan. The performance targets and action items in Volume 5A will be adopted by a separate Resolution.

- Volume 5B, Implementation: The Green Loop. This document contains the Green Loop Concept Report, describing a proposed six-mile linear park that invites residents, employees, and visitors to experience the Central City by foot and by bicycle. The document includes key objectives, alignment options, design principles, and precedents

of how the concept could be realized. Volume 5B will be adopted by a separate resolution.

- Volume 6, Public Involvement. This document presents a summary of public engagement activities during the CC2035 planning process, an outreach activities log, and materials related to an ethics complaint regarding the *West Quadrant Plan*. Volume 6 is attached as Exhibit K.

22. A public notice of the September 7, 2017 Portland City Council public hearing on the *Recommended Draft Central City 2035 Plan* was sent on August 23, 2017 to the project's mailing list, those who testified to the Planning and Sustainability Commission, individuals and organizations who requested such notice and other interested parties.

23. In addition to the public hearing on September 7, 2017 and its continuations on September 14 and 20, 2017, City Council held deliberations on the Recommended Draft Central City 2035 Plan on October 18, November 29 and December 6, 2017. A public notice of the January 18, 2018 Portland City Council public hearing on potential City Council amendments to the *Recommended Draft Central City 2035 Plan* was sent on December 29, 2017 to the project's mailing list, those who testified at the September 7, 2017 City Council public hearing and its continuations on September 14 and 20, 2017, and to property owners potentially affected by the amendments. Additional public hearings on potential amendments were held on March 7 and 22, 2018 and April 4, 2018. These additional hearings were announced on the CC2035 project web site and through the project's email distribution list. City Council held deliberations on the amendments on April 11, 2018 and deliberations and initial vote on May 24, 2018.

24. The Central City 2035 Plan, Ordinance No. 189000, was adopted by City Council on June 6, 2018 and went into effect on July 9, 2018.

25. Ordinance No. 189000 was appealed to the Oregon Land Use Board of Appeals (LUBA). LUBA issued a decision August 6, 2019 remanding Ordinance 189000 and upholding, in part, one assignment of error. LUBA held that "the city's findings [were] inadequate to explain why the adopted maximum height limits comply with PCP 4.48." Additionally, LUBA found that the city did "not point to any focused evidence that supports a conclusion that the 200-foot maximum height limit 'preserve[es] and complement[s]' District resources." Accordingly, LUBA held that remand was "required for the city to adopt findings that are adequate to explain why the 200-foot height limit complies with PCP Policy 4.48. That decision must be supported by an adequate factual base."

26. LUBA's decision was appealed to the Oregon Court of Appeals, which upheld LUBA's decision and remanded Ordinance No. 189000 on March 16, 2020.

27. Due to the COVID-19 pandemic, Governor Brown has issued a series of executive orders that impact local governments. Notably, on March 8, 2020, Governor Brown issued Executive Order 20-03 declaring a state of emergency due to COVID-19. Later, on March

23, Governor Brown issued Executive Order 20-12 declaring that non-essential gatherings outside of the home or place of residence are prohibited immediately, regardless of size.

28. On April 15, Governor Brown issued Executive Order No. 20-16 due to the COVID-19 pandemic requiring local governments to conduct public meetings by telephone, video, or other electronic means whenever possible. In order to move forward with city operations, the directive laid out instructions to conduct business virtually during this time. The Bureau of Planning and Sustainability proceeded with public noticing to readopt the CC2035 Plan following the guidelines outlined in the order, providing ample time for public input and participation. The potential economic consequences of delaying the readoption of the CC 2035 Plan would delay proposed zone changes, increased FAR allowances, new use allowances and development standards and bonuses, all of which are intended to facilitate new office, retail, housing development and increase job growth in the Central City in support of economic development policies in the Comprehensive plan and Central City 2035.

29. A public notice was sent on May 1, 2020 for a City Council public hearing on the re-adoption of CC2035 to: parties to the appeal; parties that requested notice of the final decision; parties that received notice of Council's initial hearing on CC2035; the City's legislative list; and, people on the CC2035 mailing list.

30. The record opened on May 1, 2020 allowing 27 days for the public to review re-adoption documents before the hearing and submit testimony via the MapApp tool on the project website or by mail to the City Council Clerk.

31. On May 28, 2020, the Portland City Council held a virtual public hearing and received written testimony regarding the readoption of CC2035. The virtual public meeting was held using the Zoom platform. It was free to participants and it allowed them to provide testimony by phone or computer. Participants could also watch the hearing on YouTube with closed caption accommodations.

32. On the Bureau of Planning and Sustainability's web site, the following link https://beta.portland.gov/bps/cc2035/cc2035-documents provides access to the legislative record. This link was available to the public and City Council during the public hearing process and continued to be updated with new information until the record closed..

33. The Central City 2035 Findings of Fact Report, attached as Exhibit A, includes additional findings demonstrating consistency with the State-wide Planning Goals, Metro Urban Growth Management Functional Plan, and the City of Portland *2035 Comprehensive Plan*.

NOW, THEREFORE, the Council directs:

a. Amend the *2035 Comprehensive Plan* to add the goals and policies of the *Central City 2035 Plan*, as shown in Exhibit B (Volume 1, Goals and Policies).

b. Amend Figure 9-2 of the *2035 Comprehensive Plan* and Policy 9.51, Multimodal Mixed-Use Area, as shown on pages 32 and 33 of Exhibit E (Volume 2B, Transportation System Plan Amendments).

c. Amend the *2035 Comprehensive Plan* to reflect the adoption of the *Central City 2035 Plan*, as shown in Exhibit L (Additional Amendments to the 2035 Comprehensive Plan), attached.

d. Amend the definition of "Neighborhoods" in the Glossary of the *2035 Comprehensive Plan* as follows:

> Neighborhoods: Broad areas of the city that typically include residential, commercial, and mixed-use areas. Neighborhoods are physical communities located outside of ~~the Central City and~~ large industrial areas. The term "neighborhoods" may, but is not always intended to, refer to specific Neighborhood Association geographies.

e. Replace 2035 Comprehensive Plan Map CON-05, Significant Scenic Resources, with CON-05-A, Significant Scenic Resources, and CON-05-B, Significant Scenic Resources in the Central City, as shown on Exhibit M, attached.

f. Amend the Comprehensive Plan Map as shown on page 493 of Exhibit C (Volume 2A, Zoning Code & Map Amendments, Part 1: Central City Plan District).

g. Amend the official Zoning Map to apply base zones as shown on page 489 of Exhibit C (Volume 2A, Zoning Code & Map Amendments, Part 1: Central City Plan District).

h. Amend the official Zoning Map to apply overlay zones as shown on pages 192 to 206 of Exhibit D (Volume 2A, Zoning Code & Map Amendments, Part 2: Willamette River and Trails).

i. Amend Title 33, Planning and Zoning, as shown in Exhibit C (Volume 2A, Zoning Code & Map Amendments, Part 1: Central City Plan District) and Exhibit D (Volume 2A, Zoning Code & Map Amendments, Part 2: Willamette River and Trails).

j. Amend the *Transportation System Plan* to add the policies, amend the transportation projects and studies lists, and amend the project and street classification maps, as shown in Exhibit E (Volume 2B, Transportation System Plan Amendments).

k. Adopt the *Central City 2035 Scenic Resources Protection Plan*, contained in Exhibit F (Volume 3A, Scenic Resources Protection Plan, Part 1: Summary, Results and Implementation), Exhibit G (Volume 3A, Scenic Resources Protection Plan, Part 2: Scenic Resources Inventory) and Exhibit H (Volume 3A, Scenic Resources Protection Plan, Part 3: Economic, Social, Environmental & Energy Analysis).

l. Adopt the *Willamette River Central Reach Natural Resources Protection Plan*, contained in Exhibit I (Volume 3B, Willamette River Central Reach Natural Resources Protection Plan).

m. Adopt the *Portland Central City Multimodal Mixed Use Area Agreement between the City of Portland and the Oregon Department of Transportation*, dated June 15, 2016, as shown on pages 29 to 33 of Exhibit E (Volume 2B, Transportation System Plan Amendments).

n. Adopt Exhibit A (Central City 2035 Findings of Fact Report), as amended by City Council and dated May 2020, Exhibit J (Volume 4, Background Materials), and Exhibit K (Volume 6, Public Involvement) as further findings.

o. Adopt the Introduction section, commentary to the Central City Goals and Policies section, and the Central City Districts section of Exhibit B (Volume 1, Goals and Policies) as further findings.

p. Adopt the commentary in Exhibit C (Volume 2A, Zoning Code & Map Amendments, Part 1: Central City Plan District) and Exhibit D (Volume 2A, Zoning Code & Map Amendments, Part 2: Willamette River and Trails) as legislative intent and further findings.

q. Adopt Chapter 4: Analysis of Protection Options and General Recommendations, and Chapter 5: Results of Exhibit I (Volume 3B, Willamette River Central Reach Natural Resources Protection Plan) as further findings.

r. The *Central City 2035 Plan* elements adopted by directives a. through q., above, repeal and replace the following:

1. The *Planning Guidelines/Portland Downtown Plan*, adopted by City Council in December 1972, as updated.

2. Ordinance No. 160606, as amended, which adopted the *Central City Plan* goals and policies.

3. Resolution No. 34417, as amended, which adopted the *Central City Plan* action charts, functional maps and urban design plans.

4. Ordinance No. 169535, as amended, which adopted the goals, policies and objectives of the *Central City Transportation Management Plan*.

5. Resolution No. 35472, which adopted the action items and other components of the *Central City Transportation Management Plan*.

6. Resolution No. 36970, which adopted the *Central City 2035 Concept Plan*.

7. Resolution No. 36972, which adopted the *N/NE Quadrant Plan*.

8. Resolution No. 37115, which adopted the *West Quadrant Plan*.

9. Resolution No. 37147, which adopted the *Southeast Quadrant Plan*.

s. Amend Ordinance No. 160237, as amended, to no longer apply the provisions of the *Willamette Greenway Plan* within the Central Reach River Overlay Boundary as shown on Map 475-1 on page 78 of Exhibit D (Volume 2A, Zoning Code & Map Amendments, Part 2: Willamette River and Trails).

t. Amend Ordinance No. 163957, as amended, to no longer apply the provisions of the *Scenic Resources Protection Plan* to any and all scenic resources within the Central City Boundary or to viewpoints and view corridors within the Viewpoint Boundary as shown on Map 1 on page 6 of Exhibit F (Volume 3A, Scenic Resources Protection Plan, Part 1: Summary, Results and Implementation).

u. Authorize the Director of the Bureau of Planning and Sustainability or designee to adopt, administer and periodically amend Administrative Rules for 33.510.223, Bird-Safe Exterior Glazing and 33.510.244, Low-Carbon Buildings. The adoption or amendment of these rules must include a public comment period.

v. Direct the Bureau of Planning and Sustainability to update the 2014 *Willamette River Greenway Inventory* (adopted by Ordinance No. 186858) based on the adoption of the *Central City 2035 Plan*.

w. Incorporate all documents and exhibits, identified on the Bureau of Planning and Sustainability's web site at the following link https://beta.portland.gov/bps/cc2035/cc2035-documents and all CC2035 re-adoption, written and oral testimony, into the legislative record.

Section 2. Effect

The directives of this ordinance will take effect in 30 days.

Section 3. Severability

If any section, subsection, sentence, clause, phrase, diagram or drawing contained in this ordinance, or the map, report, inventory, analysis, or document it adopts or amends, is held to be deficient, invalid or unconstitutional, that shall not affect the validity of the remaining portions. The Council declares that it would have adopted the map, report, inventory, analysis, or document each section, subsection, sentence, clause, phrase, diagram and drawing thereof, regardless of the fact that any one or more sections, subsections, sentences, clauses, phrases, diagrams or drawings contained in this Ordinance, may be found to be deficient, invalid or unconstitutional.

Passed by the Council:

Mayor Ted Wheeler
Prepared by: Troy Doss, Nicholas Starin and Rachael Hoy
Date Prepared: May 14, 2020

Mary Hull Caballero
Auditor of the City of Portland
By

Deputy

Exhibit A:
Central City 2035 Findings of Fact Report
May 20, 2020

Findings on Statewide Planning Goals

State planning statutes require cities to adopt and amend comprehensive plans and land use regulations in compliance with state land use goals. The Statewide Planning Goals addressing citizen involvement and coordination apply to all legislative reviews. Many of the other goals focus on the assembly of information, proper analysis, and policy decisions.

The Statewide Planning Goals that apply to Portland are:

Goal 1, Citizen Involvement
Goal 2, Land Use Planning
Goal 5, Natural Resources, Scenic and Historic Areas, and Open Spaces
Goal 6, Air, Water and Land Resource Quality
Goal 7, Areas Subject to Natural Hazards
Goal 8, Recreational Needs
Goal 9, Economic Development
Goal 10, Housing
Goal 11, Public Facilities and Services
Goal 12, Transportation
Goal 13, Energy Conservation
Goal 14, Urbanization
Goal 15, Willamette River Greenway

There are approximately 560 acres of land both within Portland's municipal boundaries and beyond the regional urban growth boundary that can be classified as rural land. In 1991, as part of Ordinance 164517, the City Council took an exception to Goal 3 and 4, the agriculture and forestry goals, in the manner described and authorized by state law and Goal 2. Because of the acknowledged exception, **the following goals do not apply:**

Goal 3, Agricultural Lands
Goal 4, Forest Lands

Other Statewide Planning Goals apply only within Oregon's coastal zone. The Statewide Planning Goal Glossary defines "Coast Zone" as "The area lying between the Washington border on the north to the California border on the south, bounded on the west by the extent of the state's jurisdiction, and in the east by the crest of the coastal mountain range, with the exception of: (a) The Umpqua River basin, where the coastal zone shall extend to Scottsburg; (b) The Rogue River basin, where the coastal zone shall extend to Agness; (c) The Columbia River basin, where the coastal zone shall extend to the downstream end of Puget Island. (Formerly ORS191.110)." Since Portland is not within Oregon's coastal zone, **the following goals do not apply to this decision:**

Goal 16, Estuarine Resources
Goal 17, Coastal Shorelands
Goal 18, Beaches and Dunes

Goal 19, Ocean Resources

1. **Goal 1, Citizen Involvement**. To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process.

Goal 1 applies to all legislative land use decisions. Administrative rules under Goal 1 further require cities to:

- Designate a committee for citizen involvement;
- Provide for widespread citizen involvement with an opportunity for citizens to be involved in all phases of the planning process (developing, evaluating, and amending plans; and in the development, adoption, and application of legislation to carry out the plan - the subject of periodic review Task V);
- Adopt and publicize a program for citizen involvement that is appropriate to the scale of Portland's *Central City 2035 Plan* process;
- Provide the opportunity for the public to be involved in data collection;
- To assure that technical information is available in an understandable form;
- Assure effective two-way communication with citizens, including feedback mechanisms; and
- Assure a sufficient level of funding and human resources are allocated to the citizen involvement program to make citizen involvement an integral part of the planning process.

Each of the three primary phases in the development of CC2035 involved a detailed approach to addressing the requirements of Goal 1. The entire public involvement process of CC2035 is detailed in Volume 6 – Public Involvement, and is also summarized in this ordinance as follows:

Phase 1: Central City 2035 Concept Plan. The development of the concept began by establishing an 18-member Advisory Group (AG) representing stakeholders and interest groups with experience in different issues related to the Central City and its future. This group, appointed by Mayor Sam Adams, served for one year, and participated in a series of public meetings, including workshops and topic specific symposiums, that included additional experts on different topic areas. These events, which approximately 425 people attended, were used to develop strategies and objectives in the creation of a new framework of goals, policies, and actions intended to guide the development of CC2035.

Next a 17-member Steering Committee met eight times over a year to guide staff in the development of policy and urban design framework presented by the Central City 2035 Concept Plan. As with the earlier efforts, these meetings were open to the public and attendees were provided an opportunity at each meeting to provide input to the committee as part of that process.

Phase 2 – Quadrant Plans

N/NE Quadrant Plan. A 30-member stakeholder advisory committee (SAC) met 19 times and held an additional 14 subcommittee meetings. All meetings were open to the public and opportunities to provide direct input to the SAC were provided. In support of outreach on the plan, staff attended 100 community meetings attended by more than 1,100 people; hosted 10 public events attended by more than 600 people; and, used web based tools that an additional 140 people used to provide input.

West Quadrant Plan. A 33-member SAC met 16 times. All meetings were open to the public and opportunities to provide direct input to the SAC were provided. In support of outreach on the

plan, staff attended 100 community meetings attended by more than 1,100 people; hosted 12 public events attended by more than 400 people; and, used web based tools, mailers and surveys that an additional 700 people used to provide input.

Southeast Quadrant Plan. A 30-member SAC met 14 times. All meetings were open to the public and opportunities to provide direct input to the SAC were provided. In support of outreach on the plan, staff attended 93 community meetings attended by more than 500 people; hosted 15 public events attended by more than 500 people; and, used web based tools and mailers that an additional 1,000 people used to provide input.

Phase 3 – Discussion, Proposed, and Recommended Draft Development. This phase of CC2035 involved several topic specific efforts conducted in support of CC2035 development. These efforts used a combination of committees, public open house events, and meetings with community based organizations to provide additional opportunities to influence the final recommendations to CC2035. They included the following:

- Central City Parking Policy Update (30-member SAC, open house event, online surveys, community meetings)
- Central City Scenic Resources Protection Plan (Technical Advisory Committee, Panel of Experts, Public Review Draft, community meetings, open house events)
- River Planning (Central Reach Working Group, 2-Day Public Workshop, Public River Walks, community meetings, open house events)

Additionally, as a final version of CC2035 was being produced, additional opportunities to give input into the plan were provided as follows:

- Discussion Draft. Release on February 8, 2016, this draft of the plan presented preliminary zoning amendments and policy for CC2035. Open house events attended by more than 70 were held, and staff attended over 40 community meetings related to this draft. Public input on this first draft closed on March 31, 2016, and over 200 written comments were submitted.
- Proposed Draft. On June 20, 2016, the Proposed Draft of CC2035 was released in preparation for the PSC review of the plan. This draft of the plan was amended from the earlier Discussion Draft based on much of the public input provided during the review period of that draft. Prior to the first PSC public hearing, held on July 26, 2016, open house events were conducted to provide those who may testify before the PSC with more specific information about plan elements.

The PSC held public hearings and work sessions between June 2016 and April 2017. During these meetings, testimony was received on the Proposed Draft, amendments were proposed during work sessions, and an additional hearing was held to receive testimony on PSC proposed amendments before the PSC voted on the final Recommended Draft to be forwarded to City Council. The PSC held meetings for the plan on the following dates:

- Briefing: June 28, 2016
- Hearing: July 26, 2016
- Hearing: August 9, 2016
- Work Session: September 27, 2016
- Work Session: November 16, 2016
- Work Session: January 10, 2017

- Work Session: January 24, 2017
- Work Session: February 14, 2017
- Work Session: February 28, 2017
- Work Session: March 14, 2017
- Work Session: April 11, 2017
- Work Session & Vote: May 23, 2017

- **Recommended Draft.** On June 22, 2017, the Recommended Draft of CC2035 was released in preparation of City Council review of the plan. This draft of the plan was amended from the earlier Proposed Draft and presents the recommendation of the PSC to City Council.

City Council held public hearings and work sessions between August 2017 and May 2018. During these meetings, testimony was received on the Recommended Draft, amendments were proposed during deliberations, and additional hearings were held to receive testimony on Council proposed amendments before the Council voted on the final As Adopted Central City 2035 Plan. The Council held meetings for the plan on the following dates:

- Work Session: August 15, 2017
- Hearing: September 7, 2017
- Hearing: September 14, 2017
- Hearing: September 20, 2017
- Deliberation: October 18, 2017
- Deliberation: November 29, 2017
- Deliberation December 6, 2017
- Hearing: January 18, 2018
- Hearing: March 7, 2018
- Hearing: March 22, 2018
- Hearing: April 4, 2018
- Deliberation: April 11, 2018
- Deliberation & Initial Vote: May 24, 2018
- Final Vote: June 6, 2018

The events and outreach strategies summarized here, and detailed in Volume 6, Public Involvement of the Central City 2035 Plan demonstrate consistency with the requirements of Statewide Planning Goal 1.

As noted above, the process leading to the final Recommended Draft of Central City 2035 included the development of four initial concept plans (the CC2035 Concept Plan, North/Northeast, West, and South East Quadrant Plans) and included a detailed public engagement process that provided repeated and numerous opportunities for all interested parties to shape and influence the final recommended draft.

For instance, each of the four noted plans were initially developed with the assistance of a Stakeholder Advisory Committee (SAC), specifically developed for each plan area. These SAC's include a diverse membership, including representatives from under-represented communities who have been impacted by past planning decisions. SAC meetings were open to the public, and public comment periods were a part of each meeting.

In addition to the SAC's, open house events, meetings with neighborhood and business associations, and meetings with numerous interest-based organizations were held, to ensure all interested parties and organizations had a chance to learn about and provide input on the plan.

Further, the BPS website had pages dedicated to each plan effort, and tools such as a Map App page, and contact information for a Central City 2035 help line, each providing additional opportunities to learn about the plan effort, review back ground reports, meeting notes, and numerous ways to comment on the plan.

Once a SAC endorsed plan was created for the Concept Plan and all three quadrant plans, briefings were held with the Planning and Sustainability Commission (PSC), Design Commission, and Historic Landmarks Commission. These meetings were open to the public and PSC meetings were televised and available to review online. Then a public hearing on each plan was held with the PSC, who heard testimony and reviewed written testimony on each plan. These hearings were followed by a series of work sessions where the PSC revised the plan based on their and public input, and a formal PSC Recommended Draft was forwarded to the Portland City Council, where a similar series of briefings, hearings, and work sessions were held on each plan before Council adopted each after making amendments based in part on public testimony.

On June 12, 2015, the Portland Office of the Ombudsman received a complaint noting that West Quadrant Plan SAC members did not disclose conflicts of interest and asking that the SAC recommendations be invalidated. On October 21, 2015, the Ombudsman responded to this complaint by noting that the Oregon Government Ethics Commission makes a distinction between actual and potential conflicts of interest, stating:

> *"An actual conflict of interest occurs when an action taken by the official would directly and specifically affect the financial interest of the official, the official's relative or a business with which the official or a relative of the official is associated. A potential conflict of interest exists when an official takes action that could have a financial impact on that official, a relative or a business with which the official or the relative of the official is associated."*

The Ombudsman found that SAC members did not face "actual" conflicts of interest, citing that the Oregon Government Ethics Commission, because "actual conflicts of interest cannot occur where an advisory committee makes non-binding recommendations (Advisory Opinion No. 07A-1001, page 3)." However, the Ombudsman indicated that SAC members could have faced a "potential" conflict, and although that "does not preclude anyone from being a member of the SAC or voting on a recommendation, the Ombudsman, prior to review of the CC2035 Plan by the PSC, recommended that BPS contact SAC members with a request to disclose any conflicts they may have had.

The public was then provided opportunities to discuss concerns and suggest amendments in front of both the PSC and Council in response to the potential conflict disclosures. Several members of the public took that opportunity.

The public engagement process conducted throughout the development of CC2035, provided numerous and repeated opportunities to address any input, concerns, or suggested amendments from all stakeholders of the plan.

The CC2035 Plan was appealed to the Oregon Land Use Board of Appeals (LUBA).
LUBA issued a decision August 6, 2019 remanding Ordinance 189000 and upholding, in part, one assignment of error by Restore Oregon. LUBA concluded, a decision affirmed by the Oregon Court of Appeals, that:

Remand is required for the city to adopt findings that are adequate to explain why the 200-foot height limit complies with PCP Policy 4.48. That decision must be supported by an adequate factual base.

In response to the remand, the City is readopting CC2035 with additional findings and evidence, as requested by LUBA, that document how the proposed adjustments to maximum heights in the New Chinatown/Japantown Historic District comply with applicable goals and policies.

Due to the COVID-19 pandemic. Governor Brown has issued a series of executive orders that impact local governments. Notably, on March 8, 2020, Governor Brown issued Executive Order 20-03 declaring a state of emergency due to COVID-19. Later, on March 23, Governor Brown issued Executive Order 20-12 declaring that non-essential gatherings outside of the home or place of residence are prohibited immediately, regardless of size.

On April 15, Governor Brown issued Executive Order No. 20-16 due to the COVID-19 pandemic requiring local governments to conduct public meetings by telephone, video, or other electronic means whenever possible. In order to move forward with city operations, the directive laid out instructions to conduct business virtually during this time. The Bureau of Planning and Sustainability proceeded with public noticing to readopt the CC2035 Plan following the guidelines outlined in the order, providing ample time for public input and participation. The potential economic consequences of delaying the re-adoption of the CC 2035 Plan would delay proposed zone changes, increased FAR allowances, new use allowances' and development standards and bonuses, all of which are intended to facilitate new office, retail, housing development and increase job growth in the Central City in support of Comprehensive plan policies 6.5 Economic Resilience.

A public notice was sent on May 1, 2020 for a City Council public hearing on the re-adoption of CC2035 to: parties to the appeal; parties that requested notice of the final decision; parties that received notice of Council's initial hearing on CC2035; the City's legislative list; and, people on the CC2035 mailing list.

The record opened on May 1, 2020 and closed XX, X, 2020 allowing ample time before and after the hearing for the public to review the re-adoption documents on the project website and submit testimony via the MapApp tool on the project website or by mail to the City Council Clerk. The Findings of Fact Report was made available to public on May 21, 2020, one week prior to the hearing.

On May 28, 2020, the Portland City Council held a virtual public hearing and received written testimony regarding the re-adoption of CC2035. The virtual public meeting was held using the Zoom platform. It was free to participants and it allowed them to provide testimony by phone or computer. Participants were given 3 minutes to testify. Participants could also watch the hearing on YouTube with closed caption accommodations.

At the May 28,2020 hearing, testimony was taken regarding the remand, and the findings were amended in response.

Therefore, the plan and this public engagement process are consistent with Goals 2.A – 2.G of the 2035 Comprehensive Plan.

2. **Goal 2, Land Use Planning**. To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions.

Goal 2, as it applies to CC2035, requires the development of a process and policy framework that acts as a basis for all land use decisions and assures that decisions and actions are based on an understanding of the facts relevant to the decision. The amendments support this goal because CC2035 was developed consistent with State-wide Planning Goals, the Metro Urban Growth Management Functional Plan, and 2035 Comprehensive Plan, as detailed in this ordinance. Further, the Central City 2035 Concept Plan, created with a stakeholder committee and approved by the PSC and City Council, established an additional policy framework to guide the development of subsequent quadrant plans, and the Recommended Draft of CC2035.

The plan was also developed in consultation and in partnership with all applicable City of Portland bureaus, state agencies, such as the Oregon Department of Transportation, Department of Land Conservation and Development, and local agencies, such as TriMet, Metro, and Multnomah County. Lastly, two agencies, the Port of Portland, and Portland Public Schools, testified on different elements of the recommended amendments to the Zoning Code. Thus, CC2035 is consistent with the requirements of Statewide Planning Goal 2.

3. **Goal 5, Open Space, Scenic and Historic Areas, and Natural Resources.** To protect natural resources and conserve scenic and historic areas and open spaces.

Scenic Resources

a) The plan includes an updated inventory of scenic resources in the Central City, which was developed based on the procedures and requirements for complying with Goal 5. The policies and development standards in the plan protect significant scenic resources identified in the adopted *Central City Scenic Resources Protection Plan*, Volume 3A, Part 1 and Part 3;

b) The plan includes an economic, social, environmental and energy analysis (ESEE) for the scenic resources, Volume 3A, Part 2. The ESEE analysis was developed based on the procedures and requirements for complying with Goal 5. The ESEE includes identification of conflicting uses, determination of the impact area, analysis of the ESEE consequences of allowing, limiting, or prohibiting conflicting uses, and development of a program to protect and conserve specified resources identified in the inventory;

c) Scenic resource (s) overlay zones have been applied to significant scenic resources and limit development and vegetation within views. The river overlay zoning regulations, found in 33.475, require that viewpoints associated with designated views be developed to provide public access to the scenic resource;

d) Building heights in portions of the Central City, shown on Map 510-3 and 510-4, have been updated to preserve significant views of and across the Central City. Projections are prohibited above the height if in a scenic view corridor.

Historic Resources

Over the years, there have been regular additions and evolutions to how historic resources are conserved in the Central City Plan District. Several designated Historic and Conservation Landmarks and Districts were created – NW 13th Avenue, East Portland/Grand Avenue, Yamhill, Skidmore/Old Town, Halprin, and New Chinatown/Japantown Historic Districts and the Russell Street Conservation Districts. Other historic districts were also established that are partially within the Central City, such as the Irvington and Alphabet Historic Districts.

Under CC2035, Historic Landmarks listed in the National Register of Historic Places and contributing buildings in Historic Districts will continue to be subject to discretionary Demolition Review. Also, development within all Historic and Conservation Landmark and District boundaries

in the Central City will continue to be subject to discretionary Historic Resource Review. District-specific design guidelines have been adopted for most of the Historic Districts in the Central City, providing resource-specific Historic Resource Review approval criteria. This includes Skidmore/Old Town Design Guidelines adopted in 2016 and New Chinatown/Japantown Design Guidelines adopted in 2017, which were developed as an early deliverable of the CC2035 project.

Historic District design guidelines provide guidance to property owners, designers, architects, and developers related to the established urban fabric of the district as well as resource-specific Historic Resource Review approval criteria for alterations, additions, and new construction. These district-specific approval criteria conserve the specific architectural and cultural qualities that make the particular district significant.

The CC2035 Plan retains the design guidelines applicable to each district where they've been adopted. And, although the maximum heights have been adjusted in all or parts of four Central City Historic Districts, the design guidelines for each district will continue to serve as the Historic Resource Review approval criteria to determine if proposals for new development integrate with the established urban fabric of each district on a case by case basis.

The CC2035 Plan also includes new incentives to encourage the preservation and rehabilitation of designated historic resources. Under CC2035, unused FAR on a site containing a Historic or Conservation Landmark or contributing resource in a Historic or Conservation District can be sold and transferred to another site in the Central City Plan District. This creates financial resources to support improvement of the historic building. An additional 3:1 FAR may be transferred if the historic building is seismically upgraded.

The CC2035 Plan generally maintains or reduces maximum height limits in Historic and Conservation Districts. This includes a reduction in the maximum height limit in all or part of four Historic Districts. The specifics of how this was applied varies by district in response to the historic, physical, economic, and planning context of the district.

In January 2017, the Land Conservation and Development Commission adopted a new State Administrative Rule (OAR 660-023-0200) implementing the historic resources provisions of Goal 5. This new Rule applies directly to resources listed in the National Register of Historic Places after January 2017. As of April 2020, the new rule would apply to only two individual resources in the Central City Plan District—Wheeldon Annex and Alco Apartments. The City is advancing a separate code project, the Historic Resources Code Project, to amend Chapter 33.445 to achieve consistency with the provisions of the new State Administrative Rule.

The findings for Comprehensive Plan policies 4.46-4.57 further describe programs for historic resources.

Natural Resources

Per OAR 660-023-0240(2) Goal 15 supersedes the requirements of Goal 5 for natural resources also subject to and regulated under Goal 15. The only Goal 5 natural resources in the CC2035 Plan area are located within the Willamette Greenway and therefore are regulated by Goal 15.

Open Spaces

See findings for Goal 8, Recreational Needs. Thus, CC2035 is consistent with the requirements of Statewide Goal 5.

4. **Goal 6, Air, Water, and Land Resource Quality.** To maintain and improve the quality of the air, water and land resources of the state.

Goal 6, Air, Water and Land Resource Quality, requires the maintenance and improvement of the quality of air, water, and land resources. The amendments are consistent with this goal because they:

a) Maintain existing natural resource function by applying new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources located on the land and in the water. The plan includes a natural resource inventory that identifies riparian and wildlife habitat resources and functional values, and special habitat areas. The environmental zoning will protect and conserve the identified resources by limiting development within natural resource areas, will encourage environmentally sensitive development, and will require mitigation when development has a detrimental impact on the functions and values;

b) Clarify the City's regulations for the removal and remediation of hazardous substances. The clarifications will ensure that clean-up of hazardous substances in the Central City occurs in a way that meets City goals and policies including goals related to the conservation of existing natural resources, and the use of natural bank treatments in the final design of clean up actions;

c) Existing regulations including City Zoning Title 10, Erosion Control, and the Stormwater Management Manual will remain in effect and are applicable to future development. These regulations will maintain and improve water quality;

d) Reduce the maximum allowed parking ratios for most land uses and zones and prohibit new surface parking which improves air quality by encouraging less vehicle trips into the Central City;

e) Improve air quality through identifying a public trail alignment for the Central City on the zoning maps, clarifying the Zoning Code regulations requiring development of the public trail, and identifying and prioritizing trail development capital improvement projects that the City should implement. The public trail alignment will connect the neighborhoods and work centers in the Central City to other parts of the city with a route that is safe and convenient and encourage energy efficiency using bicycles and walking as a transportation mode. Increasing the number of trips by bike or walking will reduce vehicle miles traveled and reduce air pollution;

f) Require that new buildings larger than 20,000 square feet install an ecoroof. There was significant testimony provided in support of ecoroofs. City Council finds that ecoroofs are vegetated features that reduce heat island effects and filter the air, improving air quality. City Council also finds that ecoroofs reduce energy consumption within the building, which reduces carbon dioxide emissions and improves air quality.

g) Allow for increased building / landscaped setbacks in some part of the Central City, and new policies, actions, and development standards of the plan call for the expansion of tree canopy in the Central City, both of which will increase the amount of vegetation in the plan district which will help to improve air quality.

h) Expand access of non-automotive and active transportation options, such as cycling, walking, transit, and the Green Loop, will help to reduce total miles traveled by car as well as single occupancy trips;

i) Support the Broadway/Weidler (Rose Quarter) Interchange Project, Central Eastside Access and Circulation project, N River St Reconstruction, Yamhill & Water Traffic Improvements, I-

405/Glisan Traffic Improvements, SW Broadway Traffic Improvements, and Southern Triangle Access Improvements. The Rose Quarter project was previously adopted by City Council; however, this project will improve air quality in the Central City by reducing idle times.

5. **Goal 7**, **Areas Subject to Natural Disasters and Hazards.** To protect people and property from natural hazards.

Goal 7, Areas Subject to Natural Hazards, requires the protection of life and property from natural hazards. The amendments are consistent with this goal because:

a) City programs that are deemed in compliance with Title 3 requirements for flood management, and erosion and sediment control (i.e., Title 10 Erosion Control, and the balanced cut and fill requirements of Title 24), are unchanged;

b) The Health and Environment Goal and related policies and actions provide for resilience to climate change impacts and natural hazards including flooding and earthquakes, through planning, design, education and implementation of green infrastructure and infrastructure retrofits;

c) A new River Environmental overlay zone is applied to significant natural resource areas including areas subject to natural hazards such as steep slopes and portions of the floodplain. The overlay zoning will guide development away from these areas, thereby protecting public health and safety and property from natural disasters and hazards; and,

d) Development that is not river-dependent or river-related is required to setback 50 feet from the top of bank of the Willamette River in the River General overlay zone. The setback will limit development within areas that are often subject to flooding thereby protecting people and property.

6. **Goal 8, Recreational Needs.** To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Goal 8, Recreational Needs, requires satisfaction of the recreational needs of both citizens and visitors to the State. The amendments are consistent with this goal by:

a) The City's *Vision 2020 Plan* (2001) is a comprehensive long-range citywide assessment and plan of parks, recreation and open space land, facilities and services. It sets targets for land acquisition and services to be provided throughout the City including the Central City; and considers existing and future population and corresponding recreational demands. The CC2035 Plan is consistent with and updates the *Vision 2020 Plan* for the Central City. The Housing and Neighborhoods and Willamette River goals, policies and related actions support meeting recreational needs in the Central City through establishing complete neighborhoods and a Willamette riverfront that provide park, recreation and open space opportunities. Specific actions include activities to develop a community center or neighborhood park, improve existing recreational facilities or make connections to recreational facilities like the Willamette Greenway Trail. Public-private partnerships are identified to develop recreational resources in the Central City;

b) Retaining existing open space zoning in the Central Reach and allowing a limited amount of new retail development within Open Spaces in the Central City. Small retail, such as bike or kayak rentals, will enhance the recreational experience;

c) Requiring developers who utilize a Central City Master Plan to include open space in development plans;

d) Expanding a riverfront open space bonus option for more publicly accessible open space provided with new development/redevelopment;

e) Identifying and facilitating the completion of the major public trail along the Willamette River (Greenway Trail), plus pedestrian paths connecting public rights-of-way to the trial. The trail will increase public access to and along the Willamette River and provide opportunities for active and passive recreation;

f) Expanding the river setback to 50 feet from top of bank. The standard requires that non-water-dependent and non-water-related development in the River General overlay zone set back from the Willamette River. The setback will not apply to water-related or water-dependent uses (the City uses the term river-related and river-dependent and the definitions of those terms include the state definitions of water-related and water-dependent). Testimony was received that supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the purpose of the river setback is to reserve space for the conservation and enhancement of natural resources and to provide an opportunity for public access where appropriate ;

g) Designating viewpoints along the Willamette river and upland areas and allowing for maintenance of vegetation within the view corridors to protect visual access to the Willamette River and to surrounding natural features (e.g., Mt Hood). The river overlay zoning regulations, found in 33.475, require that viewpoints associated with designated views along the Willamette River be developed to provide public access to the scenic resource;

h) Adding a new standard in the River Environmental overlay zone to allow up to four new floating structures (aka swimming platforms) within the Willamette River during the summer months;

i) The proposed Green Loop will provide a new facility that is designed to provide active recreation, such as cycling, walking, and running, as well as passive recreation opportunities by provide seating and gathering places for people along the loop's alignment. Further, the loop is intended to provide a safe and direct path between the greenway and various parks in the Central City.

7. **Goal 9, Economic Development.** To provide adequate opportunities throughout the state for a variety of economic activities vital to health, welfare, and prosperity of Oregon's citizens.

The recently adopted *2035 Comprehensive Plan* conducted extensive city-wide analysis, including the Central City Plan District, to demonstrate compliance with Goal 9. It should be noted that the intensification of industrial uses on industrial lands within the Central City, especially within the Central Eastside District, was an important part in meeting city-wide compliance with Goal 9, and Task V of *2035 Comprehensive Plan* made these changes to Central City Industrial Land prior to the adoption of CC2035. The findings below summarize the work relevant to CC2035 and add additional details specific to the Central City Plan District.

Summary:

Goal 9 requires cities to consider economic activities vital to the health, welfare, and prosperity of Oregon's citizens. Comprehensive plans for urban areas are required to include, among other

things: an analysis of economic patterns, potentialities, strengths, and deficiencies; policies concerning economic development; and land use maps that provide for at least an adequate supply of sites for a variety of industrial and commercial uses.

Land needs for a variety of industrial and commercial uses are identified in the *Economic Opportunities Analysis* (EOA), which was adopted as Exhibits L1, L2, L3, and L4 with periodic review Task III (Ordinance 187831). How these needs are met is explained in the findings contained within Exhibit A of that ordinance.

A new *Comprehensive Plan Map* was adopted with periodic review Task IV (Exhibit C of Ordinance 187832). Exhibit A of Ordinance 187832 contains findings explaining how the various land use designations on the new *Comprehensive Plan Map* meet the categories of industrial and commercial uses identified as needed within the *Economic Opportunities Analysis*.

Changes to both the *Zoning Map* and *Zoning Code* resulting from the *2035 Comprehensive Plan* take initial steps to advance the goals of the plan.

- All zone changes were made to a base zone permitted by the new *Comprehensive Plan Map* as provided by Policies 10.1, 10.2. 10.3, and 10.4 of the *2035 Comprehensive Plan*, and as described in the "Corresponding and Allowed Zone" table, which is Figure 10-1 of the *2035 Comprehensive Plan*. These zone changes were adopted as Exhibit D-1 of Ordinance. The CC2035 zone changes will not go into effect until after the 2035 Comprehensive Plan goes into effect.
- The *Zoning Code* amendments adopted with Ordinance 188177, Chapters 33.130, 33.140, and 33.150 of the as-amended *Zoning Code*, each contain a table of various commercial, industrial, and institutional uses derived from the EOA, and each of these uses are identified as allowed, limited, conditional, or prohibited by the land use regulations within these chapters.

Supply of Industrial Employment Land

The question of employment land supply was addressed by the EOA adopted with periodic review Task III (Ordinance 187831) and acknowledged on April 25, 2017 and the land use designations on the *Comprehensive Plan Map* adopted with Task IV (Ordinance 187832). The purpose of Ordinance 188177 was to carry out the decisions made by the previous stages of periodic review, not to revisit them. This ordinance similarly does not seek to revisit the decisions of these prior ordinances, but is intended to put the final zoning proposals addressing Central City industrial and employment lands in place.

The acknowledged EOA analyzed adequate growth capacity for a diverse range of employment uses by distinguishing several geographies and analyzing growth capacity at each one. The relevant industrial geographies were Harbor and Airport, Harbor Access, Columbia East, Dispersed Employment, and Central City Industrial. Each of these industrial employment geographies represented a different mix of industrial and related employment sectors, building types, and densities. The EOA included a buildable land inventory and capacity analysis in each of the geographies. That capacity analysis specifically considered a range of site sizes, infrastructure and service deficiencies, and various other development constraints.

The EOA included a summary of how the new *Comprehensive Plan Map* provided at least a twenty-year growth capacity in these geographies (Exhibit L of Ordinance 187831 - Figure 2 of Volume 4). That table described the constrained supply of land, described how additional capacity could be made available through investments in infrastructure and brownfield cleanup (the "With Other

Gains" column), and described the impact of an "Integrated Strategy", which also accounted for anticipated additional environmental protections in the future. The conclusion was that on balance there was an adequate 20-year supply provided within the *Comprehensive Plan Map*.

Ordinance 188177 adopted *Zoning Map* amendments to begin implementing the recently adopted *Comprehensive Plan Map*, including changes to the IG1 zones of the Central Eastside District of the Central City, in advance of CC2035.

The tables below identify the how industrial lands within the Central City, and CC2035, contribute to meeting the requirements of Goal 9.

Goal 9 – Table 1: Industrial Employment Demand and Supply Reconciliation

Employment Geography	20-Year Land Demand (acres)	Land Supply (acres)				Short Term Land Demand (acres)	Surplus/ Deficit
		Existing Comp Plan	2035 Comp Plan	With Other Gains	New Zoning		
Harbor and Airport	1013	774	900	1067	1011	659	+352
Harbor Access	192	113	136	167	144	82	+62
Columbia East	350	356	346	416	388	279	+109
Dispersed Emp.	130	121	146	146	369	109	+260
Central City Industrial	90	65	188	188	188[1] +	75	+113

Goal 9 – Table 2: Land Supply in Central City Industrial EOA Geography

		Occupied	BLI Redevelopment or Vacant	TOTAL
CENTRAL CITY INDUSTRAL		422	65	487
	CX	1	3	4
	EG1	1	6	7
	EX	135	40	175
	IG1	266	15	281
	IH	19	1	20

[1] In this geography, consistent with the EOA/BLI methodology used in Task II and IV, this figure includes both re-developable and vacant land. In other geographies, the EOA/BLI assumes only vacant land as available supply. This was done because industrial employment uses often involve large outdoor storage and work areas, and formulas that are typically used to identify under-utilized land based on building coverage or improvement to land value ratios do not work well for those land uses. The 188-acre figure also includes the 123 acres of supply gained by expansion of the EOS zoning, as described in the EOA, Section IV, page 12.

The supply in the Central City Industrial Geography (The Central Eastside Industrial District) is in-effect further increased by code changes made in the Central City Plan District to expand the Economic Opportunity Subarea (EOS) subarea to encompasses the broader district. This code change implements recommendations from Section 2/3 of the EOA, Chapter III (see Section 33.510.119.C of the Zoning Code), that change enables more intensive employment density in that district. Industrial Office uses are allowed in this expanded area, and Retail Sales and Service and Traditional Offices uses are limited. The changes are intended to provide a balanced approach that supports industrial retention and industrial office job growth.

The existing EOS area has been very successful at increasing employment densities, especially those in industrial office space, while retaining existing industrial operations. As described in the EOA, industrial office uses are limited primarily to information sector businesses, such as graphics and software. This zoning innovation helped accelerate job growth in the Central Eastside by reuse of underutilized second-floor space. The predominant industrial zoning in this geography has created an affordable environment for robust job growth by cost-conscious office tenants. Continued growth in this market appears to be reliant on hybrid zoning that retains industrial sanctuary cost levels while expanding development capacity of Class C office tenants. Expanding this allowance has the effect of allowing more intensive job density in the district because the types of industries that use an industrial flex format, rather than a traditional flex format, on average have much higher employment densities per square foot. Modeling estimated found that these allowances are equivalent to adding of 123 acres of industrial zoned land to the district.

Protection of Prime Industrial Lands

Statewide Planning Goal 9 is implemented by OAR Chapter 660, Division 9 (the Goal 9 Rule). In addition to requiring the identification and designation of an adequate supply of employment land, this rule has special provisions for the identification and protection of "prime" industrial land. The rule describes this type of land as possessing site characteristics that are difficult or impossible to replicate in the planning area or region, particularly lands having access to transportation and freight infrastructure "including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes."

Subsection (8) requires the City to adopt zoning map amendments and land use regulations to identify and protect prime industrial land. The City has responded to these mandates by amending the Official City Zoning Map to add an "l" (this is a lower case "L") overlay zone, titled the "Prime Industrial Overlay" (Exhibit D-2). This overlay maps prime industrial land, and the regulations associated with the overlay prohibit the re-designation of prime industrial land to any other use through any quasi-judicial procedure, and reduces the number of non-industrial uses allowed in the overlay. These reductions are in addition to already stringent use restrictions associated with the also-applicable industrial base zones. The Central City Plan District contains lands with this designation in the Lower Albina District.

The l overlay and its associated land use regulations meet the requirements of the Goal 9 Rule for prime industrial land.

Adequate Supply of Commercial Land

Most the Central City is zoned as either Central Commercial (CX) or Central Employment (EX). Both zones allow for commercial uses, as is identified in the table below:

Use Categories	EX	CX
Commercial Categories		
Retail Sales and Service	Y	Y
Office	Y	Y
Quick Vehicle Servicing	N	N
Vehicle Repair	Y	L
Commercial Parking	CU	CU
Self-Service Storage	L	L
Commercial Outdoor Recreation	Y	Y
Major Event Entertainment	CU	Y

Y = Yes, Allowed
CU = Conditional Use Review Required (see Zoning Code for applicable conditions)
L = Allowed, But Special Limitations (see Zoning Code for limitations)
N = No, Prohibited

These zones combined with the relatively high floor area ratios set for the Central City provide for the highest density of commercial uses in Portland, as well as the State of Oregon. Thus, the amendments made to the IG1 zone, Central City Industrial Lands, and the continued allowances for higher density employment, commercial, and industrial zoned lands assure CC2035 is consistent with Statewide Planning Goal 9.

8. **Goal 10, Housing.** To provide for the housing needs of citizens of the state.

The recently adopted *2035 Comprehensive Plan* conducted city-wide analysis, including the Central City Plan District, to demonstrate compliance with Goal 10. The findings below summarize the work relevant to CC2035 and add additional details specific to the Central City Plan District.

Summary:
Goal 10 specifies that each city must plan for and accommodate needed housing types, such as multifamily and manufactured housing. It requires each city to inventory its buildable residential lands, project future needs for such lands, and plan and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.

Goal 10 and its implementing administrative rules contain the following specific requirements:

1. Identify future housing needs by amount, type, tenure and affordability;
2. Maintain a residential *Buildable Lands Inventory* (BLI) with sufficient land to meet identified needs;
3. Adopt land use maps, public facility plans and policies to accommodate needed housing (housing capacity, as well as type, tenure and affordability);
4. Meet minimum density and housing mix requirements (including the Metropolitan Housing Rule); and
5. Adopt clear and objective standards for needed housing.

The findings below respond to these five requirements.

Identification of Needed Housing and Adoption of a BLI

The City satisfactorily completed the first two requirements of Goal 10 with its Task II periodic review submittal adopted by Ordinance 185657, and as updated and revised with Ordinance 187831 (Exhibits F and G of that ordinance) and acknowledged on April 25, 2017. The housing needs analysis adopted with these ordinances provided a specific estimate of the types of households (by size and income) likely to be in Portland by 2035, and provided additional facts describing housing need by type, tenure and affordability. The BLI identified the supply of land available to provide this needed housing. The first two parts of Goal 10 have been met for the reasons stated in findings prepared with those ordinances, which also pertained to the housing strategies for the Central City Plan District, as presented in CC2035.

Accommodation of Needed Housing

Ordinance 187832 addressed the third and fourth of these requirements by adopting a new *Comprehensive Plan Map* and new housing policies. In conjunction with the adoption of that ordinance the City documented that the new land use map and policies provide for needed housing. The findings below will review the relevant facts again, this time through the lens of the *Zoning Map* and regulations being adopted with this ordinance. The findings below address Goal 10 requirements that the *Zoning Map* and associated regulations accommodate 20-years of forecast growth at urban densities and provide the opportunity for a variety of housing types and tenures, with a variety of affordability levels. Several aspects of the Metropolitan Housing Rule are addressed directly.

First overall housing capacity is considered.

With Ordinance 187831 the City adopted a revised inventory of vacant and underutilized land (Exhibits F and G of Ordinance 187831). Using this revised inventory of land, and the same GIS methods acknowledged with LCDC Order No. 001850, the City estimated that the *2035 Comprehensive Plan Map* provides a capacity of 247,000 additional units,[2] still well beyond the estimated need. Using the revised inventory of land adopted with Ordinance 187831, and the same GIS methods acknowledged with LCDC Order No. 001850, the City estimates that the *Zoning Map* provides a capacity of 201,000 additional units,[3] still well beyond the estimated need (123,000 units).

As for CC2035, the BLI found that the existing zoning in the Central City can provide capacity to meet the housing projections for the year 2035. However, the plan results in the rezoning of former employment land in the Central Eastside to a mixed-use land (EX) that has produced thousands of units in the Pearl and elsewhere in the Central Eastside. The plan also proposes rezoning Central Residential (RX) zoned land to Central Commercial (CX) which has produced far more housing than the RX zone over the last 25 years. Analysis demonstrated that these amendments will be sufficient to allow approximately 39,500 units to be developed through the life of the plan. Thus, both with the *Comprehensive Plan Map* and *Zoning Map*, this ordinance is consistent with the Goal 10 requirement to accommodate needed housing.

Second, allowed density is considered.

The Metropolitan Housing Rule (OAR 660-007-0035) states that cities "***must provide for an overall density of ten or more dwelling units per net buildable acre***". This applies to land within the Urban

[2] Buildable Lands Inventory and Growth Allocation GIS Model (model run 5/24/16)

[3] Buildable Lands Inventory and Growth Allocation GIS Model (model run 9/07/16).

Growth Boundary.[4] Buildable is defined to include vacant and re-developable land, excluding land constrained by natural hazards, steep slopes, or land subject to natural resource protection measures.

In practice, most residential development in Portland occurs on land designated for mixed use development. This is particularly true within the Central City Plan District. The rule also allows consideration of mixed-use areas as "residentially-designated" (OAR 660-07-0018 (1)). The findings on Title 1, Housing Capacity, found in the "Findings on Metro Urban Growth Management Functional Plan" demonstrate how mixed-use zones in the Central City produced more housing per acre than high-density residential zones have over the last 25-years. This analysis served as a basis for CC2035 amending the base zone of RX to CX in various location in the Central City.

The Metropolitan Housing Rule applies only to new construction on vacant and re-developable land. Including mixed use zoning, and residential zoning, the Buildable Lands Inventory contains about 9,888 acres of residentially-zoned vacant and re-developable land.

Regarding the Central City Plan District, this analysis found that the plan area contained 21,800 households in 2010, and the capability of producing an additional 32,773 units with the applied Comprehensive Plan and Zoning Map designations. Further, the total acreage of residential and mixed-use residential zoned land, as well as development bonuses for commercial and residential development that support the creation of affordable housing units, are projected to result in the development of 39,500 affordable and market rate units between 2015 – 2035.

For New Chinatown/Japantown Historic District, the housing potential remains the same even with changes to maximum building height. The maximum floor area limits remain the same; and the maximum FAR can be reached on all sites even those with reduced height maximums.

On the one site in the New Chinatown/Japantown Historic District with increased height maximums, the FAR is increased from 6:1 to 9:1 with the additional requirement to build housing above the ground floor on ½ of the block. This change increases the likelihood of housing development on the site, which is a prime site for housing, per Comprehensive Plan policies including 5.23 (higher- density housing) and 9.27 (transit service to centers and corridors) because it is adjacent to the neighborhood light rail transit station on the Central City transit mall. As explained in detail later in these findings, the maximum height limit for this block of 125 feet (east half of block) and 200 feet (west have of block) allow for full utilization of its FAR within the established urban fabric of the district and the approval criteria included in the New Chinatown/Japantown Historic District Design Guidelines.

Clear and Objective Standards

ORS 197.307(4) requires that jurisdictions "may apply only clear and objective standards, conditions and procedures regulating the development of needed housing on buildable lands" …and these provisions…" may not have the effect, either in themselves or cumulatively, of discouraging needed housing through unreasonable cost or delay." However, ORS 197.307(5) states that proposals for residential development "in a formal adopted central city plan, or regional center as defined by Metro, in a city with a population of 500,000 or more." Therefore, the Central City Plan District and CC2035 are exempt from the requirements of ORS 197.307(4).

[4] Because Portland was incorporated before the creation of the UGB, there is a small area (about 440 acres) of residentially-zoned land in Portland that is outside the UGB, which is zoned for rural farm and forest uses with a 20-acre minimum lot size. This land has been excluded from the analysis of this section.

Goal 10 Conclusions

For the reasons stated above, CC2035 meets the applicable requirements of Goal 10. The *2035 Comprehensive Plan Map* and *Zoning Map* provide a City supply of residential land that is sufficient to meet identified housing needs within the meaning of ORS 197.307(3), Goal 10 and OAR Chapter 660, Division 7. The *Zoning Map* provides a variety for allowed densities. Thus, CC2035 is expected to contribute to a city-wide housing mix that is more diverse than it is today.

9. **Goal 11, Public Facilities and Services.** To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

As part of the development of the *2035 Comprehensive Plan*, Ordinance 187831, *Citywide Systems Plan*, was adopted. The plan, that also addressed the CC2035 plan area, ensures that CC2035 is consistent with the requirements of Statewide Planning Goal 11.

10. **Goal 12, Transportation.** To provide and encourage a safe, convenient and economic transportation system.

The Oregon Transportation Planning Rule (TPR) was adopted in 1991 and amended in 1996 and 2005 to implement State Goal 12. The TPR requires certain findings if the proposed [Comprehensive Plan Map amendment, Zone Change, regulation] will significantly affect an existing or planned transportation facility.

Section 660-012-0045 of the TPR requires local governments to adopt land use regulations that designate "types and densities of land uses adequate to support transit" and those that "reduce reliance on the automobile and allow transit-oriented developments on land along transit routes." These amendments support these requirements because the proposed changes

Section 660-012-0060(1) of the TPR requires "amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation that would significantly affect an existing or planned transportation facility," to ensure that allowed land uses are consistent with the identified function, capacity and performance standards of the affected facility. This requirement can be met by "adopting measures that demonstrate allowed land uses are consistent with the planned function, capacity, and performance standards of the transportation facility." These amendments support these requirements in the following manner:

A. (1)(c). Significant transportation demand management, as defined in this rule, are present in the Central City 2035 Plan, including a rewrite of parking and transportation demand management policies and new zoning code regulations that significantly limit new parking allowed to be built in the Central City. These changes eliminate the significant effect of the amendment by reducing auto trips because of the plan to below the number of trips in the "base case", which is the model run for the 2016 adopted Comprehensive Plan.

B. (8)(a)(B). MMA's are required to be designated as a "central city, regional center, town center or main street in the Portland Metropolitan 2040 Regional Growth Concept." The Central City is designated under the Metro 2040 Regional Growth Concept as its own category, "central city", thus qualifying as part of this rules as a "mixed use, pedestrian-friendly center or neighborhood".

C. (8)(b)(A). An MMA is required to "allow a concentration of a variety of uses." The Central City Plan district is largely designated as Central Commercial (CX) and Central Employment (EX). These two base zones allow for high density development that allows for commercial

office, institutions, residential, and retail uses. Further, even the industrial portions of the plan district allow for high density employment uses. Thus, this MMA requirement is met.

D. (8)(b)(C). To qualify as an MMA's the Central City Plan District should allow for "a commercial core area with multi-story buildings." Most the Central City is, or has major corridors, designated as Central Commercial (CX) and Central Employment (EX). These two base zones allow for high density development that allows for commercial office, institutions, residential, and retail uses. Thus, this MMA requirement is met.

E. (10) (a)(A). The MMA Rule (OAR 660-12-0060(10) notes that a proposed amendment qualifies to be an MMA if the amendment is: "a map or text amendment affecting only land entirely within" a MMA; is consistent with the definition of an MMA; is entirely within an urban growth boundary with adopted plans and development regulations; in an area that does not require off-street parking; and, located in one or more of specific ODOT classifications regarding intersections and interchanges. The Central City qualifies as a Multimodal Mixed-use Area under this section of 060, and meets the definition stated in (10) (b) (A through E) as noted below:

1) (10) (a)(A): Page 36 of Volume 2B contains a map of the MMA boundary
2) (10) (a)(B): The study area is consistent with the definition of an MMA.
3) (10) (b) (A:) MMA boundary provided in Volume 2B
4) (10) (b)(B) MMA is located within the region's UGB.
5) (10) (b)(D): Within an MMA "buildings and building entrances" are required "to be oriented to streets." The development standard of the Central City Plan District requires that buildings be oriented toward streets and contain main entrances and active ground floor uses to support a pedestrian and transit oriented public realm. Thus, this MMA requirement is met.
6) (10) (b)(E)(i): There are several interchanges within one-quarter mile, including I-5, HWY 26, HWY 30, I-205 and I-84.
7) (10) (b)(E)(iii): Within one-quarter mile of facilities owned by ODOT. The City has a letter of concurrency from ODOT for the Central City to designated as an MMA, found in Vol 2B, p38.

F. (10) (c). Section (10) (c) of the MMA Rule required consideration of various safety factors. In response to this, regarding the Central City, there are several mainline facilities owned by the Oregon Department of Transportation (ODOT) within and near, as defined in this rule, the study area. The City of Portland has worked with ODOT to designate the Central City as an MMA area. As such, analysis to address (10) (c) (A) has been conducted and the City and ODOT have addressed effects via an agreement (p 33-35) to manage interchanges in the future. The agreement is found in Volume 2B, along with TSP projects and studies (pp13-29) that improve safety for interchanges ringing the Central City, and an ODOT letter on p38 that provides written concurrence for the Central City to become an MMA.

G. (10) (d) and (e). The MMA Rule states that "a local government may designate an MMA by adopting an amendment to the comprehensive plan or land use regulations to delineate the boundary following an existing zone, multiple zones, an urban renewal area, or other exiting boundary." The Central City 2035 Plan (pp 36-7) as well as the City's Comprehensive

Plan include language designating the Central City as an MMA by adopting an amendment to the City's Comprehensive Plan, including establishing a new boundary.

H. (10) Under 660-012-0005 "Definitions" under "demand management" it lists "actions which are designed to change travel behavior to improve performance of transportation facilities and to reduce need for additional road capacity. Methods may include, but are not limited to, the use of alternative modes, ride-sharing and vanpool programs, trip-reductions ordinances, shifting to off-peak periods, and reduced or paid parking." The Central City 2035 contains a multitude of policies (pp.2-5), actions (in the form of TSP projects and studies (pp 13-29), and regulations (see parking regulations in Volume 2A pp.223-253). These address other transportation performance standards or policies that apply to safety for all modes, network connectivity for all modes and accessibility for freight vehicles of a size and frequency required by the development.

11. **Goal 13, Energy Conservation.** To conserve energy.

Goal 13 requires that land use plans contribute to energy conservation. The *Growth Scenario Report* adopted with periodic review Task IV of the *2035 Comprehensive Plan* (Ordinance 187831) contains information about how energy conservation was considered in the development of the comprehensive plan. The CC2035 plan includes zoning amendments that require new development to pursue certification from a low carbon building program, such as Leadership in Energy and Environmental Design (LEED), and an effort to create an urban form that reduced energy usage. This and other green building development standards, as well as new multimodal transportation elements of the plan intended to reduce single occupancy vehicle trips (SOV), and reduced parking ratios each contribute to creating and Central City consistent with Statewide Planning Goal 13.

12. **Goal 14, Urbanization.** To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Statewide Planning Goal 14, Urbanization, has several purposes, including:

- Providing orderly and efficient transitions from rural to urban land uses;
- Accommodating urban population and urban employment inside urban growth boundaries;
- Ensuring efficient use of land; and
- Providing for livable communities.

Goal 14 and its administrative rule assign most of these functions to Metro rather than the City. The City's role is limited to accepting the share of regional household and employment growth allocated by Metro and demonstrating that this growth can be accommodated in an orderly and efficient manner that preserves and enhances livability. The template for this desired development pattern is the *Region 2040 Growth Concept*, which is carried out by Metro's *Urban Growth Management Functional Plan* (UGMFP). The growth concept emphasizes development within designated centers and corridors.

The Goal 2 analysis performed for the *Growth Scenarios Report* adopted by periodic review Task III (Ordinance 187831) provided substantial evidence that the spatial development pattern of urban jobs and housing allowed by the *2035 Comprehensive Plan Map* is compatible with the *Region 2040 Growth Concept*, ensures efficient use of urban land though infill and redevelopment opportunities, and will provide for more complete and livable communities.

CC2035 is consistent with the *2035 Comprehensive Plan* as the plan continues to manage the Central City Plan District as a high-density center intended for residential and employment growth in a manner consistent with the *2035 Comprehensive Plan* and Statewide Planning Goal 14.

13. **Goal 15, Willamette River Greenway.** 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.

Goal 15, Willamette River Greenway, requires the protection, conservation, enhancement, and maintenance of the natural, scenic, historic, agricultural, economic, and recreational qualities of land along the Willamette River. The City's Willamette Greenway Plan was first adopted in October 1979 (Ordinance 148537). The Willamette Greenway Plan was acknowledged by reference when the Oregon Land Conservation and Development Commission (LCDC) acknowledged Portland's Comprehensive Plan in May 1981. The Willamette Greenway Plan was updated in November 1987 (Ordinance 160237) and acknowledged by LCDC as a post-acknowledgement plan amendment. The Central City 2035 Plan is a further update of the Willamette Greenway Plan for the area within the Central Reach boundary (Central City). The amendments are consistent with this goal because:

A. The CC2035 Plan's Willamette River goals, policies and actions protect, conserve, enhance and maintain the natural, scenic, historical, economic and recreational qualities of land along the Willamette River in the Central Reach. Policies and actions promote the multifunctional river/riverfront that provides safe and enjoyable recreation, a prosperous and vibrant riverfront, supports river transportation, improves watershed health and native species recovery, encourages context-sensitive riverfront development and promotes improvements and activities that strengthen the physical, visual, and historic/cultural connections of the river to the rest of the Central City.

B. Inventories**:** The *Willamette River Greenway Inventory* was completed in October 2014 and acknowledged by LCDC in 2014. The inventory includes existing conditions information on agricultural lands, aggregate excavation and processing, public recreation and access, recreational needs, timber resources, industrial uses, commercial uses, residential uses, significant natural areas and vegetative cover, fish and wildlife habitat, hydrologic conditions, ecologically fragile areas, acquisition area, scenic area, and historic and archaeological sites.

Inventories of natural resource and scenic resources have been updated as part of Central City 2035. The *Willamette River Natural Resources Protection Plan* (June 12, 2017) includes information about the location, quantity and quality of identified natural resources for the Central Reach and for specified inventory sites. The *Central City Scenic Resources Protection Plan* (June 12, 2017) includes information about views and viewpoints, view streets, scenic corridors, scenic sites and visual focal points.

C. Boundaries**:** There are no proposed amendments to the Willamette River Greenway boundaries in the Central Reach, which are shown on the City's zoning maps. The boundary's extent is land and river area designated with the River General overlay zone and the River Environmental overlay zone. The zoning ordinance also refers to the boundaries of the Willamette River Greenway and is the area that must be consistent with and implement the purpose and intent of Statewide Planning Goal 15. The Greenway boundary in the Central Reach includes all lands within 150 feet of the ordinary low water line on each side of the channel of the river in the Central Reach, and the total area within the boundary does not exceed, on average, 320 acres per river mile.

D. Uses**:** Uses within the Willamette River Greenway in the Central Reach are managed as follows:

1) There are no agricultural lands within the Greenway in the Central Reach, therefore there is no exclusive farm zoning;

2) There are no timber resources or no known aggregate deposits within the Greenway in the Central Reach;

3) Open space areas continue to have Open Space (OS) zoning applied at these locations. Additionally, an expanded riverfront open space bonus provides opportunities for more publicly accessible open space within the Greenway. Another open space use allowance in the Zoning Code allows a limited amount of retail structures in the OS zone outside of the river setback to support riverfront recreation and enjoyment, such as bike or kayak rentals and cafes.

4) The River General overlay zone will continue to include the river setback standard that requires all non-water-dependent and non-water-related development to be set back from the Willamette River. The setback is increasing from 25 feet to 50 feet from the top of bank of the river. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because a wider setback is needed to meet the purpose of the river setback to preserve space for the conservation and enhancement of natural resources and to provide the opportunity for public access and appreciation, where appropriate. The setback will not apply to water-related or water-dependent uses (the City uses the term river-related and river-dependent and the definitions of those terms include the state definitions of water-related and water-dependent), and non-conforming development can continue to locate within the greenway setback but cannot expand further into the river setback;

5) Significant fish and wildlife habitats have been identified in the *Willamette River Central Reach Natural Resource Protection Plan* (NRPP). The NRPP includes:

- An updated inventory with information about the location, quantity and quality of identified natural resources for the Central Reach and for specified inventory sites;
- An evaluation of alternatives and recommendations for protecting significant natural resources. The evaluation includes identification of conflicting uses, analysis of the consequences of allowing, limiting, or prohibiting conflicting uses, and development of a program to protect and conserve specified resources identified in the inventory; and
- Updates to the River General overlay zone include an increase in the width of the river setback to limit the impacts of development on natural resources;
- Application of a new River Environmental overlay zone to significant natural resources. The zoning regulations will limit or strictly limit development within the significant resource areas including rivers, streams, wetlands, flood areas and riparian vegetation. The regulations will encourage environmentally sensitive development that has fewer impacts on natural resource function than traditional development and will require mitigation for unavoidable adverse impacts on significant natural resources.
- Goals, policies and actions in the plan provide guidance and specific actions for protection and enhancement of significant fish and wildlife habitat resources.

6) Areas subject to flooding and erosion are included within the River Environmental overlay zone, and/or the areas are subject to the City's balanced cut and fill requirements;

7) Recreational needs have been identified, and zoning use allowances that require water-dependent recreational uses in certain locations have been maintained in the Central Reach. Public access opportunities will be provided through maintenance of the existing major public trail and development of connecting trail segments, as well as development of public viewpoints, in the Central Reach. The amendments identify and facilitate development of the trail and viewpoints which will provide public access to and along the Willamette River. Action items identify specific plans, park and open space and operational improvements to activate and improve the greenway area and connections to it, for in-water and on-land recreation;

8) Protection and safety along the Willamette River greenway area is addressed through zoning standards and design guidelines that address building orientation to the river, ground floor windows and pedestrian access and connections to the greenway trail, activating the riverfront through recreational improvements and a limited amount of retail near riverfront will bring more "eyes on the riverfront", along with actions that support programs that increase safety including safety improvements through building and site design;

9) The vegetative fringe along the Willamette River in the Central Reach will be protected and enhanced in the following ways by application of the River Environmental overlay to conserve and enhance natural vegetation and require a minimum amount of landscaping to be planted on all sites in the Central Reach. The purpose of the landscaping standard is to enhance the natural qualities of lands along the Willamette River in the Central Reach and will result in an increase in the quality, quantity and diversity of vegetation; and

10) The regulations for removal and remediation of hazardous substances have been clarified, and they will encourage the use of biotechnical techniques for bank stabilization, and the planting of native vegetation on the riverbank.

E. Greenway Compatibility Review: Intensifications and changes of use or development within the Central Reach Greenway boundary will be reviewed for compatibility with the Willamette River Greenway regulations established in the CC2035 Plan including compliance with River General and River Environmental overlay zone requirements, public trail development standards and other applicable regulations and design guidelines. In most cases, intensifications and changes of use or development will trigger a discretionary land use review with public hearings through a Type III Design review process. If certain Central Reach greenway regulations cannot be met, a Type II administrative River Review process may be required, with some public notice.

The development standards associated with the River General and River Environmental overlay zones in the Central Reach have been written to provide a landscaped riparian area, open space, or vegetation between the development and the river, and to provide necessary public access to and along the river. The standards are also compatible with the Greenway statutes. The Central Reach is primarily zoned for commercial mixed-use zoning that allows housing and open space zoning along with some mixed-use employment zoning. Most the riverfront is preserved for water-dependent and water-related uses. Development standards include:

a) Greenway setback. OAR 660-015-0005.C.3(k) states that "A setback line will be established to keep structures separate from the river to protect, maintain, preserve and enhance the

natural, scenic, historic and recreational qualities of the Willamette River Greenway, as identified in Greenway Inventories. The setback line shall not apply to water-related or water-dependent uses." OAR 660-015-0005.C.3(j) states that "Developments shall be directed away from the river to the greatest possible degree; provided, however lands committed to urban uses within the Greenway shall be permitted to continue as urban uses…" Consistent with these requirements, zoning code 33.475.210, River Setback, requires that non-water-dependent and non-water-related development in the River General overlay zone be set back 50 feet from the top of bank of the Willamette River unless the development is a Historic or Conservation landmark, is approved through a Greenway Goal Exception or meets the Encroachment into the setback standards. This is an expansion of the current setback which is 25 feet from top of bank, Zoning Code 33.440.210. Testimony was received that both supported and opposed the expanded setback. City Council finds that to reserve space for the conservation and enhancement of natural resources and to provide an opportunity for public access where appropriate, expanding the setback is needed. The setback will not apply to water-related or water-dependent uses (the City uses the term river-related and river-dependent and the definitions of those terms include the state definitions of water-related and water-dependent).

b) The definition of top of bank, which is the feature from which the setback is measured, is being updated to clarify that the top of bank is the first decrease in the slope of the incline that is greater than ten percent. A new measurement section is added to 33.930 providing direction to applicants when identifying the top of bank. The updated definition and addition of measurements in the zoning code ensure that the code is applied consistently and accurately to all riverfront properties. Testimony was received that supported the clarified definition and measurements and testimony was received that opposed the application of the measurements to the Willamette River North Reach. City Council finds that the definition of top of bank is a technical measurement and the clarifications are appropriate for all waterbodies in Portland. City Council also finds that the new measurements section, 33.930, provides the adequate direction regarding how to measure top of bank under and around structures and that the measurements are appropriate for all waterbodies in Portland. Specifically, top of bank should be measured from the ground surface underlying structures such as docks, wharves or bridges;

c) Minimum vegetated area. A natural vegetative fringe along the Willamette River shall be enhanced and protected to the maximum extent practicable in accordance with OAR 660-015-0005.C.3(g). The planting or maintaining of vegetation will be required on all sites with river frontage in the Central Reach. The landscaping standard requires a mix of vegetation types and densities including trees, shrubs and ground cover. The purpose of the landscaping standard is to enhance the natural qualities of lands along the Willamette River in the Central Reach, and application of the standard will result in an increase in the quality, quantity and destiny of vegetation within the greenway and improve the visual diversity along major public trails;

d) Public access to and along the river. Intensification projects and changes of use or development must comply with the zoning code and the Central City Fundamental Design Guidelines (for most cases). Base zone and other development standards within the zoning code and design guidelines address public access and pedestrian connections to the riverfront and the major public trails are addressed. This is consistent with OAR 660-015-

0005.C.3(b) and (c) which requires that local, regional and state recreational needs and adequate public access to the river be provided for, with emphasis on urban area. I;

e) Major public trails. The public trail standards require that a trail easement be dedicated and possibly developed when the impacts of the new development are roughly proportional to the impacts on the adjacent trail system. The requirement for a trail easement dedication is consistent with OAR 660-015-0005.C.3(b) and (c). Council finds the requirement of rough proportionality is consistent with established case law and creates a standardized approach and methodology;

f) River Environmental overlay zone development standards. OAR 660-015-0005.C.3(d) states that "significant fish and wildlife habitats shall be protected." OAR 660-015-0005.C.3(f) states "the natural vegetation fringe along the River shall be enhanced and protected to the maximum extent possible." Consistent with these requirements, the River Environmental overlay zone will apply to significant natural resources in the Central Reach. The overlay zone will apply to the Willamette River and to areas along the riverbank adjacent to the river that have medium or high ranked resources. Intensifications and changes of use or development will trigger compliance with standards aimed at maintaining the natural qualities of the Willamette River and riparian area by encouraging sensitive development, providing clear limitations on disturbance, and maintaining existing vegetation. The standards limit the amount of disturbance allowed in the overlay zone and require mitigation in form of replanting within or adjacent to the overlay zone.

g) When intensifications and changes of use or development cannot meet the River Environmental overlay zone development standards, a discretionary land use review is required. As with the development standards described above, the discretionary approval criteria are aimed at maintaining as much of the natural quality of the Willamette River Greenway as practicable. The criteria require that alternative locations and construction methods that have fewer detrimental impacts on the resource area be evaluated, and that the most practicable alternative that has the least amount of significant impact be chosen. The criteria also require that any loss of resource area is mitigated by in-kind replacement of the lost functional values. The criteria will result in the maximum possible landscaping, vegetation or open space between the use and the river within the context of allowing water-dependent and water-related uses and continuing to allow urban uses. The City's discretionary review procedures require that adjacent property owners and any individual or group requesting notification be notified of the proposal, allow for the possibility of a public hearing where any interested party can testify, and allow the imposition of conditions on the permit to carry out the purpose and intent of the review.

h) Removal and remediation of hazardous substances. The regulations that apply to the removal and remediation of hazardous substances encourage the use of biotechnical techniques for bank stabilization, and the planting of native vegetation on the river bank; and,

i) The Oregon Department of Land Conservation and Development was notified of the Central City 2035 Plan and the plan has been the subject of more than one public hearing. Based on the findings in this subparagraph (Greenway Compatibility Review), the amendments are consistent with OAR 660-015-005.F.3.a-f.

Findings on Metro Urban Growth Management Functional Plan

14. **Title 1, Housing Capacity.** The Regional Framework Plan calls for a compact urban form and a "fair-share" approach to meeting regional housing needs. It is the purpose of Title 1 to accomplish these policies by requiring each city and county to maintain or increase its housing capacity except as provided in section 3.07.120.

This element of the regional plan limits down-zoning in the Central City and other 2040 places – specifically Regional Centers, Town Centers, 2040 Corridors, Station Communities, and 2040 Main Streets. There is a limited set of circumstances when down-zoning within these 2040-defined places may occur, including changes to address Title 4 (Industrial and Other Employment Areas), to add medical or educational facilities, and to protect natural resources.

For purposes of this title, Metro measures "minimum zoned capacity." The title is clear that individual parcels may be down-zoned, provided the impact on the citywide minimum zoned capacity is negligible.

Method of Analysis: To evaluate compliance with Title 1, GIS analysis was performed to calculate the total acreage of rezoning from a "residential" base zone designation to another base zone that does not have a minimum zoned residential capacity. The total acreage of overlays applied to mixed-use zoning in the Central City was also calculated to determine the minimum housing projected within these overlays. Lastly, an analysis was conducted identifying the housing production within all the base zones applied to the Central City between 1990 and 2016, and analysis of production per acre of zone was conducted to compare housing production in zones with and without a minimum zoned residential capacity.

Proposed Zoning Map Amendments. CC2035 proposes a modest amount of amendments to the Zoning Map. With regards to Title 1 compliance, the plan proposes to rezone 41.4 acres of land zoned as Central Residential (RX) to Central Commercial (CX). The RX zone is highest density multi-family residential zone applied within the City of Portland and applied to the Central Residential Comprehensive Plan Map designation, described as follows by the 2035 Comprehensive Plan.

> *Central Residential. This designation allows the highest density and most intensely developed multi- dwelling structures. Limited commercial uses are also allowed as part of new development. The designation is intended for the Central City and Gateway Regional Center where urban public services are available or planned including access to high-capacity transit, very frequent bus service, or streetcar service. Development will generally be oriented to pedestrians. Maximum density is based on a floor area ratio, not on a units-per-square-foot basis. Densities allowed exceed 100 units per acre. The corresponding zone is RX. This designation is generally accompanied by a design overlay zone.*

The rezoning from RX to CX will occur in the Goose Hollow, West End, and University/South Downtown Districts. However, the basis for this rezoning is in part to stimulate residential mixed-use development in areas where residential development has been slow to respond to the RX zone. An analysis of housing production between 1990 (the year the zoning implementing the 1988 Central City Plan became effective) and 2016 found that more housing has been created in the portions of the Central City zoned CX (62 projects containing 10,431 units) but that the density per project (most located on sites of an acre or less) is 168.24 units (see Table 1). In comparison, the RX zone over the same period produced 30 projects containing only 3,986 units, for an average density of 132.9 units per project.

It should be noted that 15.7 acres of RH (High Density Residential) land will also be rezoned to CX as part of CC2035 for the same reasons a cited for the RX rezones based on the analysis shown in Table 1.

Table 1 - Housing Totals: Total number of housing units by year and base zone since adoption of 1988 Central City Plan and implementing base zones.

Year Approved	CX Zone	EX Zone	RX Zone	RH Zone	All Zones
1990	110	0	0	0	110
1991	0	0	132	0	132
1992	60	42	0	0	102
1993	288	86	148	0	522
1994	0	121	0	0	121
1995	30	127	39	90	286
1996	151	199	114	0	464
1997	1,085	6	202	0	1,293
1998	85	257	326	0	668
1999	60	457	0	0	517
2000	74	610	0	0	684
2001	166	563	442	0	1,171
2002	0	894	569	0	1,463
2003	38	571	437	0	1,046
2004	864	0	2	0	866
2005	1,290	1,366	74	0	2,736
2006	794	0	354	0	1,148
2007	513	0	0	0	513
2008	176	152	0	0	328
2009	220	288	101	0	609
2010	0	0	283	0	283
2011	200	70	0	0	270
2012	187	177	0	0	364
2013	1,038	1,575	0	0	2,613
2014	587	487	649	0	1,723
2015	417	776	0	0	1,193
2016	1,998	755	114	0	2,867
Totals	**10,431**	**9,579**	**3,986**	**90**	**24,092**

CC2035 also results in rezoning that will add an additional 59.3 acres of Central Employment (EX) zoned land in the Central Eastside. The 2035 Comprehensive Plan describes the Central Employment designation as follows:

> *Central Employment. The designation allows for a full range of commercial, light-industrial, and residential uses. This designation is intended to provide for mixed-use areas within the Central City and Gateway Regional Center where urban public services are available or planned including access to high-capacity transit or streetcar service. The intensity of development will be higher than in other mixed-use land designations. The corresponding zone is Central Employment (EX). This designation is generally accompanied by a design overlay zone.*

The EX zone is the same base zone applied to the Pearl District, the Central City's densest residential neighborhood, and since 1990 a total of 71 residential projects have been developed in this zone, containing 9,579 housing units, for an average density of 134.92 units per project.

Although Title 1 does not require that minimum residential densities be applied to residential mixed-use zones, Table 2 illustrates that the CX and EX zones have produced more housing, and housing projects at a greater density than the RX or other residential base zones applied to the Central City.

Table 2 - Housing Production and Density: Total average production and density by base zone.

Zone	Total Acres	Percentage of Central City Land Area	Total Number of Units	Percentage of All Units	Average Density / Total Acreage of Zone	Average Density / Project
CX	668.9	44.4%	10,431	43.28%	15.59 units/acre	168.24 units
EX	229.3	15.2%	9,579	39.34%	41.77 units/acre	134.92 units
RX	102.8	6.8%	3,986	15.22%	38.77 units/acre	132.9 units
RH	27.7	1.8%	90	0.34%	3.25 units/acre	90 units
RI	11.0	0.7%	16	0.06%	1.45 units/acre	16 units
R2	1.4	0.1%	0	0.0%	0.0 units/acre	0 units
Totals	1041.1	69.00%	24,102	100.00%	NA	NA

In addition to these the amendments noted above, CC2035 maintains approximately 12 acres of CX and RH zoned land within an overlay where Section 33.510.230 of the Zoning Code requires new development produce at least 15 units per acre. Thus, this development standard alone will require that at least 188 units could be developed if the entire area affected by this regulation were developed, which is well under the unit per acre average of development in the CX zone.

This analysis demonstrates that the rezoning of RX to CX, combined with the up zoning of land to EX, and the application of the "required residential development area" allows CC2035 to remain consistent with Title 1.

15. **Title 2, Regional Parking Policy,** regulated the amount of parking permitted by use for jurisdictions in the region; however, this title was repealed and the former Title 2 no longer applies to this ordinance.

16. **Title 3, Water Quality and Flood Management.** To protect the beneficial water uses and functions and values of resources within the Water Quality and Flood Management Areas by limiting or mitigating the impact on these areas from development activities and protecting life and property from dangers associated with flooding.

Title 3 calls for the protection of the beneficial uses and functional values of resources within Metro-defined Water Quality and Flood Management Areas by limiting or mitigating the impact of development in these areas. Title 3 establishes performance standards for 1) flood management; 2) erosion and sediment control; and 3) water quality. In 2002 Metro deemed the City of Portland in full substantial compliance with the requirements of Title 3 based on adoption of Title 10 Erosion Control, balanced cut-and-fill standards in Title 24 Building Regulations, and the Willamette Greenway Water Quality Zone, or "q" overlay zone. The Central City 2035 amendments for the Willamette River Central Reach maintain and support compliance with Title 3 because:

a) City programs deemed in compliance with Title 3 requirements for flood management, and erosion and sediment control (i.e., Title 10 Erosion Control, and the balanced cut and fill requirements of Title 24), are unchanged. The Central Reach amendments, including proposed River Environmental overlay zones, increased river setback, and updated landscaping standards will support goals for flood management and erosion control;

b) The CC2035 Plan's policy framework contains goals, policies and actions that achieve a Willamette River that is healthy and supports fish and wildlife and improves the quality, quantity, connectivity and overall function of the ecological system including upland, riparian and in-water habitat as well as improve the ability of floodplains to store water and provide habitat functions;

c) The River General overlay zone amendments increase the river setback to 50 feet from top of bank on Central Reach properties that have river frontage. Only river-dependent and river-related uses may encroach into the setback without a Greenway Goal Exception. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback ensures that adverse impacts on river functions, including water quality, flooding and fish and wildlife habitat are minimized. Exterior lighting standards help to minimize the impacts of light, glare and spill on fish and wildlife and their habitats;

d) The River General overlay zone also includes updates to the landscaping standards that apply within the river setback. The landscaping standard requires a mix of vegetation types and densities including trees, shrubs and ground cover. The purpose of the landscaping standard is to enhance the quality, quantity and diversity of vegetation in the riparian area. This will minimize the impacts of adjacent development on water quality and improve habitat for fish and wildlife; and

e) The River Environmental overlay zone will be applied to high and medium ranked natural resources, which includes rivers, streams, wetlands, flood areas and riparian habitat, identified in the *Willamette River Central Reach Natural Resource Protection Plan* (NRPP). The River Environmental overlay zone supports Title 3 goals to protect water quality, flooding and fish and wildlife habitat. The River Environmental overlay zone is designed to prevent adverse impacts on the features and functions of riparian corridors and the Willamette River by establishing new standards intended to encourage sensitive development while providing clear limitations on disturbance, including tree removal, and minimizing impacts on resources and functional values. Development that meets these standards may be approved without a review. Development that does not meet the standards would be subject to a River Review and where discretionary criteria are applied to ensure that adverse impacts on natural resource values and functions, including water quality, are avoided, minimized and/or mitigated.

17. **Title 4, Industrial and Other Employment Areas.** The Regional Framework Plan calls for a strong regional economy. To improve the economy, Title 4 seeks to provide and protect a supply of sites for employment by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs), Industrial and Employment Areas. Title 4 also seeks to provide the benefits of "clustering" to those industries that operate more productively and efficiently in proximity to one another than in dispersed locations. Title 4 further seeks to protect the capacity and efficiency of the region's transportation system for the movement of goods and services and to encourage the location of other types of employment in Centers, Corridors, Main Streets and

Station Communities. The Metro Council will evaluate the effectiveness of Title 4 in achieving these purposes as part of its periodic analysis of the capacity of the urban growth boundary.

The purpose of Title 4 is to maintain a regional supply of existing industrial and employment land by limiting competing uses for this land. Metro has not adopted a Statewide Planning Goal 9 economic opportunities analysis for the region, so Title 4 is not based on an assessment of the land needed for various employment types, nor do the Title 4 maps necessarily depict lands most suitable to accommodate future job growth. Rather, Title 4 seeks to protect the manufacturing, warehousing, and distribution of goods within three types of mapped areas by limiting competing uses. These three areas are Regionally Significant Industrial Areas (RSIAs), Industrial Areas, and Employment Areas. Each of these designations can be found in either the Lower Albina or Central Eastside Districts of the Central City. These areas were identified in 2004 from clusters of existing industrial and employment uses. Industrial clusters with multi-modal freight handling infrastructure were designated as RSIAs.

Identified competing uses include retail commercial uses (such as stores and restaurants), and retail and professional services that cater to daily customers (such as financial, insurance, real estate, legal, medical, and dental offices, schools, places of assembly, and parks). Limitations on competing uses are most strict within RSIAs, slightly less strict within the Industrial Areas, and least stringent within Employment Areas. Title 4 places no limitations on residential, farm, forest or open space uses in any of the three mapped areas, provided designated open spaces are not developed into parks, schoolyards or athletic fields.

Title 4 encourages the location of retail and commercial uses in Centers, Corridors, Main Streets and Station Communities, and thus works in tandem with Title 6 to support the desired future settlement pattern depicted in the *Region 2040 Growth Concept*. Title 4 was adopted in 2004 and required Portland to achieve initial compliance by 2007 and by 2010 for additional restrictions on parks and places of assembly.

All previous Metro compliance reports have determined that land in Portland within an "Industrial Sanctuary" *Comprehensive Plan Map* designation meets all Title 4 requirements for mapped RSIA Land and Industrial Land. Similarly, all land in Portland within a General Employment Comprehensive Map designation meets Title 4 requirements for Employment Areas. The annual Metro compliance reports for 2010 through 2015 were included in the record for periodic review Task IV (Ordinance 187832). The last report for 2015 was prepared in March of 2016. Each of these reports finds Portland's *Zoning Map* and *Zoning Code* complies with Title 4, with its existing *Zoning Map* and *Zoning Code*.

A new *Comprehensive Plan Map* was adopted with periodic review Task IV. Exhibit A of Ordinance 187832 contained findings explaining how the various land use designations shown in the new *Comprehensive Plan Map* comply with Title 4, provided the zones adopted by this ordinance either correspond or are otherwise allowed by the designations on new *Comprehensive Plan Map*. The distinction between plan and zone designations was made in the earlier findings because the Metro compliance reports were based on zone rather than plan designations and on land use regulations rather than plan policy.

The Metro compliance determinations examined whether City land use regulations limited retail and certain commercial uses to the extent required by Title 4. Metro evaluated whether certain uses identified in Title 4 as competing or interfering with employment and industrial uses were sufficiently limited by land use regulations associated with the City's industrial and general employment zones.

Like the *Zoning Map*, the land use regulations associated with the City's industrial and employment zones were determined to comply with Title 4 in the annual Metro compliance reports for 2010 through 2015. None of the amended land use regulations for the industrial and general employment zones within the Central City allow uses that are either not allowed by Title 4 or allowed in amounts greater than those allowed by Title 4. In many cases the City's regulations are more protective of industrial employment land than Title 4. For example, residential uses are not explicitly restricted in Metro employment areas (although arguably contrary to the purpose of Title 4). Under the City's amended regulations residential uses in the general employment zones are explicitly no longer allowed. Similarly, retail facilities up to 60,000 square feet are expressly allowed in Metro employment areas, but under the City's amended regulations for its general employment zones retail facilities larger than 20,000 square feet are no longer allowed. These changes were made, going beyond Title 4 requirements, to ensure an adequate land supply under Goal 9.

Although only a small portion of the Central City located within the Lower Albina District is designated as Prime Industrial Land, the recently adopted 2035 Comprehensive Plan exceeds the requirements of Title 4 by adopting a "Prime Industrial Land" overlay zone. The overlay regulations prohibit quasi-judicial *Comprehensive Plan Map* amendments in prime industrial areas and reduce the type and amount of non-industrial uses allowed in the prime industrial areas. These restrictions apply in addition to the regulations of the base zones. The additional overlay regulations restrict parks to no more than two acres, restrict commercial outdoor recreation to no more than 20,000 square feet, and prohibit major event entertainment and self-service storage. These overlay regulations both exceed the requirements of Title 4 help assure that there is no inconsistency between the industrial zones and Title 4.

For the facts and reasons stated above, the *Zoning Map* and the *Zoning Code*, as amended by this ordinance, continue to comply with Title 4 of the regional *Urban Growth Management Functional Plan*.

18. **Title 5, Neighboring Cities,** addressed neighbor cities and rural reserves in the region; however, this title was repealed and the former Title 5 no longer applies to this ordinance.

19. **Title 6, Centers, Corridors, Station Communities and Main Streets.** The Regional Framework Plan identifies Centers, Corridors, Main Streets and Station Communities throughout the region and recognizes them as the principal centers of urban life in the region. Title 6 calls for actions and investments by cities and counties, complemented by regional investments, to enhance this role. A regional investment is an investment in a new high-capacity transit line or designated a regional investment in a grant or funding program administered by Metro or subject to Metro's approval.

Title 6 establishes eligibility criteria for certain regional investments, and the use of more flexible trip generation assumptions when evaluating transportation impacts. Title 6 also contains aspirational activity level targets for different Metro 2040 place types. Although there are no specific mandatory compliance standards in Title 6 that apply to this ordinance, The Central City is a designated center and the zoning, actions, and policy framework of CC2035 ensure the ability of plan area to remain the highest density center with the Metro 2040 Framework Plan boundary.

20. **Title 7, Housing Choice.** The Regional Framework Plan calls for establishment of voluntary affordable housing production goals to be adopted by local governments and assistance from local governments on reports on progress towards increasing the supply of affordable housing. It is the intent of Title 7 to implement these policies of the Regional Framework Plan.

Title 7 addresses housing choice. Metro adopted voluntary affordable housing goals for each city and county in the region for the years 2001 to 2006, but never updated them. Since this ordinance

adopts implementation measures for the planning period of 2015 to 2035, Tile 7 does not apply. Nevertheless, the recently adopted *2035 Comprehensive Plan* adopts city-wide affordable housing production goals that greatly exceed those adopted by the outdated Title 7 (Ordinance 178832).

21. **Title 8, Compliance Procedures.** Title 8 addresses compliance procedures. This Title requires the City to notify Metro of pending land use decisions by providing Metro a copy of the 35-day notice required by the DLCD for proposed completion of a periodic review task. This notice was provided to Metro. Title 8 also requires the City to provide findings of compliance with the *Urban Growth Management Functional Plan*. The findings in this ordinance were also provided to Metro. All applicable requirements of Title 8 have been met.

22. **Title 9, Performance Measures.** Title 9 addressed performance measures but was repealed. The former Title 9 does not apply to this ordinance.

23. **Title 10, Functional Plan Definitions.** Title 10 contains definitions. Whenever the City had a question about a term in the *Urban Growth Management Functional Plan*, the definition in Title 10 was applied. When the measures adopted by this ordinance use a term found in Title 10, either the term has the same meaning found in Title 10 or the difference is explained in these ordinance findings. All applicable requirements of Title 10 requirements have been met.

24. **Title 11, Planning for New Urban Areas.** Title 11 addresses planning for new urban areas. Since no areas added to the urban growth boundary or designated as urban reserves have been assigned to Portland by Metro for planning, Title 11 does not apply to this ordinance.

25. **Title 12, Protection of Residential Neighborhoods.** Existing neighborhoods are essential to the success of the 2040 Growth Concept. The intent of Title 12 of the Urban Growth Management Functional Plan is to protect the region's residential neighborhoods. The purpose of Title 12 is to help implement the policy of the Regional Framework Plan to protect existing residential neighborhoods from air and water pollution, noise, and crime and to provide adequate levels of public services.

Title 12 addresses protection of residential neighborhoods. This title largely restricts Metro's authority to plan and regulate but does allow City designation of "Neighborhood Centers." The City has not exercised the option to designate neighborhood centers within the meaning of Title 12 but has employed the same term with a different meaning. The areas designated as a Neighborhood Center on the recently adopted *2035 Comprehensive Plan* map are functionally equivalent to a "Main Street" designation within Title 6. However, no Neighborhood Centers are located with the Central City, and, since the City has not employed any of the optional provisions of Title 12, the title does not apply to this ordinance.

26. **Title 13, Nature in Neighborhoods.** The purposes of this program are to (1) conserve, protect, and restore a continuous ecologically viable streamside corridor system, from the streams' headwaters to their confluence with other streams and rivers, and with their floodplains in a manner that is integrated with upland wildlife habitat and with the surrounding urban landscape; and (2) to control and prevent water pollution for the protection of the public health and safety, and to maintain and improve water quality throughout the region.

Title 13 is expressly intended to provide a minimum baseline level of protection for identified Habitat Conservation Areas. Local jurisdictions may achieve substantial compliance with Title 13 using regulatory and/or non-regulatory tools. Title 13 also allows local jurisdictions to establish "district plans" to achieve compliance on an area-specific basis. Title 13 district plans may apply to areas within a common watershed or within adjoining watersheds that "share an interrelated

economic infrastructure and development pattern." Cities and counties must demonstrate that the district plan will provide a similar level of protection and enhancement for Habitat Conservation Areas as would be achieved by applying Metro's model code or other regulations that meet Title 13 performance standards and best management practices.

The CC2035 Plan is intended to support and incorporate the basics of Title 13 and has been designed to serve as a Title 13 district plan for the Willamette River Central Reach. CC2035, Volume 3B, Willamette River Central Reach Natural Resources Protection Plan (NRP), and Volume 2A Part 2, Willamette River and Trails, will:

a) Recognize and address the unique and interrelated ecological, economic, social, and recreational characteristics of the Central Reach using updated technical information and through the development of a customized combination of tools;

b) Update the Title 13 Inventory of Regionally Significant Riparian Corridors and Wildlife Habitat for the Central Reach to address specific inventory sites and to incorporate more current, detailed data and refined analytical criteria. The NRPP includes an inventory of natural resources that better reflects the level of ecological function and relative quality of resources in the Willamette River Central Reach, such as the impacts associated with extensive riverbank hardening and vegetation removal;

c) Supplement the Title 13 Economic, Social, Environmental, and Energy (ESEE) Analysis to address the consequences of conflicting uses for specific inventory sites in the Central Reach. Per OAR 660-023-0240(2) Goal 15 supersedes the requirements of Goal 5 for natural resources also subject to and regulated under Goal 15. The only Goal 5 natural resource in the CC2035 Plan area are located within the Greenway and therefore are regulated by Goal 15. Therefore, an ESEE Analysis is not required within the Greenway. However, the NRPP includes an evaluation of the trade-offs associated with protecting significant natural resources and addresses similar economic, social and environmental consequences as the Title 13 ESEE. The NRPP makes recommendations intended to optimize economic, social and environmental values in the Portland Harbor, watershed health, and neighborhood livability in the North Reach;

d) Replace zoning code 33.440, Greenway Overlay Zones, with new 33.475, River Overlay Zones, for the Central reach. The new code establishes environmental overlay zoning on high and medium ranked resources in the Willamette River Greenway. These overlay zones will apply to the Willamette River and land within 50 feet of the top of bank, which are designated HCAs in Title 13. The overlay zone regulations meet the fundamental requirements of Title 13, including exemptions, clear and objective development standards, and discretionary criteria to avoid, minimize, and mitigate adverse impacts on Habitat Conservation Areas and water quality. The overlay zones provide a process for verifying the overlay zone based on site specific information provided at the time a development is proposed;

e) Clarify the City's regulations for the removal and remediation of hazardous substances. The clarified regulations will reduce barriers to habitat-friendly development by encouraging the retention of existing natural resources and the use of natural bank treatments in the final design of clean up actions.

27. **Title 14, Urban Growth Management Plan.** Title 14 addresses the regional urban growth boundary. Since this ordinance does not require, nor initiate, a boundary change, Title 14 does not apply.

Findings on Portland's Comprehensive Plan, Goals and Policies

The Plan: Guiding Principles

The 2035 Comprehensive Plan adopted five "guiding principles" in additional to the goals and policies typically included in a comprehensive plan. These principles were adopted to reinforce that implementation of the plan needs to be balanced, integrated and multi-disciplinary, and the influence of each principle helps to shape the overall all policy framework of the plan. The Central City 2035 Plan furthers these guiding principles as described below.

28. **Economic Prosperity.** Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

This guiding principle of the 2035 Comprehensive Plan is characterized by the following key objectives that support a robust and resilient regional economy, thriving local businesses and growth in living-wage jobs and household prosperity.

- Re-invest in Brownfields. Although brownfield conditions likely exist at different sites within the Central City, these are not a constraint to redevelopment activities. Over the last two-decades significant brownfield remediation efforts were conducted at large redevelopment sites within the Pearl District and South Waterfront. Further, recent efforts at sites in the Central Eastside and Lloyd have not found brownfield conditions to be a constraint limiting redevelopment activities, and where such conditions arise, the Zoning Code provides a high level of development potential to assist in cost recovery of cleaning or capping a site.
- Increase sites for business and employment opportunities, especially in East Portland. Much of the Central City is zoned for mixed-use commercial/employment uses, and several hundred acres are zoned for industry. Through base zone amendments, and increased floor area allowances, CC2035 increases the development potential for commercial and employment uses and adds some additional acreage into the Central City at the Clinton Station Area for these purposes. The plan further increases the maximum FAR ratios along the Transit Mall, and at key station areas, some specifically zoned for Employment Oriented Transit Development.
- Preserve existing industrial sites and intensify the level of use and development of sites. CC2035 includes use allowances that allowed for higher density industrial development within the Central Eastside District, while reducing the amount of non-industrial retail and traditional offices once allowed in the approximately 240 acres of IG1 zoned land in the district.
- Provide for employment growth at colleges and hospitals. The Central City is home to both Portland State University (PSU) and Oregon Health Sciences University (OHSU). CC2035 promotes continued growth at these and other health and educational facilities in the Central City by maintaining the development potential at key locations in the South Waterfront and University / South Downtown districts, as well as increasing the maximum FAR ratios at key station areas at PSU and the Oregon Museum of Science and Industry (OMSI). The plan also rezones RX properties within PSU to CX, to allow for more institutional as well as residential uses. The plan further supports the growth of the Innovation Quadrant that links PSU, OHSU, and OMSI with Portland Community College's CLIMB Center, and large developable parcels in the Central Eastside and South Waterfront.
- Recognize prosperity is about more than job growth. CC2035 includes elements to enhance and expand the amount of affordable housing, community assets and services, parks and open space amenities, access to public schools, the amount of green-infrastructure, and multimodal transportation options over the life of the plan. These efforts, as well as a focus on new civic, cultural, educational, retail, and entertainment options, will continue to support the Central

City as the regional center for the Portland Metropolitan area, but as a location that is attractive for new development and investment.

29. **Human Health.** Avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives.

Consistent with the 2035 Comprehensive Plan, CC2035 furthers the following objectives which are intended to avoid or minimize negative health impacts and improve opportunities for Portlanders to lead healthy active lives.

- Increase access to complete neighborhoods. Since the adoption of the 1988 Central City Plan, the city center has transformed from a downtown with housing dispersed unevenly, to a center with distinct residential neighborhoods. The Pearl, South Waterfront, Goose Hollow, University District, and West End continue to mature after 15 plus years of residential growth, while new significant housing growth is now occurring in the Lloyd and Central Eastside for the first time in decades. Despite this growth, and new inclusionary housing requirements, the Central City still needs greater access to family compatible housing, housing affordable at all income levels, and greater access to public amenities and services, such as schools, daycare, community centers, libraries, and grocery stores.

  CC2035 addresses these continuing needs by expanding the pattern of mixed-use zoning that allows for neighborhood commercial retail and services, as well as institutional uses such as schools. The plan further recommends tracking the development of affordable housing and suggesting midcourse corrections should housing units supportive of the growing number of families with children not be produced in sufficient quantities. The plan also includes development incentives for affordable housing and the inclusion of neighborhood serving services and amenities as part of new development.

- Strengthen consideration of environmental justice. The 2035 Comprehensive Plan describes environmental justice as "the equitable treatment and meaningful involvement of all people in public decision making as it applies to who benefits and who bears the cost of development and growth." The CC2035 Plan engaged neighborhood associations in and adjacent to the Central City, conducted numerous open house events, neighborhood meetings and events, coalition offices and staff, and conducted online surveys and outreach to engage as many Central City residents, and others effected by growth of the Central City, as possible. This outreach was critical in shaping and refining the Concept Plan, all three quadrant plans, and the final recommended Central City 2035 Plan.
- Build City Greenways. CC2035 contains many elements that address expansion and enhancement of the existing Willamette Greenway Trail, active multimodal transportation connections, and a new element, the Green Loop. The latter is designed to provide a new type of greenway that addresses the safety and skill level of curious, but cautious cyclists and pedestrians, and provides links to transit, the Willamette River, parks and open space areas, and major attractors within the Central City. This and other greenway proposals of the plan will result in an integrated system that helps to reduce auto trips, reduce associated pollution, and improve human and environmental health.

30. **Environmental Health.** Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water and land.

The objectives of this guiding principle are to expand the public space system, increase mobility and access to services through low-carbon transportation, and avoid, minimize, and mitigate the impact of development on natural resource systems. CC2035 responds to these objectives as follows:

- Design development to work with nature. CC2035 includes new development standards that require ecoroofs and the pursuit of green building certification for most new and redevelopment projects. The plan further encourages the use of living walls and other green elements to reduce energy usage and carbon output, improve air and water quality, and address heat island effect.
- Support nature-friendly infrastructure. The plan proposes an expanded use of green-infrastructure in the public right-of-way, new landscaped setbacks, expanded greenway setback, new open space features, and expansion of the tree canopy throughout the Central City to improve the health and function of the urban forest and ecosystem.
- Preserve and enhance Urban Habitat Corridors. Elements of CC2035, such as an expanded greenway setback, new parks and open space features, ecoroofs, bird safe glazing, an expanded urban forest, and the Green Loop, will help top improve conductivity and the amount of habitat for urban wildlife.

31. **Equity.** Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and under-represented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history.

This guiding principle of the 2035 Comprehensive Plan provides a framework to ensure Portlanders more equitably share in the benefits and burdens of growth and development. CC2035 furthers these objectives in the Central City as follows:

- Invest to reduce disparities and minimize burdens. In 2008, 8,535 of the Central City's 22,994 households were affordable to people earning 80% of the median family income. This is equal to 37 percent of the housing stock of the Central City. Although the percentage of units affordable at these levels has dropped slightly in the following decade, new inclusionary housing requirements and a development bonus focused on affordable unit creation and retention will help to increase the overall supply of such housing through the life of the plan.

  Residents of this housing, as well as market rate housing, depend on access to public schools, parks, community centers, and libraries to fulfill some of their basic needs. These residents also need access to safe and affordable transportation options. In response to these needs, CC2035 proposed incentives and strategies to increase access to these essential public services, and proposed multimodal transportation enhancements, such as transit and the Green Loop, to better connect people with limited access to a car to the services and amenities they depend upon.

- Make infrastructure decisions that advance equity. The infrastructure investments proposed by CC2035 will benefit all effected groups, but those more reliant on affordable transportation investment, may receive the most benefit. As noted, the Central City has a large and growing number of residents reliant on affordable housing. Many also have small children. Greater access to transit, as well as safe active transportation solutions, such as the Green Loop, will

provide these residents with greater access between employment, housing, and neighborhood serving services and amenities.

- Include under-served and under-represented populations in decisions that affect them. CC2035 was developed over six years and the community engagement process contacted renters as well as owners of residential properties in and around the city center. The plan also made strides to seek input from employees as well as people who visit but may not live or work within the Central City. Great care was taken to do extensive outreach because the Central City is the region's center, not just Portland's.
- Address displacement of residents to address and prevent repetition of injustices. Unlike other areas of the city where there is a threat of redevelopment displacing lower density, new housing development in the Central City has a greater ability to displace those reliant on affordable housing, and rising housing costs combined with a lack of family compatible units and access to services and amenities that serve families with children, can combine to displace families that start in the Central City for other parts of the region where their needs can be better met. CC2035 contains elements to incent the creation of housing and neighborhood amenities and services to provide greater opportunities for residents to remain and thrive in the Central City.
- Provide for on-going affordability. Recently adopted inclusionary housing requirements, combined with new development bonus standards that will support the creation of affordable housing will help address on-going affordability issues regarding housing supply. Further, the plan will result in the ability to create higher density industrial uses and contains incentives to create and retain traditional industrial space which should help to stabilize lease rates for industrial businesses in the inner city.
- Create regulations that acknowledge that one size does not fit all. CC2035 strives to address the different character and purpose of the unique districts within the Central City, and between the Central City and adjacent parts of the city, through policies, investments, use regulations, development standards, and design guidelines crafted to each area and how they intersect with other parts of the city.

32. **Resilience.** Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and build environments to withstand, recover from, and adapt to changes from natural hazards, human-made disasters, climate change, and economic shifts.

The 2035 Comprehensive Plan describes resilience as "reducing the vulnerability of our neighborhoods, businesses, and built and natural infrastructure to withstand challenges – environmental, economic and social – that may result from major hazardous events." CC2035 responds to these objectives as follows:

- Prosperity, human health, environmental health and equity are all essential components of resilience. The 2035 Comprehensive Plan notes that an integrated policy framework works to "improve Portland's resilience – growth in compact centers and corridors, provision of City Greenways and Urban Habitat Corridors, expansion of living-wage employment opportunities, investments to fill the infrastructure gaps in under-represented and under-served communities, and responsiveness to the differences among Portland's neighborhoods."

It is in this context that the policy framework for CC2035 was developed. This approach began with the Concept Plan and followed through the quadrant plans and into final adopted version of CC2035. Further, the implementing volumes of the plan provide code amendments, new actions, and other measures intended to address multiple objectives and result in multiple

outcomes to improve environmental and economic conditions and the quality of life for all Portlanders.

- Portland faces many natural and human-caused risks, which can have environmental economic and social impacts. The 2035 Comprehensive Plan notes that some of the most significant risks facing Portland are: floods and landslides; earthquake; climate change; extreme heat events; and economic and energy shocks. In response, the Comprehensive Plan identifies five key strategies to address these risks, which CC2035 responds to as follows:
  - Direct growth in lower-risk areas. Although no area of the city is immune to the threats facing the city, most of the Central City is located on fairly level terrain, is out of the flood plan of the Willamette River, and its built form is increasingly built to the latest seismic standards, incorporates green infrastructure, and energy efficient design in both the public and private realm.
  - Invest to reduce risks. The plan includes strategies to remap the flood plain, expand green infrastructure, retrofit buildings at risk to seismic activity, and other measures to address natural hazards and increase the resiliency of city center when disaster strikes.
  - Neighborhood resilience. CC2035 includes development incentives to incent the development of new schools, community centers, libraries, and other facilities that may provide shelter and emergency services in the event of a natural disaster.
  - Low-carbon economy. The green building requirements, parking reductions, and multimodal transportation elements of the plan, as well as the economic development policies and actions, will help to further enhance and expand low-carbon businesses and technologies in Portland.
  - Resilience in Natural Systems. Plan elements that address an expanded greenway setback, expanded tree canopy, new open space features, and greater use of green infrastructure in public and private development will allow the Center City to be more resilient to climate change and natural hazards threatening the city.

The Plan: Goals

33. **Goal 1.A: Multiple goals.** Portland's Comprehensive Plan provides a framework to guide land use, development, and public facility investments. It is based on a set of Guiding Principles that call for integrated approaches, actions, and outcomes that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient.

34. **Goal 1.B: Regional partnership.** Portland's Comprehensive Plan acknowledges Portland's role within the region, and it is coordinated with the policies of governmental partners.

35. **Goal 1.C: A well-functioning plan.** Portland's Comprehensive Plan is effective, its elements are aligned, and it is updated periodically to be current and to address mandates, community needs, and identified problems.

36. **Goal 1.D: Implementation tools.** Portland's Comprehensive Plan is executed through a variety of implementation tools, both regulatory and non-regulatory. Implementation tools comply with the Comprehensive Plan and are carried out in a coordinated and efficient manner. They protect the public's current and future interests and balance the need for providing certainty for future development with the need for flexibility and the opportunity to promote innovation.

37. **Goal 1.E: Administration.** Portland's Comprehensive Plan is administered efficiently and effectively and in ways that forward the intent of the Plan. It is administered in accordance with regional plans and state and federal law.

The CC2035 Plan is an amendment to the 2035 Comprehensive Plan. Yet, the plan operates as mini comprehensive plan for the Central City. The plan was developed consistent with the framework of the *2035 Comprehensive Plan*. CC2035 contains a policy framework, Comprehensive Plan Map and Zoning Map amendments, Zoning Code amendments, and list of actions and list of projects necessary to implement the plan over the life of the plan. As noted above, CC2035 is consistent with the guiding principles of the *2035 Comprehensive Plan*, and the plan was developed and will be implemented by a variety of public and private partners, including numerous bureaus of the City of Portland, ODOT, TriMet, Metro, Multnomah County, community organizations, and development entities. These agencies were represented on a Technical Advisory Committee (TAC) that met regularly during the development of the Concept and quadrant plans. As such, the plan is consistent with and furthers the objectives of Goals 1.A – 1.E of the *2035 Comprehensive Plan.* For further information regarding how the CC2035 Plan is consistent with and furthers applicable state and regional goals, see "Findings on Statewide Planning Goals" and "Findings on Metro Urban Growth Management Functional Plan" sections, located earlier in this findings report.

The Plan: Policies

The Comprehensive Plan

38. **Policy 1.1, Comprehensive Plan elements.** Maintain a Comprehensive Plan that includes these elements:

- **Vision and Guiding Principles.** The Vision is a statement of where the City aspires to be in 2035. The Guiding Principles call for decisions that meet multiple goals to ensure Portland is prosperous, healthy, equitable, and resilient.
- **Goals and policies.** The goals and policies of the Comprehensive Plan, including the Urban Design Framework, provide the long-range planning direction for the development and redevelopment of the city.
- **Comprehensive Plan Map.** The Comprehensive Plan Map is the official long-range planning guide for spatially defining the desired land uses and development in Portland. The Comprehensive Plan Map is a series of maps, which together show the boundaries of municipal incorporation, the Urban Service Boundary, land use designations, and the recognized boundaries of the Central City, Gateway regional center, town centers, and neighborhood centers.
- **List of Significant Projects.** The List of Significant Projects identifies the public facility projects needed to serve designated land uses through 2035, including expected new housing and jobs. It is based on the framework provided by a supporting Public Facilities Plan (PFP). The Citywide Systems Plan (CSP) is the City's public facilities plan. The Transportation System Plan (TSP) includes the transportation-related list of significant projects. The list element of the TSP is also an element of the Comprehensive Plan.
- **Transportation policies, street classifications, and street plans.** The policies, street classifications, and street plan maps contained in the Transportation System Plan (TSP) are an element of the Comprehensive Plan. Other parts of the TSP function as a supporting document, as described in Policy 1.2.

Consistent with Policy 1.1, Volume 1, Goals and Policies, of CC2035 contains a vision, goals, and policies specific to the Central City Plan District, which as outlined above are consistent with the

guiding principles of the 2035 Comprehensive Plan. Volume 2A, Part 1, Zoning Code & Map Amendments, presents amendments to Comprehensive Plan Map and amendments to the Zoning Code Maps consistent with the Comprehensive Plan Map. Further, Volume 2B, Transportation System Plan Amendments, and Volume 5A, Implementation: Performance Targets and Action Plans, propose public facility projects and transportation system amendments to ensure that the land use designations resulting from CC2035, and resulting densities, will be supported consistent with this policy.

Supporting Documents

39. **Policy 1.2, Comprehensive Plan supporting documents.** Maintain and periodically update the following Comprehensive Plan supporting documents.

    1. **Inventories and analyses**. The following inventories and analyses are supporting documents to the Comprehensive Plan:
        - Economic Opportunities Analysis (EOA)
        - Buildable Lands Inventory (BLI)
        - Natural Resource Inventory (NRI)
        - Housing Needs Analysis (HNA)
    2. **Public Facilities Plan**. The Public Facilities Plan (PFP) is a coordinated plan for the provision of urban public facilities and services within Portland's Urban Services Boundary. The Citywide Systems Plan (CSP) is the City's public facilities plan.
    3. **Transportation System Plan (TSP)**. The TSP is the detailed long-range plan to guide transportation system functions and investments. The TSP ensures that new development and allowed land uses are consistent with the identified function and capacity of, and adopted performance measures for, affected transportation facilities. The TSP includes a financial plan to identify revenue sources for planned transportation facilities included on the List of Significant Projects. The TSP is the transportation element of the Public Facilities Plan. Certain components of the TSP are elements of the Comprehensive Plan. S*ee Policy 1.1*.
    4. **School Facility Plans.** School facility plans that were developed in consultation with the City, adopted by school districts serving the City, and that meet the requirements of ORS 195 are considered supporting documents to the Comprehensive Plan.

CC2035 was developed consistent with the supporting documents of the recently adopted *2035 Comprehensive Plan*, as well as the following: Willamette River Greenway Inventory; Willamette River/Central Reach Natural Resources Protection Plan (includes an inventory of natural resources); Central City Scenic Resources Inventory. The plan is also consistent with the PFP and CSP, amends the TSP consistent with *2035 Comprehensive Plan.* Lastly, although Portland Public Schools (PPS) has not specifically amended its overall facilities plan, the proposed updates to Lincoln High School and facilities associated with Chapman Elementary School have been made in consultation with BPS to ensure consistency with the projections of CC2035.

Implementation tools

40. **Policy 1.3, Implementation tools subject to the Comprehensive Plan.** Maintain Comprehensive Plan implementation tools that are derived from, and comply with, the Comprehensive Plan. *Implementation tools include those identified in policies 1.4 through 1.9.*

41. **Policy 1.4, Zoning Code.** Maintain a Zoning Code that establishes the regulations that apply to

various zones, districts, uses, and development types.

42. **Policy 1.5, Zoning Map.** Maintain a Zoning Map that identifies the boundaries of various zones, districts, and other special features.

CC2035 includes numerous Zoning Code and Map amendments intended to implement the policy framework of the *2035 Comprehensive Plan* but also CC20305 Volume 1, Goals and Policies. Some of the map amendments are intended to address specific issues at the subdistrict level, some at a city-wide scale. Zoning Code amendments include the addition of new use allowances and development standards to address new policies of both plans, and amendments that enhance the ability of existing provisions, be they use allowances, development standards, or incentives, to achieve the goals and policies of these two plans. Lastly, some existing development bonuses in the Zoning Code are repealed by C2035 to ensure that the new bonus system is aligned with new Comprehensive Plan goals and policies aimed at incenting the development of affordable housing, and in support of new inclusionary housing requirements recently adopted by the Portland City Council. Thus, CC2035 is consistent with policies 1.3 – 1.5.

Administration

43. **Policy 1.10, Compliance with the Comprehensive Plan.** Ensure that amendments to the Comprehensive Plan's elements, supporting documents, and implementation tools comply with the Comprehensive Plan. "Comply" means that amendments must be evaluated against the Comprehensive Plan's applicable goals and policies and on balance be equally or more supportive of the Comprehensive Plan than the existing language or designation.

    1.10.a, Legislative amendments to the Comprehensive Plan's elements and implementation tools must also comply with the Guiding Principles.

    1.10.b, Legislative amendments to the Comprehensive Plan's elements should be based on the factual basis established in the supporting documents as updated and amended over time.

    1.10.c, Amendments to the Zoning Map are in compliance with the Comprehensive Plan if they are consistent with the Comprehensive Plan Map.

This policy requires Council to evaluate the proposal amendments against the Comprehensive Plan's Guiding Principles and applicable goals and policies to determine if the amendments are, on balance, equally or more supportive of the Comprehensive Plan than the existing language. The findings of this ordinance identify how the CC2035 Plan complies with and is consistent with the *2035 Comprehensive Plan's* Guiding Principles, goals, policies, and maps, as detailed throughout this set of findings.

44. **Policy 1.11, Consistency with Metro Urban Growth Management Functional Plan and Urban Growth Boundary.** Ensure that the Comprehensive Plan remains consistent with the Metro Urban Growth Management Functional Plan and supports a tight urban growth boundary for the Portland metropolitan area.

45. **Policy 1.12, Consistency with Statewide Planning Goals.** Ensure that the Comprehensive Plan, supporting documents, and implementation tools remain consistent with the Oregon Statewide Planning Goals.

As noted earlier in these findings, the CC2035 Plan was created consistent with and in a manner designed to further the applicable elements of the Metro Urban Growth Management Functional Plan and Statewide Planning Goals, consistent with the directives of policies 1.11 and 1.12.

46. **Policy 1.13, Consistency with state and federal regulations.** Ensure that the Comprehensive Plan remains consistent with all applicable state and federal regulations, and that implementation measures for the Comprehensive Plan are well coordinated with other City activities that respond to state and federal regulations.

The CC2035 plan was developed to be consistent with applicable state and federal regulations, and all implementing actions of the plan although intended also to be consistent with such regulations will further need to provide consistency with all applicable state and federal requirements once the details of each is further outlined at the time of implementation.

47. **Policy 1.14, Public facility adequacy.** Consider impacts on the existing and future availability and capacity of urban public facilities and services when amending Comprehensive Plan elements and implementation tools. Urban public facilities and services include those provided by the City, neighboring jurisdictions, and partners within Portland's urban services boundaries, as established by Policies 8.2 and 8.6.

Although the only amendments of CC2035 related to the *2035 Comprehensive Plan* regard limited Comprehensive Plan Map amendments, these and the corresponding Zoning Map amendments are found to be capable of being served by existing public facilities and services or those proposed to be implemented in Volume 5, Implementation Plan.

48. **Policy 1.15, Intergovernmental coordination**. Strive to administer the Comprehensive Plan elements and implementation tools in a manner that supports the efforts and fiscal health of the City, county and regional governments, and partner agencies such as school districts and transit agencies.

A multi-agency Technical Advisory Committee (TAC) was established during the development of the CC2035 Concept Plan and continued to meet to advise the development of the three quadrant plans that lead to the *Proposed Draft* of the CC2035 package of documents. Further, City, state, and federal employees attended open house events, workshops, and participated in other committees and symposiums held in support of plan development. Further, many of these same agencies submitted comments, and some, such as Portland Public Schools and the Portland of Portland, testified before Council on different elements of the plan. This involvement helped to shape the final version of CC2035, consistent with Policy 1.15.

49. **Policy 1.16, Planning and Sustainability Commission review.** Ensure the Planning and Sustainability Commission (PSC) reviews and makes recommendations to the City Council on all proposed legislative amendments to Comprehensive Plan elements, supporting documents, and implementation tools. The PSC advises City Council on the City's long-range goals, policies, and programs for land use, planning, and sustainability. The membership and powers and duties of the PSC are described in the Zoning Code.

On June 20, 2016, the Proposed Draft of CC2035 was released in preparation for the PSC review of the plan. This draft of the plan was amended from the earlier Discussion Draft based on much of the public input provided during the review period of that draft. Prior to the first PSC public hearing, held on July 26, 2016, open house events were conducted to provide those who may testify before the PSC with more specific information about plan elements.

The PSC held public hearings and work sessions between June 2016 and April 2017. During these meetings, testimony was received on the Proposed Draft, amendments were proposed during work sessions, and an additional hearing was held to receive testimony on PSC proposed amendments before the PSC voted on the final Recommended Draft to be forwarded to City Council. The PSC

held meetings for the plan on the following dates:

- Briefing: June 28, 2016
- Hearing: July 26, 2016
- Hearing: August 9, 2016
- Work Session: September 27, 2016
- Work Session: November 16, 2016
- Work Session: January 10, 2017
- Work Session: January 24, 2017
- Work Session: February 14, 2017
- Work Session: February 28, 2017
- Work Session: March 14, 2017
- Work Session: April 11, 2017
- Work Session & Vote: May 23, 2017

50. **Policy 1.17, Community Involvement Committee.** Establish a Community Involvement Committee to oversee the Community Involvement Program as recognized by Oregon Statewide Planning Goal 1 – Community Involvement and policies 2.15-2.18 of this Comprehensive Plan.

On December 15, 2010, the first of several briefings with the Citizen Involvement Committee was held regarding the CC2035 Plan. This version of the CIC was initially formed to advise on the development of the Portland Plan before shifting focus to the 2035 Comprehensive Plan. The CIC advise CC2035 staff, members participated in various CC2035 public events, and the committee was consulted in development of the plan.

51. **Policy 1.19, Area-specific plans.** Use area-specific plans to provide additional detail or refinements applicable at a smaller geographic scale, such as for centers and corridors, within the policy framework provided by the overall Comprehensive Plan.

1.19.a, Area-specific plans that are adopted after the effective date of the 2035 Comprehensive Plan should clearly identify which components amend Comprehensive Plan elements, supporting documents, or implementation tools. Such amendments should be appropriate to the scope of the Comprehensive Plan; be intended to guide land use decisions; and provide geographically-specific detail. Such amendments could include policies specific to the plan area, land use designation changes, zoning map changes, zoning code changes, and public facility projects necessary to serve designated land uses.

1.19.b, Area-specific plan components intended as context, general guidance, or directives for future community-driven efforts should not amend the Comprehensive Plan elements or implementation tools but be adopted by resolution as intent. These components include vision statements, historical context, existing conditions, action plans, design preferences, and other background information.

1.19.c, Community, area, neighborhood, and other area-specific plans that were adopted by ordinance prior to [date of Comp Plan adoption] are still in effect. However, the elements of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that are inconsistent with this Plan.

The CC2025 Plan is an “area-specific plan” as the plan focuses exclusively on the Central City Plan District, and proposes amendments to the Comprehensive Plan Map, Zoning Code and Map, TSP

and numerous implementation actions that are consistent with and specifically intended to implement the 2035 Comprehensive Plan within the geography of the Central City, consistent with Policy 1.19.

Community Involvement: Goals

52. **Goal 2.A: Community involvement as a partnership.** The City of Portland works together as a genuine partner with all Portland communities and interests. The City promotes, builds, and maintains relationships, and communicates with individuals, communities, neighborhoods, businesses, organizations, institutions, and other governments to ensure meaningful community involvement in planning and investment decisions.

53. **Goal 2.B: Social justice and equity.** The City of Portland seeks social justice by expanding choice and opportunity for all community members, recognizing a special responsibility to identify and engage, as genuine partners, under-served and under-represented communities in planning, investment, implementation, and enforcement processes, particularly those with potential to be adversely affected by the results of decisions. The City actively works to improve its planning and investment-related decisions to achieve equitable distribution of burdens and benefits and address past injustices.

54. **Goal 2.C: Value community wisdom and participation.** Portland values and encourages community and civic participation. The City seeks and considers community wisdom and diverse cultural perspectives, and integrates them with technical analysis, to strengthen land use decisions.

55. **Goal 2.D: Transparency and accountability.** City planning and investment decision-making processes are clear, open, and documented. Through these processes a diverse range of community interests are heard and balanced. The City makes it clear to the community who is responsible for making decisions and how community input is considered. Accountability includes monitoring and reporting outcomes.

56. **Goal 2.E: Meaningful participation.** Community members have meaningful opportunities to participate in and influence all stages of planning and decision making. Public processes engage the full diversity of affected community members, including under-served and under-represented individuals and communities. The City will seek and facilitate the involvement of those potentially affected by planning and decision making.

57. **Goal 2.F: Accessible and effective participation.** City planning and investment decision-making processes are designed to be culturally accessible and effective. The City draws from acknowledged best practices and uses a wide variety of tools, including those developed and recommended by under-served and under-represented communities, to promote inclusive, collaborative, culturally-specific, and robust community involvement.

58. **Goal 2.G: Strong civic infrastructure.** Civic institutions, organizations, and processes encourage active and meaningful community involvement and strengthen the capacity of individuals and communities to participate in planning processes and civic life.

The process leading to the final Recommended Draft of Central City 2035 included the development of four initial concept plans (the CC2035 Concept Plan, North/Northeast, West, and South East Quadrant Plans) and included a detailed public engagement process that provided repeated and numerous opportunities for all interested parties to shape and influence the final recommended draft.

For instance, each of the four noted plans were initially developed with the assistance of a Stakeholder Advisory Committee (SAC), specifically developed for each plan area. These SAC's include a diverse membership, including representatives from under-represented communities who have been impacted by past planning decisions. SAC meetings were open to the public, and public comment periods were a part of each meeting.

In addition to the SAC's, open house events, meetings with neighborhood and business associations, and meetings with numerous interest-based organizations were held, to ensure all interested parties and organizations had a chance to learn about and provide input on the plan.

Further, the BPS website had pages dedicated to each plan effort, and tools such as a Map App page, and contact information for a Central City 2035 help line, each providing additional opportunities to learn about the plan effort, review back ground reports, meeting notes, and numerous ways to comment on the plan.

Once a SAC endorsed plan was created for the Concept Plan and all three quadrant plans, briefings were held with the Planning and Sustainability Commission (PSC), Design Commission, and Landmarks Commission. These meetings were open to the public and PSC meetings were televised and available to review online. Then a public hearing on each plan was held with the PSC, who heard testimony and reviewed written testimony on each plan. These hearings were followed by a series of work sessions where the PSC revised the plan based on their and public input, and a formal PSC Recommended Draft was forwarded to the Portland City Council, where a similar series of briefings, hearings, and work sessions were held on each plan before Council adopted each after making amendments based in part on public testimony.

On June 12, 2015, the Portland Office of the Ombudsman received a complaint noting that West Quadrant Plan SAC members did not disclose conflicts of interest and asking that the SAC recommendations be invalidated. On October 21, 2015, the Ombudsman responded to this complaint by noting that the Oregon Government Ethics Commission makes a distinction between actual and potential conflicts of interest, stating:

"An actual conflict of interest occurs when an action taken by the official would directly and specifically affect the financial interest of the official, the official's relative or a business with which the official or a relative of the official is associated. A potential conflict of interest exists when an official takes action that could have a financial impact on that official, a relative or a business with which the official or the relative of the official is associated."

The Ombudsman found that SAC members did not face "actual" conflicts of interest, citing that the Oregon Government Ethics Commission, because "actual conflicts of interest cannot occur where an advisory committee makes non-binding recommendations (Advisory Opinion No. 07A-1001, page 3)." However, the Ombudsman indicated that SAC members could have faced a "potential" conflict, and although that "does not preclude anyone from being a member of the SAC or voting on a recommendation, the Ombudsman, prior to review of the CC2035 Plan by the PSC, recommended that BPS contact SAC members with a request to disclose any conflicts they may have had.

The public was provided opportunities to discuss concerns and suggest amendments in front of both the PSC and Council in response to the potential conflict disclosures. Several members of the public took that opportunity. Based on this testimony Council requested BPS staff to produce a height map of the West Quadrant, with properties owned by West Quadrant SAC members highlighted. Council made this request to determine if there was a basis for claims that SAC

members disproportionately benefited from height amendments. Upon reviewing the ownership map, Council determined that no disproportionate benefits were gained by SAC members.

Further opportunities for the public to engage with the PSC and City Council in the legislative review of CC2035 are summarized in the Statewide Planning Goal 1, Citizen Involvement, earlier in these findings.

In response to the remand, the City of Portland is readopting CC2035 with additional findings and evidence to demonstrate that the proposed heights in New Chinatown/Japantown Historic District comply with applicable goals and policies.

Due to the COVID-19 pandemic. Governor Brown has issued a series of executive orders that impact local governments. Notably, on March 8, 2020, Governor Brown issued Executive Order 20-03 declaring a state of emergency due to COVID-19. Later, on March 23, Governor Brown issued Executive Order 20-12 declaring that non-essential gatherings outside of the home or place of residence are prohibited immediately, regardless of size.

On April 15, Governor Brown issued Executive Order No. 20-16 due to the COVID-19 pandemic requiring local governments to conduct public meetings by telephone, video, or other electronic means whenever possible. In order to move forward with city operations, the directive laid out instructions to conduct business virtually during this time. The Bureau of Planning and Sustainability proceeded with public noticing to readopt the CC2035 Plan following the guidelines outlined in the order, providing ample time for public input and participation.

A public notice was sent on May 1, 2020 for a City Council public hearing on the re-adoption of CC2035 to: parties to the appeal; parties that requested notice of the final decision; parties that received notice of Council's initial hearing on CC2035; the City's legislative list; and, people on the CC2035 mailing list.

The record opened on May 1, 2020 and closed XX, X, 2020 allowing ample time before and after the hearing for the public to review the re-adoption documents on the project website and submit testimony via the MapApp tool on the project website or by mail to the City Council Clerk. The Findings of Fact Report was made available to public on May 21, 2020, one week prior to the hearing.

On May 28, 2020, the Portland City Council held a virtual public hearing and received written testimony regarding the re-adoption of CC2035. The virtual public meeting was held using the Zoom platform. It was free to participants and it allowed them to provide testimony by phone or computer. Participants were given 3 minutes to testify. Participants could also watch the hearing on YouTube with closed caption accommodations.

Therefore, the plan and this public engagement process are consistent with Goals 2.A – 2.G of the 2035 Comprehensive Plan.

Community Involvement: Policies

Partners in decision making

59. **Policy 2.1, Partnerships and coordination.** Maintain partnerships and coordinate land use engagement with:

    2.1.a, Individual community members.

2.1.b, Communities of color, low-income populations, Limited English Proficient (LEP) communities, Native American communities, and other under-served and under-represented communities.

2.1.c, District coalitions, neighborhood associations, and business district associations as local experts and communication channels for place-based projects.

2.1.d, Businesses, unions, employees, and related organizations that reflect Portland's diversity as the center of regional economic and cultural activity.

2.1.e, Community-based, faith-based, artistic and cultural, and interest-based non-profits, organizations, and groups.

2.1.f, Institutions, governments, and Sovereign tribes.

60. **Policy 2.2, Broaden partnerships**. Work with district coalitions, neighborhood associations, and business district associations to increase participation and to help them reflect the diversity of the people and institutions they serve. Facilitate greater communication and collaboration among district coalitions, neighborhood associations, business district associations, culturally-specific organizations, and community-based organizations.

During the development of the CC2035 Plan, staff conducted SAC meetings (57), subcommittee meetings (21), attended community meetings and events (303), and held project specific public open house events and tours (53). All meetings and events were open to the public and included opportunities for public comment. These meetings included those held with neighborhood associations, business associations, district coalitions, City advisory groups, professional organizations, and specific interest groups. Contact and updates to these organizations and individual stakeholders was maintained via email and website updates regarding the plan. A series of Technical Advisory Committee (TAC) meetings were also conducted on the overall CC2035 Plan, and for each quadrant plan. These TAC meetings included representatives of City, regional, and state government. These efforts demonstrate consistency with Policies 2.1 and 2.2.

Environmental justice

61. **Policy 2.3, Extend benefits.** Ensure plans and investments promote environmental justice by extending the community benefits associated with environmental assets, land use, and public investments to communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision. Maximize economic, cultural, political, and environmental benefits through ongoing partnerships.

62. **Policy 2.4, Eliminate burdens**. Ensure plans and investments eliminate associated disproportionate burdens (e.g. adverse environmental, economic, or community impacts) for communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision.

2.4.a, Minimize or mitigate disproportionate burdens in cases where they cannot be eliminated.

2.4.b, Use plans and investments to address disproportionate burdens of previous decisions.

Because CC2035 is a plan for the regional center of the Portland Metropolitan Region, it was critical that the plan address how the economic, cultural, political, environmental benefits deriving from a successful regional center would be shared by all. Beyond these benefits, access to affordable

housing, to transit and active transportation, to education, social services, recreation, and other assets was also addressed by the plan.

For instance, regarding housing, the plan contains policies, actions, and regulations that require the development of affordable housing that is also energy efficient and has access to transit. Other elements of the Zoning Code promote housing for families with children, seniors, and students.

Other provisions address work force development, access to affordable workspace, and increasing employment densities in Central City industrial districts to allow for a greater range of employment opportunities for people at a range of educational or skill levels providing access to jobs within incomes at lower and higher wage levels.

These elements of the plan ensure consistency with Policies 2.3 and 2.4.

Community assessment

63. **Policy 2.8, Channels of communication.** Maintain channels of communication among City Council, the Planning and Sustainability Commission (PSC), project advisory committees, City staff, and community members.

In support of CC2035, the project team conducted regular briefings with the PSC, Design Commission, Landmarks Commission, Portland Development Commission (now Prosper Portland Board), the CIC, TAC's created in support of CC2035 plan efforts, and local neighborhood and business associations, consistent with Policy 2.8.

64. **Policy 2.9, Community analysis.** Collect and evaluate data, including community-validated population data and information, to understand the needs, priorities, and trends and historical context affecting different communities in Portland.

65. **Policy 2.10, Community participation in data collection.** Provide meaningful opportunities for individuals and communities to be involved in inventories, mapping, data analysis, and the development of alternatives.

Numerous background analysis was conducted in support of CC2035, as identified in Volume 4. Reports such as the Central City 2035 Subdistrict Profiles presented demographic data, housing numbers, economic statistics, transportation, and environmental data, among other information. Other documents provided detailed information about parking or transportation issues associated with specific Subdistricts, while other documents provided detailed information about existing development, as well as unutilized development potential. Much of this data was also available in hard copies as well as online, and some of this data was also integrated into a Map App that allowed individuals to focus on issues related to a single lot, or the Central City. The use of these tools ensure CC2035 was developed consistent with the objectives of Policies 2.9 – 2.10.

Transparency and accountability

66. **Policy 2.12, Roles and responsibilities.** Establish clear roles, rights, and responsibilities for participants and decision makers in planning and investment processes. Address roles of City bureaus, elected officials, and participants, including community and neighborhood leadership, business, organizations, and individuals.

67. **Policy 2.13, Project scope.** Establish clear expectations about land use project sponsorship, purpose, design, and how decision makers will use the process results.

68. **Policy 2.14, Community influence.** At each stage of the process, identify which elements of a planning and investment process can be influenced or changed through community involvement.

Clarify the extent to which those elements can be influenced or changed.

69. **Policy 2.15, Documentation and feedback.** Provide clear documentation for the rationale supporting decisions in planning and investment processes. Communicate to participants about the issues raised in the community involvement process, how public input affected outcomes, and the rationale used to make decisions.

As noted, the process to develop the Recommended CC2035 Plan involved numerous plan efforts, some focusing on Central City-wide policy development, others on specific quadrants or subdistricts of the plan area. Each effort provided numerous opportunities to influence the next version of the plan to be presented to the eventual plans crafted by the PSC and then adopted by City Council.

Throughout these efforts, staff contacted, met with, and coordinated with stakeholders to inform them how to engage in the decision-making process, how the process was structured, and additional opportunities to participate when such opportunities existed.

Further opportunities to for the public to engage with the PSC and City Council in the legislative review of CC2035 are summarized in the Statewide Planning Goal 1, Citizen Involvement, earlier in these findings.

Thus, these efforts are consistent with Policies 2.12 – 2.15.

Process design and evaluation

70. **Policy 2.24, Representation.** Facilitate participation of a cross-section of the full diversity of affected Portlanders during planning and investment processes. This diversity includes individuals, stakeholders, and communities represented by race, color, national origin, English proficiency, gender, age, disability, religion, sexual orientation, gender identity, and source of income.

71. **Policy 2.25, Early involvement.** Improve opportunities for interested and affected community members to participate early in planning and investment processes, including identifying and prioritizing issues, needs, and opportunities; participating in process design; and recommending and prioritizing projects and/or other types of implementation.

The community involvement program conducted in support of CC2035 engaged thousands of stakeholders and hundreds of stakeholder organizations. Accommodations were made available for people with disabilities and those that were non-English speaking stakeholders to participate in events and access materials. Also, staff was available to meet with all interested parties, regardless of whether they were directly affected by the plan or had a historic connection to the plan area. Many of these meetings were used to engage the public about issues to be addressed by the plan, confirming existing conditions data, and to refine plan recommendations. These efforts were consistent with policy direction of 2.24 and 2.25.

72. **Policy 2.26, Verifying data.** Use data, including community-validated population data, to guide planning and investment processes and priority setting and to shape community involvement and decision-making efforts.

73. **Policy 2.27, Demographics.** Identify the demographics of potentially affected communities when initiating a planning or investment project.

74. **Policy 2.28, Historical understanding.** To better understand concerns and conditions when initiating a project, research the history, culture, past plans, and other needs of the affected community, particularly under-represented and under-served groups, and persons with limited English proficiency (LEP). Review preliminary findings with members of the community who have

institutional and historical knowledge.

75. **Policy 2.29, Project-specific needs.** Customize community involvement processes to meet the needs of those potentially affected by the planning or investment project. Use community involvement techniques that fit the scope, character, and potential impact of the planning or investment decision under consideration.

Prior to initiating the overall CC2035 Plan effort, as well as the individual quadrant plans, a detailed existing conditions analysis was prepared that established baseline demographic data, built conditions, environmental conditions, transportation data, and other important facts regarding past, current, and projected conditions. Further, the policies and objectives of previous plans were analyzed to determine their effectiveness and applicability for CC2035. Lastly, staff engaged the public in open house and other community meetings to verify this data and to identify other data and issues important in the creation of a new plan for the Central City.

76. **Policy 2.30, Culturally-appropriate processes.** Consult with communities to design culturally-appropriate processes to meet the needs of those affected by a planning or investment project. Evaluate, use, and document creative and culturally-appropriate methods, tools, technologies, and spaces to inform and engage people from under-served and under-represented groups about planning or investment projects.

77. **Policy 2.31, Innovative engagement methods**. Develop and document innovative methods, tools, and technologies for community involvement processes for plan and investment projects.

78. **Policy 2.32, Inclusive participation beyond Portland residents.** Design public processes for planning and investment projects to engage affected and interested people who may not live in Portland such as property owners, employees, employers, and students, among others, as practicable.

79. **Policy 2.33, Inclusive participation in Central City planning.** Design public processes for the Central City that recognize its unique role as the region's center. Engage a wide range of stakeholders from the Central City and throughout the region including employees, employers, social service providers, students, and visitors, as well as regional tourism, institutional, recreation, transportation, and local/regional government representatives, as appropriate.

Consistent with Policies 2.30 – 2.33, throughout the development of CC2035, BPS maintained a webpage dedicated to the effort which provided constant updates including meeting announcements, meeting minutes, draft reports and analysis, links to video of PSC hearings, and the Central City Map App. These tools located on this site provided internet access for people to learn about and provide comments throughout the development of the plan. Further, outreach materials were presented in ten different languages and accommodations were made available for people of those languages to provide comments or receive answers to questions in those languages. More information regarding the total number of meetings and organizations met with can be found in Volume 6, Public Involvement, of the plan.

80. **Policy 2.34, Accessibility.** Ensure that community involvement processes for planning and investment projects are broadly accessible in terms of location, time, and language, and that they support the engagement of individuals with a variety of abilities and limitations on participation.

81. **Policy 2.35, Participation monitoring.** Evaluate and document participant demographics throughout planning and investment processes to assess whether participation reflects the demographics of affected communities. Adapt involvement practices and activities accordingly to increase effectiveness at reaching targeted audiences.

82. **Policy 2.36, Adaptability.** Adapt community involvement processes for planning and investment projects as appropriate to flexibly respond to changes in the scope and priority of the issues, needs, and other factors that may affect the process.

83. **Policy 2.37, Process evaluation.** Evaluate each community involvement process for planning or investment projects from both the City staff and participants' perspectives, and consider feedback and lessons learned to enhance future involvement efforts.

The CC2035 process formally began in 2010 with the initiation of the CC2035 Concept Plan and N/NE Quadrant Plan. At that time information from the 2010 Census was being released and used as an initial baseline for the demographics of the Central City. However, throughout the life of the plan effort, demographic, development, and transportation data was updated and used to inform the final versions of the two plans noted above, as well as the subsequent West and Southeast Quadrant Plans, and final Recommended Draft of CC2035. This ensured that the plan reflected real-time conditions and evolving projects for the plan area, and the information was made available to plan stakeholders and decision makers, consistent with Policies 2.34 – 2.37.

Information design and development

84. **Policy 2.38, Accommodation.** Ensure accommodations to let individuals with disabilities participate in administrative, quasi-judicial, and legislative land use decisions, consistent with federal regulations.

85. **Policy 2.39, Notification.** Notify affected and interested community members and recognized organizations about administrative, quasi-judicial, and legislative land use decisions with enough lead time to enable effective participation. Consider notification to bot h property owners and renters.

86. **Policy 2.40, Tools for effective participation.** Provide clear and easy access to information about administrative, quasi-judicial, and legislative land use decisions in multiple formats and through technological advancements and other ways.

87. **Policy 2.41, Limited English Proficiency (LEP).** Ensure that limited English proficient (LEP) individuals are provided meaningful access to information about administrative, quasi-judicial, and legislative land use decisions, consistent with federal regulations.

Consistent with Policies 2.38 – 2.41, and BPS community involvement practices, meetings, open house events, and all public meetings, described in more detail in the findings for Statewide Goal 1, were held at locations that could accommodate people with disabilities, meetings were noticed, information on the plan were provided to meeting participants as well as online, and accommodations were made to allow LEP individuals learn about and comment on the plan.

Urban Form: Goals

88. **GOAL 3.A: A city designed for people.** Portland's built environment is designed to serve the needs and aspirations of all Portlanders, promoting prosperity, health, equity, and resiliency. New development, redevelopment, and public investments reduce disparities and encourage social interaction to create a healthy connected city.

89. **GOAL 3.B: A climate and hazard resilient urban form.** Portland's compact urban form, sustainable building development practices, green infrastructure, and active transportation system reduce

carbon emissions, reduce natural hazard risks and impacts, and improve resilience to the effects of climate change.

90. **GOAL 3.C: Focused growth.** Household and employment growth is focused in the Central City and other centers, corridors, and transit station areas, creating compact urban development in areas with a high level of service and amenities, while allowing the relative stability of lower-density single-family residential areas.

91. **GOAL 3.D: A system of centers and corridors.** Portland's interconnected system of centers and corridors provides diverse housing options and employment opportunities, robust multimodal transportation connections, access to local services and amenities, and supports low-carbon complete, healthy, and equitable communities.

92. **GOAL 3.E: Connected public realm and open spaces.** A network of parks, streets, City Greenways, and other public spaces supports community interaction; connects neighborhoods, districts, and destinations; and improves air, water, land quality, and environmental health.

93. **GOAL 3.F: Employment districts.** Portland supports job growth in a variety of employment districts to maintain a diverse economy.

94. **GOAL 3.G: Nature in the city.** A system of habitat corridors weaves nature into the city, enhances habitat connectivity, and preserves natural resources and the ecosystem services they provide.

The Urban Design chapter of the 2035 Comprehensive Plan contains goals and policies that view the city as if viewed from above. It considers the natural and urban conditions that shape the city, the unique districts that gives the city a diverse character and considers the network of corridors that link the city internally and with the region. Viewed from this perspective, the CC2035 Plan is intended to shape systems that make up the densest urban center in the State of Oregon. The Central City is a regional hub for transportation, civic and cultural life, and government. Yet, it is also a collection of 10 individual districts, each with their own character and role, bound together by a close relationship with the Willamette River and a dynamic topography which further defines its character.

Consistent with Goals 3.A – 3.D, CC2035 contains goals, policies, and actions that support the Central City Plan District as the primary center for Portland, as well as the Portland Metropolitan Region. The plan's policy framework and implementation plan supports a city center that "is composed of diverse, high density districts that feature high-quality spaces and a character that facilitates social interaction" (Goal 5.B) that can provide "equitable benefits to human health, the natural environment and the local economy" (Goal 6.A). The framework further contains policies addressing natural hazard and climate change resiliency (Policies 6.1 and 6.2), and numerous goals, policies, and actions supporting the Central City as the preeminent location for high-density focused growth in terms of economic development, housing, and access to government, cultural, and educational assets.

These goals, policies, and actions are further supported by Zoning Code amendments, such as development standards, FAR and height and development incentives, that on balance increase the development potential of the Central City . For instance, the Zoning Code has increased the base FAR of a number of sites that previously had a base of 4:1 to 5:1. These changes are intended to incent the development of new residential development, especially those containing affordable housing as a result of adopted inclusionary housing provisions. Further, limited portions of the Central Eastside were rezoned from industrial designations to Central Employment (EX) a mixed-use zone that allows higher density development as well as housing in certain situations. These

provisions also build upon past and anticipated public investments in transportation infrastructure and respond to projections that the Central City will need to provide for 30% of Portland's projected growth by 2035.

The CC2035 Plan further contains several elements that further the objective of Goal 3.E. These include the proposed Green Loop, new development standards and actions addressing the use of green infrastructure, expanded tree canopy, and additional vegetated setbacks within and adjacent to the public realm. The plan also contains goals, policies, and actions that support new open space creation, expanded use of the public realm and open space areas for a diversity of uses that enhance social interaction and environmental health.

Beyond the CC2035 policy framework, the plan includes many elements promoting a high-density and diverse economic center. The plan allows for increased employment densities in the Central Eastside, along the transit mall, at key station areas, and at major bridgeheads, consistent with Goal 3.F.

And lastly, as the Willamette River, Sullivan's Gulch, and West Hills intersect with the Central City, combining with a public open space network that create corridors of habitat through the urban center of the city, CC2035 contains goals and policies promoting enhancement and expansion of these systems, as well as new development standards that require a greater setback from the Willamette River, improved enhancement requirements, greater open space areas at master plan sites, and bird safe design, are consistent with Goal 3.G.

Urban Form: Policies

Citywide design and development

95. **Policy 3.2, Growth and stability.** Direct most growth and change to centers, corridors, and transit station areas, allowing the continuation of the scale and characteristics of Portland's residential neighborhoods.

CC2035 strategically proposed FAR increases as well as height amendments various parts of the Central City, with an emphasis on the transit mall and new University Place, OMSI, Clinton station area. These amendments, as shown on Maps 510-2. 510-3, and 510-4 of the Central City Plan District (Volume 2A, Part 1 of the revised Recommended Draft of CC2035) were specifically intended to increase development densities in the Central City, with a further emphasis on incenting residential densities. During various points in their review of CC2035, Council proposed additional height and FAR amendments stating that these increases and bonus opportunities could result in additional housing that would help to increase the supply of housing within the city. Thus, these amendments increasing development potential are consistent with this policy direction.

96. **Policy 3.3, Equitable development.** Guide development, growth, and public facility investment to reduce disparities, ensure equitable access to opportunities, and produce positive outcomes for all Portlanders.

3.3.a, Anticipate, avoid, reduce, and mitigate negative public facility and development impacts, especially where those impacts inequitably burden communities of color, under-served and under-represented communities, and other vulnerable populations.

3.3.b, Make needed investments in areas that are deficient in public facilities to reduce disparities and increase equity. Accompany these investments with proactive measures to avoid displacement and increase affordable housing.

3.3.c, Encourage use of community benefit agreements to ensure equitable outcomes from development projects that benefit from public facility investments, increased development allowances, or public financial assistance. Consider community benefit agreements as a tool to mitigate displacement and housing affordability impacts.

3.3.d, Consider use of exactions imposed on development and other tools to capture value created by plans and investments, to reduce or mitigate displacement and housing affordability impacts.

3.3.e, Coordinate housing, economic development, and public facility plans and investments to create an integrated community development approach to restore communities impacted by past decisions.

97. **Policy 3.4, All ages and abilities.** Strive for a built environment that provides a safe, healthful, and attractive environment for people of all ages and abilities.

The CC2035 Plan expands the boundaries of the existing plan district to include the new Clinton station area, an underutilized industrial area of about 12 acres in size which is now zoned for a mix of residential and employment uses. Other than that, the plan focuses redevelopment of existing underutilized and vacant areas of the Central City, and with uses of a similar character but at higher densities. This approach avoids displacement of existing populations. The plan further contains policies, actions, and development standards that promote housing and essential services for people of different ages and abilities to ensure that Central City neighborhoods are complete and sustainable communities, consistent with Policies 3.3 – 3.4.

98. **Policy 3.5, Energy and resource efficiency.** Support energy-efficient, resource-efficient, and sustainable development and transportation patterns through land use and transportation planning.

99. **Policy 3.6, Land efficiency**. Provide strategic investments and incentives to leverage infill, redevelopment, and promote intensification of scarce urban land while protecting environmental quality.

100. **Policy 3.7, Integrate nature.** Integrate nature and use green infrastructure throughout Portland.

101. **Policy 3.8, Leadership and innovation in design.** Encourage high-performance design and development that demonstrates Portland's leadership in the design of the built environment, commitment to a more equitable city, and ability to experiment and generate innovative design solutions.

Consistent with the objectives of Policies 3.5 – 3.8, CC2035 promotes high-density and efficient land uses that are constructed to be energy efficient and that incorporate green infrastructure. The plan contains new zoning standards that introduce minimum density requirements in mixed use zones, and require new development pursue energy efficient certification and include ecoroofs. The plan also proposes expansion of transit and active transportation facilities, while reducing allowable parking ratios throughout the Central City.

102. **Policy 3.9, Growth and development.** Evaluate the potential impacts of planning and investment decisions, significant new infrastructure, and significant new development on the physical characteristics of neighborhoods and their residents, particularly under-served and under-represented communities, with attention to displacement and affordability impacts. Identify and implement strategies to mitigate the anticipated impacts.

While CC2035 promotes infill over displacement in existing Central City neighborhoods, the plan also promotes greater access to affordable housing and work space, public schools, community centers, and other amenities that serve under served and growing populations in the city center.

103. **Policy 3.11, Significant places.** Enhance and celebrate significant places throughout Portland with symbolic features or iconic structures that reinforce local identity, histories, and cultures and contribute to way-finding throughout the city. Consider these especially at:
    - High-visibility intersections
    - Attractions
    - Schools, libraries, parks, and other civic places
    - Bridges
    - Rivers
    - Viewpoints and view corridor locations
    - Historically or culturally significant places
    - Connections to volcanic buttes and other geologic and natural landscape features
    - Neighborhood boundaries and transitions

CC2035 takes various tacks at addressing the objectives of Policy 3.11. The plan treats the bridgeheads along the Willamette River as key locations for some of the taller and most dense development along the Central Reach of the river. The plan also promotes development of a similar scale along the transit mall. Conversely, the plan increases the protection of public view corridors within and through the city center, promotes solar access to public park spaces, such as the Park Blocks and the Lan Su Classical Chinese Garden, and appropriate scale transitions to adjacent residential neighborhoods and historic district in and outside of the Central City.

In the New Chinatown/Japantown Historic District, the only MAX light rail station in the district fronts a 40,000 square foot site entirely used for surface parking. The CC2035 plan includes greater heights on the block to promote its redevelopment in line with goals for greater station area densities, the vitality of the historic district and residential activity. The heights are increased from 100 feet to 125 feet on the full block and an additional 75 feet of bonus height to 200 feet on the western half of the block located adjacent to this station area. Although the design of a building at this location, including the ultimate massing and height, would be reviewed for consistency with the applicable historic district design guidelines for the district, such a structure would better support the objective of Policy 3.11 than a vacant or surface parking lot.

Centers

104. **Policy 3.12, Role of centers.** Enhance centers as anchors of complete neighborhoods that include concentrations of commercial and public services, housing, employment, gathering places, and green spaces.

105. **Policy 3.13, Variety of centers.** Plan for a range of centers across the city to enhance local, equitable access to services, and expand housing opportunities.

The Central City is the largest center on the 2035 Comprehensive Plan Map, a place that is intended to contain government services, civic amenities, a central business district, major institutions, diverse residential neighborhoods, the regional transportation hub, and a center for innovation and exchange. The CC2035 Plan addresses the multiple roles through an integrated policy framework

that address economic development, housing opportunities, community development, environmental enhancement, multimodal transportation options, and a public realm and other features that provide for public gathering, discourse and events that benefit typical Central City users, but also the region.

The plan further supports this framework through actions that support new community centers, public schools, diversity of housing types and affordability, and the development and maintenance of essential public services that support residents. Employees, and visitors of the city center. Zoning amendments that address the creation of affordable housing, public open space, multimodal transportation, and essential public services directly implement the objectives of Policies 3.12 and 3.13.

106. **Policy 3.14, Housing in centers.** Provide housing capacity for enough population to support a broad range of commercial services, focusing higher-density housing within a half-mile of the center core.

107. **Policy 3.15, Investments in centers.** Encourage public and private investment in infrastructure, economic development, and community services in centers to ensure that all centers will support the populations they serve.

The CC2035 Plan projects that 30 percent of the city's growth by 2035 will occur in the Central City. This includes 38,000 new households and 51,000 new jobs. The increase in maximum floor area and use allowances of the Zoning Code proposed by the plan are modest, as the preexisting maximum height and FAR can accommodate these projections, based on analysis included in the buildable lands inventory (BLI). However, beyond capacity alone, the plan includes actions, development standards, and development incentives that address the inclusion of services and amenities that will support this continued growth and allow the Central City to sustain growth and the needs of residents and employees through the life of the plan and beyond. Specifically, new Central City Master Plan standards (Section 33,510.255 of the Zoning Code) requires the development of publicly accessible open space at key large development sites, and Section 33.510.2.E of the Zoning Code contains floor area allowance incentives when public services such as schools, community centers, libraries, and daycare are developed. These various elements of the plan are consistent with policies 3.14 and 3.15.

108. **Policy 3.16, Government services.** Encourage the placement of services in centers, including schools and colleges, health services, community centers, daycare, parks and plazas, library services, and justice services.

In direct response to this directive, the policy framework and implementation plan for CC2035 call for the development of new community centers, daycare, public open space, educational facilities, and other essential public services. Development incentives have also been included that encourage the development of such facilities as part of new mixed-use development and as standalone development.

109. **Policy 3.17, Arts and culture.** Ensure that land use plans and infrastructure investments allow for and incorporate arts, culture, and performance arts as central components of centers.

The role and importance of arts and culture to the economy and livability of the Central City is addressed in the policy framework and actions of the plan. The zoning strategy of the plan also supports this directive through the expansion of mixed-use zoning at key station areas where such

amenities exist and where additional amenities are proposed, such as the OMSI station area in the Central Eastside.

Amendments to the Zoning Code also protect existing arts and cultural infrastructure. For example, height limit adjustments to new development are possible to protect the Lan Su Classical Chinese Garden, an important cultural asset, adjacent to the New Chinatown/Japantown Historic District. A shadow study will be required of all new development on the blocks south, southwest and west of the Lan Su Garden. This shadow analysis will be required to ensure the garden, and the various functions it hosts, have access to light and air, and will be free from excessive shadowing from adjacent structures that might otherwise block sunlight during part of the afternoon.

110. **Policy 3.18, Accessibility.** Design centers to be compact, safe, attractive, and accessible places, where the street environment makes access by transit, walking, biking, and mobility devices such as wheelchairs, safe and attractive for people of all ages and abilities.

111. **Policy 3.19, Center connections.** Connect centers to each other and to other key local and regional destinations, such as schools, parks, and employment areas, by frequent and convenient transit, bicycle sharing, bicycle routes, pedestrian trails and sidewalks, and electric vehicle charging stations.

The existing conditions of the Central City may present the best example of how to address the objectives of Policies 3.18 and 3.19. However, the CC2035 Plan proposes enhancing the accessibility of the city center through additional transit connections, and multimodal infrastructure, like the Green Loop, that offer greater safety and separation for cyclists and pedestrians while connecting key service and destinations throughout the Central City.

112. **Policy 3.20, Green infrastructure in centers.** Integrate nature and green infrastructure into centers and enhance public views and connections to the surrounding natural features.

The policies, actions, and development standards of the plan address this policy by supporting and often requiring the development of energy efficient buildings, ecoroofs, use of green infrastructure on private land and in the public right-of-way, and expansion of greenway setbacks and tree canopy throughout the Central City.

Central City

113. **Policy 3.21, Role of the Central City.** Encourage continued growth and investment in the Central City, and recognize its unique role as the region's premier center for jobs, services, and civic and cultural institutions that support the entire city and region.

The CC2035 Plan proposed modest increases in FAR, as the plan district already contains a significant amount of growth potential through current zoning. However, significant growth is proposed for the transit mall and key station areas. CC2035 amendments increasing FAR and height allowances are shown on Maps 510-2, 510-3, and 510-4 of the Central City Plan District (Volume 2A, Part 1 of the revised Recommended Draft of CC2035). These were specifically intended to increase development densities in the Central City.

The plan also includes Zoning Code development standards allowing higher density employment in the Central Eastside industrial sanctuary. Lastly, the plan focuses on the redevelopment of vacant and under-utilized parcels throughout the city center, and places minimum density requirements for new development in mixed zones, consistent with this policy.

114. **Policy 3.22, Model Urban Center.** Promote the Central City as a living laboratory that

demonstrates how the design and function of a dense urban center can concurrently provide equitable benefits to human health, the natural environment, and the local economy.

This policy calls for the Central City to be developed as a vibrant mixed-use center, that includes dense development that contributes to human and environmental health. CC2035 addresses these multiple objectives through elements that require the use of green infrastructure and energy efficient buildings. Additional elements that address environmental enhancement standards, expansion of non-automotive transportation options, a diverse mix of housing and essential public services, and an integrated approach toward transportation, urban design, development, and environmental enhancement, each contribute to the objectives of Policy 3.22.

115. **Policy 3.23, Central City employment.** Encourage the growth of the Central City's regional share of employment and continue its growth as the region's unique center for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

By the year 2035, the Central City is anticipated to add 51,000 new jobs to the more than 135,000 jobs that already exist. CC2035 contains numerous goals, policies, and actions that directly address expanded employment opportunities, but the plan most directly encourages growth by increasing FAR along the transit mall, at key station areas, and by increasing FAR allowances for higher density employment in the Central Eastside. These and similar elements of the plan ensure that CC2035 increase the Central City's share of regional job growth through the life of the plan, consistent with Policy 3.23.

116. **Policy 3.24, Central City housing.** Encourage the growth of the Central City as Portland's and the region's largest center with the highest concentrations of housing and with a diversity of housing options and services.

Over the life of the CC2035 Plan, the Central City is projected to grow by 38,000 households, and most of this growth will continue in existing districts such as the Pearl, West End, Goose Hollow, and South Waterfront. However, emerging residential neighborhoods in the Lloyd, Old Town/Chinatown, and other districts are expected to densify as well. The plan supports this direction through increased FAR allowances at key station areas, the rezoning of some areas to base zones that have demonstrated the ability to produce more housing, policies supporting a mix of housing types, and through development incentives that encourage affordable housing, as well as community supporting services and amenities, consistent with Policy 3.24.

117. **Policy 3.25, Transportation hub.** Enhance the Central City as the region's multimodal transportation hub and optimize regional access as well as the movement of people and goods among key destinations.

CC2035 amends the City's Transportation Systems Plan (TSP) to add a new goal and 16 new polices addressing various transportation issue, including Policy 9.40 which states:

> *Regional transportation hub. Strengthen the Central City as the highly accessible and multimodal hub for moving people and goods, reinforcing its regional center roles, enabling successful high density employment and housing development, and thereby affirming its role in Metro's Regional 2040 Framework Plan.*

The plan also contains over 100 transportation related action items that address transit improvements, enhance freight mobility, expand and increase the safety of pedestrian and bicycle

facilities, improve intersections and turn movements to the benefit of all modes, and consider the use of the Willamette River for regional transit options, such as high speed ferry service. These and other actions are intended to support and enhance the role of the Central City as the regional transportation hub, consistent with Policy 3.25. For more information regarding how the CC2035 Plan is consistent with all applicable transportation related Comprehensive Plan goals and policies, review "Transportation" findings located later in this findings report.

118. **Policy 3.26, Public places.** Promote public places and the Willamette River waterfront in the Central City as places of business and social activity and gathering for the people of its districts and the broader region.

The CC2035 Plan promotes the role and importance of the Willamette River, public right-of-way, and parks and open space areas in making the Central City a civic and cultural center for innovation and exchange. The plan's policy framework and implementation plan contain elements supporting enhancement and expansion of public open space and gathering places, such as community centers and allowing limited retail uses in OS zones. The zoning amendments from the plan further provide development incentives to create greater setbacks from the Willamette River than those required by the plan, and require that public open space be a part of large master plan sites. The plan contains additional elements that protect solar access from public spaces, promote expanded use of the right-of-way, and support the creation of the Green Loop, a key pedestrian and bicycle access way that links key public places throughout the Central City.

Corridors

119. **Policy 3.44, Growth and mobility.** Coordinate transportation and land use strategies along corridors to accommodate growth and mobility needs for people of all ages and abilities.

120. **Policy 3.45, Connections.** Improve corridors as multimodal connections providing transit, pedestrian, bicycle, and motor vehicle access and that serve the freight needs of centers and neighborhood business districts.

121. **Policy 3.46, Design.** Encourage street design that balances the important transportation functions of corridors with their roles as the setting for commercial activity and residential living.

122. **Policy 3.47, Green infrastructure in corridors.** Enhance corridors with distinctive green infrastructure, including landscaped stormwater facilities, extensive tree plantings, and other landscaping that both provide environmental function and contribute to a quality pedestrian environment.

The Central City contains several designated Civic Corridors and Neighborhood Corridors. These tend to be major streets that extend from the city center outward into the rest of the city, such as Burnside, Martin Luther King Jr., Naito Parkway, and Broadway, among others. Within the Central City, these streets, their design, and their function may seem very like any number of other streets. However, once these corridors leave the city center, they often serve as both a major route to and from the Central City, but also a local node of high-density, mixed-use development for the neighborhoods they serve.

That said, the role of these corridors as routes that connect the Central City with other corridors and town centers is an important one. Although these densities, mix of uses, use of green infrastructure, and inclusion of active transportation facilities and transit is not unique to these streets in the city center, the character of development and design and programming of these streets is what often makes them different. The CC2035 plan addresses the unique character of

these corridors through Transportation Systems Plan (TSP) designations that address the multiple roles these corridors play. The plan also enhances development standards and use allowances that focus on ground floor activation, glazing standards, building setbacks, landscaping, green infrastructure and other elements that support the objectives of Policies 3.44 – 3.47.

Civic Corridors

123. **Policy 3.48, Integrated land use and mobility.** Enhance Civic Corridors as distinctive places that are models of ecological urban design, with transit-supportive densities of housing and employment, prominent street trees and other green features, and high-quality transit service and pedestrian and bicycle facilities.

124. **Policy 3.49, Design great places.** Improve public streets and sidewalks along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe, healthy, and attractive pedestrian environment, and contribute to quality living environments for residents.

125. **Policy 3.50, Mobility corridors.** Improve Civic Corridors as key mobility corridors of citywide importance that accommodate all modes of transportation within their right-of-way or on nearby parallel routes.

126. **Policy 3.51, Freight.** Maintain freight mobility and access on Civic Corridors that are also Major or Priority Truck Streets.

The following streets are designated Civic Corridors within the Central City: Burnside, Broadway, Sandy, Naito Parkway, MLK Jr., SE Powell, and SE Hawthorne. The policies above identify key objectives for designated Civic Corridors. These include integrating freight, transit, and active transportation capacity, and green infrastructure, within a well-designed public realm that promotes human interaction and health. The CC2035 Plan promotes these objectives through development standards that require adjacent development to activate the public realm with a mix of uses and greater amounts of windows. Other Zoning Code standards provide incentives to setback development to create an expanded pedestrian experience. The plan also includes updated classification to the Transportation Systems Plan (TSP) that denote the multiple roles these various streets are required to plan as routes for transit, freight, bike commuting, and general circulation.

Neighborhood Corridors

127. **Policy 3.52, Neighborhood Corridors.** Enhance Neighborhood Corridors as important places that support vibrant neighborhood business districts with quality multi-family housing, while providing transportation connections that link neighborhoods.

The following streets are designated Neighborhood Corridors within the Central City: NW Lovejoy, East Burnside, SE Belmont, and SE Division. Consistent with the above policy, the plan approach toward the designated Neighborhood Corridors in the Central City is to maintain mixed use zoning along these streets that requires active ground floor uses, such as retail sales and service, offices, and other uses, with upper stories available for residential, offices, and along the south side of SE Belmont, industrial office uses.

Transit Station Areas

128. **Policy 3.53, Transit-oriented development.** Encourage transit-oriented development and transit-supportive concentrations of housing and jobs, and multimodal connections at and adjacent to high-capacity transit stations.

Nearly all districts in the Central City have key station areas that are supported by transit-oriented development (TOD). CC2035 continues to support redevelopment in and near these station areas with TOD, and specifically addresses the inclusion of TOD at recently created station areas along the Max Orange Line in the University/South Downtown, South Waterfront, and Central Eastside Districts. An example of this can be found within the OMSI Station Area, where vacant and underutilized lands zoned for lower density employment and light industry use have been up-zoned to allow for these uses, as well as a mix of office, retail, and housing as a conditional use. This area now also enjoys greater maximum FAR and heights, which will allow a denser and greater mix of uses to exist as TOD at this station.

129. **Policy 3.54, Community connections.** Integrate transit stations into surrounding communities and enhance pedestrian and bicycle facilities (including bike sharing) to provide safe and accessible connections to key destinations beyond the station area.

130. **Policy 3.55, Transit station area safety.** Design transit areas to improve pedestrian, bicycle, and personal safety.

The station areas of the Central City are well connected to the multimodal network of bike and pedestrian routes that serve the city center, and CC2035 maintains and proposes to expand this network. The plan also proposes TOD at higher densities, and development standards that create active pedestrian-oriented uses at and adjacent to stations to increase safety of transit riders and other users of these station areas, consistent with Policies 3.54 – 3.55.

131. **Policy 3.56, Center stations.** Encourage transit stations in centers to provide high density concentrations of housing and commercial uses that maximize the ability of residents to live close to both high-quality transit and commercial services.

132. **Policy 3.57, Employment stations.** Encourage concentrations of jobs and employment-focused land uses in and around stations in employment-zoned areas.

CC2035 addresses the objectives of Policies 3.56 and 3.57 in several ways. Along the transit mall and at key station areas, FAR and height allowances have been applied to mixed-use zoned areas where a higher density of uses and development may now occur in response to the transit that has been expanded in the Central City over the last decade. In the Central Eastside, two new station areas located in underutilized low density industrial/employment land have been rezoned to mixed employment, with higher FAR and height allowances. One of these, the Clinton Station, is intended for a mix of residential and employment uses, whereas, the OMSI station area is intended for Employment Transit-Oriented Development (ETOD) and housing is only allowed as a conditional use where it can be found to not erode the viability of industrial employment uses on adjacent parcels.

133. **Policy 3.58, Transit neighborhood stations.** Encourage concentrations of mixed-income residential development and supportive commercial services close to transit neighborhood stations. Transit neighborhood stations serve mixed-use areas that are not in major centers.

134. **Policy 3.59, Destination stations.** Enhance connections between major destinations and transit facilities and strengthen the role of these station areas as places of focused activity.

Many of the existing stations in the Central City are located at areas with key regional attractions, such as OMSI, the Moda Center, and the Saturday Public Market. Some of these stations have long enjoyed high-density mixed-use zoning, that includes affordable and market rate housing as well as mix of retail and employment uses. However, in situations where redevelopment around these

stations has been slow to occur, or where zoning limitations restricted TOD at these locals, CC2035 proposes new base zones, increased height and FAR, and sometimes the creation of Central City Master Plans, that will in part be used to leverage the development of a dense mix of uses at and adjacent to these stations, consistent with Policy 3.58 and 3.59.

City Greenways

135. **Policy 3.60, Connections.** Create a network of distinctive and attractive City Greenways that link centers, parks, schools, rivers, natural areas, and other key community destinations.

136. **Policy 3.61, Integrated system.** Create an integrated City Greenways system that includes regional trails through natural areas and along Portland's rivers, connected to neighborhood greenways, and heritage parkways.

137. **Policy 3.62, Multiple benefits.** Design City Greenways that provide multiple benefits that contribute to Portland's pedestrian, bicycle, green infrastructure, and parks and open space systems.

138. **Policy 3.63, Design.** Use design options such as distinctive street design, motor vehicle diversion, landscaping, tree plantings, scenic views, and other appropriate design options, to create City Greenways that extend the experience of open spaces and nature into neighborhoods, while improving stormwater management and calming traffic.

The Central City contains two primary City Greenways: The Green Loop and Willamette Greenway Trail. CC2035 continues to address the completion of the greenway trail as new and redevelopment activities that trigger trail construction occur along its alignment. As for the Green Loop, designated as an "enhanced greenway corridor," this is a significant new greenway that will pass through most of the districts in the Central City and furnishes a new type of pedestrian and bicycle infrastructure designed for more cautious riders who prefer a separation from automobile traffic. The loop will provide connections to other pedestrian, bicycle, and transit alignments, and connect various public parks, visitor attractions, and institutions. The distinctive character of the loop, its integration with the multimodal network, and connections to key Central City destinations ensure consistency with the objectives of Policies 3.60 – 3.63.

Urban habitat corridors

139. **Policy 3.64, Urban habitat corridors.** Establish a system of connected, well-functioning, and diverse habitat corridors that link habitats in Portland and the region, facilitate safe fish and wildlife access and movement through and between habitat areas, enhance the quality and connectivity of existing habitat corridors, and establish new habitat corridors in developed areas.

140. **Policy 3.65, Habitat connection tools.** Improve habitat corridors using a mix of tools including natural resource protection, property acquisition, natural resource restoration, tree planting and landscaping with native plants, and ecological design integrated with new development.

141. **Policy 3.66, Connect habitat corridors.** Ensure that planned connections between habitat corridors, greenways, and trails are located and designed to support the functions of each element, and create positive interrelationships between the elements, while also protecting habitat functions, fish, and wildlife.

The CC2035 amendments are consistent with Policies 3.64, 3.65 and 3.66 in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features including the 187-mile long Willamette River and riparian area which connects 11,500 square miles of land to the Columbia River and Pacific Ocean. The Willamette River is a migratory corridor for fish and wildlife. Chapter 5, Results, includes recommendations for protecting and maintaining natural resource features and functions and enhancing the resources to improve quality, quantity and connectivity of habitats.

B. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the Willamette River, floodplains and riparian areas by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirements include planting of native vegetation and a mix of trees, shrubs and groundcover, which will improve habitat quality, quantity and connectivity along the Willamette River.

C. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. There is a landscaping requirement for the setback that requires native plants to be installed with development. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion and updated landscaping requirement is appropriate because they will improve habitat quality, quantity and connectivity for fish and wildlife.

D. The regulations for removal and remediation of hazardous substances require the use of biotechnical techniques for bank stabilization and the planting of native vegetation on the river bank. This will enhance fish and wildlife habitat in the Willamette River and riparian areas.

E. The major trail alignment and completion of the Greenway Trail along the Willamette River will include landscaping that incorporates native vegetation and a mix of trees, shrubs and groundcover, which will improve habitat quality, quantity and connectivity along the Willamette River.

F. C2035 includes a range of policies that will ensure the City continues progress toward incorporating tree canopy with redevelopment throughout the Central City. Specifically, the Plan contains tree canopy targets for all ten Central City subdistricts. Nine out of the 10 subdistricts are expected to experience increases in tree canopy over the life of the plan. Additional tree canopy will create new habitat connectivity corridors that allow wildlife to move across the urban landscape.

G. The Green Loop is a multimodal transportation corridor that incorporates green infrastructure including trees and other vegetation into the design. The vegetation included in the Green Loop will create a new habitat connectivity corridor for wildlife to move through the Central City and connect to the Willamette River.

H. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including habitat for avian species. Ecoroofs will improve habitat connectivity for birds and insects throughout the urban landscape.

Employment areas

142. **Policy 3.67, Employment area geographies.** Consider the land development and transportation needs of Portland's employment geographies when creating and amending land use plans and

making infrastructure investments.

143. **Policy 3.68, Regional Truck Corridors.** Enhance designated streets to accommodate forecast freight growth and support intensified industrial use in nearby freight districts. *See Figure 3-7 — Employment Areas.* Designated regional truckways and priority truck streets (Transportation System Plan classifications are shown to illustrate this network).

The Central City contains two urban industrial districts: Central Eastside and Lower Albina Districts. Both are predominately zoned for a mix of freight dependent industrial employment uses, both are designated freight districts, and both include mixed-use corridors and major transit stations. CC2035 results in modest changes to the Lower Albina District; however, the plan significantly increases allowed employment densities in the Central Eastside, the rezoning of industrial to mixed use development at light rail stations, while increasing the designation of key freight routes to a higher classification and proposing new couplets and signalization improvements intend to enhance freight mobility and the viability of industrial employment throughout the district, consistent with Policies 3.67 and 3.68.

Rivers Pattern Area

144. **Policy 3.69, Historic and multi-cultural significance.** Recognize, restore, and protect the historic and multi-cultural significance of the Willamette and Columbia Rivers, including current activities such as subsistence fishing of legally-permitted fish species.

The amendments are consistent with this policy because Willamette River goals, policies and actions promote the Willamette River's historic and cultural significance, economy, and river recreation including fishing. Specifically:

A. Willamette River goals state the river's significant role in the environmental health, economy, recreation and character, that the river is healthy for fish, wildlife and people and the river and adjacent public areas are connected;

B. Policies 4.1 and district policies 1.SW-2, 4.DT.1 and UD 18, for example, speak to improvements and activities that strengthen the physical, visual and cultural connections to the river and increase awareness of the river's history, economy and ecological importance;

C. Other policies focus on river-dependent and river-related uses, improved access to the river and to docks, and safe and enjoyable recreation including fishing such as Policy 4.3, Central Eastside Policy 4.CE-1 and South Waterfront policies 4.SW.1;

D. Specific Central Citywide actions such as WR5 and district actions such as Old Town/Chinatown action UD53, call for installation of art, signage and attractions along the riverfront to showcase the river's past including highlighting Native American and maritime history; and

E. Specific Central Citywide and district actions call for improved access to the river and to docks (Central Citywide WR4) and district actions promote low impact recreation including fishing (University District/South Downtown action UD62 and South Waterfront action UD 75 and 76).

145. **Policy 3.70, River transportation.** Recognize and enhance the roles of the Willamette and Columbia rivers as part of Portland's historic, current, and future transportation infrastructure, including for freight, commerce, commuting, and other public and private transportation functions.

The amendments are consistent with this policy because a Transportation goal, along with policies and actions recognize and enhance the role of the Willamette River as part of Portland's historic, current and future transportation infrastructure through:

A. Transportation Goal 3A maintains that the Central City has a safe, affordable, efficient and accessible transportation system that prioritizes transit (including river transit in transportation system diagram) and Transportation Policy 3.10 includes exploring river transit;

B. Numerous policies (e.g. Willamette River 4.4) and actions call for preserving, improving and promoting infrastructure that support commercial and marine freight (e.g. Lower Albina Policy 3.LA-3), river transit (e.g. Central City actions TR4 and TR5), individual watercraft and boating uses (e.g. Downtown TR41); and

C. See above findings for Policy 3.69, Historic and Cultural Significance, for findings that relate to maritime history.

D. The Transportation Studies list in CC2035 include a River Transit Study to assess the feasibility of a river transit system.

146. **Policy 3.71, Recreation.** Improve conditions along and within the Willamette and Columbia rivers to accommodate a diverse mix of recreational users and activities. Designate and invest in strategically-located sites along the length of Portland's riverfronts for passive or active recreation activities that are compatible with nearby land uses, historically and culturally important sites, significant habitat areas, restoration sites, and native fish and wildlife usage.

The CC2035 Plan is consistent with this policy because:

A. Numerous goals, policies and actions related to the Willamette River accommodate a diverse mix of recreational users and activities. Examples are Willamette River Goals 4A and 4C, Policies 1.5, 4.2 and 4.5, and actions WR 4, WR8 and WR14;

B. The amendments also designate and include investments in strategically-located sites along the riverfront for recreation that is compatible with nearby land uses and other significant sites. Examples are: Policy 4.11 calls for low impact dock design, Downtown Policy 4.DT-1 addresses diverse recreation and habitat at Central City's riverfront Governor Tom McCall Waterfront Park, EN17, EN 19 and EN21;

C. Two Zoning Code use allowances in the Central City Plan District also support improving conditions along the Willamette River for recreational users. One allows a limited amount of retail structures in Open Space zoned properties outside of the river setback, to support parks users and activities. This includes specific OS zoned locations along the riverfront. Portland Parks and Recreation anticipates retail development to serve parks users with food and drink vendors and recreation rentals such as kayaks. The other Zoning Code development standard is for a Riverfront Open Space Bonus that entails a developer dedicating additional open space area adjacent to the river setback to provide more open space opportunities in exchange for additional development potential; and

D. The new River Overlays Chapter in the Zoning Code includes an expanded river setback of 50' as measured from top of bank, for new development and redevelopment along the riverfront. This increase from the existing 25' setback provides more land area for recreation and other objectives of the Willamette River Greenway.

147. **Policy 3.73, Habitat.** Enhance the roles of the Willamette and Columbia rivers and their confluence as an ecological hub that provides locally and regionally significant habitat for fish and wildlife and habitat restoration opportunities.

The amendments support enhancing the role of the Willamette River as an ecological hub that provides locally and regionally significant fish and wildlife habitat and habitat restoration opportunities. See findings for Statewide Planning Goals 5, 6 and 15, Metro Urban Growth Management Functional Plan Title 3, 2035 Comprehensive Plan Goal 7B and policies: 3.64, 3.65 and 3.66, 7.8, 7.9, 7.10 among other policy findings in Chapter 7 Environment and Watershed Health.

148. **Policy 3.74, Commercial activities.** Enhance the roles of the Willamette and Columbia rivers in supporting local and regional business and commerce, including commercial fishing, tourism, recreation, and leisure.

The CC2035 Plan is consistent with this policy through goals, policies, actions, zoning code and map changes that enhance the role of the Willamette River in supporting local and regional business and commerce, tourism, recreation and leisure.

A. Goals 4A and 4B state that the Willamette River plays a significant role in diverse aspects including economy and recreation and the river is healthy and supports fish, wildlife and people.

B. Regional Center policies and actions seek enhancement of the riverfront as a city-wide and regional destination by encouraging shops, restaurants, other attractions and recreation, and support opportunities for river tours, river transit and regional cruises. See policies 1.5, 1-PL.3, 1-CE.3, 1-SW-2 and actions RC20, RC60, and RC63 as examples.

C. Willamette River policies and actions call for a prosperous and vibrant riverfront with a variety of businesses and attractions that provide jobs and serve riverfront visitors. See policies 4.1, 4.3, 4.4, 4.9, 4-LA.1, and 4-CE-1 and actions TR20, TR74, UD18, UD22, UD55 and UD72.

D. A Central City Plan District zoning provision also supports commercial activities in the riverfront area. It allows a limited amount of retail structures in Open Space zoned properties outside of the river setback, to support parks users and activities. This includes a sizable amount of OS zoned locations along the riverfront. It is anticipated that retail development will be food and drink vendors and recreation rentals such as kayaks.

E. The plan includes a zoning map change for the riverfront area in the Central Eastside by the Oregon Museum of Science and Industry (OMSI) that will allow more opportunities for commerce, tourism, recreation and leisure. The new zoning map changes zoning around the OMSI light rail station area from industrial to Central Employment (EX) zone. This zoning map amendment will allow greater opportunities for commercial uses near the river.

F. A River Overlay Zones development standard expands river-related development in the 50' river setback for Marine Passenger Terminals but limits this activity to a 5,000-square foot building footprint within the setback to balance this development with other Willamette Greenway goals including habitat conservation. Allowed river-related development associated with Marine Passenger Terminals can happen in a multi-story building within the maximum building footprint allowance and can also locate outside the river setback.

149. **Policy 3.75, River neighborhoods.** Enhance the strong river orientation of residential areas that are located along the Willamette and Columbia Rivers.

The amendments support this policy through the CC2035 Plan policy framework that enhance the strong river orientation of river neighborhood developments to/along the Willamette River.

A. Goals 5A and 4C address a well-designed built environment with views to the surrounding landscape, building orientation and east/west connectivity to the Willamette River;

B. Central City-wide Policy 4.8 along with specific district policies such as 4.OT-1 and 4CE-2 call for development projects along the riverfront that improve the physical and visual relationship of buildings and activities to the river including the orientation of doors and windows to the river; and

C. A few actions seek to have new developments connect to the river (see findings for Policy 3.76 below), and direct staff to update the Central City Fundamental Design Guidelines (action UD1), which includes a guideline on the Willamette River that supports this policy.

150. **Policy 3.76, River access.** Enhance and complete Portland's system of river access points and riverside trails, including the Willamette Greenway Trail, and strengthen active transportation connections between neighborhoods and the rivers.

The CC2035 Plan is consistent with this policy through numerous goals, policies and actions and through zoning code implementation.

A. Goals 3.A, 4.C and 5A prioritize active transportation, east-west access (to the river) and make public areas accessible and connected, e.g. Governor Tom McCall Waterfront Park;

B. Numerous policies relate to visual and physical connections to the riverfront including to river transportation and improvements to streets and trails such as the Willamette Greenway Trail that connect people to the river, including the following examples of Central City-wide policies: 4.4, 4.5, and 5.12 and specific district policies: 3.DT-1, 3PL-1, 5.OT-3, 5.CE-2 and 3SW-1.

C. There are numerous Transportation actions that enhance and complete river access and riverside trails and strengthen active transportation connections to the river, examples are: TR44, TR74, TR94, TR107, TR114, UD 25, and UD 77.

D. Action TR118 states that the Bureau of Development Services will adopt and implement a proposed administrative rule that establishes a formula for determining rough proportionality for major public trail (e.g. Willamette Greenway Trail) exactions from specific proposed developments; to clarify when dedication of trail construction and/or dedication of easements would be required of a proposed development based on impacts to the trail system.

151. **Policy 3.77, River management and coordination.** Coordinate with federal, state, regional, special districts, and other agencies to address issues of mutual interest and concern, including economic development, recreation, water transportation, flood and floodplain management and protection, regulatory compliance, permitting, emergency management, endangered species recovery, climate change preparation, Portland Harbor Superfund, brownfield cleanup, and habitat restoration.

The CC2035 Plan includes numerous actions that involve coordination with federal, state, regional, special districts and other agencies to address issues of mutual interest and concern related to the Willamette River/riverfront's environment, recreation, transportation and commerce. Action item examples for each topic area follow:

A. WR7 develops an action plan to enhance and restore habitat throughout the Central Reach;

B. UD55 improves and enhances boater access to/from the Willamette River at Waterfront Park;

C. TR51 explores funding mechanisms, phasing and implementation of downtown river transit; and

D. TR20 supports the creation of privately operated river transit services in the Central Eastside.

152. **Policy 3.80, Willamette River Central Reach.** Enhance the role of the Willamette River Central Reach as the Central City and region's primary riverfront destination for recreation, history and culture, emergency response, water transportation, and as habitat for fish and wildlife.

The CC2035 Plan updates the *Willamette Greenway Plan* (1987) for the Central Reach. The policy framework, zoning map and zoning code regulations and implementation actions enhance the role of the Central Reach as the Central City and region's primary riverfront destination for diverse purposes including recreation, history and culture, water transportation and fish and wildlife habitat. See findings for Statewide Planning Goals 5, 8 and 15, Metro Title 3, and numerous Comprehensive Plan findings such as the following examples: Policy 3.69, 3.70, 3.71, 3.73, 4.41 and 7.1.

153. **Policy 3.82, Willamette River Greenway.** Maintain multi-objective plans and regulations to guide development, infrastructure investments, and natural resource protection and enhancement within and along the Willamette Greenway.

The amendments support maintaining multi-objective plans and regulations to guide development, infrastructure investments and natural resource protection and enhancement within and along the Willamette River in the Central Reach. See findings for Policy 3.80 above.

Central City Pattern Area

154. **Policy 3.83, Central City districts.** Enhance the distinct identities of the Central City's districts.

Since the adoption of the 1988 Central City Plan, there have been many changes to the urban form of the Central City, including introduction of entirely new neighborhoods such as the Pearl and South Waterfront Districts. To reflect how the districts have and will continue to evolve, the CC2035 identified 10 unique districts in the Central City. Each has a district identity that results from the mix of uses allowed (and often prohibited), block structure, adjacency to the Willamette River, built form and density.

The Central City also includes several Historic Districts such as the NW 13th Avenue, East Portland/Grand Avenue, and New Chinatown/Japantown Historic Districts. Maximum building heights in these districts were adjusted to preserve and complement each unique Historic District's contributing resources and the district as a whole.

For instance, in the New Chinatown/Japantown Historic District, a new maximum height of 200 feet, reduced from 425 feet, sets the new datum for height on the district's four northern blocks. An additional full block, an existing surface parking lot, had its maximum height increased from 100 feet to 125 feet with the western half of the block allowed an additional 75 feet to a maximum of 200 feet through bonus height as a means to incent new development on that site adjacent to a light rail station. Even with new height limits any new development will still be required to meet the applicable Historic Resource Review approval criteria for each district, reviewed on a case by case basis.

In Historic Resource Review, the review body will use applicable approval criteria to determine if specific development proposals are compatible with that district's unique established urban fabric—including style, materials, details, massing, and height. Council finds that the code amendments and design review and historic resource review processes demonstrate that the

amendments equally or better support this policy compared with the existing language. Consistent with Policy 3.83, CC2035 proposes an urban design concept for each area, applies development standards and use allowance that reinforce each concept, and proposes new design guidelines that address the specific desired character for each district.

155. **Policy 3.84, Central City river orientation.** Enhance and strengthen access and orientation to the Willamette River in the Central City and increase river-focused activities.

The 1972 Downtown and 1988 Central City Plans both included elements striving to better connect the Central City with the Willamette River. Because of these efforts, improvements such as Governor Tom McCall Waterfront Park and the Eastbank Esplanade came to be, as well as visions for new waterfront districts such as South Waterfront and the River District (now the Pearl and Old Town/Chinatown). CC2035 includes numerous additional ways to better connect with the river. These include greater setbacks from the river's edge to provide areas for riparian enhancement, public trails, and gathering spaces. The plan also allows for limited visitor serving retail uses in public parks along the waterfront to attract and support visitor enjoyment of these assets. The plan also allows for a higher density and mix of uses at the OMSI Station Area, the only location on the eastside of the Willamette in the Central City where the urban form of the city and people can directly interface with the Willamette. These and other elements of the plan will enhance the urban cores relationship with the Willamette, consistent with Policy 3.84.

156. **Policy 3.85, Central City pedestrian system.** Maintain and expand the Central City's highly interconnected pedestrian system.

157. **Policy 3.86, Central City bicycle system.** Expand and improve the Central City's bicycle system.

CC2035 results in several TSP amendments and new projects that expand and enhance the existing network of pedestrian and bike routes through the Central City. These include elements such as new traffic signals at key intersections throughout the Central Eastside and improvements along SE Salmon street intended to better connect that district and residential neighborhoods to the east with the Central City and Willamette River. Other elements, such as the Green Loop, attempt to provide routes that separate pedestrians and cyclists from traffic, while providing a safe connection to transit, bikeways, trails, and major Central City destinations, consistent with Policy 3.85 and 3.86.

Projects and studies in the plan increase walking and bicycling opportunities and infrastructure. 64% of TSP projects support pedestrian use and 74% support bicycle use. Policies and actions to develop the Green Loop, design streets as public spaces and enhance the Willamette for people also meet this policy.

	Bike	Ped	Auto, Freight	Transit	Safety	Total
# of projects	87	76	41	8	85	**118**
% total	73.7%	64.4%	34.7%	6.8%	72.0%	
Cost of projects	$ 962,419,223	$ 954,169,223	$ 563,352,391	$ 302,000,000	$ 784,581,249	**$ 1,169,907,301**
% total	82.3%	81.6%	48.2%	25.8%	67.1%	

Design and Development: Goals

158. **Goal 4.A: Context-sensitive design and development.** New development is designed to respond to and enhance the distinctive physical, historic, and cultural qualities of its location, while accommodating growth and change.

City Council interprets the term d*istinctive physical, historic, and cultural qualities of its location to* mean *established urban fabric* as described in Policy 4.48.

The CC2035 Plan results in height and limited FAR increases in various locations throughout the Central City. As noted previously, FAR increases generally occur in areas well served by transit and other multimodal transportation infrastructure as well as in areas where previous public investment has been made to support additional density. However, in other situations height and FAR were modified and reduced to ensure that development within designated historic districts will be more compatible with the existing character of these unique areas.

In most situations, the ability to earn bonus height in a Historic District has been repealed, while the ability to earn bonus FAR has been retained. This was done so that applicants could propose utilizing the existing floor area assigned to a site, while creating a building envelope more consistent with those typically found within these historic districts. The one exception is in the New Chinatown/Japantown Historic District, where the height on the vacant and underutilized Block 33 site is increased to 125 feet and, through bonus height, to a maximum of 200 feet on the western half of the block. Currently Block 33 is a surface parking lot that fronts on the neighborhood light rail transit station. Increasing the height on the western half of the block provides flexibility to utilize floor area for denser mixed-use development along the station area while sculpting a new building to maintain lower heights along the eastern half of the block facing the interior of the district. Based on the evidence in the record, including the memo from John M. Tess on May 8, 2020, this arrangement of building height responds to and enhances the physical, historic, and cultural qualities of the district; complements contributing resources by increasing the economic viability of rehabilitation and reuse; and accommodates growth and change in conformance with Goal 4.A.

As also discussed in the findings for Policy 4.48, in the NW 13th Avenue, East Portland/Grand Avenue, Irvington, and New Chinatown/Japantown Historic Districts, the maximum allowable height was adjusted to be more consistent with the established urban fabric and applicable historic resource review criteria for each district. Further, the adopted Historic Resource Review approval criteria for each district have been retained. New development in these areas will be reviewed using these district-specific criteria to determine that the new development is responsive to and compatible with the character of the district.

City Council finds that the allowed heights in each of the districts are equally or more supportive of the comprehensive plan goals and policies related to historic resources. Council finds that the adopted historic design guidelines for each district are essential implementation tool to ensure that the designs for each proposed development respond to and enhance physical, historic and cultural qualities of their locations. City Council finds that application of these guidelines as part of historic resource review process, which is a component of the City's Goal 5 program, may result in disapproval of a proposed development at its maximum allowable height and requirement that the building height be modified to respond to the contributing resources found in that particular district.

Outside of Historic Districts, most new development within a non-industrially zoned area, is subject to discretionary Design Review using the Central City Fundamental Design Guidelines. These guidelines work with the existing height and FAR assigned to a site to ensure that new development is designed to respond to and enhance the character of an area, enhances the public realm, and is designed and developed such that the quality and character of the architecture of a structure will not detract from the setting it is located within. The design review process is discretionary. It is intended to result in development that uses some or all of its FAR in a manner that is also consistent with all applicable design guidelines.

159. **Goal 4.B: Historic and cultural resources.** Historic and cultural resources are integral parts of an urban environment that continue to evolve and are preserved.

Over the years, there have been regular additions and evolutions to how historic resources are conserved in the Central City Plan District. Several designated Historic and Conservation Landmarks and Districts were created – NW 13th Avenue, East Portland/Grand Avenue, Yamhill, Skidmore/Old Town, Halprin, and New Chinatown/Japantown Historic Districts and the Russell Street Conservation Districts. Other historic districts were also established that are partially within the Central City, such as the Irvington and Alphabet Historic Districts.

Under CC2035, Historic Landmarks listed in the National Register of Historic Places and contributing buildings in Historic Districts will continue to be subject to discretionary Demolition Review. Also, development within all Historic and Conservation Landmark and District boundaries in the Central City will continue to be subject to discretionary Historic Resource Review. District-specific design guidelines have been adopted for most of the Historic Districts in the Central City, providing resource-specific Historic Resource Review approval criteria. This includes Skidmore/Old Town Design Guidelines adopted in 2016 and New Chinatown/Japantown Design Guidelines adopted in 2017, which were developed as an early deliverable of the CC2035 project.

Historic District design guidelines provide guidance to property owners, designers, architects, and developers related to the established urban fabric of the district as well as resource-specific Historic Resource Review approval criteria for alterations, additions, and new construction. These district-specific approval criteria conserve the specific architectural and cultural qualities that make the particular district significant.

The CC2035 Plan retains the design guidelines applicable to each district where they've been adopted. And, although the maximum heights have been adjusted in all or parts of four Central City Historic Districts, the design guidelines for each district will continue to serve as the Historic Resource Review approval criteria to determine if proposals for new development integrate with the established urban fabric of each district on a case by case basis.

The CC2035 Plan also includes new incentives to encourage the preservation and rehabilitation of designated historic resources. Under CC2035, unused FAR on a site containing a Historic or Conservation Landmark or contributing resource in a Historic or Conservation District can be sold and transferred to another site in the Central City Plan District. This creates financial resources to support improvement of the historic building. An additional 3:1 FAR may be transferred if the historic building is seismically upgraded.

The CC2035 Plan generally maintains or reduces maximum height limits in Historic and Conservation Districts. This includes a reduction in the maximum height limit in all or part of four Historic Districts. The specifics of how this was applied varies by district in response to the historic, physical, economic, and planning context of the district.

In January 2017, the Land Conservation and Development Commission adopted a new State Administrative Rule (OAR 660-023-0200) implementing the historic resources provisions of Goal 5. This new Rule applies directly to resources listed in the National Register of Historic Places after January 2017. As of April 2020, the new rule would apply to only two individual resources in the Central City Plan District—Wheeldon Annex and Alco Apartments. The City is advancing a separate code project, the Historic Resources Code Project, to amend Chapter 33.445 to achieve consistency with the provisions of the new State Administrative Rule.

The findings for Comprehensive Plan policies 4.46-4.57 further describe programs for historic resources that support this goal.

Based on the above findings and the evidence in the record, Council finds that CC2035 is equally or more supportive of this goal to preserve historic resources.

160. **Goal 4.C: Human and environmental health.** Neighborhoods and development are efficiently designed and built to enhance human and environmental health: they protect safety and livability; support local access to healthy food; limit negative impacts on water, hydrology, and air quality; reduce carbon emissions; encourage active and sustainable design; protect wildlife; address urban heat islands; and integrate nature and the built environment.

161. **Goal 4.D: Urban resilience.** Buildings, streets, and open spaces are designed to ensure long-term resilience and to adjust to changing demographics, climate, and economy, and withstand and recover from natural disasters.

Whereas the Urban Design chapter of the 2035 Comprehensive Plan takes a bird's eye view of the city's systems and layout, the Design and Development chapter focuses on the specifics of the built environment. Issues such as site design, pedestrian realm, transitions between districts, place making, and scenic and historic resources are considered in fine detail, among other issues. As the CC2035 plan area includes 10 distinct districts, as well as 5 historic districts, each with their own identity, opportunities, and constraints, the plan strives to address the goals and policies of Chapter 4 at both the macro and micro level.

For instance, to ensure that the plan is sensitive to the unique context and character of each district, CC2035 includes: policies specific to these 15 individual districts; proposes development standards regarding height, floor area ratios, and the pedestrian environment responsive to the distinct character of these areas; and, proposes actions to amend applicable design guidelines to encourage new development that responds to the desire character, context, and historic and cultural resources of these different areas. Existing Historic District design guidelines for districts such as the New Chinatown/Japantown, NW 13th Avenue, Skidmore/Old Town, and East Portland/Grand Avenue Historic Districts are maintained to ensure that new maximum height and FAR provided through CC2035 are utilized in a manner consistent with the established design direction for these districts. Similarly, the existing Central City Fundamental Design Guidelines have been retained and will continue to be applicable to most new development within non-industrially zoned areas within the Central City. Further, the plan requires that seismic upgrades to historic structures are a precondition before FAR can be transferred from sites with designated landmarks. These elements of the plan respond to the direction of Goals 4.A and B above.

Consistent with Goal 4.C, C2035 also promotes human and environmental health through new policies, development standards and actions that focus on enhancing human health through the creation of a walkable, safe urban form that provides access to parks, natural areas, community gardens, and full-service grocery stores, among other amenities and services. Further, the plan

proposes enhancing the environmental health of the Central City through new development standards that will over time establish an urban form that reduces stormwater discharges, improve air quality, reduce heat island effect and carbon emissions, utilize green infrastructure, and minimize impacts to wildlife. These new regulations include those requiring the development of ecoroofs, energy efficient buildings, bird safe development, and others.

Lastly, the plan includes new policies, standards, and actions intended to enhance the ability of the Central City to: withstand impacts from natural disasters such as earthquakes and flooding; respond to the effects of climate changes while reducing impacts that might contribute to climate change; and continue to serve as the regional center for the Portland Metropolitan Area as population, demographic changes, and the economy of the region evolves through the life of the plan. These elements of CC2035 also ensure that the plan is consistent with Goal 4.D.

Design and Development: Policies

Context

162. **Policy 4.1, Pattern areas.** Encourage building and site designs that respect the unique built, natural, historic, and cultural characteristics of Portland's five pattern areas described in Chapter 3: Urban Form.

163. **Policy 4.2, Community identity.** Encourage the development of character-giving design features that are responsive to place and the cultures of communities.

164. **Policy 4.3, Site and context.** Encourage development that responds to and enhances the positive qualities of site and context — the neighborhood, the block, the public realm, and natural features.

The CC2035 Plan focuses on the entire Central City Pattern Area, as well as the Willamette River Central Reach of the Rivers Pattern Area. As such, the plan contains numerous elements addressing these two pattern areas, and where they overlap, balancing the policy provisions of each through development standards and actions intended to reflect the characteristics unique to both. These include, generally reduced maximum heights in historic districts by eliminating height bonuses, creating height setbacks adjacent to some public parks, increase building setbacks along the Willamette River (except at key bridgehead locations), and street/public realm standards intended to enhance the pedestrian environment in response to specific conditions with the Central City's 10 different districts. These elements of the plan respond to Policies 4.1, 4.2 and 4.3 above.

165. **Policy 4.4, Natural features and green infrastructure.** Integrate natural and green infrastructure such as trees, green spaces, ecoroofs, gardens, green walls, and vegetated stormwater management systems, into the urban environment. Encourage stormwater facilities that are designed to be a functional and attractive element of public spaces, especially in centers and corridors.

The plan includes new development standards requiring the development of ecoroofs on new development, as well as energy efficient development that often utilizes green infrastructure. The plan also contains new standards, actions, and policies intended to increase tree canopy and vegetative stormwater treatment facilities throughout the Central City.

166. **Policy 4.5, Pedestrian-oriented design.** Enhance the pedestrian experience throughout Portland through public and private development that creates accessible, safe, and attractive places for all those who walk and/or use wheelchairs or other mobility devices.

The new Zoning Code provisions and TSP amendments proposed by the plan include regulations that implement this plan by creating new building setbacks in some situations, for instance at sites along the Park Blocks, reducing building heights in others, encouraging the enhancement of the public realm to include new landscape and recreational amenities, among others. The plan also proposes projects, such as the Green Loop, intended to increase pedestrian safety and expand access to areas not currently well served by pedestrian connections.

167. **Policy 4.6, Street orientation.** Promote building and site designs that enhance the pedestrian experience with windows, entrances, pathways, and other features that provide connections to the street environment.

168. **Policy 4.7, Development and public spaces.** Guide development to help create high-quality public places and street environments while considering the role of adjacent development in framing, shaping, and activating the public space of streets and urban parks.

The plan responds to this policy direction by proposing development standards that activate the public realm with active uses, building massing requirements along the public open space features, and ground floor window standards, which are intended to result in building massing and programing that positively influence the experience in the public realm. These elements of the plan are consistent with Policies 4.6 and 4.7 above.

169. **Policy 4.9, Transitional urbanism.** Encourage temporary activities and structures in places that are transitioning to urban areas to promote job creation, entrepreneurship, active streets, and human interaction.

Although the Central City is a fairly established urban area, there remain places where through a combination of under-utilization or a low-density of uses where opportunities exist to increase the use and density of uses. CC2035 contains policies and actions, such as the Green Loop, and the ability to allow limited retail uses in open space area, in response to this policy direction.

Health and safety

170. **Policy 4.10, Design for active living.** Encourage development and building and site design that promotes a healthy level of physical activity in daily life.

CC2035 contains many elements that promote active living and health. These include but are not limited to the Green Loop, publicly accessible open space features within large master plan sites, an expanded greenway setback, connections to the Willamette River for swimming and boating, the exploration of sites for community centers, and numerous active transportation projects.

171. **Policy 4.11, Access to light and air.** Provide for public access to light and air by managing and shaping the height and mass of buildings while accommodating urban-scale development.

172. **Policy 4.12, Privacy and solar access.** Encourage building and site designs that consider privacy and solar access for residents and neighbors while accommodating urban-scale development.

In response to Policies 4.11 and 4.12, new development standards are proposed for the Central City Plan District that require shade analysis and public view corridor analysis for projects that could have an adverse impact on views or solar access if these factors were not considered during the design of building massing. Specifically, Section 33.510.211 of the Zoning Code has been added, which requires that structures more than 100 feet in height along the eastside of the North and South Park Blocks undergo a shadow analysis to ensure that shadows cast on the blocks do not cover more than 50 percent of any individual block. Additionally, the Zoning Code continues to require small floor plates for taller tower constructed in the North Pearl, South Waterfront, and

portions of RiverPlace. These standards ensure consistency with Policy 4.12.

In a very specific situation, sites on the blocks to the west, southwest, and south of the Lan Su Classical Chinese Garden are required to conduct a shadow analysis to ensure that the garden will continue to have access to light and air, free from excessive shadowing, consistent with this policy.

173. **Policy 4.13, Crime-preventive design.** Encourage building, site, and public infrastructure design approaches that help prevent crime.

The new and enhanced ground activation requirements, Central City Master Plan regulations, and actions addressing updates to the Central City Fundamental Design Guidelines and new lighting strategies for public parks and the public right-of-way respond to this policy direction.

174. **Policy 4.14, Fire prevention and safety.** Encourage building and site design that improves fire prevention, safety, and reduces seismic risks.

Although the building code addresses measures to improve fire prevention and safety, and CC2035 remains consistent with this direction, the plan also proposes new measures to encourage and in some cases, require seismic upgrades, especially to structures with historically significant structures.

Residential areas

175. **Policy 4.15, Residential area continuity and adaptability.** Encourage more housing choices to accommodate a wider diversity of family sizes, incomes, and ages, and the changing needs of households over time. Allow adaptive reuse of existing buildings, the creation of accessory dwelling units, and other arrangements that bring housing diversity that is compatible with the general scale and patterns of residential areas.

The plan contains policy language that encourages the development of units having two or more bedrooms to support the rapidly growing number of families with children living in the Central City. The Plan includes actions calling for the monitoring of unit and bedroom development going forward, and recommends that new incentives or standards be considered by the City if the development of family compatible housing starts to decline. This will help to ensure that studio and single bedroom units are not the only residential options available to Central City residents.

176. **Policy 4.16, Scale and patterns.** Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, open space patterns, and landscaping. Allow for a range of architectural styles and expression.

In response to this policy direction, CC2035 proposes new building massing and master plan standards, as well as greenway setbacks, building setbacks, and scenic view corridors each intended to address the unique characteristic that exists where the urban environment interfaces with adjacent neighborhoods, the Willamette Greenway, public parks, and regionally significant landscape features. For instance, the amended Central City Master Plan regulations (Section 33.510.255 of the Zoning Code) contain approval criteria regarding establishing building pads and an orientation that complements and does not adversely impact public views, parks, the Willamette Riverfront, and adjacent urban form and character that is to be preserved.

Throughout the Central City, most new development (not zoned industrial or located in an historic district) is subject to Design Review using the Central City Fundamental Design Guidelines. These guidelines work with the existing height and FAR assigned to a site to ensure that the quality and

character of the architecture of new development is designed to complement the character and scale of an area and enhance the public realm.

In Historic Districts, other strategies may be used to meet Policy 4.16 including different approaches to height and FAR allowances. Generally, in historic districts bonus FAR may be allowed but bonus height is not. This is to better ensure compatibility of new development with the character and scale of existing development while still allowing for FAR to be used. In certain historic districts, base maximum height limits established prior to the creation of the district have been reduced where warranted by the particular character of the district's established urban fabric as a way to better ensure the compatibility of new development.

For example, in the New Chinatown/Japantown Historic District these type of height and FAR strategies are coupled with new guidelines for the district that identify characteristics of established urban fabric and allow for a variety of ways new development can be designed to complement district character and scale (as described in detail in the findings for Policy 4.48).Also, a shadow analysis is required to establish a step down/transition from the district to the Lan Su Classical Chinese Garden to ensure the garden will maintain access to light and air free from excessive shadowing.

Another example is found in the Pearl District/River District. This was once an industrial district with an architectural character defined in some subareas by remnant brick industrial buildings that once housed manufacturing and cold storage facilities. Other parts of the district contained surface parking lots, newer mid-century "tilt up" construction industrial buildings, and low-density office buildings. The plan, adopted in the 1990's, was to preserve buildings with a desired character, while promoting the redevelopment of under-utilized and vacant parcels. A combination of strategies was used to do this including creation of an urban renewal district, development agreements on key properties, and zoning allowances that increased over time as key public investments in transportation, parks and open space, and affordable housing were made.

The Pearl/River District strategies also included designation of an historic district within the larger district. The NW 13th Avenue Historic District was established within the Pearl/River district with provisions that encouraged the preservation of a contributing historic structures as well as non-contributing structures that had an historic character. This combination of strategies produced results like re-use and preservation of historically contributing buildings adjacent to new contemporary buildings (e.g. the 24-foot tall Sinclair Building in the NW 13th Avenue Historic District and the 175' tall Casey Condominiums, which is adjacent to the Sinclair Building just outside the historic district boundary. Individually these two buildings are of a very different character, scale and style. Although these two buildings are of very different styles and scale, this differentiation complements the general scale and character of the neighborhood while not detracting or diminishing what is unique about the Sinclair Building.

177. **Policy 4.19, Resource efficient and healthy residential design and development.** Support resource efficient and healthy residential design and development.

The Plan proposes new standards requiring that new development pursue certification of different energy efficiency and green building certification criteria. This includes residential projects throughout the Central City.

Design and development of centers and corridors

178. **Policy 4.20, Walkable scale.** Focus services and higher-density housing in the core of centers to support a critical mass of demand for commercial services and more walkable access for customers.

179. **Policy 4.21, Street environment.** Encourage development in centers and corridors to include amenities that create a pedestrian-oriented environment and provide places for people to sit, spend time, and gather.

Consistent with Policies 4.20 and 4.21, the plan proposes new Urban Design Policies, including urban design diagrams, that focus on the street hierarchy and development character along key street in the Central City. The plan also includes new development standards intended to implement this urban design direction, as well as actions calling for an update to applicable design guidelines to further respond to this direction. Lastly the Central City Plan District has been amended to expand restrictions to vehicle service and sales uses in transit areas with high pedestrian traffic and prohibits new drive-through facilities throughout the Central City.

180. **Policy 4.22, Relationship between building height and street size.** Encourage development in centers and corridors that is responsive to street space width, thus allowing taller buildings on wider streets.

The Central City has an existing ubiquitous grid pattern of streets typically between 60 and 80 feet in width, most framed by taller and denser development than found in any other corridors and centers.

181. **Policy 4.23, Design for pedestrian and bicycle access.** Provide accessible sidewalks, high-quality bicycle access, and frequent street connections and crossings in centers and corridors.

CC2035 proposes numerous new projects, such as the Green Loop, multiple active transportation infrastructure projects, new signals at key intersections, and new trail alignments and connections consistent with this policy directive.

182. **Policy 4.24, Drive-through facilities.** Prohibit drive through facilities in the Central City, and limit new development of new ones in the Inner Ring Districts and centers to support a pedestrian-oriented environment.

CC2035 directly responds to this policy by proposing a prohibition on all new drive-through facilities throughout the Central City Plan District.

183. **Policy 4.25, Residential uses on busy streets.** Improve the livability of places and streets with high motor vehicle volumes. Encourage landscaped front setbacks, street trees, and other design approaches to buffer residents from street traffic.

CC2035 proposes a new street hierarchy that identifies key streets where different public right-of-way treatments should be pursued, in response to traffic volumes and the uses most likely to be located along these streets. The plan proposes to implement this new hierarchy through various measures such as encouraging building setbacks on key streets, expanded landscape setbacks and street trees, and new design guidelines that address the appropriate interface of residential uses with the public right-of-way.

184. **Policy 4.26, Active gathering places.** Locate public squares, plazas, and other gathering places in centers and corridors to provide places for community activity and social connections. Encourage location of businesses, services, and arts adjacent to these spaces that relate to and promote the

use of the space.

The Plan contains policies, such as Policy 2.1, Complete Neighborhoods, and Policy 2.2, Promote healthy active living, that support the creation of new public open space features in park deficient areas. The plan also includes a new Central City Master Plan, code section 33.510.255,that require the development of publicly accessible parks and plazas within master plan sites. Lastly, a key element of the proposed Green Loop project is to connect existing and new open space amenities along the alignment of the loop, allowing the alignment to serve as a location where new public spaces and new businesses can be sited.

185. **Policy 4.27, Protect defining features.** Protect and enhance defining places and features of centers and corridors, including landmarks, natural features, and historic and cultural resources.

City Council interprets the term "protect and enhance" to mean the same as "preserve and complement" as described in the findings for Policy 4.48 The Plan addresses this policy directive through various measures, including but not limited to establishing new setback allowances along key streets, step down provisions along the north and south Park Blocks, and by amending the maximum heights allowed in certain historic districts, while preserving the ability to use the floor area assigned to individual parcels.

For example, in the East Portland/Grand Avenue and New Chinatown/Japantown Historic Districts the maximum heights, many adopted prior to the establishment of these areas as historic districts, have generally been reduced to a lower maximum height to ensure that new development will protect and enhance contributing historic resources and the district as a whole while allowing the full base FAR assigned to these same parcels to be proposed for utilization.

In the New Chinatown/Japantown Historic District, four blocks located north of NW Everett have been lowered from a maximum height of 425 feet to 200 feet. The blocks south, southwest, and west located adjacent to west of the Lan Su Classical Chinese Garden will be required to conduct a shadow analysis to ensure that new development along this block face will not create excessive shadowing on the garden while also allowing use of the 9:1 FAR assigned to the block.

The findings described under Policy 4.46 and 4.48 further describe how CC2035 protects and enhances historic resources.

186. **Policy 4.28, Historic buildings in centers and corridors.** Protect and encourage the restoration and improvement of historic resources in centers and corridors.

187. **Policy 4.29, Public art.** Encourage new development and public places to include design elements and public art that contribute to the distinct identities of centers and corridors, and that highlight the history and diverse cultures of neighborhoods.

The Central City has long featured public art, cultural landmarks, signage and gateways, and incorporated historically significant buildings and building remnants as important elements to enliven of the public realm. CC2035 contains actions to complete the Park Avenue Vision project, Green Loop, and to establish special design guidelines and streetscape improvements for the Cultural District, which would include art and other elements that establish a distinct character in these areas, including historic and cultural aspects of these places, consistent with Policy 4.29.

Transitions

188. **Policy 4.30, Scale transitions.** Create transitions in building scale in locations where higher-density and higher-intensity development is adjacent to smaller-scale single-dwelling zoning. Ensure that new high-density and large-scale infill development adjacent to single dwelling zones incorporates

design elements that soften transitions in scale and limit light and privacy impacts on adjacent residents.

189. **Policy 4.31, Land use transitions.** Improve the interface between non-residential uses and residential uses in areas where commercial or employment uses are adjacent to residentially-zoned land.

190. **Policy 4.32, Industrial edge.** Protect non-industrially zoned parcels from the adverse impacts of facilities and uses on industrially zoned parcels using a variety of tools, including but not limited to vegetation, physical separation, land acquisition, and insulation to establish buffers between industrial sanctuaries and adjacent residential or mixed-use areas to protect both the viability of long-term industrial operations and the livability of adjacent areas.

CC2035 responds to this policy direction by proposing or maintains lower maximum heights and floor area ratios where the Central City transitions with adjacent Central City neighborhoods such as those located outside of the Lloyd and Central Eastside Districts. The Plan also contains development standards for the Central Eastside and OMSI Station Area requiring that residential development, within an area predominately used for industry and employment, be designed to minimize exposure to industrial operations to protect residents and the long-term viability of industrial operations. Lastly, new Zoning Code regulations in PCC 33.510 requiring that non-industrial development record an Industrial Disclosure Statement that acknowledges that lawful impacts related to noise, glare, odors, and freight operations should be expected, regardless of the impact on non-industrial uses also allowed within the Central Eastside. These various elements of the plan are consistent with the policy directives of Policies 4.30 – 4.31 above.

Off-site impacts

191. **Policy 4.33, Off-site impacts.** Limit and mitigate public health impacts, such as odor, noise, glare, light pollution, air pollutants, and vibration that public facilities, land uses, or development may have on adjacent residential or institutional uses, and on significant fish and wildlife habitat areas. Pay attention to limiting and mitigating impacts to under-served and under-represented communities.

CC2035 responds to this policy primarily by not allowing the expansion of residential development in areas zoned for industrial use. However, in the Central Eastside where industrial zone land directly abuts areas zone for residential and mixed-use development, either by right or as a conditional use, new Plan District zoning regulations require the recording of the Industrial Disclosure Statement noted above. Further, where residential uses are allowed as a conditional use as part of the amended Central City Master Plan section of the Zoning Code (33.510.255), the new development standards require housing be designed to minimize exposure to industry to protect residents and the long-term viability of industrial operations.

192. **Policy 4.34, Auto-oriented facilities, uses, and exterior displays.** Minimize the adverse impacts of highways, auto-oriented uses, vehicle areas, drive-through areas, signage, and exterior display and storage areas on adjacent residential uses.

The Plan responds to this policy in several ways, such as restricting vehicle service and sales uses near transit station areas planned for high-density residential uses, prohibiting the creation of new drive-through facilities Central City-wide, establishing minimum density requirements for new development to discourage the under-utilization of land, and land use allowances and building massing limitations where the Central City has a direct interface with residential zoned areas.

193. **Policy 4.35, Noise impacts.** Encourage building and landscape design and land use patterns that limit and/or mitigate negative noise impacts to building users and residents, particularly in areas near freeways, regional truckways, major city traffic streets, and other sources of noise.

194. **Policy 4.36, Air quality impacts.** Encourage building and landscape design and land use patterns that limit and/or mitigate negative air quality impacts to building users and residents, particularly in areas near freeways, regional truckways, high traffic streets, and other sources of air pollution.

195. **Policy 4.37, Diesel emissions.** Encourage best practices to reduce diesel emissions and related impacts when considering land use and public facilities that will increase truck or train traffic.

196. **Policy 4.38, Light pollution.** Encourage lighting design and practices that reduce the negative impacts of light pollution, including sky glow, glare, energy waste, impacts to public health and safety, disruption of ecosystems, and hazards to wildlife.

In addition to the provisions noted above, CC2035 addresses potential impacts associated with noise, air quality and pollution, and light and glare on building tenants and natural areas through development standards including, but not limited to: wider setbacks for new development along the Willamette riverfront; lighting standards within and adjacent to the river setback; enhanced building setbacks on key streets; and new design guidelines that will address means to design new buildings to shield tenants from these potential impacts. The plan also includes measures to reduce the source of impacts where possible. Lastly, elements of the plan that prohibit new surface parking

Scenic resources

197. **Policy 4.41, Scenic resources.** Enhance and celebrate Portland's scenic resources to reinforce local identity, histories, and cultures and contribute toward way-finding throughout the city. Consider views of mountains, hills, buttes, rivers, streams, wetlands, parks, bridges, the Central City skyline, buildings, roads, art, landmarks, or other elements valued for their aesthetic appearance or symbolism.

CC2035 includes the Central City Scenic Resources Protection Plan (CCSRPP), which identifies the scenic resources in and surrounding the Central City. The views addressed in the CCSRPP include views of mountains, hills, buttes, rivers, parks, bridges, skyline, buildings, roads, art and landmarks. The plan includes an economic, social, environmental and energy analysis (ESEE) for the scenic resources. The ESEE includes evaluation of the contribution that scenic resources make towards a sense of place and identify, history and cultures of Portland, and way-finding throughout the city. The results of the CCSRPP are recommendations for when and how to protect and maintain significant scenic resources.

198. **Policy 4.42, Scenic resource protection.** Protect and manage designated significant scenic resources by maintaining scenic resource inventories, protection plans, regulations, and other tools.

The Central City Scenic Resources Protection Plan (CCSRPP) is an update of the 1991 Scenic Resources Protection Plan and includes three parts:

- Part 1 – Summary, Results and Implementation – Includes recommended amendments to the regulations and maps to implement the results of the inventory and ESEE Analysis
- Part 2 – Scenic Resources Inventory – Documentation of the scenic resources located within and surrounding the Central City. Includes views, viewpoints, view streets, scenic corridors, scenic sites and visual focal points.
- Part 3 – Economic, Social, Environmental and Energy Analysis – Provides an analysis and makes recommendations regarding which resources to protect and maintain.

The CCSRPP is implemented through updates to the zoning code including:

1. 33.510, Central City – Map 510-3, Base Heights, is adjusted and a new Map 510-4, Bonus Heights, is added to be protective of views.
2. 33.475, River Overlay Zones – Standards allow for removal of trees, with replacement, and removal of other vegetation from view corridors to maintain views. Requires that when the Greenway Trail is developed, designated viewpoints must also be developed.

Testimony was received that both supported and opposed protecting certain views. City Council finds that protecting scenic resources, including views, is important and maintained protections for almost all of the recommended views. Council finds that the view of Mt Adams from viewpoint SW24, Upper Hall, is not significant enough to warrant protection by limiting heights on many properties in the Central City. Council finds that the view of Vista Bridge from SW Jefferson Street can be adequately protected while allowing building heights of 75 feet along the north side of the street.

199. **Policy 4.43, Vegetation management.** Maintain regulations and other tools for managing vegetation in a manner that preserves or enhances designated significant scenic resources.

CC2035 includes Zoning Code Chapter 33.475, River Overlay Zones. New standards allow for removal of trees, with replacement, and removal of other vegetation from view corridors to maintain views. Landscaping standards allow flexibility, such as different tree sizes and locations, to allow for maintenance of views.

200. **Policy 4.44, Building placement, height, and massing.** Maintain regulations and other tools related to building placement, height, and massing to preserve designated significant scenic resources.

CC2035 includes Zoning Code Chapter 33.510, Central City. Map 510-3, Base Heights, is adjusted and a new Map 510-4, Bonus Heights, is added to be protective of views.

201. **Policy 4.45, Future development.** Encourage new public and private development to create new public viewpoints providing views of Portland's rivers, bridges, surrounding mountains, hills and buttes, the Central City skyline, and other landmark features.

CC2035 includes Zoning Code Chapter 33.475, River Overlay Zones. The code requires that when the Greenway Trail is developed, designated viewpoints must also be developed to create formal places where the public can view Portland's rivers, bridges, mountain, hills, buttes, skyline and other landmarks. The *Central City Scenic Resources Protection Plan* includes management recommendations to improve ADA accessibility to all designated viewpoints and add amenities such as benches, informational signs or lighting.

Historic and cultural resources

202. **Policy 4.46, Historic and cultural resource protection.** Protect and encourage the restoration of historic buildings, places, and districts that contribute to the distinctive character and history of Portland's evolving urban environment.

The City Council interprets terms as follows:

"Protect" means to defend or guard against loss, injury, or destruction. Policies calling for protection apply to multiple topic areas and can be accomplished or supported using various tools, such as regulations to prohibit or limit an action, investments such as land acquisition, agreements, and community partnerships.

"Encourage" means to promote or foster using some combination of voluntary approaches, regulations, or incentives.

"Restore" means to recreate elements that are missing; move something back to its original condition; rehabilitate.

"Historic buildings, places, and districts" means historic resource. A historic resource is a structure, place, or object that has a relationship to events or conditions of the human past. Historic resources may be significant for architectural, historical, and cultural reasons. Examples include historic landmarks, conservation landmarks, historic districts, conservation districts, and structures or objects that are identified as contributing to the historic significance of a district, including resources that are listed in the National Register of Historic Places. Rank I, II, and III structures, places, and objects that are included in historic inventories are historic resources.

"Urban environment" means established urban fabric, as interpreted in the findings for Policy 4.48.

The City Council interprets Policy 4.46 to require that provisions pertaining to demolition and alteration are applied to designated historic resources and that voluntary incentives are made available to support rehabilitation of those resources. The City Council further interprets this policy to mean that historic resources contribute to the city's distinctive character, history, and urban fabric but that this contribution does not preclude the evolution and change of a living city's urban fabric. Actions that implement Policy 4.46 are not limited to those that regulate new development; Protecting historic buildings, places, and districts from loss, injury, or destruction includes actions regulating alterations and additions to historic resources, as well as actions that provide economic incentives for historic resources to be preserved, rehabilitated, and reused.

The CC2035 Plan maintains and supplements the City's regulations for identifying, designating, and protecting historic resources within the Central City Plan District. These regulations, codified primarily in Chapter 33.445, Historic Resource Overlay Zone, provide a citywide approach to protecting historic resources consistent with statewide land use Goal 5.

Chapter 33.445 regulations protect Historic Landmarks and Historic Districts (both those designated by the City and those listed on the National Register of Historic Places), Conservation Landmarks and Conservation Districts, and undesignated resources identified in the Historic Resources Inventory as Rank I, II, or III. Existing provisions in Chapter 33.445 provide the following regulations that protect historic resources and encourage their restoration:

1. **Demolition Review**. Historic Landmarks that have been listed on the National Register of Historic Places and contributing resources in Historic Districts are subject to Demolition Review, a Type IV land use procedure that requires approval by the Portland City Council before a demolition permit can be issued. Other historic resources addressed by Chapter 33.445 are subject to 120-day demolition delay.
2. **Historic Resource Review**. Historic and Conservation Landmarks and properties within the boundaries of Historic and Conservation Districts are also subject to Historic Resource Review, a discretionary land use regulation that applies to most exterior alteration and new construction proposals. Historic Resource Review ensures the protection of designated historic resources by considering resource-specific factors such as the repair, alteration and replacement of historic materials; the compatibility of architectural features, massing, and height of additions and new structures; and the continuity of design patterns, cultural associations, and structural resilience. The approval criteria for Historic Resource Review is

provided in Chapter 33.846, Historic Resource Reviews. Within the Central City Plan District, the applicable approval criteria are described in Chapter 33.846.060.F, Approval Criteria in the Central City Plan District. Alterations, additions, and new construction are allowed within the boundaries of designated historic resources to allow for the evolution of the city's urban fabric, with development activities subject to the Historic Resource Review approval criteria.

In general, alterations to Historic and Conservation Landmarks are subject to the approval criteria provided in the code; alterations and new construction in Historic and Conservation Districts are subject to district-specific guidelines, the Central City Fundamental Design Guidelines, subdistrict design guidelines, the approval criteria provided in the code, or a combination or the above. On a site-by-site basis, Historic Resource Review can limit allowed building height, massing, setback, materials, details, or other features to ensure the protection of historic resources. City Council recognizes the discretionary nature of Historic Resource Review as an integral part of ensuring the protection of Historic and Conservation Landmarks and Districts.

3. Incentives. Chapter 33.445 also includes special provisions that increase the potential for historic resources to be rehabilitated by increasing land use flexibility and redevelopment options. These include exceptions from minimum density requirements and a lower review type threshold for conditional use applications in certain zones. CC2035 also includes an expanded floor area transfer bonus as an incentive to preserve historic buildings through seismic upgrades.

The Council finds that, together, the regulations in Chapters 33.445 and 33.846 protect and encourage the restoration of historic resources that contribute to Portland's evolving urban fabric.

In addition to the regulations of Chapter 33.445, several of the historic districts in the Central City are also part of City designated urban renewal districts. These areas have dedicated public investment resources and redevelopment plans administered by the City's community development agency, Prosper Portland. These programs help implement Policy 4.46 in these areas through direct investments in public infrastructure and new development, support for development of historic district guidelines and plans, support for business development and community engagement related to development and the historic and cultural character and assets of the district.

City Council finds that these existing regulations, incentives, and programs serve to protect and encourage the restoration of historic resources.

City Council additionally finds that the following new provisions in the CC2035 Plan protect and encourage the restoration of historic resources:

1. Commercial uses in the RX zone. This new provision encourages restoration of older buildings, including those that are designated as historic resources, by allowing 100 percent of existing non-residential buildings in the RX zone (e.g. meeting halls, churches, community centers and other special-purpose buildings) to be used for office and retail uses.

2. Office uses in the IG1 Zone. This new provision encourages the restoration of historic resources by allowing up to 100% of the floor area of designated historic resources in the IG1 zone to be used as Industrial Office use (plus up to an additional 5,000 square feet in a rooftop addition).

3. New FAR Transfer Provisions. The CC2035 Plan revises the FAR bonus and transfer system in the Central City Plan District, a change that supports several of the historic and cultural resource polices. The changes provide an expanded historic resource FAR transfer incentive

that requires seismic upgrades but provides an additional 3:1 floor area as a financial incentive to support the upgrades and other restoration activities. These provisions allow for Historic and Conservation Landmarks and contributing resources in Historic and Conservation Districts to transfer unused and additional FAR to sites elsewhere inside and outside the Central City. Transferring FAR provides the owner of the historic resource with monetary value that can be invested in the rehabilitation of the resource.

The Council finds that the existing regulations and the new provisions in the CC2035 Plan protect and encourage the restoration of historic resources. Council finds that the existing and new provisions require the protection of historic resources that contribute to the distinctive character and history of Portland's evolving urban fabric.

203. **Policy 4.47, State and federal historic resource support.** Advocate for state and federal policies, programs, and legislation that would enable stronger historic resource designations, protections, and rehabilitation programs.

The Council finds that the CC2035 Plan responds to this policy through new goals and policies specific to the Central City that call for the rehabilitation and reuse of historic structures, historic district protection measures, and updates to the Historic Resource Inventory.

Specific to Policy 4.47, CC2035 Plan action item UD2 calls for the City to advocate for the passage of a state historic tax credit. The City Council finds that 39 other states have adopted state historic tax credit programs to support the rehabilitation of historic resources. The City Council advocated for establishment of such a credit in the 2019 legislative session, but the proposal was not adopted.

204. **Policy 4.48, Continuity with established patterns.** Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources.

The City Council interprets terms as follows:

"Encourage" means to promote or foster using some combination of voluntary approaches, regulations, or incentives.

"Vacant and underutilized gaps" means sites identified on the Buildable Lands Inventory, sites that include no buildings, and sites that include buildings with significantly less development in terms of square feet than allowed by the base mapped FAR for the site. "Vacant and underutilized gaps" does not include Historic and Conservation Landmarks or contributing resources in Historic and Conservation Districts.

"Established urban fabric" means characteristics of the existing and historic built environment of a district or place including, but not limited to, block pattern, arrangement and design of streets and pedestrian realm, street wall, street-level activity, building use, construction type, architectural style, exterior materials, design details, massing, and height.

"Preserve" means to save from significant change or loss and reserve for a special purpose.

"Complement" means to add to, enhance, or improve.

"Historic resource" means a structure, place, or object that has a relationship to events or conditions of the human past. Historic resources may be significant for architectural, historical, and cultural reasons. Examples include historic landmarks, conservation landmarks, historic districts, conservation districts, and structures or objects that are identified as contributing to the historic

significance of a district, including resources that are listed in the National Register of Historic Places. Rank I, II, and III structures, places, and objects that are included in historic inventories are historic resources.

City Council interprets Policy 4.48 to consist of two parts that work together: 1) encouraging development that fills in vacant and underutilized gaps in the established urban fabric and 2) preserving and complementing historic resources. Regarding the first part, City Council finds that meeting this policy requires allowing new development within the existing built environment. This includes new development that is adjacent to individual historic resources and on non-contributing sites in Historic and Conservation Districts. Regarding the second part, City Council finds that Policy 4.48 requires the protection of historic resources and provisions for requiring new development to complement those resources. Historic resources are complemented when the relationship between the characteristics of additions, alterations, and new development improves the ability to preserve, rehabilitate, reuse, or understand the existing historic resource.

City Council interprets this policy to be implemented by the development review processes and provisions described in the findings for Policy 4.46. In Historic and Conservation Districts, this includes the review of new development to add to, enhance, or improve characteristics of the established urban fabric that relate to the historic significance of the district. City Council also finds this policy is implemented by new development because it supports and increases economic opportunities for the preservation, restoration and reuse of historic resources. The businesses, residents, and other uses provided by new development can be critical to preserving or resuscitating the economic and social vitality and sustainability of individual Landmarks, contributing resources in districts, and even districts as a whole.

City Council finds that the CC2035 Plan balances the policy's two objectives to 1) encourage development and 2) preserve and complement historic resources in the following ways:

1. Encouraging development that fills in vacant and underutilized gaps within the established urban fabric. The City Council finds that the CC2035 Plan encourages development that will fill in the vacant and underutilized gaps by maximizing the public's significant investment in infrastructure through encouraging development that increases the density of housing and jobs across the Plan District.

   City Council's application of the first part of Policy 4.48 is informed both by existing development and by the fact that the CC2035 Plan is intended to guide new development and growth across the Central City Plan District. The Comprehensive Plan and CC2035 plan policies simultaneously encourage development of vacant and underutilized parcels and preservation of historic resources. Policies such as 3.53, Transit-Oriented Development, 5.23, Higher Density Housing, and 6.15 Regionally-competitive development sites support increasing the concentration of housing and jobs near transit stations and encourage infill redevelopment generally across the Plan District. It is only in places identified to include resources to protect - scenic view corridors, open spaces, and Historic and Conservation Districts - where the CC2035 Plan increases the limitations of how infill will integrate with the established urban fabric.

   With the exception of historic resources that are subject to demolition protections, the CC2035 Plan is not intended to prevent redevelopment of vacant and underutilized sites. This approach extends to non-contributing sites in historic districts, as explained further below. There are Historic and Conservation Districts in the Central City that have numerous vacant lots, surface parking lots, and 20th century redevelopment that detract from the character and vitality of these districts. Even though they contain important Historic Landmarks and contributing

structures, the amount vacant and under-utilized parcels resulted in these districts being designated as blighted and becoming urban renewal districts in the 1970s, 1980s and 1990s.

The infill development promoted by Policy 4.48 is intended to bring back a continuous street wall in these areas. This simultaneously can make the pedestrian realm more active and safe and recreate the intimate urban spaces present historically. The number of vacant and underutilized sites in Historic and Conservation Districts differs by district. The NW 13th Avenue Historic District is largely intact with only two non-contributing properties (4% of the land area of the district). The New Chinatown/Japantown Historic District is on the other end of this spectrum with as many as 25 non-contributing properties (58% of the land area of the district).

Across the Central City Plan District, City Council expects that redevelopment of vacant and underutilized sites may not be identical to the existing physical characteristics of the surrounding existing buildings. The CC2035 Plan, Chapter 33.420, Chapter 33.445, and applicable approval criteria supports a variety of approaches to infill, resulting in buildings that complement existing historic resources. This variety of new development allows provides for growth, density, innovation, the ability to meet the needs of a diversity of uses and people, and the ability for urban form and sense of place to appropriately evolve over time. With the exception of Historic and Conservation Landmarks and Districts that are subject to Historic Resource Review, the existing application of the Design Overlay and corresponding discretionary design review in much of the Central City Plan District is an additional way the CC2035 Plan ensures that new buildings will integrate into the established urban fabric, even if new development departs from that fabric in one or more characteristic.

The role of height and FAR allowances in encouraging development of vacant and underutilized sites in the Central City.

The Central City is generally divided in a grid pattern that establishes 40,000 square foot blocks, one of the smallest typical downtown town block patterns found in North America. Therefore, it is typical for a development site to occupy an entire city block and when the Zoning Code assigns base FAR to an area it assumes that a full block development will be able to use the full development potential made possible by the assigned FAR allowances.

In many portions of the Pearl, Old Town/Chinatown, Central Eastside, Goose Hollow, South Waterfront, and University District/South Downtown, the Zoning Code has historically assigned a base FAR of 6:1 with the ability to earn an additional bonus 3:1 FAR for a total FAR allowance of 9:1 FAR. On a 40,000 square foot site this allows 360,000 square feet of development potential.

Before a maximum building height is assigned to a site, certain typical building metrics are considered. These include the typical base floor to ceiling heights of the ground floor of a mixed-use building (which on average is 15 feet) as well as those for all other floors in an office and/or residential building (which on average is a minimum of 12 feet for office buildings and 10 feet for residential buildings).

Additionally, the average floor plate size of different types of buildings is also factored in. Generally, the floor area on each floor of the podium, the base of the building, is on average 38,000 square feet in area, and the total floors included in a podium is three stories on average. Thus, the podium typically can use as much as 114,000 square feet on average. This leaves approximately 246,000 square feet of building potential for the tower above the podium.

On average the floor plate size of a residential tower is assumed to be 18,000 square feet, and 30,000 square feet for an office tower.

When these metrics are applied to the development of a residential tower (assuming 10-foot floor-to-ceiling heights, 18,000 square foot floor plates, and 246,000 square feet of remaining development potential), the full use of the remaining allocated FAR would allow for the development of approximately 14 stories above the podium, which would result in a 175-foot tall, 17-story residential mixed-use building on average. The maximum height could vary depending on variations in podium size, tower floor plate sizes, and floor to ceiling heights, all of which vary from building to building. Thus, if all the FAR available through the base and bonus FAR is used (assuming this totals 9:1 FAR) the actual height necessary for this amount of FAR may vary between 175' to 250' for residential development.

For this reason, the maximum building height assigned by the Zoning Code to areas that have a base FAR of 9:1, or the ability to earn 9:1 through a combination of base and bonus FAR, typically ranges between 175 feet and 250 feet on average. In areas subject to Historic Resource Review, the City Council recognizes that FAR and height are allowances and not guaranteed entitlements.

2. Preserving historic resources. City Council finds that CC2035 does not amend the existing Zoning Code provisions that protect historic resources citywide. These provisions are described in the findings for Policy 4.46. As of April 2020, there are 241 Historic Landmarks, eight Historic Districts (including portions of Historic Districts), and one Conservation District within the Central City Plan District. Within the Historic and Conservation districts, 224 parcels are contributing and 170 parcels are non-contributing. As described below, the CC2035 Plan adjusts height limits in four Historic Districts to complement the historic resources found in those districts.

The City Council finds that the Central City Plan District, through new FAR transfer provisions, described in detail in the findings for Policy 4.46, encourages new development that supports the preservation of historic resources. The FAR transfer provisions allow owners of Historic and Conservation Landmarks and owners of contributing resources within Historic and Conservation Districts to transfer unused and additional FAR to other sites in the Central City Plan District. Transferring FAR provides monetary value to historic resource owners to fund seismic upgrades and other rehabilitation activities, as well as removes redevelopment potential from historic resource sites that have transferred FAR. Approximately 419 historic resources in the Central City Plan District will be eligible to participate in these new historic resource FAR transfer provisions. The City Council recognizes that the availability of unused FAR on historic resource sites creates the potential for monetary value that can support rehabilitation; the City Council therefore finds that maintaining existing base FAR for historic resource sites across the Central City supports the preservation of those resources.

3. Encouraging development that complements individually-listed historic resources. The City Council finds that the CC2035 Plan encourages development of vacant and underutilized sites that will complement Historic and Conservation Landmarks by increasing the economic viability of preservation, rehabilitation, and reuse.

Council finds that the approach to how new development can complement an individual Historic or Conservation Landmark outside of an Historic District is exemplified by the Ladd

Carriage House, a three-story wood construction Historic Landmark building constructed in 1883. The Ladd Carriage House sits alongside the more recently developed 23-story Ladd Tower Apartments. The Ladd Carriage House is protected by the historic resource regulations described in the findings for Policy 4.46, with the CC2035 Plan allowing unused historic resource FAR to be transferred to redevelopment sites to generate money for rehabilitation activities. The adjacent Ladd Tower—with a parking garage that extends under the Ladd Carriage House—provides residents, workers, and parking that directly support the economic viability of the Landmark structure. The Ladd Tower complements the Ladd Carriage House by providing financial viability for a Historic Landmark that was nearly demolished in 2005 due to the high costs of rehabilitation, greatly improving economic opportunities for reuse.

The City Council finds that this policy, outside of Historic and Conservation Landmark and District boundaries, does not require the design of development adjacent to and nearby historic resources to relate to the physical features of those resources. However, within the boundaries of Historic and Conservation Landmarks and Districts, alterations, additions, and new construction are subject to Historic Resource Review (Note that as described in the findings for State Land Use Goal 5, resources listed in the National Register of Historic Places after January 2017 are not subject to Historic Resource Review).

The City Council finds that, within Historic and Conservation Landmark and District boundaries, Historic Resource Review ensures new development activities will complement the physical characteristics of those resources. For sites outside of Historic and Conservation Landmark and District boundaries, the City Council finds that the new development may depart from the physical characteristics of the adjacent and nearby historic resources. The City Council recognizes that for properties within a Design Overlay district, design standards and approval criteria may require new development to relate to one or more physical features of adjacent and nearby historic resources to ensure that new development better integrates into the established urban fabric.

4. Encouraging development that complements Historic and Conservation Districts. The City Council finds that the CC2035 Plan encourages development of vacant and underutilized sites in Historic and Conservation Districts that will complement contributing resources by increasing the economic viability of preserving, rehabilitating, and reusing those resources.

The City Council further finds that the CC2035 Plan encourages development of vacant and underutilized sites in Historic and Conservation Districts that will complement the established urban fabric found in those districts. The City Council finds that this policy does not require development adjacent to and nearby Historic and Conservation Districts to complement the physical features found in those districts, except as required of any Design Overlay standards or approval criteria that may apply to the site.

Policy 4.49 describes Historic Districts as “unique.” The City Council therefore finds that established urban fabric—and the relative importance of the characteristics of that fabric—differs district-by-district. The established urban fabric found in Historic and Conservation Districts includes characteristics of the built environment present during the historic period of significance, as well as those present today. This fabric may include, but is not limited to, block pattern, arrangement and design of streets and pedestrian realm, street wall, street-level activity, building use, construction type, architectural style, exterior materials, design details, massing, and height. Information about the established urban fabric found in a Historic or

Conservation District can be found in the nomination for historic designation, the district design guidelines, the built environment today, and, for the CC2035 Plan, additional documentation found in the record.

The CC2035 Plan adjusts maximum height limits in four Historic Districts: NW 13th Avenue, East Portland/Grand Avenue, Irvington, and New Chinatown/Japantown. Building height is one characteristic of established urban fabric, with some historic districts having greater consistency of building height than others. In each of these four Historic Districts, the existing height limits were established prior to the districts being listed in the National Register of Historic Places. The City Council finds that adjusting height limits in these four districts complements the contributing historic resources found in the districts, as well as complement the historic district as a whole.

The City Council recognizes that district-specific design guidelines have been adopted for three of the four Historic Districts - NW 13th Avenue, East Portland/Grand Avenue, and New Chinatown/Japantown. The Council further recognizes that general approval criteria found in Chapter 33.846 applies to the fourth Historic District – Irvington. The three design guideline documents describe each district's historic significance, important elements of the historic and contemporary established urban fabric, and approval criteria that relate to the districts' unique significance and fabric. The National Register nominations for each of the four Historic Districts contain similar documentation and description of the elements that comprise each district's urban fabric. The City Council recognizes the adopted design guidelines and National Register nominations for these districts as additional evidence of established urban fabric and complementing historic resources.

The City Council finds that the CC2035 Plan's adjustment of maximum height limits in NW 13th Avenue, East Portland/Grand Avenue, Irvington, and New Chinatown/Japantown complements the historic resources found in these districts, as well as complements the districts as wholes. With the exception of one block discussed in the section below, City Council further finds that maintaining base FAR in these districts supports the preservation of the districts' contributing resources through the CC2035 Plan's new FAR transfer provisions.

The City Council recognizes the CC2035 Plan retains existing maximum height limits in all other Historic and Conservation Districts.

NW 13th Avenue Historic District. The City Council provides the following additional findings on Policy 4.48 specific to the NW 13th Avenue Historic District. The City Council finds that NW 13th Avenue Historic District's established urban fabric includes the existing 19 contributing resources, physical characteristics and human activity present during the 1900-1945 period of significance, existing non-contributing buildings, and existing vacant and underutilized sites. The City Council recognizes the contributing structures, as well as the district as a whole, to be historic resources. The City Council recognizes non-contributing structures, surface parking lots, and vacant lots to be vacant and underutilized.

On all sites in the NW 13th Avenue Historic District, proposed alterations, additions, and new buildings must meet the approval criteria in the NW 13th Avenue Historic District Design Guidelines. The design guidelines provide approval criteria to ensure that contributing resources are not damaged by exterior alterations and additions. The City Council finds that the existing historic resource overlay zone protections described in the findings for Policy 4.46, the new FAR transfer provisions of the CC2035 Plan, and the district design guidelines preserve contributing resources in the NW 13th Avenue Historic District.

The CC235 Plan removes the option for bonus height in the NW 13th Avenue Historic District, thereby establishing maximum allowed height limits of 100 feet and 75 feet within the historic district. City Council finds that height is an important aspect of established urban fabric in this historic district. City Council further finds that these height changes preserve and complement historic resources in by encouraging development on vacant and underutilized sites that will increase the economic viability of preserving, rehabilitating, and reusing contributing resources, as well as increase the economic viability and human activity of the district as a whole.

East Portland/Grand Avenue Historic District. The City Council provides the following additional findings on Policy 4.48 specific to the East Portland/Grand Avenue Historic District. The City Council finds that NW 13th Avenue Historic District's established urban fabric includes the existing 36 contributing resources, physical characteristics and human activity present during the 1883-1930 period of significance, existing non-contributing buildings, and existing vacant and underutilized sites. The City Council recognizes non-contributing structures, surface parking lots, and vacant lots to be vacant and underutilized.

On all sites in the East Portland/Grand Avenue Historic District, proposed alterations, additions, and new buildings must meet the approval criteria in the East Portland/Grand Avenue Historic District Design Guidelines. The design guidelines provide approval criteria to ensure that contributing resources are not damaged by exterior alterations and additions. The City Council finds that the existing historic resource overlay zone protections described in the findings for Policy 4.46, the new FAR transfer provisions of the CC2035 Plan, and the district design guidelines preserve contributing resources in the East Portland/Grand Avenue Historic District.

The CC235 Plan removes the option for bonus height in the East Portland/Grand Avenue Historic District and further reduces height in the center of the historic district to 160 feet. City Council finds that height is an important aspect of established urban fabric in this historic district, with the contributing Weatherly Building providing a 160-foot height datum up to which new development may complement the district. City Council further finds that these height changes preserve and complement historic resources in by encouraging development on vacant and underutilized sites that will increase the economic viability of preserving, rehabilitating, and reusing contributing resources, as well as increase the economic viability and human activity of the district as a whole.

Irvington Historic District. The City Council provides the following additional findings on Policy 4.48 specific to the portion of the Irvington Historic District located within the Central City Plan District. The City Council finds that Irvington Historic District's established urban fabric includes the existing 2397 contributing resources, physical characteristics and human activity present during the 1891-1948 period of significance, existing non-contributing buildings, and existing vacant and underutilized sites. The City Council recognizes non-contributing structures, surface parking lots, and vacant lots to be vacant and underutilized. Approximately nine blocks of the Irvington Historic District containing 24 contributing resources are located within the Central City Plan District.

On all sites in the Irvington Historic District, proposed alterations, additions, and new buildings must meet the approval criteria in Chapter 33.846.060.G. These approval criteria ensure that contributing resources are not damaged by exterior alterations and additions. The City Council finds that the existing historic resource overlay zone protections described in the findings for Policy 4.46, the new FAR transfer provisions of the CC2035 Plan, and the Historic Resource Review approval criteria preserve contributing resources in the Irvington Historic District.

The CC235 Plan reduces the maximum allowed height in the portion of the Irvington Historic District within the Central City to a maximum of 75 feet. City Council finds that height is an important aspect of established urban fabric in the nine blocks of the historic district within the Central City Plan District. City Council further finds that these height changes preserve and complement historic resources in by encouraging development on vacant and underutilized sites that will increase the economic viability of preserving, rehabilitating, and reusing contributing resources, as well as increase the economic viability and human activity of the district as a whole.

New Chinatown/Japantown Historic District. The City Council provides the following additional findings on Policy 4.48 specific to the New Chinatown/Japantown Historic District:

Zoning history

The New Chinatown/Japantown Historic District was listed in the National Register of Historic Places in 1989, but the intent to establish a historic district there had been formulated by the time the 1988 Central City Plan and zoning amendments were being developed. Prior to the creation of the Historic District and 1988 Central City Plan, the base zoning was Central Commercial (C1), with a Downtown Development overlay (Z). The C1Z zone allowed for uses ranging from high-rise commercial office buildings to residential towers. The maximum height allowance for most of the area was 460 feet. The 1988 Central City Plan reduced this maximum. In the area north of NW Everett, the maximum height allowance was decreased to 350 feet with the ability to reach 425 feet through development bonuses. South of NW Everett, the maximum height allowance was reduced to 100 feet with a few parcels along NW 3rd Avenue in the Skidmore-Old Town Historic District further reduced to a maximum height of 75 feet.

Development pattern

As of April 2020, the New Chinatown/Japantown Historic District consists of ten square blocks, each approximately 40,000 square feet in area. The district is bound by NW 5th on the west, NW 3rd on the east, NW Glisan on the north, and West Burnside on the south. The developable land area of the district consists of approximately 9.18 acres of land, 3.31 acres of which, or 40 percent of the district, is covered by 27 structures that are designated as contributing structures in the Historic District. Each of these 27 structures were developed at different points over a period from 1880 to 1943. Two of these are designated as individual Historic Landmarks. The City Council recognizes the 27 contributing structures (inclusive of the two Historic Landmarks), as well as the district as a whole, to be historic resources. Non-contributing structures cover an additional 3.3 acres of land, or 36 percent of the district. The remaining developable acreage in the district consists of several surface parking lots and one vacant lot. These areas cover approximately 2.17 acres, or 23.6 percent of the developable land area of the historic district. The City Council recognizes these sites to be vacant and underutilized.

Defining the established urban fabric in New Chinatown/Japantown Historic District

The City Council finds that New Chinatown/Japantown's established urban fabric includes the existing 27 contributing resources, physical characteristics and human activity present during the 1880-1943 period of significance, existing non-contributing buildings, and existing vacant and underutilized sites. The City Council further finds the 200-foot square block pattern, street system and Transit Mall are part of the district's established urban fabric. The City Council recognizes the memo submitted by John M. Tess on May 8, 2020, as additional evidence of the

established urban fabric found in the district. Among the characteristics that define establish urban fabric, City Council recognizes the following in New Chinatown/Japantown:

Block pattern, arrangement and design of streets, and pedestrian realm.
The New Chinatown/Japantown Design Guidelines state that the district "originally had 200-foot square blocks surrounded by 60-foot wide streets. Although this spatial framework continues to define the district, changes along West Burnside Street and NW Glisan Street have altered its once-uniform block and street pattern. In 1931, West Burnside was widened from its original 60-foot width to approximately 100 feet. This widening resulted in the reduction of the original 200-foot blocks immediately north of West Burnside Street by 20 feet. Similarly, the 1933 widening of NW Glisan Street between NW 3rd and 4th Avenues from 60 feet to approximately 80 feet also changed the district's block pattern."

Street wall.
The district design guidelines provide that "over time, the district's historic block, lot, and street pattern, and construction of contiguous one- to seven-story buildings created a streetscape that defined its urban character at the end of the period of significance. Today, this character and historic framework remain evident with existing buildings constructed to the right-of-way line." At the end of the historic period, the unified continuous street wall was a predominant feature of the district. The City Council recognizes the existing gaps in the street wall diminish the established urban fabric from the historic period.

Street-level activity and building use.
City Council finds that a variety of building uses are present in the district today, including retail, office, residential, hotel, and social service uses. Historically, a diversity of uses were present in the district, with significant Asian American presence within buildings and contributing to an active street life during the period of significance. The National Register nomination summary of the district's unifying physical characteristics concludes with the statement "the district is significant under criterion A for its historical associations" without any reference to criterion C (architectural significance).

The City Council recognizes that Chinese and Japanese populations were present in the district, with 3rd Avenue holding a concentration of uses associated with the Japanese population, NW 4th Avenue holding a concentration of uses associated with the Chinese population, and NW 5th including Chinese and Japanese associations, but fewer in number. The City Council finds that the presence of vacant and underutilized sites diminishes the active human presence and dense mix of uses that defined the district during the period of significance.

Construction type.
The City Council finds that several building construction typologies exist in the district, primarily unreinforced masonry, concrete, and reinforced concrete.

Architectural style.
The City Council recognizes that the contributing resources in the district reflect three architectural styles: 20th Century Commercial, Italianate, and Moderne. Non-contributing buildings depart from these styles, but generally retain elements informed by these styles. The district design guidelines provide that "collectively, these three styles make up

three-fourths of all buildings within the district, giving the district an underlying stylistic uniformity."

Exterior materials.
The City Council recognizes the district design guidelines statement that "the most common exterior building materials found within the district are brick and concrete stucco, both in widely varying color ranges."

Design details.
The City Council finds that Chinese and Japanese Cultural design adaptations are an integral characteristic of the district's historic significance and established urban fabric. As stated in the district design guidelines, "Cultural adaptations to existing and sometimes new buildings within the district were a common and significant expression of Chinese and Japanese culture during the 1880 to 1943 period. These adaptations were predominantly conducted by Chinese occupants and owners and included the repurposing or installation of horizontally-oriented upper-level projecting and/or recessed balconies as extended living space or gardens, altering existing storefronts with signs and cloth awnings, applying horizontal arched awnings at the upper levels, displaying political flags, adding hanging lanterns, installing signs with Asian characters. Although not every building exhibited Chinese and/or Japanese design expressions, on a collective level, these cultural adaptations created a unique urban design aesthetic that defined the district."

Massing.
The City Council finds that blocky building massing is a typical characteristic of the district's established urban fabric. The district design guidelines state "contributing building forms in the district are simple volumetric shapes, typically square or rectangular with no setbacks." The same blocky pattern exists for non-contributing buildings, with building volumes generally extending to the lot lines for much or all of the buildings' height, with the exception of lightwells and some upper story stepbacks.

Building height.
The City Council finds that contributing buildings in the New Chinatown/Japantown Historic District range in height from one to seven stories and that non-contributing buildings range in height from one to 16 stories. The City Council also finds that since the time of the district's listing in the National Register, new buildings have been approved at heights of four, five, eight, nine, and 16 stories.

The City Council agrees that "building height is but one component of the urban fabric" as explained in the memo submitted by John M. Tess on May 8, 2020, as additional expert evidence on the established urban fabric of the district. Furthermore, the City Council finds that building height alone does not determine whether a building is complementary to the character of this particular district. The City Council finds that the National Register nomination that created the district does not address height in its physical description summary. In fact, during the period of significance, buildings in this district were constructed that were two to four times taller than adjacent buildings, perhaps best illustrated by the contributing Mason-Ehrman Building.

The role of district design guidelines in preserving contributing resources and the district as a whole
On all sites in the New Chinatown/Japantown Historic District, proposed alterations, additions,

and new buildings must meet the approval criteria in the New Chinatown/Japantown Design Guidelines, adopted by City Council in September 2017. These guidelines were intentionally developed to be part of the CC2035 Plan package of related policies, regulations, and implementing measures. The design guidelines provide approval criteria to ensure that contributing resources are not damaged by exterior alterations and additions. The City Council finds that the existing historic resource overlay zone protections described in the findings for Policy 4.46, the new FAR transfer provisions of the CC2035 Plan, and the district design guidelines preserve contributing resources in the New Chinatown/Japantown Historic District.

Changes to height allowances in the Historic District

There are two locations in the New Chinatown/Japantown Historic District in which CC2035 changes height limits. The maximum height limit of new development on the four blocks north of NW Everett Street is decreased from 425 feet to 200 feet. The maximum height limit on "Block 33", the full block surface parking lot located at NW 4th and NW Davis, is increased from 100 feet to 200 feet on the western half of the site and from 100 feet to 125 feet on the eastern half. The base FAR on Block 33 is increased to 9:1 FAR to encourage development of this vacant site if a new building proposes residential use on all floors above the ground floor on the western half of the block.

The role of height allowances in preserving and complementing contributing resources in the Historic District

City Council finds that these height changes preserve and complement historic resources in New Chinatown/Japantown by encouraging development on vacant and underutilized sites that will increase the economic viability of preserving, rehabilitating, and reusing contributing resources, as well as increase the economic viability and human activity of the district as a whole. The blocks subject to height change under CC2035 have 9:1 FAR which determines the total square feet of development the site can hold. City Council finds that with the proposed maximum heights, this amount of FAR can reasonably be proposed for development of new residential and commercial office buildings through standard construction practices. This is based on both Zoning Code development standards, such as those regulating ground floor active uses, as well as standard metrics used by the development industry to create mid- and high-rise residential and commercial towers.

North of NW Everett Street, CC2035 reduces maximum height from 425 feet to 200 feet. On those four blocks, there are 10 contributing resources many of which are adjacent to vacant or underutilized sites. City Council finds the height limit reduction north of NW Everett Street makes new development more likely to be complementary to the blocky building forms found in the district while still allowing proposals that utilize the full 9:1 base FAR. This ability for full development increases the potential for economically feasible projects that add significant user and economic activity to the district. This in turn can benefit the ability of the district to support economically viable rehabilitation and reuse of historic buildings as well. Moreover, the 200 foot maximum height allowance here creates more opportunity for development of a vacant or underutilized portion of a site using FAR transferred from a contributing structure elsewhere on the site. As in the case of the Ladd Carriage House, Council finds that allowing 200 feet of height on the four blocks north of NW Everett in New Chinatown/Japantown allows for a taller new building on part of a site to help preserve a contributing building elsewhere on the site.

Similarly, City Council finds that the height increase from 100 feet to 200 feet on the western half of the Block 33 and increase from 100 feet to 125 feet on the eastern half of the lot can preserve and complement the contributing buildings on the blocks around it. The City Council

finds that the additional height and FAR will increase the potential for an economically feasible project that adds uses and economic activity to the district. The increase in FAR adds approximately 120,000 square feet of new development to the Block 33 site. The increase in height allows utilization of this additional floor area in a way that can step down to the core of the district while stepping up to the location at a transit station on the transit mall.

The new development would fill long-standing and large gaps in the street wall and activate street-level commercial uses. A new building on this site that is no taller than the block-faces are long would re-establish the continuity of street wall, blocky massing, and human activity found in the district during the period of significance. The taller height on the western half of the block is consistent with the fact that, according to the design guidelines, NW 5th Avenue "includes the tallest contributing buildings within the district."

New development up to 200 feet in height will complement adjacent and nearby contributing resources because the district design guidelines provide options for site-specific design responses that can complement those contributing resources, even when the new building is taller. The City Council finds that a 200-foot height limit allows applicants beneficial flexibility to respond to site-specific circumstances with building forms and designs that will complement adjacent and nearby historic resources. City Council finds evidence of this in Design Guideline D3, Vertical Composition, which encourages proposals for taller building to use strategies such as "(v)isually minimizing heights in excess of neighboring buildings through strategies such as step-backs, projecting horizontal elements, change of materials, color shifts, and/or shifting or grouping the pattern of openings and bays above a more regularized base."

<u>The role of height allowances in preserving and complementing the Historic District as a whole</u>
The City Council finds that adjusting height limits on the four northern blocks from 425 feet to 200 feet and on Block 33 from 100 feet to 125 feet and 200 feet also complements the district as a whole.

The City Council finds that significant physical elements of the established urban fabric from the historic period are missing from the district. New development on vacant and underutilized sites that return a uniform street wall, density of building uses and activities, prominent architectural styles, limited exterior material palette, cultural design details, and blocky massing will especially complement the district as a whole. As a specific example of how taller contemporary buildings have complemented the established urban fabric of the district, the City Council notes that the 160-foot tall Pacific Tower is part of the established urban fabric and has supported the preservation of nearby historic resources because it returns residential living to the district, fills in the street wall, integrates consistent exterior materials, and increases the potential for nearby contributing resources to achieve economic viability for rehabilitation and reuse. The City Council further finds there is no evidence in the record that the Pacific Tower adversely affects the District.

City Council recognizes district design guideline D2, Form and Articulation, which provides that "contributing building forms in the district are simple volumetric shapes, typically square or rectangular with no setbacks. This 'blocky' overall development form should be evident in new construction." The City Council finds that since typical blocks in the historic district are 200 feet square, setting the maximum building height at 200 feet is consistent with the typically blocky form of development present in the district.

City Council considered testimony from opponents of these height changes that adjustments to height limits would possibly cause the Historic District to be removed from the National

Register. City Council reviewed the expert testimony on both sides. The City Council recognizes letters from the Oregon State Historic Preservation Office and Heritage Consulting Group, which provided no evidence that any National Register historic district in the nation has been removed due to allowed building heights or the height of new construction within the district. Specific to this Historic District, the National Register nomination provides that "Chinatown Historic District is zoned CIZ, which allows for many commercial uses; mid to high rise development, clean labor - intensive industry and manufacturing; and high density apartments." The City Councils finds that the district was listed in the National Register when the zoning allowed building heights of up to 425 feet. The CC2035 Plan allows a maximum building height of only 200 feet in the district. The City Council therefore concludes the District's listing on the National Register—as well as the listing of constituent contributing resources—is not endangered by the CC2035 Plan and adjustments to maximum allowed heights.

The City Council finds the height limits are supported by additional evidence received throughout the public process. This evidence includes original LUBA Rec. 14973-14978 (testimony describing why it is consistent with the National Register nomination and the Old Town Chinatown vision statement to leave the height on the North Blocks); Rec. 6320 (testimony explaining the process and unlikelihood of a delisting and increasing height is the best opportunity for development on Block 33); Rec. 49651 (background document describing the North Blocks as "envisioned by the city with the potential for larger-scaled structures, to take advantage of the location's view to the Willamette River in the east and north, and to downtown in the south, and the housing towers in the west."); Rec. 48059 (background finding that new construction is only viable in the District where greater development entitlements and rents can be achieved); Rec. 48140 (interview notes describing Block 33 as a key catalyst site); Rec. 48189 (summary of issues and opportunities identifying that redevelopment of vacant and surface parking lots is important component for revitalizing the area); Rec. 24096 (BPS staff briefing to PSC explaining that the New Chinatown/Japantown Historic District Design Guidelines are intended to allow the Block 33 applicant to make the case for a building that is taller than what the height limits are today); Rec. 24253 (PSC work session considering historic district heights and request to set height on North Blocks at 350 feet); Rec. 15023 (testimony describing that the district's roots are cultural rather than architectural); Rec. 7731-7732 (testimony in support of increased entitlements on Block 33 to encourage development); Rec. 48092 (background document considering high-density housing north of NW Everett along NW Glisan corridor); Rec. 48190 (summary of planning events describing testimony that development regulations, including height and FAR may be discouraging new development). The evidence submitted by John M. Tess on May 8, 2020 provides expert testimony on the application of Policy 4.48 specific to New Chinatown/Japantown.

The City Council finds this evidence is credible and supports Council's finding that a 200-foot height limit in the New Chinatown/Japantown Historic District preserves and complements the district's contributing resources and the district as a whole.

205. **Policy 4.49, Resolution of conflicts.** Adopt and periodically update design guidelines for unique historic districts. Refine base zoning in historic districts to consider the character of the historic resources in the district.

The City Council finds that Historic Districts in the Central City Plan District are subject to Historic Resource Review, a discretionary land use review described in the findings for Policy 4.46. All or part of nine Historic Districts are located in the Central City Plan District. Adopted design guidelines

exist for six of these Historic Districts, including Skidmore/Old Town and New Chinatown/Japantown, both of which were adopted during the CC2035 legislative process. Consistent with Policy 4.49, CC2035 includes action items (UD9 and UD46) calling for updates to the design guidelines that apply in the East Portland/Grand Avenue Historic District and Russell Street Conservation District.

The City Council finds that base zones are not being changed in Historic Districts in the CC2035 Plan. The existing base zones do not conflict with the historic character of the historic resources in the district. The CC2035 Plan includes adjustments to height limits in four Historic Districts, described in the findings for Policy 4.48.

206. **Policy 4.50, Demolition.** Protect historic resources from demolition. Provide opportunities for public comment, and encourage pursuit of alternatives to demolition or other actions that mitigate for the loss.

The City Council finds that demolition protections for historic resources are provided in Chapter 33.445, Historic Resources Overlay Zone, and Chapter 33.846, Historic Resource Reviews. National Register-listed Historic Landmarks and contributing resources in Historic Districts are subject to Demolition Review, with the Portland City Council assigned as the review body for such demolition proposals. These existing regulations protect historic resources, provide opportunities for public comment when a resource is proposed for demolition, and provides decision-maker that ability to require alternatives to demolition.

207. **Policy 4.51, City-owned historic resources.** Maintain City-owned historic resources with necessary upkeep and repair.

208. **Policy 4.52, Historic Resources Inventory.** Maintain and periodically update Portland's Historic Resources Inventory to inform historic and cultural resource preservation strategies.

The City Council finds that the Historic Resources Inventory was last updated in 1984. The City Council recognizes that 2007 changes in State Administrative Rule allow for the Inventory to be updated. The regulations included in Chapter 33.445, Historic Resources Overlay Zone, do not provide a viable land use procedure for updating the Historic Resources Inventory. The CC2035 Plan does not address this, but a separate zoning code project, the Historic Resources Code Project, anticipates addressing this. The CC2035 Plan includes an action item (UD4) calling for updating the Historic Resource Inventory for the Central City, prioritizing the West End and Goose Hollow.

209. **Policy 4.53, Preservation equity.** Expand historic preservation inventories, regulations, and programs to encourage historic preservation in areas and in communities that have not benefited from past historic preservation efforts, especially in areas with high concentrations of under-served and/or under-represented people.

The City Council finds that this policy requires actions that expand equity in historic resource programs. The CC2035 Plan includes an action item (UD45) that calls for preparation of "a National Register of Historic Places Multiple Property Documentation form for African-American historic resources based on the Cornerstones of Community inventory." The Multiple Property Documentation was submitted to the State Historic Preservation Office on April 27, 2020.

210. **Policy 4.54, Cultural diversity.** Work with Portland's diverse communities to identify and preserve places of historic and cultural significance.

The City Council finds that the Multiple Property Documentation submission described in the findings for Policy 4.54 supports this policy. Additionally, an individual National Register Historic

Landmark nomination for the Williams Avenue YWCA (Billy Webb Elks Lodge) was submitted to the State Historic Preservation Office on April 27, 2020, at the request of African American lodge members.

211. **Policy 4.55, Cultural and social significance.** Encourage awareness and appreciation of cultural diversity and the social significance of historic places and their roles in enhancing community identity and sense of place.

The City Council finds that the findings for Policies 4.53 and 4.54 supports this policy.

212. **Policy 4.56, Community structures.** Encourage the adaptive reuse of historic community structures, such as former schools, meeting halls, and places of worship, for arts, cultural, and community uses that continue their role as anchors for community and culture.

The City Council finds that adaptive reuse is supported by the existing regulations and CC2035 Plan, as described in the findings for Policy 4.46-4.48. The plan includes an action item calling for an update of the Historic Resources Inventory in the next 2-5 years, which also supports this policy. This process will engage the public at-large as well as stakeholders involved in cultural and historic resource preservation. The process will likely also identify additional publicly and privately-owned structures to be added to the Historic Resources Inventory and some that will qualify for Historic Landmark status and by extension the protections and incentives contained in the Zoning Code. For example, the City-funded nomination of the Williams Avenue YWCA (Billy Webb Elks Lodge) will extend demolition protections to an irreplaceable community structure. Updating the Historic Resource Inventory and advancing targeted Historic Landmark nominations will further support Policies 4.50 – 4.56 above.

213. **Policy 4.57, Economic viability.** Provide options for financial and regulatory incentives to allow for the productive, reasonable, and adaptive reuse of historic resources.

The City Council finds that the existing Oregon Special Assessment of Historic Property Program, the existing incentives described in the findings for Policy 4.46, and the new CC2035 provisions described in findings for Policy 4.46 support the economic viability of historic resources. Additionally, the CC2035 Plan includes an action item calling for the City to advocate for the passage of a state historic tax credit, as described in the findings for Policy 4.47.

214. **Policy 4.58, Archaeological resources.** Protect and preserve archaeological resources, especially those sites and objects associated with Native American cultures. Work in partnership with Sovereign tribes, Native American communities, and the state to protect against disturbance to Native American archaeological resources.

The goals, policies, actions, and implementation tools of the Central City 2035 plan remain consistent with this direction and do not conflict with existing laws and measures to protect archaeological resources or to coordinate with Sovereign tribes, and Native American communities.

Public art

215. **Policy 4.59, Public art and development.** Create incentives for public art as part of public and private development projects.

CC2035 contains policies and actions calling for an expanded presence of public art in the Central City. These include pursuing opportunities to place art in public parks, sections of the Willamette Greenway, and within the public realm.

Resource-efficient design and development

216. **Policy 4.60, Rehabilitation and adaptive reuse.** Encourage rehabilitation and adaptive reuse of buildings, especially those of historic or cultural significance, to conserve natural resources, reduce waste, and demonstrate stewardship of the built environment.

A key response of CC2035 to this policy direction is a new floor area transfer provision that allows unused floor area to be transferred from sites with a designated historic landmark so long as the landmark has or will be subject to seismic upgrades. The Plan further requires that major new development or alterations that increase floor area pursue green building certification, which typically encourages reduced construction waste, and incentive for adaptive reuse.

217. **Policy 4.61, Compact housing.** Promote the development of compact, space- and energy-efficient housing types that minimize use of resources such as smaller detached homes or accessory dwellings and attached homes.

CC2035 is consistent with this policy as the Central City is zoned for high-density development, including mixed-use residential development. Specifically, the Plan District proposes maintaining, and in some case introducing new, maximum floor area allowances, provides incentives to create denser development, and establishes minimum density requirements.

218. **Policy 4.62, Seismic and energy retrofits.** Promote seismic and energy-efficiency retrofits of historic buildings and other existing structures to reduce carbon emissions, save money, and improve public safety.

Consistent with this policy, CC2035 contains new FAR transfer regulations that incent the transfer of unused floor area from sites with a designated historic resource; however, seismic upgrades necessary to protect the structure and occupants are required as part of the FAR transfer process. Additionally, when new development adds 50,000 sq. ft. or more to an existing development, the Zoning Code amendments require such projects to pursue green building / energy efficient certification.

219. **Policy 4.63, Life cycle efficiency.** Encourage use of technologies, techniques, and materials in building design, construction, and removal that result in the least environmental impact over the life cycle of the structure.

The CC2035 plan includes zoning amendments that require new development to pursue certification from a low carbon building program, such as Leadership in Energy and Environmental Design (LEED), which considers life cycle efficiency to reduce environmental impacts. CC2035 also requires that new buildings larger than 20,000 square feet install an ecoroof. There was significant testimony provided in support of ecoroofs. City Council finds that ecoroofs are vegetated features that have a longer life expectancy than traditional roofs and reduce heat island effects and filter the air, improving air quality. City Council also finds that ecoroofs reduce energy consumption within the building, which reduces carbon dioxide emissions and improves air quality.

220. **Policy 4.64, Deconstruction.** Encourage salvage and reuse of building elements when demolition is necessary or appropriate.

221. **Policy 4.65, Materials and practices.** Encourage use of natural, resource-efficient, recycled, recycled content, and non-toxic building materials and energy-efficient building practices.

222. **Policy 4.66, Water use efficiency.** Encourage site and building designs that use water efficiently and manage stormwater as a resource.

223. **Policy 4.67, Optimizing benefits.** Provide mechanisms to evaluate and optimize the range of benefits from solar and renewable resources, tree canopy, ecoroofs, and building design.

224. **Policy 4.68, Energy efficiency.** Encourage and promote energy efficiency significantly beyond the Statewide Building Code and the use of solar and other renewable resources in individual buildings and at a district scale.

225. **Policy 4.69, Reduce carbon emissions.** Encourage a development pattern that minimizes carbon emissions from building and transportation energy use.

226. **Policy 4.70, District energy systems.** Encourage and remove barriers to the development and expansion of low-carbon heating and cooling systems that serve multiple buildings or a broader district.

227. **Policy 4.71, Ecodistricts.** Encourage ecodistricts, where multiple partners work together to achieve sustainability and resource efficiency goals at a district scale.

228. **Policy 4.72, Energy-producing development.** Encourage and promote development that uses renewable resources, such as solar, wind, and water to generate power on-site and to contribute to the energy grid.

Consistent with Policies 4.63 – 4.72, CC2035 contains policies addressing: energy efficient buildings design and development; use of green infrastructure; low-carbon district energy systems, and other measure to reduce carbon emission, reduce energy usage, encourage recycling of building materials, and other practices to reduce waste and the carbon footprint of new development. The plan also contains actions directing the City to: develop new regulatory tools and incentives to increase use of green building technologies; encourage the use of solar energy; seek opportunities for water capturing and reuse; and preserve and expand the urban forest. Lastly, the Plan District will be amended to require the use of ecoroofs and for new and significant rehabilitations to pursue green building certification.

Designing with nature

229. **Policy 4.73, Design with nature.** Encourage design and site development practices that enhance, and avoid the degradation of, watershed health and ecosystem services and that incorporate trees and vegetation.

230. **Policy 4.74, Flexible development options.** Encouraging flexibility in the division of land, the siting and design of buildings, and other improvements to reduce the impact of development on environmentally-sensitive areas and to retain healthy native and beneficial vegetation and trees.

The CC2035 amendments are consistent with Policy 4.73 and 4.74 in the following ways:

A. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the existing natural resources identified in the *Willamette River Central Reach Natural Resources Protection Plan* (NRPP), by avoiding impacts on natural resources, limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirements include planting of native vegetation and a mix of trees, shrubs and groundcover, which will improve watershed health and ecosystem services.

B. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. There is a landscaping requirement for the setback that requires native plants to be installed

with development but allows flexibility in the size and location of trees to be compatible with adjacent development. Testimony was received that supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback and landscaping will improve watershed health and ecosystem services.

C. The regulations for removal and remediation of hazardous substances, the use of biotechnical techniques for bank stabilization and the planting of native vegetation on the riverbank to improve watershed health and ecosystem services.

D. CC2035 includes a range of policies that will ensure the City continues progress toward incorporating tree canopy with redevelopment throughout the Central City. Specifically, the Plan contains tree canopy targets for all ten Central City subdistricts. Nine out of the 10 subdistricts are expected to experience increases in tree canopy over the life of the plan.

E. The Green Loop is a multimodal transportation corridor that incorporates green infrastructure including trees and other vegetation into the design. The vegetation included in the Green Loop will create new habitat for wildlife alongside development.

F. The street setback requirements in some parts of the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees.

G. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple ecosystem services.

231. **Policy 4.75, Low-impact development and best practices.** Encourage use of low-impact development, habitat-friendly development, bird-friendly design, and green infrastructure.

The CC2035 amendments are consistent with this policy in the following ways:

A. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs are a type of green infrastructure and provide multiple ecosystem services including providing habitat for avian species.

B. A new standard for bird-friendly development requires that windows in the first 60 feet of new developments and major remodels be treated with a bird-safe glaze or pattern to reduce the risk of bird-to-building collisions.

C. The street setback requirements in some parts of the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees.

D. Existing regulations including the Stormwater Management Manual are applicable to future development. The regulations require that new impervious surfaces be treated for stormwater runoff quantity and/or quality. The manual requires onsite infiltration to the maximum extent possible through green infrastructure techniques.

232. **Policy 4.76, Impervious surfaces.** Limit use of and strive to reduce impervious surfaces and associated impacts on hydrologic function, air and water quality, habitat connectivity, tree canopy, and urban heat island effects.

The CC2035 amendments are consistent with this policy in the following ways:

A. Existing regulations including the Stormwater Management Manual are applicable to future development. The regulations encourage reduction of impervious surfaces and require that new impervious surfaces be treated for stormwater runoff quantity and/or quality. The manual requires onsite infiltration to the maximum extent possible through green infrastructure techniques. This includes tree canopy, ecoroofs, bioswales and pervious paving. Green infrastructure that includes vegetation also improves air quality and reduce heat island effects.

B. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs are a type of green infrastructure that reduces impervious surface area and provides multiple ecosystem services including managing stormwater runoff for quantity and quality, improving air quality and reducing heat island effects.

C. C2035 includes a range of policies that will ensure the City continues progress toward incorporating tree canopy with redevelopment throughout the Central City. Specifically, the Plan contains tree canopy targets for all ten Central City subdistricts. Nine out of the 10 subdistricts are expected to experience increases in tree canopy over the life of the plan. One way the targets can be attained is by planting more trees along public rights-of-way. Some street setback requirements throughout the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees.

233. **Policy 4.77, Hazards to wildlife.** Encourage building, lighting, site, and infrastructure design and practices that provide safe fish and wildlife passage, and reduce or mitigate hazards to birds, bats, and other wildlife.

The CC2035 amendments are consistent with this policy in the following ways:

A. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the existing wildlife by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirements include planting of native vegetation and a mix of trees, shrubs and groundcover, which will improve fish and wildlife safe passage along and to the river.

B. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. There is a landscaping requirement for the setback that requires native plants to be installed with development but allows flexibility in the size and location of trees to be compatible with adjacent development. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback and landscaping will improve fish and wildlife safe passage along and to the river.

C. New standards for lighting along the Willamette River will require lighting to be located away from the natural resource areas except when associated with trails, docks and public roads. In all situations lighting must be directed down, limiting impacts to birds, bats and other wildlife, and cannot shine directly into the water, limiting impacts on fish.

D. A new standard for bird-friendly development requires that windows in the first 60 feet of new developments and major remodels be treated with a bird-safe glaze or pattern to reduce the risk of bird-to-building collisions.

234. **Policy 4.78, Access to nature.** Promote equitable, safe, and well-designed physical and visual

access to nature for all Portlanders, while also maintaining the functions and values of significant natural resources, fish, and wildlife. Provide access to major natural features, including:

- Water bodies such as the Willamette and Columbia rivers, Smith and Bybee Lakes, creeks, streams, and sloughs.
- Major topographic features such as the West Hills, Mt. Tabor, and the East Buttes.
- Natural areas such as Forest Park and Oaks Bottom.

The CC2035 amendments are consistent with this policy in the following ways:

A. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback maintains space for public access to the Willamette River, including a major public trail and viewpoints, and natural resource enhancement.

B. The major trail alignment and completion of the Greenway Trial along the Willamette River will improve public access along and to the Willamette River.

C. The Green Loop is a multimodal transportation corridor that will improve public access around all the Central City, as well as to and across the Willamette River.

D. The Central City Scenic Resources Protection Plan (CCSRPP) and zoning code amendments in 33.475, River Overlay Zones, protect view corridors and maintain the visual access to the Willamette River, major topographic features including mountains and buttes, and natural areas including parks.

Hazard-resilient design

235. **Policy 4.79, Natural hazards and climate change risks and impacts.** Limit development in or near areas prone to natural hazards, using the most current hazard and climate change-related information and maps.

The amendments are consistent with this policy in the following ways:

A. The Health and Environment Goal and related policies and actions provide for resilience to climate change impacts and natural hazards including flooding and earthquakes, through planning, design, education and implementation of green infrastructure and infrastructure retrofits.

B. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes an updated inventory of natural resource features and functions in the Central City. The NRPP evaluates the functions above and the ecosystem services (e.g., natural hazard management, public health, climate resiliency, etc.) provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions.

C. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. By applying new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources

located in the water, in the floodplain and on land, the plan reduces risks associated with flooding, landslides and wildfire.

D. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because it reduces the risk of flooding and landslide on development near the river. In addition, there is a landscaping requirement for the setback that requires additional native plants to be planted. The setback and landscaping retain space that mitigates the risks associated with river flooding. Landscaping also sequesters carbon, reduces the heat island effect and helps improve air quality.

E. Actions call for partnerships between local, regional, state and federal regulatory, Sovereign nations, non-profit organization, neighborhoods and property owners. One action is to work with FEMA to address the NOAA Fisheries biological opinion regarding the floodplain development and impacts on species listed under the Endangered Species Act. This will include a remapping of the floodplain in the Central City. Another action is to amend the flood-related regulations and other guidelines to, a) help prevent or minimize the risk of flood damage to new, redeveloped and rehabilitated buildings located in the 100-year floodplain; b) avoid, minimize and mitigate the impacts of such development on floodplain functions; and, c) comply with updated NFIP requirements.

F. Increasing the resiliency of the urban forest is a critical component of the CC2035 Plan. Maintaining and increasing the number of native species underlies the CC2035 tree planting strategy. For example, Policy 6.9, Strategic tree canopy enhancement, of the Plan encourages the planting of Northwest native and climate change-resilient trees. The Plan also includes strategies to expand efforts to reestablish and expand native, large canopy tree species in Portland's parks and natural areas.

G. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including sequestering carbon, reducing heat island impacts and managing stormwater runoff – all of which makes development more resilient to climate change.

H. Existing regulations though City Code Title 24, Building Regulations, are also applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

I. CC2035 maintains existing Environmental conservation overlay zones on Sullivan's Gulch. The regulations limit development on the steep slope and reduce risk of landslides and wildfire on development.

236. **Policy 4.80, Geological hazards.** Evaluate slope and soil characteristics, including liquefaction potential, landslide hazards, and other geologic hazards.

The amendments are consistent with this policy in the following ways:

A. The Health and Environment Goal and related policies and actions provide for resilience to climate change impacts and natural hazards including flooding and earthquakes, through planning, design, education and implementation of green infrastructure and infrastructure retrofits.

B. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes an updated inventory of natural resources features and functions in the Central City. The NRPP evaluates the functions above and the ecosystem services (e.g., natural hazard management, public health, climate resiliency, etc.) provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions.

C. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. By applying new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources located in the water, in the floodplain and on land, the plan reduces risks associated with flooding, landslides and wildfire.

D. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because it reduces the risk of flooding and landslide on development near the river. In addition, there is a landscaping requirement for the setback that requires additional native plants to be planted. The setback and landscaping retain space that mitigates the risks associated with river flooding. Landscaping also sequesters carbon, reduces the heat island effect and helps improve air quality.

E. Actions call for partnerships between local, regional, state and federal regulatory, Sovereign nations, non-profit organization, neighborhoods and property owners. One action is to work with FEMA to address the NOAA Fisheries biological opinion regarding the floodplain development and impacts on species listed under the Endangered Species Act. This will include a remapping of the floodplain in the Central City. Another action is to amend the flood-related regulations and other guidelines to: a) help prevent or minimize the risk of flood damage to new, redeveloped and rehabilitated buildings located in the 100-year floodplain; b) avoid, minimize and mitigate the impacts of such development on floodplain functions; and, c) comply with updated NFIP requirements.

F. Increasing the resiliency of the urban forest is a critical component of the CC2035 Plan. Maintaining and increasing the number of native species underlies the CC2035 tree planting strategy. For example, Policy 6.9, Strategic tree canopy enhancement, of the Plan encourages the planting of Northwest native and climate change-resilient trees. The Plan also includes strategies to expand efforts to reestablish and expand native, large canopy tree species in Portland's parks and natural areas.

G. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including sequestering carbon, reducing heat island impacts and managing stormwater runoff – all of which makes development more resilient to climate change.

H. Existing regulations though City Code Title 24, Building Regulations, are also applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

I. CC2035 maintains existing Environmental conservation overlay zones on Sullivan's Gulch. The regulations limit development on a steep slope and reduce the risk of landslides and wildfire on development.

237. **Policy 4.81, Disaster-resilient development.** Encourage development and site-management approaches that reduce the risks and impacts of natural disasters or other major disturbances and that improve the ability of people, wildlife, natural systems, and property to withstand and recover from such events.

Consistent with the policy direction of Policies 4.79 – 4.81, Volume 1, Goals and Policies, of CC2035 contains a chapter on Health and Environment that includes goals and policies address the following topics: natural hazard resilience; climate change resilience; and flood ready development. The Plan District also contains new development incentives intended to encourage seismic upgrades for historic structures, and the Plan includes various actions that call for: amending flood-related regulations and guidelines; new development to include early warning systems regarding fire protection; and revising seismic upgrade standards.

238. **Policy 4.83, Urban heat islands.** Encourage development, building, landscaping, and infrastructure design that reduce urban heat island effects.

CC2035 contains policies that call for site and building designs that incorporate vegetation to address urban heat island effect. Further, the Plan District contains a new development standard that requires that ecoroofs be constructed on buildings having a net-building area of at least 20,000 sq. ft., and that new development of at least 50,000 sq. ft. and rehabilitations that add 50,000 sq. ft. of floor area must pursue green building certification, which could include other design elements that address heat island effect.

239. **Policy 4.84, Planning and disaster recovery.** Facilitate effective disaster recovery by providing recommended updates to land use designations and development codes, in preparation for natural disasters.

As noted above, the Plan includes various actions directing the City to update flood plain management and seismic standards enforced by the City, and to implement new fire early warning systems in new development, consistent with this policy.

Healthy food

240. **Policy 4.85, Grocery stores and markets in centers.** Facilitate the retention and development of grocery stores, neighborhood-based markets, and farmer's markets offering fresh produce in centers.

241. **Policy 4.86, Neighborhood food access.** Encourage small, neighborhood-based retail food opportunities, such as corner markets, food co-ops, food buying clubs, and community-supported agriculture pickup/drop-off sites, to fill in service gaps in food access across the city.

The zoning pattern for most of the Central City, especially those areas where residential mixed-use development is allowed, also allow for retail uses, such as grocery stores, and temporary activities such as farmers markets and other fresh food distribution activities. CC2035 continues to support this zoning pattern and furthers the directives of Policies 4.85 and 4.86 through policies, such as 2.1, Complete Neighborhoods, and 2.2, Promote healthy active living, that promote new grocery store development and publicly accessible locations for farmer's markets and similar activities.

242. **Policy 4.87, Growing food.** Increase opportunities to grow food for personal consumption, donation, sales, and educational purposes.

243. **Policy 4.88, Access to community gardens.** Ensure that community gardens are allowed in areas close to or accessible via transit to people living in areas zoned for mixed-use or multi-dwelling development, where residents have few opportunities to grow food in yards.

Consistent with these policies 4.87 and 4.88, CC2035 contains policies calling for "access to locally grown and healthy foods," while the Plan also calls for the expansion of publicly accessible open space and park amenities, including but not limited to community gardens, and the use of under-utilized public right-of-way and land for such uses.

Housing: Goals

244. **Goal 5.A: Housing diversity.** Portlanders have access to high-quality affordable housing that accommodates their needs, preferences, and financial capabilities in terms of different types, tenures, density, sizes, costs, and locations.

245. **Goal 5.B: Equitable access to housing.** Portland ensures equitable access to housing, making a special effort to remove disparities in housing access for people with disabilities, people of color, low-income households, diverse household types, and older adults.

246. **Goal 5.C: Healthy connected city.** Portlanders live in safe, healthy housing that provides convenient access to jobs and to goods and services that meet daily needs. This housing is connected to the rest of the city and region by safe, convenient, and affordable multimodal transportation.

247. **Goal 5.D: Affordable housing.** Portland has an adequate supply of affordable housing units to meet the needs of residents vulnerable to increasing housing costs.

248. **Goal 5.E: High-performance housing.** Portland residents have access to resource-efficient and high-performance housing for people of all abilities and income levels.

In 2016 there were approximately 24,092 housing units within the Central City Plan District. CC2035 is intended to support the development of an additional 39,500 units by the year 2035. This is a 165 percent increase, and accounts for 30 percent of city-wide projected housing growth, but in an area equal to only 3 percent of the city's land mass. Further analysis of the existing housing stock reveals that 74 percent of it consists of studio and 1-bedroom units, even though between 2010 and 2015, an average of 231 children annually were born to families living in the Central City. This data suggests that the demographics of the Central City are changing faster than the housing that supports it. It also suggests that a greater array of essential public services, schools, play grounds, daycare, community centers, and libraries, will be needed during the life of the CC2035 Plan.

As for affordability, in 2015, approximately 7,978 units of regulated affordable housing was in the Central City, or 37.6 percent of all housing. However, most of these units are studio and 1-bedroom units, and with the median family income (MFI) for a family of two in Portland being $53,230 and maximum monthly housing cost (considered affordable) for the same family being $1,331, most market rate housing in the Central City is not affordable to the average Portland family with children.

Central City 2035 builds upon the recently adopted Inclusionary Housing Program adopted by the City of Portland, by including policies, such as 2.1, Complete Neighborhoods, and 2.2, Promote healthy active living, that address the need to provide affordable housing, middle income housing, senior and student housing, and family compatible housing at all income levels, as well as

neighborhood amenities and essential public services that allow for sustained community development by providing for the needs of people at all ages, income levels, and abilities.

Specific Zoning Code amendments, such as development standard 3.510.200.E, which provides floor area bonuses when public services and amenities are developed as part of a mixed-use project, help to implement different desired outcomes of these goals. Also, during the review of the Recommended Draft of CC2035, Council received testimony both for and against the maximum heights proposed by the plan and considered various amendments to increase heights at different locations throughout the Central City. In most cases, Council noted a desire to allow increased heights as a way to incent new residential development throughout the Central City, expand the supply of housing and reduce pressure on increased housing costs.

These and other elements of the plan ensure that CC2035 is consistent with Goals 5.A – 5.E, and the following applicable policies.

Housing: Policies

Diverse and expanding housing supply

249. **Policy 5.1, Housing supply.** Maintain sufficient residential development capacity to accommodate Portland's projected share of regional household growth.

250. **Policy 5.2, Housing growth.** Strive to capture at least 25 percent of the seven-county region's residential growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania counties).

251. **Policy 5.3, Housing potential.** Evaluate plans and investments for their impact on housing capacity, particularly the impact on the supply of housing units that can serve low- and moderate-income households, and identify opportunities to meet future demand.

Most the base zones in the Central City allow housing by right, and over 1,100 acres of the plan district have such zoning applied to it. These include the RH and RX zones, which focus on housing production, but also the CX and EX zones, commercial and employment mixed use zones where historically the most housing has been created since 1990. CC2035 maintains this supply of land zoned for these purposes and expands the total area of mixed-use zoning allowing housing outright or as a conditional use in the Central City by over 100 acres.

Further, during the review of the Recommended Draft of CC2035, Council received testimony for and against the maximum heights proposed by the plan, as well as various amendments by Council to increase heights at different locations throughout the Central City. In most cases, Council noted a desire to allow increased heights as a way to incent new residential development throughout the Central City, expand the supply of housing and reduce pressure on increased housing costs.

There are limited situations where City Council reduced the maximum height in historic districts, while maintaining the floor area ratios of the effected properties. In the New Chinatown/Japantown Historic District, the FAR available to all the affected lots remains the same with the exception of one lot that has the potential to increase the base floor area from 6:1 to 9:1 if the western half of the block, adjacent to the transit station, is all residential development above the ground floor. Thus the total housing potential in the district remains the same with an opportunity for an increase on this additional lot adjacent to the transit station. .

In summary, the CC2035 does not rely upon the full utilization of all buildable FAR within the plan district to satisfy the projected housing potential of the CC2035 Plan, 2035 Comprehensive Plan, or

Metro 2040 Framework Plan. Specifically, the buildable lands analysis for the 2035 Comprehensive Plan found that the zoning in place for the Central City prior to the amendments proposed by the Central City 2035 Plan, which overall increased development potential throughout the Central City, would have been sufficient to meet the housing projections targeted by the 2035 Comprehensive Plan. Therefore, these amendments to the Zoning Code are consistent with and further the objectives of Policies 5.1 - 5.3.

252. **Policy 5.5, Housing in centers.** Apply zoning in and around centers that allows for and supports a diversity of housing that can accommodate a broad range of households, including multi-dwelling and family-friendly housing options.

The zoning pattern for the Central City is intended to produce high-density, multifamily housing. The applicable development standards do not focus on any specific tenure, unit type, or intended user. However, CC2035 contains policies that support the development and additional efforts to monitor housing supply through the life of the plan to ensure that Central City housing production keeps pace with the diverse needs or the city center's increasingly diversifying population. This includes a focus on the total number of housing units compatible with families with children, senior units, student housing, and middle-income units, consistent with Policy 5.5.

253. **Policy 5.8, Physically-accessible housing.** Allow and support a robust and diverse supply of affordable, accessible housing to meet the needs of older adults and people with disabilities, especially in centers, station areas, and other places that are proximate to services and transit.

254. **Policy 5.9, Accessible design for all.** Encourage new construction and retrofitting to create physically-accessible housing, extending from the individual unit to the community, using Universal Design Principles.

Goal 2.A of CC2035 states: "*The Central City is a successful dense mixed-use center composed of livable neighborhoods with housing, services and amenities that support the needs of people of all ages, incomes, and abilities.*" CC2035 further supports the objectives of Policies 5.8 – 5.9 by maintaining and expanding the supply of land zoned for high-density multifamily housing in the city center, much of which is designed for people at different ages and abilities and is in areas well served by transit and a safe pedestrian environment.

Housing access

255. **Policy 5.11, Remove barriers**. Remove potential regulatory barriers to housing choice for people in protected classes to ensure freedom of choice in housing type, tenure, and location.

256. **Policy 5.12, Impact analysis.** Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low-income households. Identify and implement strategies to mitigate the anticipated impacts.

CC2035 promotes the development of studio, and 1-, 2-, and 3-bedroom units, to ensure that the housing needs for different household types, be they single occupant or families with children, are being met. The plan further expands the amount of mixed-use zoned land in the Central City Plan District and increases the floor area ratios applicable in parts of the Central City in areas with high levels of transit service. Further, in conjunction with the recently adopted inclusionary housing regulations and new development bonus system for commercial development, CC2035 will result in a more predictable ongoing supply of units affordable to people earning less than 80 percent median family income. These provisions are anticipated to result in greater diversity of unit type and increased access to affordable units, consistent with Policies 5.11 – 5.12.

257. **Policy 5.13, Housing stability.** Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.

258. **Policy 5.14, Preserve communities.** Encourage plans and investments to protect and/or restore the socioeconomic diversity and cultural stability of established communities.

259. **Policy 5.15, Gentrification/displacement risk.** Evaluate plans and investments, significant new infrastructure, and significant new development for the potential to increase housing costs for, or cause displacement of communities of color, low- and moderate-income households, and renters. Identify and implement strategies to mitigate the anticipated impacts.

260. **Policy 5.16, Involuntary displacement.** When plans and investments are expected to create neighborhood change, limit the involuntary displacement of those who are under-served and under-represented. Use public investments and programs, and coordinate with nonprofit housing organizations (such as land trusts and housing providers) to create permanently-affordable housing and to mitigate the impacts of market pressures that cause involuntary displacement.

CC2035 is consistent with Policies 5.13 – 5.16, as the plan proposes infill of vacant and under-utilized land in the Central City. Most of these sites do not currently contain housing or tenants that could be impacted by new housing. Further, the plan and new inclusionary housing program work together to promote the retention and expansion of affordable housing options throughout the city center, to prevent displacement and expand opportunities for vulnerable populations.

Housing location

261. **Policy 5.22, New development in opportunity areas.** Locate new affordable housing in areas that have high/medium levels of opportunity in terms of access s to active transportation, jobs, open spaces, high-quality schools, and supportive services and amenities.

262. **Policy 5.23, Higher-density housing**. Locate higher-density housing, including units that are affordable and accessible, in and around centers to take advantage of the access to active transportation, jobs, open spaces, schools, and various services and amenities.

CC2035 is consistent with Policies 5.22 and 5.23 as the plan proposes housing development at higher levels than are achievable anywhere else in the city, and within an urban environment with the greatest access to transit, active transportation options, employment, and numerous open space amenities.

Also, as noted above, during the review of the Recommended Draft of CC2035, Council received testimony for and against the maximum heights proposed by the plan and considered various amendments to increase heights at different locations throughout the Central City. In most cases, Council noted a desire to allow increased heights as a way to incent new residential development throughout the Central City, expand the supply of housing and, reduce pressure on increased housing cost.

Through CC2033 the base FAR of a number of sites have been increased, that previously had a base of 4:1, to 5:1. These changes are intended to incent the development of new residential development, As a result of the adopted inclusionary housing provisions, these areas will contain a mix of market rate and affordable housing.

In addition, in Central City historic districts floor area ratios have not been reduced even though maximum heights have been lowered to ensure that high density development potential is still available in these areas. In fact, in New Chinatown/Japantown Historic District, to encourage future residential development, one lot has the potential to increase the base floor area from 6:1

to 9:1 if the western half of the block, adjacent to the transit station, is all residential development above the ground floor.

Further, limited portions of the Central Eastside were rezoned from industrial designations to Central Employment (EX) a mixed-use zone that allows higher density development as well as housing in certain situations.

The plan further proposes working with PPS to expand access to K-12 public schools and offers development incentives when these and other essential public services, such as libraries, community centers, and daycare, are included within mixed-use development projects.

263. **Policy 5.24, Impact of housing on schools.** Evaluate plans and investments for the effect of housing development on school enrollment, financial stability, and student mobility. Coordinate with school districts to ensure plans are aligned with school facility plans.

The entire Central City is located within Portland Public Schools (PPS) boundaries. PPS staff were consulted and were members of the Technical Advisory Committee (TAC) for CC2035. In this role, housing projections and where and how the plan proposes to encourage additional housing were shared with PPS staff. Thus, development incentives regarding the inclusion of public schools in mixed-use development were included, as well as actions calling for the City to work with PPS to expand access to public schools for families living in the Central City, consistent with this policy.

Housing affordability

264. **Policy 5.25, Housing preservation**. Preserve and produce affordable housing to meet needs that are not met by the private market by coordinating plans and investments with housing providers and organizations.

265. **Policy 5.26, Regulated affordable housing target.** Strive to produce at least 10,000 new regulated affordable housing units citywide by 2035 that will be affordable to households in the 0-80 percent MFI bracket.

266. **Policy 5.29, Permanently-affordable housing.** Increase the supply of permanently-affordable housing, including both rental and homeownership opportunities.

CC2035 proposes new FAR bonus allowances that award additional floor area for development when applicants for non-residential development pay into an affordable housing fund that will be used by the Portland Housing Bureau to create new affordable units or to preserve existing units for providing affordable units. This bonus and the new requirements for inclusionary housing are intended to secure at least 30 percent of the housing in the city center as affordable to people earning less than 80 percent MFI by 2035, consistent with Policies 5.25, 5.26, and 5.29.

267. **Policy 5.30, Housing cost burden.** Evaluate plans and investments for their impact on household cost, and consider ways to reduce the combined cost of housing, utilities, and/or transportation. Encourage energy-efficiency investments to reduce overall housing costs.

268. **Policy 5.31, Household prosperity.** Facilitate expanding the variety of types and sizes of affordable housing units, and do so in locations that provide low-income households with greater access to convenient transit and transportation, education and training opportunities, the Central City, industrial districts, and other employment areas.

269. **Policy 5.33, Central City affordable housing.** Encourage the preservation and production of affordable housing in the Central City to take advantage of the area's unique concentration of active transportation access, jobs, open spaces, and supportive services and amenities.

270. **Policy 5.34, Affordable housing resources**. Pursue a variety of funding sources and mechanisms including new financial and regulatory tools to preserve and develop housing units and various assistance programs for households whose needs are not met by the private market.

271. **Policy 5.35, Inclusionary housing.** Use inclusionary zoning and other regulatory tools to effectively link the production of affordable housing to the production of market-rate housing.

272. **Policy 5.36, Impact of regulations on affordability**. Evaluate how existing and new regulations affect private development of affordable housing, and minimize negative impacts where possible. Avoid regulations that facilitate economically-exclusive neighborhoods.

273. **Policy 5.38, Workforce housing**. Encourage private development of a robust supply of housing that is affordable to moderate-income households located near convenient multimodal transportation that provides access to education and training opportunities, the Central City, industrial districts, and other employment areas.

As noted, the City of Portland recently adopted inclusionary zoning regulations that apply to all projects that result in more than 20 new residential units. Due to the typical scale of development in the Central City, this means between 10 to 20 percent of nearly all new residential development will consist of housing affordable to people earning between 60 to 80 percent MFI. However, the previously noted floor area bonus for commercial development, and policies of the plan will further assist in expanding the supply of affordable housing, including workforce housing, throughout the city center. Thus, CC2035 is consistent with the above policies as follows:

A. Policy 5.30, Housing cost burden: the plan requires new development to pursue green-building certification which should reduce the heating and energy costs for residents. The plan also expands access to transit and other multimodal transportation options, which should reduce household transportation expenses. Lastly, the plan includes development bonuses that will expand the supply of affordable housing in the Central City.

B. Policy 5.31, Household prosperity: Policies, such as 2.8, Family-compatible housing, which support expanded access to units with 2 or more bedrooms, as well as action items calling for the monitoring of unit production for affordable housing, combined with the recently adopted inclusionary housing provisions of the Zoning Code ensure that CC2035 will expand "the variety of types and sizes of affordable units" in the Central City.

C. Policy 5.33, Central City affordable housing, Policy 5.34, Affordable housing resources, and Policy 5.35, Inclusionary housing: The plan contains new development bonuses that provide additional floor area in exchange for a contribution to the City's affordable housing fund. This combined with the recently adopted inclusionary housing regulations of the Zoning Code will expand the supply of affordable housing in the Central City.

D. Policy 5.36, Impact of regulations on affordability, and Policy 5.38, Workforce housing: The recently adopted inclusionary housing provisions of the Zoning Code, and restructuring of the development bonuses allowances of the code to prioritize affordable housing are intended to significantly expand access to affordable housing, including workforce housing in the Central City. These provisions have also been crafted to minimize the impact of existing regulations and administrative costs, such as the cost of design review for affordable housing projects.

Homelessness

274. **Policy 5.46, Housing continuum**. Prevent homelessness and reduce the time spent being homeless by ensuring that a continuum of safe and affordable housing opportunities and related

supportive services are allowed, including but not limited to Permanent Supportive Housing, transitional housing, self-built micro housing communities, emergency shelters, temporary shelters such as warming centers, and transitional campgrounds.

CC2035 addresses the objectives of Policy 5.46 by maintaining and expanding zoning that allows for shelters, transitional housing, and social services that support this population, while also expanding the number of affordable units Central City-wide. The plan also includes policies and actions that focus on job training, transitional housing, and human and health services to aid vulnerable populations within the Central City.

Health, safety, and well-being

275. **Policy 5.49, Housing quality.** Encourage housing that provides high indoor air quality, access to sunlight and outdoor spaces, and is protected from excessive noise, pests, and hazardous environmental conditions.

276. **Policy 5.50, High-performance housing.** Encourage energy efficiency, green building practices, materials, and design to produce healthy, efficient, durable, and adaptable homes that are affordable or reasonably priced.

CC2035 includes new development standards (33.510. 244) that require new development or redevelopment, that results in 50,000 square feet or more of new floor area, pursue low-carbon/green building certification. Buildings receiving such certification typically receive points for the use of materials and design elements that promote human health. Further, the plan contains approval criteria for the design and siting of some housing located in the Central Eastside Industrial District to minimize the impact of adjacent industrial uses on new housing (see Central City Master Plans, Section 33.510.255. These elements of the plan will further the objectives of Policies 5.49 and 5.50.

277. **Policy 5.51, Healthy and active living.** Encourage housing that provides features supportive of healthy eating and active living such as useable open areas, recreation areas, community gardens, crime-preventive design, and community kitchens in multifamily housing.

278. **Policy 5.52, Walkable surroundings.** Encourage active transportation in residential areas through the development of pathways, sidewalks, and high-quality onsite amenities such as secure bicycle parking.

279. **Policy 5.53, Responding to social isolation.** Encourage site designs and relationship to adjacent developments that reduce social isolation for groups that often experience it, such as older adults, people with disabilities, communities of color, and immigrant communities.

CC2035 Policy 6.5 states:

> *Human health. Encourage the use of active modes of transportation by creating and enhancing a network of bike and pedestrian facilities that provide access to services and destinations including natural areas. Improve access for all people to locally grown and healthy foods. Encourage the use of building construction methods, materials and products that do not have harmful effects on human health and the environment. Encourage social health by fostering community in a hospitable public realm.*

Policies 5.51 – 5.53 are supported by amendments to the Zoning Code and Transportation Systems Plan that will modify the experience and range of uses allowed in the public realm, and expand the amount of publicly accessible open space in the Central City. These measures will also expand access to active transportation facilities and recreation opportunities. The plan further calls for a

community center, community gardens, and new parks and open space features to be developed during the life of the plan to support the additional 38,000 households projected by the year 2035.

Economic Development: Goals

280. **Goal 6.A: Prosperity.** Portland has vigorous economic growth and a healthy, diverse economy that supports prosperity and equitable access to employment opportunities for an increasingly diverse population. A strong economy that is keeping up with population growth and attracting resources and talent can:

- Create opportunity for people to achieve their full potential.
- Improve public health.
- Support a healthy environment.
- Support the fiscal well-being of the city.

A healthy local economy, access to good, stable employment, and a stable and growing tax base, is important to the ability of the City to support its residents and businesses with the services they need to thrive. A strong, local economy also correlates to better health and educational outcomes for individuals. As such, the recently adopted 2035 Comprehensive Plan promotes the growth of 141,643 new jobs, 44,740 of which will be located with the Central City. This accounts for 32 percent of all projected job growth.

The job growth targeted by CC2035 to support these projections is addressed within the commercially as well as industrially zoned portions of the plan district, as well at institutions located within the Central City. A combination of base zone amendments, FAR increases, and development standards that will allow a broader and denser array of industrial jobs, will allow for employment opportunities for people at various income, skill, and employment levels, allowing the plan to further the objectives of Goal 6.A.

281. **Goal 6.B: Development.** Portland supports an attractive environment for industrial, commercial, and institutional job growth and development by: 1) maintaining an adequate land supply; 2) a local development review system that is nimble, predictable, and fair; and 3) high-quality public facilities and services.

CC2035 is consistent with the objectives of this goal as follows:

A. The plan increases the existing supply of mixed-commercial and mixed-employment lands and allows for higher densities of industrial office uses in the Central Eastside, while offering development incentives for the creation of ground floor industrial uses. The plan also brings in approximately 12 acres at the Clinton Station Area into the Central Eastside and zones the area for high density mixed-employment uses. Lastly, the plan increases land use densities within mixed-use zones along the transit mall and at key station areas.

B. The plan simplifies many preexisting development standards, land use allowances, and parking regulations, to create a more streamline and predictable development review system. The plan also contains actions calling for an update to the design guidelines applicable to the Central City, and the periodic review of different development standards and incentives.

C. The plan proposes numerous projects to the transportation system, parks and open space network, and public infrastructure that support commercial office, retail, institutional, and

other employment uses in the Central City. The plan also proposes strategies to seismically upgrade numerous structures for employment uses, promotes expansion of the amount of green-infrastructure, the creation of an Innovation Quadrant, a permanent location for a day laborer facility, and strategies to expand the skilled workforce, provide affordable workspace, and create new employment partnerships in the Central Eastside.

282. **Goal 6.C: Business district vitality.** Portland implements land use policy and investments to:
    - Ensure that commercial, institutional, and industrial districts support business retention and expansion.
    - Encourage the growth of districts that support productive and creative synergies among local businesses.
    - Provide convenient access to goods, services, and markets.
    - Take advantage of our location and quality of life advantages as a gateway to world-class natural landscapes in Northwest Oregon, Southwest Washington, and the Columbia River Basin, and a robust interconnected system of natural landscapes within the region's Urban Growth Boundary.

CC2035 addresses the objectives of Goal 6.C through support of the emerging Innovation Quadrant, located within the Central Eastside, South Waterfront, and University/South Downtown District and through potential investments in infrastructure and strategies that leverage employment and traded sector growth in the Central City. The plan also contains actions intended to address skill gaps within high-growth, high-demand occupations, the creation of a new business improvement district in the Central Eastside, and continued collaboration with existing business associations on infrastructure improvements and strategies that may affect the viability of member businesses.

Economic Development: Policies

Diverse, expanding city economy

283. **Policy 6.1, Diverse and growing community**. Expand economic opportunity and improve economic equity for Portland's diverse, growing population through sustained business growth.

284. **Policy 6.2, Diverse and expanding economy**. Align plans and investments to maintain the diversity of Portland's economy and status as Oregon's largest job center with growth across all sectors (commercial, industrial, creative, and institutional) and across all parts of the city.

285. **Policy 6.3, Employment growth.** Strive to capture at least 25 percent of the seven-county region's employment growth (Multnomah, Washington, Clackamas, Yamhill, Columbia, Clark, and Skamania counties).

Consistent with these policies, the plan proposes zone changes, increased FAR allowances, new use allowances, and development standards and bonuses, all of which are intended to facilitate new office development, new incubator industrial uses, and retail and other commercial service businesses and jobs to grow in all Central City districts. This approach does not target any one job sector, nor does it focus on jobs that require a specific skill level, or educational level. Rather, these elements of the plan seek to increase the supply of land and amount of multi-story buildings throughout the city center available for employment and industrial uses.

At the same time, the plan contains actions that focus on job/skill development, affordable work space, and partnerships between government and the private sector aimed at leveraging new job

and industrial sector growth. These elements will allow the Central City to create upwards of 51,000 new jobs and will contribute to the city's ability to capture 25 percent of the projected regional employment growth.

286. **Policy 6.4, Fiscally-stable city.** Promote a high citywide jobs-to-households ratio that supports tax revenue growth at pace with residential demand for municipal services.

CC2035 proposes several elements that are intended to result in an additional 51,000 new jobs and 38,000 new households within the Central City by the year 2035, which is 30 percent of the projected city-wide growth targeted by the 2035 Comprehensive Plan. If these targets are achieved, the Central City will contain approximately 174,565 jobs and 62,092 households, continuing to make it the densest center within the city, and a strong source of tax revenue supporting municipal services city-wide.

287. **Policy 6.5, Economic resilience.** Improve Portland's economic resilience to impacts from climate change and natural disasters through a strong local economy and equitable opportunities for prosperity.

288. **Policy 6.6, Low-carbon and renewable energy economy.** Align plans and investments with efforts to improve energy efficiency and reduce lifecycle carbon emissions from business operations. Promote employment opportunities associated with energy efficiency projects, waste reduction, production of more durable goods, and recycling.

CC2035 addresses Policies 6.5 and 6.6 as follows:

A. The plan contains goals and policies that support continued investments that support the goal of making the Central City resilient to climate change and natural hazards. Further, the plan contains specific actions that address flood plain protection, seismic upgrades, green infrastructure, and green-development strategies.

B. The Zoning Code amendments of the plan increase the setback for development along the Willamette River, require the inclusion of ecoroofs on new buildings, and that new development pursue green-building certification.

289. **Policy 6.7, Competitive advantages**. Maintain and strengthen the city's comparative economic advantages including access to a high-quality workforce, business diversity, competitive business climate, and multimodal transportation infrastructure.

290. **Policy 6.8, Business environment.** Use plans and investments to help create a positive business environment in the city and provide strategic assistance to retain, expand, and attract businesses.

291. **Policy 6.9, Small business development.** Facilitate the success and growth of small businesses and coordinate plans and investments with programs that provide technical and financial assistance to promote sustainable operating practices.

CC2035 responds to Policies 6.7 – 6.9 as follows:

A. The plan promotes development of office, industrial, and institution uses throughout the Central City, and creates additional development capacity in areas targeted for high density employment. The plan also proposes numerous transportation improvements intended to facilitate freight mobility, and work force commutes by multiple means, including ground and river transit, active transportation, and through carpooling.

B. The plan contains actions supporting the creation of a business improvement district for the Central Eastside, promotes district parking in underserved areas for employees and customers, and promotes the creation of affordable work space for new and emerging businesses.

C. The plan seeks the creation of an Innovation Quadrant where institutions and the training, and research and development conducted can be commercialized by local businesses in the Central City. The plan also promotes skill development through programs and partnerships between business associations and PCC and PPS.

292. **Policy 6.10, Business innovation.** Encourage innovation, research, development, and commercialization of new technologies, products, and services through responsive regulations and public sector approaches.

In response to this goal, CC2035 promotes the creation of an Innovation Quadrant that links the research and development functions of PSU and OHSU with businesses operations in and around the Central City, with a focus on the University District/South Downtown, South Waterfront, and Central Eastside districts. The plan contains policies and actions supportive of this effort, as well as new development standards and use allowances that are intended to increase employment densities and diversify the range of industrial and high-tech businesses operating in the Central City.

293. **Policy 6.12, Economic role of livability and ecosystem services.** Conserve and enhance Portland's cultural, historic, recreational, educational, food-related, and ecosystem assets and services for their contribution to the local economy and their importance for retention and attraction of skilled workers and businesses.

The Central City has become a large draw for employers and residents because of the many amenities it contains. These include access to recreational, cultural, and educational assets including access to food, entertainment, and retail. For example, the river setback and Greenway Trail standards in 33.475, River Overlay Zones, ensure adequate land is available for public access to the Willamette River for recreation. Access to government services and a diverse multimodal transportation network also attract skilled workers and businesses. CC2035 supports the objectives of this goal by: 1) maintaining the zoning and use allowances that have allowed these assets to flourish in the Central City; and 2) by expanding the zoning and supporting continued investment in the maintenance and enhancement of the Central City as the primary location where these assets and more can be found.

Land development

294. **Policy 6.13, Land supply.** Provide supplies of employment land that are sufficient to meet the long-term and short-term employment growth forecasts, adequate in terms of amounts and types of sites, available and practical for development and intended uses. Types of sites are distinguished primarily by employment geographies identified in the Economic Opportunities Analysis, although capacity needs for building types with similar site characteristics can be met in other employment geographies.

295. **Policy 6.15, Regionally-competitive development sites.** Improve the competitiveness of vacant and underutilized sites located in Portland's employment areas using incentives, and regional and state assistance for needed infrastructure and site readiness improvements.

The Economic Opportunity Analysis (EOS), adopted June 2016, considers the Central City as the location of two primary types of economic uses: commercial office, and close-in incubator industrial. The EOA found that of the 141,600 new jobs forecasted for the City of Portland by 2035,

that 44,741 jobs (32 percent) will be generated in the Central City with 34,124 assigned to commercial uses, and 19,171 assigned to industrial uses. This forecast translates into a needed capacity of 60 acres of commercially zoned land, and 90 acres of industrial zoned land.

As for commercial land, the analysis found the Central City has 201-acre supply of land for these uses, or an excess capacity of 141 acres. Conversely, the same analysis found that there is a demand for 90 acres of industrial zoned land capacity, but only 65 acres of supply available for the industrial uses allowed in the Central City. This means the CC2035 Plan needed to develop a means to create additional capacity for close-in incubator industrial uses. As the ability to create new industrial supply in the land locked urban center was not a possibility, the only option was to incent ways to encourage denser, vertical industrial prototypes.

The primary two methods used by CC2035 to achieve this is by expanding the acreage where industrial office uses may be sited and offering development incentives to create more industrial office uses when traditional industrial uses are located on the ground floor of industrial office projects. Thus, the plan modifies the use allowances for the IG1 (General Industrial 1) zone to include industrial office uses up to a maximum of 3:1 FAR per site in the Central Eastside District. This expands the ability to do such uses from a previous maximum of 60,000 sq. ft. per site, and from a subarea of only 48 acres to over 240 acres of IG1 zoned land. These new use allowances for the Central Eastside are intended to create much of the industrial demand noted by the EOA. The created capacity, as well as the untapped capacity of the Lower Albina District will allow the demand for close-in industrial uses to be meet by the year 2035.

Further, the plan proposes freight and other infrastructure investments, as additional strategies to increase the density of jobs in both industrial districts to ensure the demand for industrial jobs is met and possibly exceeded, consistent with Policies 6.13 and 6.15.

296. **Policy 6.16, Regulatory climate.** Improve development review processes and regulations to encourage predictability and support local and equitable employment growth and encourage business retention, including:

6.16.a, Assess and understand cumulative regulatory costs to promote Portland's financial competitiveness with other comparable cities.

6.16.b, Promote certainty for new development through appropriate allowed uses and "clear and objective" standards to permit typical development types without a discretionary review.

6.16.c, Allow discretionary-review to facilitate flexible and innovative approaches to meet requirements.

6.16.d, Design and monitor development review processes to avoid unnecessary delays.

6.16.e, Promote cost effective compliance with federal and state mandates, productive intergovernmental coordination, and efficient, well-coordinated development review and permitting procedures.

The Central City 2035 Plan includes numerous Zoning Code amendments that will provide more certainty for development proposals, while reducing the cost and time to review uses. For instance, as noted above, the ability to develop Industrial Office uses in the Central Eastside was once set at a maximum of 60,000 sq. ft. per site; however, there exists a demand to create much more of this use in the district, which previously was only possible through an uncertain, costly, and long conditional use review. CC2035 removes these barriers by increasing the amount of floor area that can be created for this use by-right. The plan also results in similar code

amendments that simplify the review process for other land uses, and parking, throughout the Central City.

The plan further contains actions directing a review and amendments to the discretionary design review process applicable to most development in the Central City, to streamline and simplify the process currently in effect. These and other elements of the plan respond to the various objectives of Policy 6.16. Additional information regarding how the plan improves the conditions that affected under-utilized and vacant sites can be found under the "Goal 9, Economic Development" section of this findings report.

297. **Policy 6.17, Short-term land supply**. Provide for a competitive supply of development-ready sites with different site sizes and types, to meet five-year demand for employment growth in the Central City, industrial areas, campus institutions, and neighborhood business districts.

CC2035 contains new use allowance for industrial areas in the Central Eastside that will allow higher-density industrial uses to location throughout the district. Then plan also includes zone changes to some under-performing industrial sites located at transit station areas from low density light industrial zoning to high density, mixed-use employment zoning to increase employment growth. Analysis conducted in support of the 2035 Comprehensive Plan and CC2035 Plan (see "Goal 9, Economic Development" section of this findings report), demonstrated how these elements of the plan increase the acreage available for employment in the Central City.

298. **Policy 6.19, Corporate headquarters.** Provide land opportunities for development of corporate headquarters campuses in locations with suitable transportation facilities.

The mixed-use and industrial zoning found in the Central City allows for the siting of corporate headquarters, and over the last few years the number of headquarters in the city center has grown substantially. These businesses are served by numerous public and private assets attractive to employers and employees alike, including access to a diverse multimodal transportation network that connects the Central City to the regional, Oregon and Washington, and points beyond.

Traded sector competitiveness

299. **Policy 6.20, Traded sector competitiveness.** Align plans and investments with efforts to improve the city and regional business environment for traded sector and export growth. Participate in regional and statewide initiatives.

300. **Policy 6.21, Traded sector diversity**. Encourage partnerships to foster the growth, small business vitality, and diversity of traded sectors.

301. **Policy 6.22, Clusters.** Align plans and investments with efforts that direct strategic business development resources to enhance the competitiveness of businesses in traded sector clusters.

CC2035 has many elements that will strengthen the ability to retain and expanded traded sector businesses in the Central City. These include expanding the use allowances in the industrial districts to include a suite of new emerging industrial sectors previously prohibited from locating in close-in industrial areas. The plan also increases the FAR allowances for these and commercial office uses, and proposes a series of infrastructure and strategic investments that will benefit traded sector businesses.

302. **Policy 6.23, Trade and freight hub.** Encourage investment in transportation systems and services that will retain and expand Portland's competitive position as a West Coast trade gateway and

freight distribution hub.

CC2035 strengthens classifications in the Transportation System Plan (TSP) regarding freight mobility and proposes system enhancements, including new traffic signals and a freight couplet, intended to improve freight operations in the Central City.

Further, CC2035 policies 3.1 and 3.2 address the Central City as a regional hub. In addition, polices 3.LA-2 and 3.CE-2 emphasize freight movement and access improvements in Lower Albina and the Central Eastside. There are also several freight-specific TSP projects and studies that will increase and protect freight movement and the Central City's role as a multimodal system and hub. Freight district and freight street classifications in the TSP also address this policy. Major freight-related projects in CC2035 include the Broadway/Weidler (Rose Quarter) Interchange Project (now an adopted element of the City's TSP), Central Eastside Access and Circulation, N River St Reconstruction, Yamhill & Water Traffic Improvements, I-405/Glisan Traffic Improvements, SW Broadway Traffic Improvements, and Southern Triangle Access Improvements.

303. **Policy 6.24, Traded sector land supply.** Foster traded sector retention, growth, and competitive advantages in industrial districts and the Central City. Recognize the concentration of traded-sector businesses in these districts.

The Central City has a concentration of traded sector businesses, and CC2035 maintains and expands the capacity of these businesses in the district by expanding zoning that allows employment, increases FAR allowances in areas targeted for employment growth, and expands the range of industrial uses allowed in the city center, consistent with Policy 6.24.

304. **Policy 6.26, Business opportunities in urban innovation**. Strive to have Portland's built environment, businesses, and infrastructure systems showcase examples of best practices of innovation and sustainability.

The Central City currently is home to many engineering, architectural, and development firms that have pioneered sustainable practices in the built environment, both for the public and private development. This work has also translated into the creation of many LEED certified buildings, district energy facilities, green infrastructure investments, and an expansive and growing active transportation system. CC2035 continues this positive trend with a policy framework that supports further public investment in these areas, and proposes an expansion of green infrastructure throughout the Central City. Lastly, the plan includes Zoning Code amendments that make previous incentives to develop ecoroofs or pursue green building certification into requirements for most development and redevelopment projects. These plan elements are consistent with Policy 6.26.

Equitable household prosperity

305. **Policy 6.27, Income self-sufficiency.** Expand access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities to support and expand opportunities in Portland for middle- and high-wage jobs that do not require a 4-year college degree.

6.27.a, Support the role of industrial districts as a leading source of middle-wage jobs that do not require a 4-year college degree and as a major source of wage-disparity reduction for under-served and under-represented communities.

6.27.b, Evaluate and limit negative impacts of plans and investments on middle and high wage job creation and retention.

306. **Policy 6.29, Poverty reduction**. Encourage investment in, and alignment of, poverty-reduction

efforts that address economic development, land use, transportation, housing, social services, public health, community development, and workforce development.

Consistent with Policies 6.27 and 6.29, CC2035 strategically maintains the industrial sanctuary zoning for the Central Eastside and Lower Albina industrial districts, while increasing the diversity of industrial uses allowed in the Central Eastside and offering incentives to create additional capacity for manufacturing, industrial service, wholesale sales, and warehouse uses. The plan further promotes expansion of the supply of affordable housing in the Central City, while expanding access to transit to areas outside of the city center where lower wage and lesser skill laborers may live. These elements of the plan are specifically intended to ensure that the Central City remains and expands its availability to workers at all skill and income levels.

Central City

307. **Policy 6.33, Central City.** Improve the Central City's regional share of employment and continue its growth as the unique center of both the city and the region for innovation and exchange through commerce, employment, arts, culture, entertainment, tourism, education, and government.

CC2035 is consistent with Policy 6.33 in several ways. The plan expands the amount of mixed-use zoning in the Central City, and increases FAR ratios in areas targeted for substantial employment growth. The plan expands protection of industrial zoned lands while allowing for increase employment densities in industrial districts. The plan also promotes public investment in new infrastructure and strategies intended to support the role of the Central City as the regional center for employment, governance, education, tourism, and arts, culture, and entertainment.

308. **Policy 6.34, Central City industrial districts**. Protect and facilitate the long-term success of Central City industrial districts, while supporting their evolution into places with a broad mix of businesses with high employment densities.

As noted below, CC2035 implements the objectives of Policy 6.34 through new use allowances that expand the diversity of industrial uses allowed in the Central Eastside, that promote higher density industrial uses, and incent the development of buildings that incorporate traditional and emerging industrial sectors. The plan also includes Zoning Code amendments that reduce the total amount of non-industrial uses, such as Retail Sales and Service and Traditional Office uses allowed in the IG1 zone, the predominate industrial zone within the Central City. The plan lastly maintains existing prohibitions regarding the development of housing within industrial zoned land.

309. **Policy 6.35, Innovation districts.** Provide for expanding campus institutions in the Central City and Marquam Hill, and encourage business development that builds on their research and development strengths.

CC2035 responds to Policy 6.35 by increasing the maximum height and FAR allowances in and around PSU and the OMSI station area, maintains high density development allowances in South Waterfront where OHSU is expanding operations from the Marquam Hill campus to the new Schnitzer Campus, and through higher density industrial use provisions applicable to sites across the Tillikum Bridge in the Central Eastside.

Industrial and employment districts

310. **Policy 6.36, Industrial land**. Provide industrial land that encourages industrial business retention, growth, and traded sector competitiveness as a West Coast trade and freight hub, a regional center of diverse manufacturing, and a widely accessible base of family-wage jobs, particularly for under-served and under-represented people.

311. **Policy 6.37, Industrial sanctuaries**. Protect industrial land as industrial sanctuaries identified on the Comprehensive Plan Map primarily for manufacturing
and distribution uses and to encourage the growth of industrial activities in the city.

CC2035 maintains over 300 acres of IG1 zoned land, and 15.4 of IH zoned land that is considered prime industrial land. As the IG1 and IH zones are two of the three zones that implement industrial sanctuary policies, and CC2035 strengthens protections of the IG1 zone by reducing the amount of retail and traditional office uses allowed in the IG1 zoned portions of the Central Eastside, the plan is consistent with Policies 6.36 and 6.37.

312. **Policy 6.38, Prime industrial land retention**. Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land that is prioritized for long-term retention.

6.38.a, Protect prime industrial lands from quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land to non-industrial uses, and consider the potential for other map amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.

6.38.b, Limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

6.38.c, Limit regulatory impacts on the capacity, affordability, and viability of industrial uses in the prime industrial area while ensuring environmental resources are also protected.

6.38.d, Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics. Offsets may include but are not limited to additional brownfield remediation, industrial use intensification, strategic investments, and other innovative tools and partnerships that increase industrial utilization of industrial land.

6.38.e, Protect prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.

6.38.f, Promote efficient use of freight hub infrastructure and prime industrial land by limiting non-industrial uses that do not need to be in the prime industrial area.

The Central City contains a limited amount of prime industrial land, all of which is in the Lower Albina District surrounding the Albina Rail Yard. These lands have a stronger relationship with the Portland North Harbor area than the Central City, and thus, CC2035 preserves these lands for prime industrial uses by proposing no amendments to the protections, in terms of use allowance and development standards, that have been applicable to these lands prior to the adoption of CC2035.

313. **Policy 6.41, Multimodal freight corridors**. Encourage freight-oriented industrial development to locate where it can maximize the use of and support reinvestment in multimodal freight corridors.

The Central Eastside and Lower Albina Districts within the Central City are heavily reliant on freight to deliver supplies and distribute product made in these areas. Further, as major center, most uses in the Central City depend on freight deliveries be they commercial, industrial, residential, or institutional uses. Thus, CC2035 continues to support freight mobility in the city center by designating new freight routes, proposing new freight-oriented infrastructure, and proposing strategies to enhance freight movement while expanding active transportation options, consistent with Policy 6.41.

314. **Policy 6.43, Dispersed employment areas**. Provide small, dispersed employment areas for a flexible and affordable mix of office, creative services, small-scale manufacturing, traded sector and distribution, and other small-format light industrial and commercial uses with access to nearby freeways or truck streets.

315. **Policy 6.44, Industrial land use intensification**. Encourage reinvestment in, and intensification of, industrial land use, as measured by output and throughput per acre.

As noted in the "Goal 9, Economic Development" section of this findings report the recently adopted EOA identified a deficit of industrial land capacity necessary to meet projected demand. Thus, CC2035 includes measures that allow for denser industrial development, and a diversification of the types of industrial uses allowed in the Central City to meet and exceed the growth projected by 2035, consistent with Policy 6.44.

316. **Policy 6.46, Impact analysis.** Evaluate and monitor the impacts on industrial land capacity that may result from land use plans, regulations, public land acquisition, public facility development, and other public actions to protect and preserve existing industrial lands.

CC2035 contains actions calling for additional studies and analysis regarding jobs development and creation of an Innovation Quadrant in the Central Eastside. These actions will ensure that additional analysis of how CC2035 elements are affecting industry in the district will be conducted consistent with this policy. Further, this plan implements the Central City components of *the 2035 Comprehensive Plan*, and the development of that plan included numerous studies of industrial land capacity (see Findings for Statewide Planning Goal 9, Economic Development, earlier in these findings).

317. **Policy 6.47, Clean, safe, and green**. Encourage improvements to the cleanliness, safety, and ecological performance of industrial development and freight corridors by facilitating adoption of market feasible new technology and design.

CC2035 includes new requirements that new development construct ecoroofs and pursue green building certification, even in industrial districts. The plan also includes strategies to expand the use of green infrastructure, and improve freight mobility by reducing cueing at intersections, consistent with the objectives of Policy 6.47.

318. **Policy 6.52, Residential and commercial reuse.** Facilitate compatible industrial or employment redevelopment on residential or commercial sites that become available for reuse if the site is in or near prime industrial areas, and near a freeway or on a freight street.

CC2035 is consistent with the directive of this policy as the zoning pattern implemented by the plan allows for employment and industrial uses on EX zoned lands where such uses occur, and because the EX zone of is the primary mixed-use zone used within and adjacent to industrial districts in the Central City.

319. **Policy 6.55, Neighborhood park use**. Allow neighborhood park development within industrial zones where needed to provide adequate park service within one-half mile of every resident.

The existing zoning pattern in the Central City allows for the development of public parks and recreational assets within the Lower Albina and Central Eastside districts, and this pattern is maintained by CC2035. Further, the Plan and quadrant plans contain actions seeking opportunities to locate such facilities in and near these districts as they continue to densify through the life of the plan.

Campus institutions

320. **Policy 6.56, Campus institutions**. Provide for the stability and growth of Portland's major campus institutions as essential service providers, centers of innovation, workforce development resources, and major employers.

321. **Policy 6.57, Campus land use**. Provide for major campus institutions as a type of employment land, allowing uses typically associated with health care and higher education institutions. Coordinate with institutions in changing campus zoning to provide land supply that is practical for development and intended uses.

Portland State University and Oregon Health Sciences University have institutional campuses in the Central City. Additionally, Portland Community College, Pacific Northwest College of Art, the University of Oregon, and other colleges have facilities in the city center, as is Portland Public School's Lincoln High School campus. CC2035 contains some minor zoning amendments that will ensure these facilities are within mixed-use employment or commercial zones, where they are an allowed use. The plan also proposes continued work on the Innovation Quadrant, which seeks to leverage the educational training, research, and skill training that occurs at these institutions to create new jobs, job sectors, and businesses in the Central City, consistent with Policies 6.56 and 6.57.

322. **Policy 6.61, Satellite facilities**. Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality.

Portland Community College (PCC) and the University of Oregon (U of O) have satellite facilities in the Central City, both of which are located there as the programs they contain relate to skills and job sectors important to the economy of the city center. As noted above, the plan results in minor zoning amendments, that in the case of PCC allows it to enjoy the same zoning as U of O, whereby both are uses allowed outright, and thus have additional capacity to grow and densify within the Central City, consistent with this policy.

Neighborhood business districts

323. **Policy 6.62, Neighborhood business districts**. Provide for the growth, economic equity, and vitality of neighborhood business districts.

324. **Policy 6.63, District function.** Enhance the function of neighborhood business districts as a foundation of neighborhood livability.

The Central City Plan District is home to a few business districts and associations, including the Portland Business Alliance (PBA), Central Eastside Industrial Council (CEIC), Pearl District Business Association (PDBA). CC2035 is consistent with Policies 6.62 and 6.63 as the plan includes several actions that include these organizations as implementers and calls for additional strategies and partnerships between the City and these organizations in implementing different elements of the plan that address transportation and economic development.

325. **Policy 6.64, Small, independent businesses.** Facilitate the retention and growth of small and locally-owned businesses.

CC2035 includes actions calling for additional strategy development and new partnerships intended to support the retention of small incubator businesses in the Central Eastside, as well as strategies to expand the growth of such industries in the Central Eastside and Lower Albina industrial districts, consistent with this policy directive.

326. **Policy 6.67, Retail development.** Provide for a competitive supply of retail sites that support the wide range of consumer needs for convenience, affordability, accessibility, and diversity of goods and services, especially in under-served areas of Portland.

The mixed-use and industrial zoning found in the Central City allows for Retail Sales and Service uses outright. These allowances ensure that neighborhood as well as regional serving retail uses can locate throughout most of the Central City serving businesses, employees, residents, and visitors alike, consistent with Policy 6.67.

327. **Policy 6.70, Involuntary commercial displacement.** Evaluate plans and investments for their impact on existing businesses.

6.70.a, Limit involuntary commercial displacement in areas at risk of gentrification, and incorporate tools to reduce the cost burden of rapid neighborhood change on small business owners vulnerable to displacement.

6.70.b, Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.

The objectives of this policy are perhaps most applicable to the close-in industrial districts of the Central City where land values and lease rates for commercial uses tend to be lower than in the mixed-use zoned portions of the Central City. CC2035 addresses these objectives by maintaining the zoning that implements the industrial sanctuary policies of the 2035 Comprehensive Plan. CC2035 also increases the amount of commercial development allowed in the Central Eastside by right, which may increase the supply of space available for such uses, and thus prevent excessive lease rate increases and displacement of commercial businesses.

328. **Policy 6.71, Temporary and informal markets and structures.** Acknowledge and support the role that temporary markets (farmer's markets, craft markets, flea markets, etc.) and other temporary or mobile-vending structures play in enabling startup business activity. Also, acknowledge that temporary uses may ultimately be replaced by more permanent development and uses.

CC2035 maintains and expands a zoning pattern where the uses mentioned by Policy 6.71 are typically allowed by right. The plan also includes new use allowances applicable to the Open Space zone, whereby a limited amount of retail activity is allowed. These elements of the plan ensure consistency with Policy 6.71.

329. **Policy 6.73, Centers**. Encourage concentrations of commercial services and employment opportunities in centers.

6.73.a, Encourage a broad range of neighborhood commercial services in centers to help residents and others in the area meet daily needs and/or serve as neighborhood gathering places.

6.73.b, Encourage the retention and further development of grocery stores and local markets as essential elements of centers.

6.73.c, Enhance opportunities for services and activities in centers that are responsive to the needs of the populations and cultural groups of the surrounding area.

6.73.d, Require ground-level building spaces in core areas of centers accommodate commercial or other street-activating uses and services.

6.73.e, Encourage employment opportunities as a key function of centers, including connections between centers, institutions, and other major employers to reinforce their roles as vibrant centers of activity.

CC2035 addresses the objectives of Policy 6.73 largely by maintaining and expanding the area of the Central City zoned for mixed-use development. The plan also refines development standards that require ground floor activation of buildings with uses, including commercial retail and office uses. These elements and the existing flexibility of Central City mixed-use zones ensure that the objectives of this policy will be met by the plan.

Environmental and Watershed Health: Goals

330. **Goal 7.A: Climate.** Carbon emissions are reduced to 50 percent below 1990 levels by 2035.

The amendments are consistent with this policy in the following ways:

A. The Health and Environment Goal and related policies and actions provide for resilience to climate change impacts and natural hazards including flooding and earthquakes, through planning, design, education and implementation of green infrastructure and infrastructure retrofits.

B. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features and functions provided by the existing natural resources in the Central City. The NRPP evaluates the functions provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. The evaluation includes an assessment of how the natural resources improve the resiliency of the Central City and help manage risks, such as flooding and heat island, associated with Climate Change. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the Willamette River, floodplains and riparian areas by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resources features or functions in the Central City.

C. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. There is a landscaping requirement for the setback that requires additional native plants to be planted. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback and landscaping retain space that mitigates the risks associated with river flooding. Landscaping also sequesters carbon, reduces the heat island effect and helps improve air quality.

D. Some street setback requirements in the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will sequester carbon, improve air quality and reduce heat island impacts.

E. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including sequestering carbon and reducing heat island impacts.

F. The major trail alignment and completion of the Greenway Trail along the Willamette River will reduce carbon emissions by establishing a public trail that serves as transportation corridors for pedestrians and cyclists and connecting people throughout the Central City and to adjacent neighborhoods. Increasing the number of trips conducted by bike or walking will reduce vehicle miles traveled and reduce air pollution.

G. The Green Loop is a multimodal transportation corridor that will encourage trips conducted within the Central City to be by bike or walking, thus reducing vehicle miles traveled and reduce air pollution.

H. The new Low-Carbon Building standard, Section 33.510.244, requires that green building certification be pursued for most new development in the Central City, and those that become certified or follow green building design and programming criteria, will result in reductions of carbon as compared to more traditional building methods.

331. **Goal 7.B: Healthy watersheds and environment.** Ecosystem services and ecosystem functions are maintained and watershed conditions have improved over time, supporting public health and safety, environmental quality, fish and wildlife, cultural values, economic prosperity, and the intrinsic value of nature.

The amendments are consistent with this policy in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features and functions provided by the existing natural resources in the Central City. The NRPP evaluates the services (e.g., environmental quality, fish and wildlife, public health, etc.) provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. The evaluation includes assessment of the contributions of services to public and ecological health and safety, cultural values and economic prosperity. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource functions in the Central City.

B. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback is intended to preserve the in-water habitat, riverbanks (flood area, soils and vegetation) and riparian area (flood area, soils and vegetation) for enhancement of natural resource features and functions and for public uses such as a major public trail, scenic viewpoints and education.

C. The regulations for removal and remediation of hazardous substances will ensure that the cleanup actions will occur in a way that improve environmental quality.

D. Some street setback requirements in the Central City are updated to allow for additional space between buildings and the public right-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will improve environmental quality and public health.

E. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs improve air and water quality and provide habitat for avian wildlife species.

332. **Goal 7.C: Resilience.** Portland's built and natural environments function in complementary ways and are resilient in the face of climate change and natural hazards.

The amendments are consistent with this goal because the amendments by:

A. Applying a new River Environmental overlay zone to significant natural resources including rivers, streams, flood areas and riparian areas. The River Environmental overlay zone regulations will limit or strictly limit development, encourage environmentally sensitive development that has fewer impacts on natural resource function than traditional development and will require mitigation for unavoidable adverse impacts on significant natural resources;

B. Retaining the river setback in the River General overlay zone, which requires all non-water-dependent and non-water-related development to be setback from the Willamette River. The setback is increasing to 50 feet from the top of bank of the river. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the purpose of the river setback is to reserve space for the conservation and enhancement of natural resources and to provide the opportunity for public access where appropriate;

C. Update the River General overlay zone landscaping setback to require a minimum quantity and diversity of plantings on the riverbank and within the riparian area; and

D. Maintaining regulations that require balanced cut and fill within areas subject to flooding.

333. **Goal 7.D: Environmental equity.** All Portlanders have access to clean air and water, can experience nature in their daily lives, and benefit from development designed to lessen the impacts of natural hazards and environmental contamination.

The amendments are consistent with this goal in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) evaluates the ecosystem services (e.g., water quality, flood management, public health, etc.) provided by natural resource features. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The Willamette River is a regional natural resource that serves all of Portland. Ecological health is important to everyone who lives, works and recreates along and in the river. Protecting and enhancing the Willamette River and riparian areas contributes towards environmental equity in Portland.

B. The city's requirements regarding clean-up of hazardous substances in the Central City have been clarified to ensure that cleanup occurs in a way that meets City goals and policies including goals related to the conservation of existing natural resources including water quality.

C. Existing regulations though City Code Title 24, Building Regulations, are applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

These regulations ensure that future development will not increase risk to people or property from flooding.

D. The major trail alignment and completion of the Greenway Trail along the Willamette River and the proposed Green Loop will improve air quality in the Central City by establishing a public trail that serves as transportation corridors for pedestrians and cyclists and connects people throughout the Central City and to adjacent neighborhoods.

334. **Goal 7.E: Community stewardship.** Portlanders actively participate in efforts to maintain and improve the environment, including watershed health.

The amendments are consistent with this goal in the following ways:

A. CC2035 includes multiple goals, policies and actions that foster community stewardship. For example, additional residential and commercial development is encouraged along the frontage streets of the Willamette River to bring more people to the river's edge.

B. The major trail alignment and completion of the Greenway Trail along the Willamette River and the proposed Green Loop will improve air quality by establishing a public trail that serves as a transportation corridor for pedestrians and cyclists and connects people throughout the Central City and to adjacent neighborhoods.

C. Scenic viewpoints are identified along the Greenway Trail and the zoning code requires that when the trail is developed, formal viewpoints also be constructed. Scenic viewpoints offer places for people to see the Willamette River, riverbanks and city skyline. This will foster community stewardship.

Environmental and Watershed Health: Policies

Improving environmental quality and resilience

335. **Policy 7.1, Environmental quality.** Protect or support efforts to protect air, water, and soil quality, and associated benefits to public and ecological health and safety, through plans and investments.

The amendments are consistent with this policy in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features and functions provided by the existing natural resources in the Central City. The NRPP evaluates the services (e.g., water quality, air quality, heat island, public health, etc.) provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. The evaluation includes assessment of the contributions of services to public and ecological health and safety. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource functions in the Central City.

B. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback is intended to preserve the shallow water habitat, riverbanks (flood area, soils and vegetation) and riparian area (flood area, soils

and vegetation) for enhancement of natural resource feature and functions and for public uses such as a major public trail and scenic viewpoints.

C. The regulations for removal and remediation of hazardous substances ensure that the cleanup actions will occur in a way that improve environmental quality.

D. Some street setback requirements in the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will enhance air, water and soil quality and improve public and ecological health.

E. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs improve air and water quality.

F. The major trail alignment and completion of the Greenway Trail along the Willamette River and the proposed Green Loop will improve air quality by establishing a public trail that serves as a transportation corridor for pedestrians and cyclists and connects people throughout the Central City and to adjacent neighborhoods.

336. **Policy 7.2, Environmental equity.** Prevent or reduce adverse environment-related disparities affecting under-served and under-represented communities through plans and investments. This includes addressing disparities relating to air and water quality, natural hazards, contamination, climate change, and access to nature.

The amendments are consistent with this goal in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) evaluates the ecosystem services (e.g., water quality, flood management, public health, etc.) provided by natural resource features. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The Willamette River is a regional natural resource that serves all of Portland. Ecological health is important to everyone who lives, works and recreates along and in the river. Protecting and enhancing the Willamette River and riparian areas contributes towards environmental equity in Portland.

B. The city's requirements regarding clean-up of hazardous substances in the Central City have been clarified to ensure that cleanup occurs in a way that meets City goals and policies including goals related to the conservation of existing natural resources including water quality.

C. Existing regulations though City Code Title 24, Building Regulations, are applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut. These regulations ensure that future development will not increase risk to people or property from flooding.

D. The major trail alignment and completion of the Greenway Trail along the Willamette River and the proposed Green Loop will improve air quality in the Central City by establishing a public trail that serve as a transportation corridor for pedestrians and cyclists and connects people throughout the Central City and to adjacent neighborhoods.

337. **Policy 7.3, Ecosystem services.** Consider the benefits provided by healthy ecosystems that contribute to the livability and economic health of the city.

The amendments are consistent with this policy in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features and functions provided by the existing natural resources in the Central City. The NRPP evaluates the ecosystem services provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. The evaluation includes assessment of the contributions of ecosystem services to livability and economic health of the Central City. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resources and ecosystem services by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of ecosystem functions in the Central City.

B. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback is intended to preserve the shallow water habitat, riverbank and riparian area for enhancement of natural resources and ecosystem services and for public uses such as a major public trail and scenic viewpoints.

C. The regulations for removal and remediation of hazardous substances ensure that the cleanup actions will occur in a way that meets the City's policies including protecting and enhancing natural resources and ecosystem services.

D. Some street setback requirements in the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will enhance ecosystem service and improve stormwater management and reduce heat island impacts.

E. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple ecosystem services including stormwater management, reducing heat island impacts and providing habitat for avian species. Ecoroofs can be designed as open space areas to improve livability.

F. The major trail alignment and completion of the Greenway Trial along the Willamette River and the proposed Green Loop will improve air quality by establishing a public trail that serve as transportation corridors for pedestrians and cyclists and connects people throughout the Central City and to adjacent neighborhoods.

338. **Policy 7.4**, **Climate change.** Update and implement strategies to reduce carbon emissions and impacts, and increase resilience through plans and investments and public education.

7.4.a, Carbon sequestration. Enhance the capacity of Portland's urban forest, soils, wetlands, and other water bodies to serve as carbon reserves.

7.4.b, Climate adaptation and resilience. Enhance the ability of rivers, streams, wetlands, floodplains, urban forest, habitats, and wildlife to limit and adapt to climate-exacerbated flooding,

landslides, wildfire, and urban heat island effects.

The amendments are consistent with this policy in the following ways:

A. The Health and Environment Goal and related policies and actions provide for resilience to climate change impacts and natural hazards including flooding and earthquakes, through planning, design, education and implementation of green infrastructure and infrastructure retrofits.

B. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features and functions provided by the existing natural resources in the Central City. The NRPP evaluates the functions provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. The evaluation includes an assessment how the natural resources improve the resiliency of the Central City and help manage risks, such as flooding and heat island, associated with Climate Change. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the Willamette River, floodplains and riparian areas by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource features or functions in the Central City.

C. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. There is a landscaping requirement for the setback that requires additional native plants to be planted. Testimony was received that supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback and landscaping retain space that mitigates the risks associated with river flooding. Council also finds that landscaping sequesters carbon, reduces the heat island effect and helps improve air quality.

D. Some street setback requirements in the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will sequester carbon, improve air quality and reduce heat island impacts.

E. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including sequestering carbon and reducing heat island impacts.

F. The major trail alignment and completion of the Greenway Trail along the Willamette River will reduce carbon emissions by establishing a public trail that serves as a transportation corridor for pedestrians and cyclists and connecting people throughout the Central City and to adjacent neighborhoods. Increasing the number of trips conducted by bike or walking will reduce vehicle miles traveled and reduce air pollution.

G. The Green Loop is a multimodal transportation corridor that will encourage trips conducted within the Central City to be by bike or walking, thus reducing vehicle miles traveled and reduce air pollution.

339. **Policy 7.5**, **Air quality.** Improve, or support efforts to improve, air quality through plans and investments, including reducing exposure to air toxics, criteria pollutants, and urban heat island effects. Consider the impacts of air quality on the health of all Portlanders.

The amendments are consistent with this policy in the following ways:

A. The major trail alignment and completion of the Greenway Trail along the Willamette River will reduce air pollution by establishing a public trail that serves as a transportation corridor for pedestrians and cyclists and connect people throughout the Central City and to adjacent neighborhoods. Increasing the number of trips conducted by bike or walking will reduce vehicle miles traveled and reduce air pollution.

B. The Green Loop is a multimodal transportation corridor that will encourage trips conducted within the Central City to be by bike or walking, thus reducing vehicle miles traveled and reduce air pollution.

C. Some street setback requirements in the Central City are updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will improve air quality and reduce heat island impacts.

D. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including sequestering carbon and reducing heat island impacts.

E. The new River Environmental overlay zone will protect and maintain the Willamette River and vegetated riparian areas. Open water bodies and vegetated riparian corridors cool the air and reduce heat island impacts.

340. **Policy 7.6, Hydrology.** Through plans and investments, improve or support efforts to improve watershed hydrology to achieve more natural flow and enhance conveyance and storage capacity in rivers, streams, floodplains, wetlands, and aquifers. Minimize impacts from development and associated impervious surfaces, especially in areas with poorly-infiltrating soils and limited public stormwater discharge points, and encourage restoration of degraded hydrologic functions.

The amendments are consistent with this policy in the following ways:

A. By applying new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources located on the land and in the water, the plan maintains existing the hydrology of the Willamette River. The environmental zoning will protect and conserve the hydrologic functions by limiting development within natural resource areas, will encourage environmentally sensitive development, and will require mitigation when development has a detrimental impact on the functions and values, including hydrology.

B. Development that is not river-dependent or river-related is required to setback 50 feet from the top of bank of the Willamette River in the River General overlay zone. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback will limit development impacts on the Willamette River.

C. Actions call for partnerships between local, regional, state and federal regulatory, Sovereign nations, non-profit organization, neighborhoods and property owners. One action is to work with FEMA to address the NOAA Fisheries biological opinion regarding the floodplain development and impacts on critical habitat for species listed under the Endangered Species Act. This will include a remapping of the floodplain in the Central City. Another action is to amend the flood-related regulations and other guidelines to, a) help prevent or minimize the risk of flood damage to new, redeveloped and rehabilitated buildings located in the 100-year

floodplain; b) avoid, minimize and mitigate the impacts of such development on floodplain functions; and, c) comply with updated National Flood Insurance Program (NFIP) requirements.

D. Existing regulations though City Code Title 24, Building Regulations, are also applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

E. Existing regulations including City Zoning Title 10, Erosion Control, and the Stormwater Management Manual are applicable to future development. These regulations will maintain and improve stormwater runoff.

341. **Policy 7.7, Water quality.** Improve, or support efforts to improve, water quality in rivers, streams, floodplains, groundwater, and wetlands through land use plans and investments, to address water quality issues including toxics, bacteria, temperature, metals, and sediment pollution. Consider the impacts of water quality on the health of all Portlanders.

The amendments are consistent with this policy in the following ways:

A. By applying new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources located on the land and in the water, water quality of the Willamette River will be maintained and improved. The plan includes a natural resource inventory that identifies riparian resources and functional values. The environmental zoning will protect and conserve the identified resources by limiting development within natural resource areas, will encourage environmentally sensitive development, and will require mitigation when development has a detrimental impact on the functions and values of the identified resource.

B. The city's requirements regarding clean-up of hazardous substances in the Central City have been clarified to ensure that cleanup occurs in a way that meets City goals and policies including goals related to the conservation of existing natural resources including water quality.

C. Existing regulations including City Zoning Title 10, Erosion Control, and the Stormwater Management Manual are applicable to future development. These regulations will maintain and improve water quality;

D. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including sequestering carbon and reducing heat island impacts, while also reducing the flow of stormwater into city systems.

E. The street setback requirements enacted in some sections of the Central City have been updated to allow for additional space between buildings and the public rights-of-way for installation of vegetation including trees. Increasing vegetation coverage and tree canopy in the Central City will manage stormwater and improve water quality.

342. **Policy 7.8, Biodiversity.** Strive to achieve and maintain self-sustaining populations of native species, including native plants, native resident and migratory fish and wildlife species, at-risk species, and beneficial insects (such as pollinators) through plans and investments.

The amendments are consistent with this policy in the following ways:

A. A new River Environmental overlay zone is applied to high and medium ranked natural resources, which includes wildlife habitat and special habitat areas in the *Willamette River Central Reach Natural Resource Protection Plan* (NRPP). The plan includes an updated natural resources inventory that identifies significant features and functions including fish and wildlife

habitat. The River Environmental overlay zone regulations will limit or strictly limit development, encourage environmentally sensitive development that has fewer impacts on natural resource functions than traditional development and will require mitigation for unavoidable adverse impacts on significant natural resources;

B. The river setback in the River General overlay zone is retained. The setback requires all non-water-dependent and non-water-related development to be setback from the Willamette River. The setback is increased to 50 feet from the top of bank of the river. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the purpose of the setback is to reserve space for the conservation and enhancement of fish and wildlife habitat;

C. The River General overlay zone also includes updates to the landscaping standards that apply within the river setback. The landscaping standard requires a mix of vegetation types and densities including trees, shrubs and ground cover. The purpose of the landscaping standard is to enhance the quality, quantity and diversity of vegetation in the riparian area. Diverse vegetation within the riparian area will support a diversity of fish and wildlife.

D. The regulations that apply to the removal and remediation of hazardous substances encourage the use of biotechnical techniques for bank stabilization and the planting of native vegetation on the river bank.

343. **Policy 7.9, Habitat and biological communities.** Ensure that plans and investments are consistent with and advance efforts to improve, or support efforts to improve fish and wildlife habitat and biological communities. Use plans and investments to enhance the diversity, quantity, and quality of habitats habitat corridors, and especially habitats that:

- Are rare or declining.
- Support at-risk plant and animal species and communities.
- Support recovery of species under the Endangered Species Act, and prevent new listings.
- Provide culturally important food sources, including those associated with Native American fishing rights.

The amendments are consistent with this policy in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) identifies features and functions provided by the existing natural resources in the Central City. The NRPP recommends protection of habitats that support rare or declining species, supports at-risk species and supports recovery of species that are listed under the Endangered Species Act and aides in preventing new listings by applying zoning code 33.475, River Overlay Zones, and 33.865, River Review, to natural resources. The zoning code limits development within natural resource areas, encourages environmentally sensitive development and requires mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource functions in the Central City.

B. The NRPP also recommends protection of the Willamette River and riparian areas as culturally important areas associated with Native American fishing rights.

C. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback is intended to preserve the shallow

water habitat, riverbanks (flood area, soils and vegetation) and riparian area (flood area, soils and vegetation) to protect rare and declining species and support recovery of species listed under the Endangered Species Act.

D. The regulations for removal and remediation of hazardous substances ensure that the cleanup actions will occur in a way that improve environmental quality and create habitat that supports rare and declining species and recovery of species listed under the Endangered Species Act.

344. **Policy 7.10, Habitat connectivity.** Improve or support efforts to improve terrestrial and aquatic habitat connectivity for fish and wildlife by using plans and investments, to:

- Prevent and repair habitat fragmentation.
- Improve habitat quality.
- Weave habitat into sites as new development occurs.
- Enhance or create habitat corridors that allow fish and wildlife to safely access and move through and between habitat areas.
- Promote restoration and protection of floodplains.

The amendments are consistent with this policy in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) recommends protection of the Willamette River and land within at least 50 feet of top of bank as a habitat connectivity corridor. The River Environmental and River General overlay zone require development to be setback from the river, natural resources to be maintained and native vegetation to be planted. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback will improve habitat connectivity and habitat quality over time.

B. Existing regulations though City Code Title 24, Building Regulations, are also applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

C. The Green Loop is a multimodal transportation corridor that will incorporate vegetation into design and development. Trees and vegetation along the Green Loop will serve to improve habitat connectivity throughout the urban landscape.

D. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including habitat for avian species. Ecoroofs will improve habitat connectivity for birds and insects throughout the urban landscape.

345. **Policy 7.11, Urban forest.** Improve, or support efforts to improve the quantity, quality, and equitable distribution of Portland's urban forest through plans and investments.

346. **7.11.a, Tree preservation.** Require or encourage preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas.

CC2035 encourages the preservation of medium- and large-form native trees throughout the Central City, wherever possible. Policies specifically aimed at preserving these types of trees include the following:

- Policy 6.9, Strategic tree canopy enhancement, encourages the preservation of large, healthy, non-nuisance and native trees.
- Policy 6.10, Effective tree planting, includes policy directives to encourage wider sidewalk corridors to better accommodate larger canopy trees, as well as innovative design strategies that accommodate healthy trees already on site.

CC2035 also applies a new River Environmental overlay zone (river e-zone) to tree canopy that is located on the Willamette riverbank or contiguous to the riverbank. The river e-zone generally requires that existing trees be protected. If trees must be removed for development, there are tree replacement standards to ensure no net loss of tree canopy over time.

347. **7.11.b, Urban forest diversity.** Coordinate plans and investments with efforts to improve tree species diversity and age diversity.

An underlying aim of the CC2035 Plan is to encourage or mandate the incorporation of a variety of trees species and ages. Examples of policies and regulations to that end include the following:

- Policy 6.9, Strategic tree canopy enhancement, b. Tree Diversity, specifically sets a goal to "improve tree species and age diversity throughout the Central City."
- Policy 6.3, Multiple Functions, and Policy 6.12, City investment in street trees, directs the City to plant, and encourage the planting of, street trees that provide multiple benefits, such as stormwater management and, urban heat island reduction. These policies are expected to expand the number of tree species planted within the Central City.
- Policy 4DT-1b, Governor Tom McCall Waterfront Park, directs the Parks and Recreation bureau to incorporate large trees within the park and along public ROW adjacent to the park.

Central City Master Plan code (33.510.255) encourages the incorporation of medium- and large-form trees by providing additional flexibility in the tree density standard for these larger sites. This option is expected to significantly increase the diversity of new trees planted, when compared to a traditional master plan development.

348. **7.11.c, Tree canopy.** Support progress toward meeting City tree canopy targets.

CC2035 includes a range of policies that will ensure the City continues progress toward its overall tree canopy targets. Specifically, the Plan contains tree canopy targets for all ten Central City subdistricts. Nine out of the 10 subdistricts are expected to experience increases in tree canopy over the life of the plan. The low end of the range for the South Downtown/University subdistrict projects a slight reduction in tree canopy but the high-end projects an increase.

349. **7.11.d, Tree planting.** Invest in tree planting and maintenance, especially in low-canopy areas, neighborhoods with under-served or under-represented communities, and within and near urban habitat corridors.

CC2035 includes a few policies focused on ensuring tree planting in mixed-use commercial areas, along rights-of-way, and other areas with limited existing canopy. The CC2035 canopy targets incorporate the expectation that the Bureau of Environmental Services (BES) will double its current street tree planting frequency to increase canopy in the Central City, especially low-canopy areas and in historically under-served neighborhoods. Additionally, Policy 6.8, Upland habitat connections, specifically aims to create "an upland wildlife habitat corridor using trees, native vegetation in landscaping" and ecoroofs.

350. **7.11.e, Vegetation in natural resource areas.** Require native trees and vegetation in significant natural resource areas.

CC2035 applies a new River Environmental overlay zone (river e-zone) to vegetated riverbanks and riparian areas within a minimum of 50 feet from top of bank. The regulations of the river e-zone minimize removal of vegetation and require replacement plants to ensure no net loss of riparian vegetation over time. In addition, the River General overlay zone also includes updates to the landscaping standards that apply within the river setback. The landscaping standard requires a mix of vegetation types and densities including trees, shrubs and ground cover. The purpose of the landscaping standard is to enhance the quality, quantity and diversity of native vegetation in the riparian area.

351. **7.11.f, Resilient urban forest.** Encourage planting of Pacific Northwest hardy and climate change resilient native trees and vegetation generally, and especially in urban habitat corridors.

Increasing the resiliency of the urban forest is critical component of the CC2035 Plan. Maintaining and increasing the number of native species underlies the CC2035 tree planting strategy. For example, Policy 6.9, Strategic tree canopy enhancement, of the Plan encourages the planting of Northwest native and climate change-resilient trees. The Plan also includes strategies to expand efforts to reestablish and expand native, large canopy tree species in Portland's parks and natural areas.

352. **7.11.g, Trees in land use planning.** Identify priority areas for tree preservation and planting in land use plans.

The CC2035 Plan utilized a detailed and comprehensive methodology to develop aspirational, yet achievable, tree canopy targets. As a part of this effort, specific areas within the Central City expected to maintain or accommodate new trees were identified. Detailed analyses of tree canopy were completed on a variety of areas within the Central City, including:

1. Existing parcels likely to be developed or redeveloped, including trees planted within optional Central City building setbacks;
2. Trees placed on upper floors of new buildings, as a part of ecoroofs or rooftop gardens;
3. Future planting of currently vacant planting strips;
4. Changes in tree canopy in existing parks;
5. New trees planted within the expanded Willamette River setback;
6. Future enhancements to the Willamette riverbank resulting from public and private investment.

Collectively, these represent priority areas within the Central City that can reach tree canopy targets over the life of the plan.

Specifically, CC2035 applies a new River Environmental overlay zone to trees identified in the NRPP as providing natural resource functions. The regulations require that trees be preserved when possible and tree replacement occur when trees must be removed. In addition, the River General overlay requires landscaping of the riverbank and riparian area, including planting a diversity of tree species.

353. **7.11.h, Managing wildfire risk.** Address wildfire hazard risks and management priorities through plans and investments.

The River overlay zones applies to areas of natural vegetation on steep slopes; these areas are susceptible to wildfire risk. The River Environmental overlay zone regulates removal of native plants along the Willamette River and requires replanting disturbance areas with native vegetation. The River General overlay zone require landscaping that includes removal of non-native and

invasive species along with planting of native vegetation. Native vegetation is less susceptible to wildlife risk than non-native and invasive species.

CC2035 maintains the existing regulations applied to Sullivan's Gulch, including the Environmental conservation overlay zone (c-zone). The c-zone regulations encourage maintenance of native vegetation and removal of invasive species. In addition, an action in CC2035 calls for developing a multi-objective management strategy for enhancing Sullivan's Gulch that includes trail development, removal of invasive species and revegetation. Landscaping associated with completion of the trail will include native vegetation.

354. **Policy 7.12, Invasive species.** Prevent the spread of invasive plants, and support efforts to reduce the impacts of invasive plants, animals, and insects, through plans, investments, and education.

The regulations of the River Environmental and River General overlay zones require removal of invasive species and planting of native vegetation on the riverbank and riparian area of the Willamette River. In addition, the City of Portland maintains a list of invasive plant species that must be removed whenever identified. The requirement is intended to eradicate these invasive species.

355. **Policy 7.13, Soils.** Coordinate plans and investments with programs that address human-induced soil loss, erosion, contamination, or other impairments to soil quality and function.

The amendments are consistent with this policy in the following ways:

A. The River Environmental overlay zone applies to riverbanks and riparian areas along the Willamette River. The regulations maintain soil by limiting development, including ground disturbance, and requiring mitigation for unavoidable impacts, including application of top soil before planting. The River Environmental overlay zone also includes regulations for removal and remediation of hazardous substances ensure that the cleanup actions will occur in a way that improve soil structure and soil quality.

B. The River General overlay zone requires that non-river-dependent or river-related development be setback 50 feet from the top of bank of the Willamette River. This will reduce impacts of development on the soil and reduce erosion. The regulations also require landscaping the setback with native plants, which will retain soil structure and improve soil quality over time.

C. Existing regulations including City Zoning Title 10, Erosion Control, and the Stormwater Management Manual are applicable to future development. These regulations require erosion control during development activities and maintain and improve stormwater runoff.

356. **Policy 7.14, Natural hazards.** Prevent development-related degradation of natural systems and associated increases in landslide, wildfire, flooding, and earthquake risks.

The amendments are consistent with this policy in the following ways:

A. By applying new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources located in the water, in the floodplain and on land, the plan reduces risks associated with flooding, landslides and wildfire. The environmental zoning will protect and conserve the natural functions by limiting development within natural resource areas, will encourage environmentally sensitive development, and will require mitigation when development has a detrimental impact on the functions and values.

B. Development that is not river-dependent or river-related is required to setback 50 feet from the top of bank of the Willamette River in the River General overlay zone. This reduces the risk of flooding and landslide on development near the river.

C. Actions call for partnerships between local, regional, state and federal regulatory, Sovereign nations, non-profit organization, neighborhoods and property owners. One action is to work with FEMA to address the NOAA Fisheries biological opinion regarding the floodplain development and impacts on species listed under the Endangered Species Act. This will include a remapping of the floodplain in the Central City. Another action is to amend the flood-related regulations and other guidelines to, a) help prevent or minimize the risk of flood damage to new, redeveloped and rehabilitated buildings located in the 100-year floodplain; b) avoid, minimize and mitigate the impacts of such development on floodplain functions; and, c) comply with updated NFIP requirements.

D. Existing regulations through City Code Title 24, Building Regulations, are also applicable to future development. These regulations require review of impacts within the river and floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

E. CC2035 maintains existing Environmental conservation overlay zones on Sullivan's Gulch. The regulations limit development on the steep slope and reduce risk of landslides and wildfire on development.

357. **Policy 7.15, Brownfield remediation.** Improve environmental quality and watershed health by promoting and facilitating brownfield remediation and redevelopment that incorporates ecological site design and resource enhancement.

The River Environmental overlay zone regulations for removal and remediation of hazardous substances ensure that the cleanup actions will occur in a way that improves environmental quality and public health and create habitat.

358. **Policy 7.16, Adaptive management.** Evaluate trends in watershed and environmental health using current monitoring data and information to guide and support improvements in the effectiveness of City plans and investments.

The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) evaluates trends in watershed and environmental health using best available science, current monitory data and information and new technological advances to produce the inventory of natural resources and assess the tradeoffs associated with protecting those natural resources. The NRPP pulls together information from many other sources and background documents. The outcome is recommended protections for natural resources. The NRPP supports City plans, including CC2035, and investments, such as environmental restoration projects.

359. **Policy 7.17, Restoration partnerships.** Coordinate plans and investments with other jurisdictions, air and water quality regulators, watershed councils, soil and water conservation districts, Sovereign nations, and community organizations and groups including under-served and under-represented communities, to optimize the benefits, distribution, and cost-effectiveness of watershed restoration and enhancement efforts.

The amendments are consistent with this policy in the following ways:

A. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) and the R*iverbank Restoration Target* memo identified opportunities for natural resource enhancement and restoration actions.

B. Actions call for partnerships between local, regional, state and federal regulatory, Sovereign nations, non-profit organization, neighborhoods and property owners. Examples of those actions include:

- Work with FEMA to address the NOAA Fisheries biological opinion regarding the floodplain development and impacts on species listed under the Endangered Species Act.
- Explore concepts and partnerships to enhance fish and wildlife habitat along the Eastbank Esplanade.
- Coordinate system planning efforts among city bureaus and potential private investors for green infrastructure improvements.
- Identify tree preservation and planting opportunities and implement strategies that meet multiple objectives including reducing heat island, improving air quality and intercepting rainfall.
- Improve water quality by integrating green infrastructure with streetscape improvements in areas served by the separated storm system.
- Evaluate options to increase property owner interest in street tree plantings.

360. **Policy 7.18, Community stewardship.** Encourage voluntary cooperation between property owners, community organizations, and public agencies to restore or re-create habitat on their property, including removing invasive plants and planting native species.

The amendments are consistent with this goal in the following ways:

A. CC2035 includes multiple goals, policies and actions that foster community stewardship. For example, additional residential and commercial development is encouraged along the frontage streets of the Willamette River to bring more people to the river's edge.

B. The major trail alignment and completion of the Greenway Trail along the Willamette River and the proposed Green Loop will improve air quality by establishing a public trail that serve as transportation corridor for pedestrians and cyclists and connects people throughout the Central City and to adjacent neighborhoods.

C. Scenic viewpoints are identified along the Greenway Trail and the zoning code requires that when the trail is developed, formal viewpoints also be constructed. Scenic viewpoints offer places for people to see the Willamette River, riverbanks and city skyline. This will foster community stewardship.

Planning for natural resource protection

361. **Policy 7.19, Natural resource protection.** Protect the quantity, quality, and function of significant natural resources identified in the City's natural resource inventory, including:

- Rivers, streams, sloughs, and drainageways.
- Floodplains.
- Riparian corridors.
- Wetlands.

- Groundwater.
- Native and other beneficial vegetation species and communities.
- Aquatic and terrestrial habitats, including special habitats or habitats of concern, large anchor habitats, habitat complexes and corridors, rare and declining habitats such as wetlands, native oak, bottomland hardwood forest, grassland habitat, shallow water habitat, and habitats that support special-status or at-risk plant and wildlife species.
- Other resources identified in natural resource inventories.

The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes an updated inventory of natural resources features and functions in the Central City. The NRPP documents the quantity and quality of the following features: river, streams, drainageways, wetlands, flood areas, riverbank treatments, forests, woodlands, shrublands, herbaceous vegetation, steep slopes and special habitat areas, which area unique, rare or declining habitats and habitats that support special status or at-risk fish, wildlife and plant species. The functions evaluated in the inventory include: microclimate and shade; stream flow moderation and water storage; bank function, and sediment, pollution and nutrient control; large wood and channel dynamics; organic inputs, food web and nutrient cycling; riparian wildlife movement corridor; habitat patch size and interior area; connectivity between habitat patches; and proximity to water.

The NRPP evaluates the functions above and the ecosystem services (e.g., natural hazard management, public health, climate resiliency, etc.) provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. The evaluation also includes assessment of the contributions of services to cultural values and economic prosperity. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions.

Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource functions in the Central City.

362. **Policy 7.20, Natural resource inventory.** Maintain an up-to-date inventory by identifying the location and evaluating the relative quantity and quality of natural resources.

The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes an up-to-date inventory, based on best available sciences, of relative quantity and quality of natural resource features and functions in the Central City.

363. **Policy 7.21, Environmental plans and regulations.** Maintain up-to-date environmental protection plans and regulations that specify the significant natural resources to be protected and the types of protections to be applied, based on the best data and science available and on an evaluation of cumulative environmental, social, and economic impacts and tradeoffs. *See Figure 7-2 — Adopted Environmental Plans.*

7.21.a, Improve the effectiveness of environmental protection plans and regulations to protect and encourage enhancement of ecological functions and ecosystem services.

The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes recommendations to protect and enhancement natural resource features and functions. The NRPP is based on best available data and sciences. The NRPP includes an assessment of the environmental, social and economic impacts and tradeoffs associated with protecting the natural

resource features and functions. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource functions in the Central City.

364. **Policy 7.22, Land acquisition priorities and coordination.** Maintain a land acquisition program as a tool to protect and support natural resources and their functions. Coordinate land acquisition with the programs of City bureaus and other agencies and organizations.

CC2035 includes actions to increase public parks, open space and recreation opportunities through acquisition. Parks and open spaces in the Central City typically include natural resources such as trees and shrubs and provide opportunities for additional green infrastructure to provide functions like reducing heat island effects and managing stormwater runoff.

Protecting natural resources in development situations

365. **Policy 7.23, Impact evaluation.** Evaluate the potential adverse impacts of proposed development on significant natural resources, their functions, and the ecosystem services they provide to inform and guide development design and mitigation consistent with policies 7.24-7.26, and other relevant Comprehensive Plan policies.

The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) evaluates relative impacts of different development (called conflicting uses) on the natural resource features and functions in the Central City. The River Environmental overlay zone includes exemptions for some necessary development, such as maintenance, repair and replacement of existing structures, standards for environmental sensitive development and river review for more impactful development. Mitigation for unavoidable negative impacts on natural resource features and functions is required.

Zoning code 33.865, River Review, regulations require the following information:

- Existing conditions site plan that documents the existing natural resource features; and
- Proposed site development plan that depicts the natural resource feature impacted including temporary and permanent disturbance areas.

366. **Policy 7.24, Regulatory hierarchy: avoid, minimize, mitigate.** Maintain regulations requiring that the potential adverse impacts of new development on significant natural resources and their functions first be avoided where practicable, then minimized, then lastly, mitigated.

Zoning code 33.475, River Environmental overlay zones, includes standards that avoid and minimize impacts of development on natural resource features and function. The standards also include a requirement for unavoidable impacts on natural resource features and functions to be mitigated. Development that cannot meet the standards must go through River Review. Zoning code 33.865, River Review includes the following approval criteria:

- Proposed development minimizes the loss of identified natural or scenic resources and functional values consistent with the uses that are generally permitted or allowed in the base zone without a land use review, or permitted or allowed by an approved conditional use review;
- Proposed development locations, designs, and construction methods are less detrimental to identified natural and scenic resources and functional values than practicable and significantly

different alternatives, including alternatives on the same site, but outside of the River Environmental overlay zone;

- There will be no significant detrimental impact on areas of the site reserved for mitigation, areas within the River Environmental overlay zone not proposed for development now, downstream river habitat within the Central Reach, or other sites in the Central Reach where environmental restoration is in progress or complete; and
- The mitigation plan demonstrates that there will be compensation for all significant detrimental impacts on identified scenic and natural resources and functional values.

367. **Policy 7.25, Mitigation effectiveness.** Require that mitigation approaches compensate fully for adverse impacts on locally and regionally significant natural resources and functions. Require mitigation to be located as close to the impact as possible. Mitigation must also take place within the same watershed or portion of the watershed that is within the Portland Urban Services Boundary, unless mitigating outside of these areas will provide a greater local ecological benefit. Mitigation will be subject to the following preference hierarchy:

- On the site of the resource subject to impact with the same kind of resource; if that is not possible, then
- Off-site with the same kind of resource; if that is not possible, then
- On-site with a different kind of resource; if that is not possible, then
- Off-site with a different kind of resource.

Zoning code 33.865, River Review includes the following approval criteria:

- To the extent practicable, the natural and scenic resources and functional values restored or enhanced as mitigation must be the same kind of resource, performing the same functions as the lost resource;
- The amount of natural resource mitigation due as compensation must be based on the amount and relative condition of the resources and functional values impacted by the proposal. The amount of natural resource mitigation required will be at a ratio of no less than 1.5:1 of mitigation area to project impact area;
- Mitigation must occur on-site when practicable, and ecologically beneficial;
- If on-site mitigation is not practicable or ecologically beneficial, the applicant may perform mitigation off-site. The off-site mitigation must meet all other approval criteria in this Subparagraph and the following:
  - Mitigation must occur at a minimum 3:1 FAR ratio of mitigation area to protect the impact area; and,
  - The mitigation area must be located within the Willamette River Central Reach.

368. **Policy 7.26, Improving environmental conditions through development.** Encourage ecological site design, site enhancement, or other tools to improve ecological functions and ecosystem services in conjunction with new development and alterations to existing development.

Zoning code 33.475, River General overlay zone, regulations require that at the time of development the river setback, which includes the riverbank and land within 50 feet of the top of bank, be landscaped with a mix of native vegetation. The landscaping standard allows for flexibility

in the mix of tree sizes and requires that a diversity of trees, shrubs and ground cover be planted. This will improve ecological functions and ecosystem services over time.

Zoning code 33.475, River Environmental overlay zone, and Zoning code 33.865, River Review, regulations require that site development be designed to avoid impacts on protected natural resources and mitigate for unavoidable negative impacts. There are also clear and objective standards for site enhancement and for remediation and cleanup of hazardous substances. These regulations will improve ecological functions and ecosystem services during development.

Willamette River Watershed

The findings under Statewide Goal 15, Willamette Greenway, also demonstrate that the amendments are consistent with these policies and goals

369. **Policy 7.33, Fish habitat.** Provide adequate intervals of ecologically-functional shallow-water habitat for native fish along the entire length of the Willamette River within the city, and at the confluences of its tributaries.

The amendments are consistent with this policy in the following ways:

A. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that supported and opposed the expanded setback. City Council finds that the expansion is appropriate because the setback is intended to preserve the shallow water habitat, riverbanks (flood area, soils and vegetation) and riparian area (flood area, soils and vegetation) to protect fish habitat and support recovery of species listed under the Endangered Species Act.

B. The River Environmental overlay zone is applied to the Willamette River, riverbanks and riparian areas. The overlay zone protects the eight existing shallow water habitats in the Central Reach by limited development and requiring mitigation for negative impacts to natural resource features and functions. The regulations will result in no net loss of fish habitat over time and support recovery of species listed under the Endangered Species Act.

C. CC2035 includes an action to restore five shallow water habitat areas and to enhance 12,600 linear feet of riverbanks in the Central Reach. The actions will improve fish habitat and support recovery of species listed under the Endangered Species Act.

370. **Policy 7.34, Stream connectivity.** Improve stream connectivity between the Willamette River and its tributaries.

There are no surface tributary streams to the Willamette River in the Central Reach. However, regulations and actions to protect and enhance in-water and riparian habitat in the Central Reach support fish that migrate from tributary streams through the Central Reach to the Columbia River and back.

371. **Policy 7.35, River bank conditions.** Preserve existing river bank habitat and encourage the rehabilitation of river bank sections that have been significantly altered due to development with more fish and wildlife friendly riverbank conditions.

The amendments are consistent with this policy in the following ways:

A. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council

finds that the expansion is appropriate because the setback is intended to preserve the shallow water habitat, riverbanks (flood area, soils and vegetation) and riparian area (flood area, soils and vegetation) to protect fish habitat and support recovery of species listed under the Endangered Species Act.

B. The River Environmental overlay zone is applied to the Willamette River, riverbanks and riparian areas. The overlay zone protects the eight existing shallow water habitats by limited development and requiring mitigation for negative impacts to natural resource features and functions. The regulations will result in no net loss of fish habitat over time and support recovery of species listed under the Endangered Species Act.

C. CC2035 includes an action to restore five shallow water habitat areas and to enhance 12,600 linear feet of riverbanks in the Central Reach. The actions will improve fish habitat and support recovery of species listed under the Endangered Species Act.

372. **Policy 7.37, Contaminated sites.** Promote and support programs that facilitate the cleanup, reuse, and restoration of the Portland Harbor Superfund site and other contaminated upland sites.

The Portland Harbor Superfund site is not within the Central Reach. The River Environmental overlay zone regulations for removal and remediation of hazardous substances ensure that the cleanup actions in the Central Reach will occur in a way that improves environmental quality and public health and creates habitat.

373. **Policy 7.38, Sensitive habitats.** Protect and enhance grasslands, beaches, floodplains, wetlands, remnant native oak, bottomland hardwood forest, and other key habitats for native wildlife including shorebirds, waterfowl, and species that migrate along the Pacific Flyway and the Willamette River corridor.

The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes an updated inventory of natural resources features and functions in the Central City. The NRPP documents the quantity and quality of special habitat areas. Special habitat areas include: areas containing sensitive or unique plant populations, wetlands and associated seeps, spring and streams that are part of the wetland complex; native oaks; bottomland hardwood forests; riverine islands; river deltas; migratory stopover habitat; habitat corridors between patches or habitats; areas that support at-risk fish and wildlife species; elk migratory corridors; upland habitats or landscape features important to grassland-associated species; and unique resources or structures that provide critical or unique habitat functions (such as bridges).

Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. The mitigation requirement will ensure that overall there is no net loss of natural resource functions in the Central City.

374. **Policy 7.39, Riparian corridors.** Increase the width and quality of vegetated riparian buffers along the Willamette River.

Zoning code 33.475, River General overlay zone, increases the width of the river setback from 25 feet to 50 feet from the top of bank. Development that is not river-dependent or river-related must be setback. This increases the width of the riparian area. The River General overlay zone also includes a landscaping standard that requires that at the time of development or alterations to development, the river setback be landscaped with native vegetation. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is

appropriate because this will improve the quality of the riparian area.

Zone code 33.475, River Environmental overlay zone, protects the Willamette River, riverbanks and riparian areas by limiting development and requiring unavoidable impacts to natural resource features and functions to be mitigated.

375. **Policy 7.40, Connected upland and river habitats.** Enhance habitat quality and connectivity between the Willamette riverfront, the Willamette's floodplain, and upland natural resource areas.

The amendments are consistent with this policy in the following ways:

A. Zoning code 33.475, River Environmental overlay zone, applies to the Willamette River and its undeveloped floodplain. The regulations protected the habitat and connectivity between the in-water and floodplain habitats by limiting development and requiring mitigation for unavoidable negative impacts on natural resource features and functions, including habitat connectivity. The River General overlay zone requires that the river setback, which includes the riverbank and land within 50 feet of the top of bank, be landscaped, which enhances the habitat quality and connectivity between the riparian areas and the Willamette River.

B. The Green Loop is a multimodal transportation corridor that will incorporate vegetation into design and development. Trees and vegetation along the Green Loop will serve to improve habitat connectivity between uplands and the Willamette River.

C. A new standard for the Central City requires that new buildings over 20,000 square feet in net size must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including habitat for avian species. Ecoroofs will improve habitat connectivity for birds and insects between uplands and the Willamette River.

376. **Policy 7.41, River-dependent and river-related uses.** Develop and maintain plans and regulations that recognize the needs of river-dependent and river-related uses, while also supporting ecologically-sensitive site design and practices.

The amendments are consistent with this policy in the following ways:

A. Zoning code 33.910.030. Definitions, maintains the definition of river-dependent and includes uses which can only be carried out on, in or adjacent to the river. The definition is updated to clarify that a dock or gangway is river-dependent because it can only be built on, in or over the river.

B. Zoning code 33.910.030, Definitions, maintains the definition of river-related and includes uses that while not directly dependent on river access are uses that provide goods or services directly associated with river-dependent uses or development. There is a list of uses that are not river-related, such as residences, parking areas, restaurants, and businesses. There is a list of uses that are considered river-related, such as trails and viewpoints adjacent to the river, bridge exist and entrance ramps and removal or remediation of hazardous substances. The river-related definition is updated to include resource enhancement projects and passenger waiting and queuing areas, security checkpoints and machine shops associated with marine passenger docks for sub-regional travel and marine passenger terminals for regional travel. The update to include some uses for marine passenger travel supports river-dependent uses.

C. Zoning code 33.475, River Environmental overlay zones, limits the footprint of the area that can be developed for river-related uses associated with marine passenger docks and terminals to no more than 5,000 square feet. Mitigation for impacts to natural resources is required. This

supports river-dependent and river-related uses in the Central City while also supporting ecological site design.

Public Facilities and Services: Goals

377. **Goal 8.A: Quality public facilities and services.** High-quality public facilities and services provide Portlanders with optimal levels of service throughout the city, based on system needs and community goals, and in compliance with regulatory mandates.

378. **Goal 8.B: Multiple benefits.** Public facility and service investments improve equitable service provision, support economic prosperity, and enhance human and environmental health.

379. **Goal 8.C: Reliability and resiliency.** Public facilities and services are reliable, able to withstand or recover from catastrophic natural and manmade events, and are adaptable and resilient in the face of long-term changes in the climate, economy, and technology.

380. **Goal 8.D: Public rights-of-way.** Public rights-of-way enhance the public realm and provide a multi-purpose, connected, safe, and healthy physical space for movement and travel, public and private utilities, and other appropriate public functions and uses.

381. **Goal 8.E: Sanitary and stormwater systems.** Wastewater and stormwater are managed, conveyed, and/or treated to protect public health, safety, and the environment, and to meet the needs of the community on an equitable, efficient, and sustainable basis.

382. **Goal 8.F: Flood management.** Flood management systems and facilities support watershed health and manage flooding to reduce adverse impacts on Portlanders' health, safety, and property.

383. **Goal 8.G: Water.** Reliable and adequate water supply and delivery systems provide sufficient quantities of high-quality water at adequate pressures to meet the needs of the community on an equitable, efficient, and sustainable basis.

384. **Goal 8.H: Parks, natural areas, and recreation.** All Portlanders have safe, convenient, and equitable access to high-quality parks, natural areas, trails, and recreational opportunities in their daily lives, which contribute to their health and well-being. The City manages its natural areas and urban forest to protect unique urban habitats and offer Portlanders an opportunity to connect with nature.

385. **Goal 8.I: Public safety and emergency response.** Portland is a safe, resilient, and peaceful community where public safety, emergency response, and emergency management facilities and services are coordinated and able to effectively and efficiently meet community needs.

386. **Goal 8.J: Solid waste management.** Residents and businesses have access to waste management services and are encouraged to be thoughtful consumers to minimize upstream impacts and avoid generating waste destined for the landfill. Solid waste — including food, yard debris, recyclables, electronics, and construction and demolition debris — is managed, recycled, and composted to ensure the highest and best use of materials.

387. **Goal 8.K: School facilities.** Public schools are honored places of learning as well as multifunctional neighborhood anchors serving Portlanders of all ages, abilities, and cultures.

388. **Goal 8.L: Technology and communications.** All Portland residences, businesses, and institutions have access to universal, affordable, and reliable state-of-the-art communication and technology services.

389. **Goal 8.M: Energy infrastructure and services.** Residents, businesses, and institutions are served by reliable energy infrastructure that provides efficient, low-carbon, affordable energy through decision-making based on integrated resource planning.

The CC2035 Plan is intended to result in the creation of: 51,000 new jobs; 39,500 new housing units; 12,600 linear feet of riverbank enhancement; between 386 and 456 acres of tree canopy; and, increase the time people spend in Central City public spaces by 20 percent. Although the Central City is well served by existing public facilities, infrastructure, and services, as the density of uses and people in the city center intensify over time there will be a need to expand access to services and to create additional infrastructure to support this projected growth.

As such, the plan proposes increases in floor area ratios for office, industrial, and residential uses, new development standards requiring ecoroofs development; new river/environmental standards addressing riverbank enhancement, provisions and actions seeking to increase public open space and access to open space amenities, and revised landscaping and tree canopy requirements. The plan also requires seismic upgrades to historic landmarks when certain development incentives are pursued, a greater setback for new development from the Willamette River, and the development of "green" energy efficient buildings. Further, the plan includes numerous actions over the life of the plan to develop new and rehab existing public infrastructure to be resilient to natural disaster and climate change. These elements of the plan are consistent with Goals 8.A – 8.C.

Because the public right-of-way covers nearly 40 percent of the landscape of the Central City, and is by far the most dominate factor influencing the character of the urban environment, the plan seeks to utilize this feature for multiple purposes and to achieve multiple benefits. Thus, consistent with Goal 8.D, the plan proposes numerous improvements to public right-of-way intended to improve mobility and safety for all modes, the expansion of green infrastructure to enhance environmental health, and greater use of the right-of-way for uses other than transportation alone.

In response to the sanitary and stormwater objectives of Goal 8.E, CC2035 proposes new requirements regarding the development of ecoroofs and "green" energy efficient buildings, and includes actions to expand the use of green infrastructure in the public right-of-way and in private development, all to support better stormwater management among other goals. And, consistent with Goal 8.F, the plan increases the setback for development along the Willamette River, requires riverbank enhancement, and includes stormwater regulations that are intended to decrease runoff to the river. Additionally, the plan supports continued collaboration between the city, state, and federal agencies in working to create new flood-related regulations as a follow-up to recent litigation regarding the impacts of development within the 100-year flood plain and impacts on listed threatened and endangered species.

Regarding the parks, natural areas, and recreation objectives of Goal 8.H, the plan contains new development standards and incentives to increase the amount of setback along the Willamette River to, in part, create expanded places for passive and active recreation. The plan also proposes actions to expand greater use of the public right-of-way for recreational and active transportation uses, most notably through the creation of the Green Loop which is a dedicated active transportation facility that would also link to public parks and open space features. The plan further proposes actions to create new public park and recreation services in the Central City, including a new Community Center.

Lastly, CC2035 calls for continued coordination with emergency service providers, waste management providers, Portland Public Schools, and utility providers, as the Central City population grows and diversifies, consistent with Goals 8.I – 8.M.

Public benefits

390. **Policy 8.31, Application of Guiding Principles**. Plan and invest in public facilities in ways that promote and balance the Guiding Principles established in The Vision and Guiding Principles of this Comprehensive Plan.

CC2035 and the proposed investments in public facilities made by the plan are summarized as follows:

- **Economic Prosperity.** Support a low-carbon economy and foster employment growth, competitiveness and equitably distributed household prosperity.

  The plan promotes: growth on former brownfields, at major institutions (such as PSU and OHSU); the creation of a new Innovation Quadrant that links institutions to industrial sector job creation; intensification of industrial uses; and a significant expansion of green buildings, green infrastructure, and active transportation options.

- **Human Health.** Avoid of minimize negative health impacts and improve opportunities for Portlanders to lead healthy, active lives.

  The plan supports the growth of essential public services, such as schools, parks, community centers, and libraries as the residential population of the Central City grows, to provide essential services and amenities to the broader community. The plan also proposes new recreational facilities, bike and pedestrian trails, and access to the Willamette River for swimming and non-motorized boating.

- **Environmental Health.** Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water and land.

  The plan proposes an expansion of the urban tree canopy, a wider and more vegetated river setback, the use of green infrastructure, and additional landscaped setbacks and open space areas, to expand the urban forest and the many benefits it provides to the Central City.

- **Equity.** Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and under-represented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland's history.

  The plan includes new development bonuses to create affordable housing, some which may be publicly owned, expand essential public services that would benefit Central City residents, especially families with children, and expand transit and active transportation facilities to provide non-auto transportation options.

- **Resilience.** Reduce risk and improve the ability of individuals, communities, economic systems, and the natural and build environments to withstand, recover from, and adapt to

changes from natural hazards, human-made disasters, climate change, and economic shifts.

The plan includes incentives to seismically retrofit at-risk buildings, study a possible expansion of the flood plain, expand the use of green buildings and infrastructure, and study how public facilities can be used following major natural disasters, all to improve the resiliency of the Central City.

391. **Policy 8.32, Community benefit agreements.** Encourage the use of negotiated community benefit agreements for large public facility projects as appropriate to address environmental justice policies in Chapter 2: Community Involvement.

392. **Policy 8.33, Community knowledge and experience.** Encourage public engagement processes and strategies for larger public facility projects to include community members in identifying potential impacts, mitigation measures and community benefits.

The environmental justice policies of Chapter 2 of the Comprehensive Plan call for plans and investments to "*promote environmental justice by extending the community benefits associated with environmental assets, land use, and public investments to communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision. Maximize economic, cultural, political, and environmental benefits through ongoing partnerships*." These policies also call for: the elimination of associated disproportionate burdens for communities of color, low-income populations, and other under-served or under-represented groups impacted by decisions; the minimization or mitigation of disproportionate burdens in cases where they cannot be eliminated; and, the use of plans and investments to address disproportionate burdens of previous decisions.

CC2035 establishes a policy framework to guide future planning efforts and decision making. Policies of the plan addressing economic development and housing will support "access to and expansion of economic opportunities in the Central City for all groups facing longstanding disparities, including education, housing and employment barriers" (Policy 1.9), and the maintenance of "economic and cultural diversity of established communities in and around the Central City" (Policy 2.7). Additionally, the plan contains policies addressing diverse community structure, access to social services, housing affordability, and access to essential public services.

Further, the plan contains actions that support worker/day laborers rights, employment skills and career training, and the creation of affordable work spaces. The plan also has actions supporting investment in affordable housing, public schools and parks in areas where there is and will be a growing population of residents who depend on affordable housing.

Projects and plans implementing these policies and actions, will including public engagement elements that address the community benefits that are desired and appropriate because of land public facility projects, consistent with Policies 8.23 and 8.33, as well as the environmental justice policies of the Comprehensive Plan.

393. **Policy 8.34, Resource efficiency**. Reduce the energy and resource use, waste, and carbon emissions from facilities necessary to serve designated land uses to meet adopted City goals and targets.

394. **Policy 8.35, Natural systems**. Protect, enhance, and restore natural systems and features for their infrastructure service and other values.

CC2035 contains elements that address resource efficiency and natural systems in many ways. For instance, the plan contains new development standards that require that ecoroofs be incorporated into new development and that development 50,000 sq. ft. or larger pursue green building certification. The plan also proposes new active transportation and transit facilities, the use of green infrastructure in the public right-of-way, expansion of the urban forest, river bank habitat restoration, including wider setbacks from the Willamette River, and bird safe development requirements. These amendments to the Zoning Code and Transportation Systems Plan, as well as numerous goals, policies, and actions addressing resource efficiency, resiliency, and environmental enhancements, respond to the direction of Policies 8.34 and 8.35.

395. **Policy 8.36, Context-sensitive infrastructure**. Design, improve, and maintain public rights-of-way and facilities in ways that are compatible with, and that minimize negative impacts on, their physical, environmental, and community context.

One of the "Big Ideas" emerging from CC2035 is a reexamination of the street hierarchy and development character resulting from how the public right-of-way is designed and used. This is because approximately 40 percent of the land area of the Central City consists of public right-of-way. The plan seeks to integrate active transportation and recreational infrastructure, including major projects such as the Green Loop, in a manner that allows this infrastructure to complement but not conflict with adjacent land uses, and other key purposes for the right-of-way, such as auto and freight mobility, and improve the local environment and health of its users, consistent with Policy 8.36.

396. **Policy 8.38, Age-friendly public facilities**. Promote public facility designs that make Portland more age-friendly.

Consistent with Policy 8.38, CC2035 contains policies and actions calling for new public services and amenities that serve the needs of residents, employees, and visitors of all ages and abilities. Although not all facilities may meet the needs of any one group, CC2035 proposes new facilities where a greater variety of abilities and needs are addressed, such as the Green Loop meeting the abilities of pedestrians and cyclists with more flexibility than a standard bike land or sidewalk improvement.

Public rights-of-way

397. **Policy 8.39, Interconnected network**. Establish a safe and connected rights-of-way system that equitably provides infrastructure services throughout the city.

398. **Policy 8.40, Transportation function**. Improve and maintain the right-of-way to support multimodal transportation mobility and access to goods and services as is consistent with the designated street classification.

Consistent with Policies 8.39 and 8.40, CC2035 strives to expand and enhance existing elements of the public right-of-way to provide safe routes for all modes with an emphasis on the street network, street diversity and amenities in the street. For instance, policies, such as Optimized Street Network (Policy 3.3), Transportation System Plan (Policy 3.4), Street Diversity (Policy 3.6), and Streetscapes (Policy 3.7), all support the objectives of the policies above. Further, TSP elements addressing the Central Eastside propose numerous new signalized intersections, and the reconfiguration of certain streets to be more attractive to freight, while others are improved for cycling, and others for general auto traffic. These actions will address all mode by providing safer and preferred routes for each, while enhancing mobility and safety for all types of users.

Further, there are several freight specific TSP projects and studies that will increase and protect freight movement and the Central City's role as a multimodal system and hub. TSP Freight district and freight street classifications also address this policy. Major freight-related projects in CC2035 include the Broadway/Weidler (Rose Quarter) Interchange Project (now an adopted element of the City's TSP), Central Eastside Access and Circulation, N River St Reconstruction, Yamhill & Water Traffic Improvements, I-405/Glisan Traffic Improvements, SW Broadway Traffic Improvements, and Southern Triangle Access Improvements.

399. **Policy 8.42, Stormwater management function**. Improve rights-of-way to integrate green infrastructure and other stormwater management facilities to meet desired levels-of-service and economic, social, and environmental objectives.

400. **Policy 8.43, Trees in rights-of-way.** Integrate trees into public rights-of-way to support City canopy goals, transportation functions, and economic, social, and environmental objectives.

401. **Policy 8.44, Community uses**. Allow community use of rights-of-way for purposes such as public gathering space, events, or temporary festivals, if the community uses are integrated in ways that balance and minimize conflict with the designated through movement and access roles of rights-of-ways.

As noted above, the shear extent of the amount of right-of-way, and open space, in the Central City requires it to serve a multitude of functions beyond allowing people to get from one location to another. The right-of-way must also be where most public and private utilities are located, where stormwater is treated, where street trees and most of the other landscaping that constitutes the urban forest is planted, and furnishings, amenities, and services that enliven the public realm are located.

CC2035 contains the following policies, to ensure the Central City's right-of-way will continue to serve multiple functions, and that opportunities to expand these functions are pursued through the life of the plan:

- Policy 5.8, Public realm. *Enhance the character and function of the public realm through design standards, guidelines, amenities and land uses that activate the pedestrian environment and encourage community gathering*.
- Policy 6.3, Multiple functions. *Encourage green infrastructure, parks, open space, and recreation opportunities in the Central City that serve multiple functions to provide capacity during flood event, improve stormwater management, reduce heat island effects, create pockets of fish and wildlife refuge, and provide places of respite and recreation for employees, residents, and visitors*.
- Policy 6.4, Green infrastructure. *Increase the use of trees, ecoroofs, vertical gardens, sustainable site development, landscaped setbacks and courtyards, living walls and other vegetated facilities to manage stormwater, improve the pedestrian environment, reduce heat island effects, improve air and water quality and create habitat for birds and pollinators.*

402. **Policy 8.45, Pedestrian amenities**. Encourage facilities that enhance pedestrian enjoyment, such as transit shelters, garbage containers, benches, etc. in the right-of-way.

403. **Policy 8.46, Commercial uses**. Accommodate allowable commercial uses of the rights-of-way for enhancing commercial vitality, if the commercial uses can be integrated in ways that balance and minimize conflict with the other functions of the right-of-way.

404. **Policy 8.47, Flexible design**. Allow flexibility in right-of-way design and development standards to

appropriately reflect the pattern area and other relevant physical, community, and environmental contexts and local needs.

405. **Policy 8.48, Corridors and City Greenways**. Ensure public facilities located along Civic Corridors, Neighborhood Corridors, and City Greenways support the multiple objectives established for these corridors.

CC2035 is consistent with Policies 8.45 – 8.48, CC2035 contains policies that support a walkable pedestrian environment in the Central City, such as Policy 3.7, Streetscape, and Policy 3.8, Walking. Further, policies such as 5.7, which states "Enhance the character and function of the public realm through design standards, guidelines, amenities and land uses that activate the pedestrian environment…", and actions such as TR32, which states "lighting within public realm and ground floor programing will be designed to create a safe and attractive environment for pedestrians…", and amended development standard 33.510.215, Required Building Lines, that has the stated purpose to "create diverse street character based street hierarchy…that promote active uses, pedestrian movement, and opportunities for stopping and gathering…". Also, the optimized street network policies in each Central City district emphasize and recognize unique features on Civic Corridors and City Greenways for infrastructure improvements.

Trails

406. **Policy 8.53, Public trails.** Establish, improve, and maintain a citywide system of public trails that provide transportation and/or recreation options and are a component of larger network of facilities for bicyclists, pedestrians, and recreational users.

407. **Policy 8.54, Trail system connectivity.** Plan, improve, and maintain the citywide trail system so that it connects and improves access to Portland's neighborhoods, commercial areas, employment centers, schools, parks, natural areas, recreational facilities, regional destinations, the regional trail system, and other key places that Portlanders access in their daily lives.

408. **Policy 8.55, Trail coordination**. Coordinate planning, design, improvement, and maintenance of the trail system among City agencies, other public agencies, non-governmental partners, and adjacent landowners.

409. **Policy 8.56, Trail diversity.** Allow a variety of trail types to reflect a trail's transportation and recreation roles, requirements, and physical context.

The Central City, with its proximity to the Willamette River, and nexus for most regional transportation options, all contribute to it also being a major hub for the city's pedestrian and bicycle trail network. The CC2035 Plan contains policies that support continued enhancement and improvements to the existing network, while proposing new connections and new infrastructure, such as the Green Loop. The plan also contains new master plan standards that require the design of circulation on large master plan sites to connect with trails, and to enhance those sections of the network that bypass these sites. The plan also calls for coordination between PBOT, Parks, and other entities responsible for maintaining the city's part of the regional trail network. These elements of the plan ensure CC2035 is consistent with Policies 8.53 – 8.56.

410. **Policy 8.57, Public access requirements**. Require public access and improvement of public trails along the future public trail alignments shown in Figure 8-2 — Future Public Trail Alignments**.**

411. **Policy 8.58, Trail and City Greenway coordination.** Coordinate the planning and improvement of trails as part of the City Greenways system.

412. **Policy 8.59, Trail and Habitat Corridor coordination.** Coordinate the planning and improvement of trails with the establishment, enhancement, preservation, and access to habitat corridors.

CC2035 includes amendments to Section 33.272, Public Trails, of the Zoning Code that clarify the role of the City in requiring trail easements and improvements to trails found on figure 8-2 of the 2035 Comprehensive Plan. Specifically, that figure identifies trails, such as the Willamette Greenway Trail, Sullivan's Gulch Trail, and OMSI – Springwater Trail, that bisect the Central City Plan District. As such, the development of segments of those trails may be required to be constructed when certain development actions occur. CC2035 clarifies that "when a proposed development will increase the use of the trail system or will contribute to the need for additional trail facilities, and application of the regulations is determined to be roughly proportional to the impacts of the proposed development" provisions of the code requiring trail easements and development may be applied. These standards allow the integrated regional trail network within the Central City to be completed to the benefit of trail users and sites near the trail network to benefit visitors, employees, residents, and customers, consistent with Policies 8.57 – 8.59.

413. **Policy 8.60, Intertwine coordination.** Coordinate with the Intertwine Alliance and its partners, including local and regional parks providers, to integrate Portland's trail and active transportation network with the bi-state regional trail system.

The City of Portland is a member of the Intertwine Alliance, and additional work to complete and coordinate with other alliance partners to complete and connect unfinished segments of the "Intertwine" within the Central City Plan District will be coordinated, consistent with Policy 8.60 above.

Stormwater Systems

414. **Policy 8.68, Stormwater facilities**. Provide adequate stormwater facilities for conveyance, flow control, and pollution reduction.

415. **Policy 8.69, Stormwater as a resource**. Manage stormwater as a resource for watershed health and public use in ways that protect and restore the natural hydrology, water quality, and habitat of Portland's watersheds.

CC2035 contains several elements that respond to Policies 8.68 and 8.69. Policies 3.CE-3, Green Streets, and 5.UD-3, Montgomery Green Street, support the incorporation of green facilities in the public right-of-way. Also, the Zoning Code amendments include requirements to incorporate ecoroofs into new development, and the plan contains provisions incenting the use of green infrastructure on private property and within public right-of-way.

416. **Policy 8.71, Green infrastructure**. Promote the use of green infrastructure, such as natural areas, the urban forest, and landscaped stormwater facilities, to manage stormwater.

Policy 6.4 of CC2035 calls for increasing "the use of trees, ecoroofs, vertical gardens, sustainable site development, landscaped setbacks and courtyards, living walls and other vegetated facilities to manage stormwater…" The plan also contains Zoning Code regulations requiring the use of ecoroofs, and contains incentives to create vegetated setbacks on key streets in the Central City. These elements of the plan further the objectives of Policy 8.71.

Flood management

417. **Policy 8.76, Flood management**. Improve and maintain the functions of natural and managed drainageways, wetlands, and floodplains to protect health, safety, and property, provide water conveyance and storage, improve water quality, and maintain and enhance fish and wildlife

habitat.

418. **Policy 8.77, Floodplain management.** Manage floodplains to protect and restore associated natural resources and functions and to minimize the risks to life and property from flooding.

419. **Policy 8.78, Flood management facilities.** Establish, improve, and maintain flood management facilities to serve designated land uses through planning, investment and regulatory requirements.

The amendments are consistent with Policies 8.76, 8.77 and 8.78 in the following ways:

A. The Health and Environment Goal and related policies and actions provide for resilience to climate change impacts and natural hazards including flooding through planning, design, education and implementation of green infrastructure and infrastructure retrofits.

B. The *Willamette River Central Reach Natural Resources Protection Plan* (NRPP) includes an updated inventory of natural resources features and functions in the Central City. The NRPP evaluates the functions above and the ecosystem services, including floodplain and flood management, provided by those features in Chapter 4, Analysis of Protection Options and General Recommendations. Chapter 5, Results, includes recommendations for maintaining natural resource features and functions.

C. Zoning code 33.475, River Overlay Zones, and 33.865, River Review, will protect and conserve the identified resource features and functions by limiting development within natural resource areas, encouraging environmentally sensitive development and requiring mitigation when development has a detrimental impact on the resources. By applying the new River Environmental overlay zoning for identified natural resource areas in the Central City, including resources located in the water, in the floodplain and on land, the plan reduces risks to people and property from flooding.

D. The River setback is increased. The setback requires that development that is not river-dependent or river-related be setback 50 feet from the top of bank of the Willamette River. Testimony was received that both supported and opposed the expanded setback. City Council finds that the expansion is appropriate because this reduces the risk of flooding impacts on development near the river. In addition, there is a landscaping requirement for the setback that requires additional native plants to be planted. The setback and landscaping retain space that mitigate the risks associated with river flooding.

E. Actions call for partnerships between local, regional, state and federal regulatory, Sovereign nations, non-profit organization, neighborhoods and property owners. One action is to work with FEMA to address the NOAA Fisheries biological opinion regarding the floodplain development and impacts on species listed under the Endangered Species Act. This will include a remapping of the floodplain in the Central City. Another action is to amend the flood-related regulations and other guidelines to, a) help prevent or minimize the risk of flood damage to new, redeveloped and rehabilitated buildings located in the 100-year floodplain; b) avoid, minimize and mitigate the impacts of such development on floodplain functions; and, c) comply with updated NFIP requirements.

F. A new standard for the Central City requires that new buildings over 20,000 square feet in net building area must install an ecoroof over 60% of the roof area. Ecoroofs provide multiple functions including managing stormwater runoff. This reduces localized flooding.

G. Existing regulations through City Code Title 24, Building Regulations, are also applicable to future development. These regulations require review of impacts within the river and

floodplain including a test of no net rise and balancing of fill placed in the floodplain with an equal cut.

Parks and recreation

420. **Policy 8.92, Acquisition, development, and maintenance**. Provide and maintain an adequate supply and variety of parkland and recreational facilities to serve the city's current and future population based on identified level-of-service standards and community needs.

421. **Policy 8.93, Service equity.** Invest in acquisition and development of parks and recreation facilities in areas where service-level deficiencies exist.

422. **Policy 8.95, Park planning.** Improve parks, recreational facilities, natural areas, and the urban forest in accordance with current master plans, management plans, or adopted strategies that reflect user group needs, development priorities, development and maintenance costs, program opportunities, financing strategies, and community input.

423. **Policy 8.96, Recreational trails.** Establish, improve, and maintain a complete and connected system of public recreational trails, consistent with Portland Parks & Recreation's trail strategy.

The goals and policies, Volume 1, and action items, Volume 5 (Implementation Plan) of CC2035 support Policies 8.92 – 8.96 by supporting new public park development and planning, as well as the maintenance and enhancement of new park assets to support current Central City residents, employees, and visitors, as well as projected growth in the Central City through the life of the plan. The proposed Green Loop elements of the plan also further the objectives of these two policies by providing a new urban trail that provides for passive and active transportation opportunities, and an alignment that links trail users to numerous other trails and parks within the Central City.

424. **Policy 8.97, Natural resources**. Preserve, enhance, and manage City-owned natural areas and resources to protect and improve their ecological health, in accordance with both the natural area acquisition and restoration strategies, and to provide compatible public access.

425. **Policy 8.98, Urban forest management.** Manage urban trees as green infrastructure with associated ecological, community, and economic functions, through planning, planting, and maintenance activities, education, and regulation.

CC2035 contains elements calling for increased street tree planting, expansion of tree canopy on public and private property, an increased setback from the Willamette River, and establishing new targets for river bank enhancement, consistent with Policies 8.97 and 8.98.

426. **Policy 8.99, Recreational facilities**. Provide a variety of recreational facilities and services that contribute to the health and well-being of Portlanders of all ages and abilities.

Volume 1 and Volume 5, Implementation Plan, of CC2035 contain policies and actions pursuing the use of green infrastructure in the right-of-way, a public community center, new restrooms in parks, additional trails, play areas, and other recreational amenities and services, consistent with Policy 8.99.

School facilities

427. **Policy 8.113, School district capacity.** Consider the overall enrollment capacity of a school district – as defined in an adopted school facility plan that meets the requirements of Oregon Revised Statute 195 – as a factor in land use decisions that increase capacity for residential development.

428. **Policy 8.114, Facilities Planning.** Facilitate coordinated planning among school districts and City

bureaus, including Portland Parks and Recreation, to accommodate school site/facility needs in response to most up-to-date growth forecasts.

429. **Policy 8.115, Co-location.** Encourage public school districts, Multnomah County, the City of Portland, and other providers to co-locate facilities and programs in ways that optimize service provision and intergenerational and intercultural use.

430. **Policy 8.116, Community use.** Encourage public use of public school grounds for community purposes while meeting educational and student safety needs and balancing impacts on surrounding neighborhoods.

431. **Policy 8.117, Recreational use**. Encourage publicly-available recreational amenities (e.g. athletic fields, green spaces, community gardens, and playgrounds) on public school grounds for public recreational use, particularly in neighborhoods with limited access to parks.

432. **Policy 8.118, Schools as emergency aid centers**. Encourage the use of seismically-safe school facilities as gathering and aid-distribution locations during natural disasters and other emergencies.

433. **Policy 8.119, Facility adaptability.** Ensure that public schools may be upgraded to flexibly accommodate multiple community-serving uses and adapt to changes in educational approaches, technology, and student needs over time.

434. **Policy 8.120, Leverage public investment.** Encourage City public facility investments that complement and leverage local public school districts' major capital investments.

435. **Policy 8.122, Private institutions.** Encourage collaboration with private schools and educational institutions to support community and recreational use of their facilities.

Consistent with Policies 8.113 – 8.122, CC2035 contains elements that encourage coordination with Portland Public Schools, and private education providers, that consider how to address the growing school age population within the Central City, and as it grows over time, address the capacity of their programs, and the diversity of programming needs. Specifically, the plan considers these facilities as essential public services that beyond education have the capacity to serve community gathering functions, and areas where additional recreational needs can be provided. As such, the plan contains policies and actions encouraging cooperation between PPS and the City when existing facilities are upgraded and new facilities planned. Further, the plan promotes the development of public school facilities, among other essential services, and provides a floor area ratio (FAR) bonus when such facilities are included in a development project. Lastly, Goal 3.1 of the plan emphasizes walking and biking as the preferred means of transportation in the district to increase safe access to schools.

Energy infrastructure

436. **Policy 8.125, Energy efficiency**. Promote efficient and sustainable production and use of energy resources by residents and businesses, including low-carbon renewable energy sources, district energy systems, and distributed generation, through land use plans, zoning, and other legislative land use decisions.

CC2035 contains goals and policies that support actions like and consistent with Policy 8.125, and the Zoning Code amendments further this direction by requiring that new development with a net building area of at least 50,000 sq. ft. pursue low-carbon, energy efficient certification.

Transportation: Goals

437. **GOAL 9.A: Safety.** Transportation safety impacts the livability of a city and the comfort and security of those using City streets. Comprehensive efforts to improve transportation safety through engineering, education, enforcement and evaluation will be used to eliminate traffic-related fatalities and serious injuries from Portland's transportation system.

CC2035 meets this goal with the plan's emphasis on a safe affordable, efficient and accessible transportation system that prioritizes walking, bicycling and transit (Goal 3.A). Further, the Broadway/Weidler (Rose Quarter) Interchange Project (now an adopted element of the City's TSP), is an ODOT project, created in partnership with the City of Portland, intended to reduce collisions on a section of Interstate 5 (I-5) that has the highest collision count of anywhere in the State of Oregon.

During City Council review of the CC2035 Plan there was a significant amount of testimony on this project, much suggesting the project was intended solely to increase capacity and decrease congestion. Conversely, Council received testimony in support of the project from the various stakeholders who depend on reliable freight delivery, delivery often impacted when collisions in this section of I-5 halt or significantly slow traffic.

As result of this testimony, Council sought input from PBOT and ODOT staff who noted that the project was intended to reduce congestion and improve safety on I-5, but would also result in new overpasses with improved pedestrian and bicycle facilities over I-5 in the Rose Quarter, an area of concern to PBOT with regard to pedestrian and cycling safety. After considering the testimony, and staff input on the project, Council decided to continue supporting the Broadway/Weidler Interchange Project, which had previously been added to the TSP project list by City Council through adoption of the *2035 Comprehensive Plan* (Ordinance 187832) prior to its review of the CC2035 Plan.

438. **Goal 9.B: Multiple goals.** Portland's transportation system is funded and maintained to achieve multiple goals and measurable outcomes for people and the environment. The transportation system is safe, complete, interconnected, multimodal, and fulfills daily needs for people and businesses.

CC2035 meets this goal with the plan's emphasis on a safe affordable, efficient and accessible transportation system that prioritizes walking, bicycling and transit (Goal 3.A) along with goals and policies that emphasize green infrastructure, nature, connections to the river and the development of the Green Loop.

439. **GOAL 9.C: Great places.** Portland's transportation system enhances quality of life for all Portlanders, reinforces existing neighborhoods and great places, and helps make new great places in town centers, neighborhood centers and corridors, and civic corridors.

CC2035 meets this goal with the policies and actions emphasizing the development of the Green Loop, celebrating Portland's civic and cultural life, and designing streets to be great places. Policies related to streetscapes, optimized street networks, street diversity and street policies specific to the different districts in the Central City address this policy as well.

440. **GOAL 9.D: Environmentally sustainable.** The transportation system increasingly uses active transportation, renewable energy, or electricity from renewable sources, achieves adopted carbon reduction targets, and reduces air pollution, water pollution, noise, and Portlanders' reliance on private vehicles.

CC2035 meets this goal with the policies and actions emphasizing the development of the Green Loop, decreases in parking, an emphasis on green streets, transportation demand management and on walking, bicycling and transit in the central city. In addition, Zoning Code updates establish lower maximum parking ratios and encourage the shared use of existing and new parking facilities. Transportation modeling of the elements of this plan indicate that, compared with a base scenario (using as a base case the 2016 adopted Portland Comprehensive Plan), the Central City in 2035 because of CC2035 is expected to have fewer single-occupancy vehicle trips and more walking, biking and transit trips, with the result that by 2035 the model indicates that the commute mode split would be 80.2%, meeting the transportation performance target set by this plan and found in Volume 5A.

441. **GOAL 9.E: Equitable transportation.** The transportation system provides all Portlanders options to move about the city and meet their daily needs by using a variety of safe, efficient, convenient, and affordable modes of transportation. Transportation investments are responsive to the distinct needs of each community.

CC2035 meets this goal with the plan's emphasis on a safe affordable, efficient and accessible transportation system that prioritizes walking, bicycling and transit (Goal 3.A). Street optimization policies in each district are responsive to the distinct needs of the community. Studies that are a part of the plan will also address distinct needs in each community. Example studies include the Goose Hollow Access and Circulation Plan, Old Town Chinatown Access and Circulation Plan, and University District Access and Circulation Plan.

442. **GOAL 9.F: Positive health outcomes.** The transportation system promotes positive health outcomes and minimizes negative impacts for all Portlanders by supporting active transportation, physical activity, and community and individual health.

CC2035 meets this goal with the plan's emphasis on a safe affordable, efficient and accessible transportation system that prioritizes walking, bicycling and transit (Goal 3.A). Transportation modeling of the elements of this plan indicate that, compared with a base scenario (using as a base case the 2016 adopted Portland Comprehensive Plan), the Central City in 2035 as a result of CC2035 is expected to have fewer single-occupancy vehicle trips and more walking, biking and transit trips, with the end result that by 2035 the model indicates that the commute mode split would be 80.2%, meeting the transportation performance target set by this plan and found in Volume 5A. The project list also includes 109 projects that are primarily focused on active transportation.

Lastly, Council support of the Broadway/Weidler Interchange Project also further supports this Goal, as ODOT has previously noted that the project is expected to reduce collisions in the Rose Quarter section of I-5, resulting in reduced emissions from vehicle idling.

443. **GOAL 9.G: Opportunities for prosperity.** The transportation system supports a strong and diverse economy, enhances the competitiveness of the city and region, and maintains Portland's role as a West Coast trade gateway and freight hub by providing efficient and reliable goods movement, multimodal access to employment areas and educational institutions, as well as enhanced freight access to industrial areas and intermodal freight facilities. The transportation system helps people and businesses reduce spending and keep money in the local economy by providing affordable alternatives to driving.

CC2035 meets this goal with transportation policies that support a regional hub (Policy 3.1 and 3.2); support loading of goods in the Central City (Policy 3.15); enhance freight movement in the Central Eastside (Policy 3.CE-2); and support institutional and visitor parking (Policy 3.SW-3). Projects and

studies will also address this policy. The project list includes 9 projects that are primarily focused on freight access and mobility, and 85 projects that provide affordable alternatives to driving.

Further, Council received testimony from stakeholders including the Port of Portland, Central Eastside Industrial Council, trades groups, and ODOT, in support of the Broadway/Weidler Interchange Project as necessary to improve safety and ensure freight and employees were less impacted by collisions in this section of I-5 in the Rose Quarter. As a result of this testimony and input from PBOT and ODOT staff, Council decided to continue supporting this project, previously adopted via the *2035 Comprehensive Plan* (Ordinance 187832).

Transportation: Policies

Designing and planning

444. **Policy 9.1, Street design classifications**. Maintain and implement street design classifications consistent with land use plans, environmental context, urban design pattern areas, and the Neighborhood Corridor and Civic Corridor Urban Design Framework designations.

CC2035 meets this policy as TSP Street Design Classification descriptions were adopted in the Comprehensive Plan Task 5 (December 2016) and are consistent with land use plans, environmental context, urban design pattern areas, and were not changed as part of the CC2035. CC2035 includes an update to the street design classification map in the Central City.

445. **Policy 9.2, Street policy classifications.** Maintain and implement street policy classifications for pedestrian, bicycle, transit, freight, emergency vehicle, and automotive movement, while considering access for all modes, connectivity, adjacent planned land uses, and state and regional requirements.

CC2035 meets this policy because TSP Classification descriptions were updated in Comp Plan Task 5 (December 2016) and TSP Stage 3 (in process) and are consistent with land use plans, environmental context, urban design pattern areas, and were not changed as part of CC2035. CC2035 includes updates to the modal classification maps in the Central City.

9.2.a, Designate district classifications that emphasize freight mobility and access in industrial and employment areas serving high levels of truck traffic and to accommodate the needs of intermodal freight movement.

CC2035 meet this policy because Freight districts were adopted as part of the Freight Master Plan and the Southeast quadrant plan and reflects this policy.

9.2.b, Designate district classifications that give priority to pedestrian access in areas where high levels of pedestrian activity exist or are planned, including the Central City, Gateway regional center, town centers, neighborhood centers, and transit station areas.

CC2035 meets this policy because Pedestrian Districts were adopted as part of the 2007 TSP and were not changed as part of the CC2035 plan.

9.2.c, Designate district classifications that give priority to bicycle access and mobility in areas where high levels of bicycle activity exist or are planned, including Downtown, the River District, Lloyd District, Gateway Regional Center, town centers, neighborhood centers, and transit station areas.

CC2035 meets Policy 9.2.c because Bicycle Districts were created in the non-industrial areas of the Central City as part of the plan. Bicycle Districts were developed as part of the adopted Portland Bicycle Plan for 2030, and were expanded to additional areas as part of CC2035.

446. **Policy 9.3, Transportation System Plan.** Maintain and implement the Transportation System Plan (TSP) as the decision-making tool for transportation-related projects, policies, programs, and street design.

CC2035 meets this policy because the TSP will be updated as part of the CC2035 legislative process with an updated projects list and street classification maps.

447. **Policy 9.4, Use of classifications.** Plan, develop, implement, and manage the transportation system in accordance with street design and policy classifications outlined in the Transportation System Plan.

CC2035 meets Policy 6.4 because it is consistent with the updated TSP classifications from Comp Plan Task 5 and the existing TSP 2007 classification descriptions.

448. **Policy 9.5, Mode share goals and Vehicle Miles Travelled (VMT) reduction.** Increase the share of trips made using active and low-carbon transportation modes. Reduce VMT to achieve targets set in the most current Climate Action Plan and Transportation System Plan, and meet or exceed Metro's mode share and VMT targets.

CC2035 meets this policy with a target (Volume 5A) that at least 80% of commute trips to and from the Central City will be made by non-single occupancy vehicles. Transportation modeling of the elements of this plan indicate that, compared with a base scenario (using as a base case the 2016 adopted Portland Comprehensive Plan), the Central City in 2035 because of CC2035 is expected to have fewer single-occupancy vehicle trips and more walking, biking and transit trips, with the result that by 2035 the model indicates that the commute mode split would be 80.2%.

449. **Policy 9.6, Transportation strategy for people movement.** Design the system to accommodate the most vulnerable users, including those that need special accommodation under the Americans with Disabilities Act (ADA). Implement a prioritization of modes for people movement by making transportation system decisions per the following ordered list:

- Walking
- Bicycling
- Transit
- Taxi / commercial transit / shared vehicles
- Zero emission vehicles
- Other single-occupancy vehicles
- When implementing this prioritization ensure that:
- The needs and safety of each group of users are considered, and changes do not make existing conditions worse for the most vulnerable users.
- All users' needs are balanced with the intent of optimizing the right of way for multiple modes on the same street.
- When necessary to ensure safety, accommodate some users on parallel streets as part of multi-street corridors.

- Land use and system plans, network functionality for all modes, other street functions, and complete street policies, are maintained.
- Policy-based rationale is provided if modes lower in the ordered list are prioritized.

CC2035 meets this policy because Goal 3.A prioritizes walking, bicycling and transit. Active transportation policies (Policies 3.5 – 3.11) prioritize walking, bicycling, and transportation demand management. Projects and studies in the plan increase walking and bicycling opportunities and infrastructure. Policies and actions to develop the Green Loop, design streets as public spaces and enhance the Willamette for people also meet this policy. Most proposed TSP projects have a bicycle, pedestrian and transit component, such as the Broadway/Weidler Interchange Project, and only about a third have an auto component.

	Bike	Ped	Auto, Freight	Transit	Safety	Total
# of projects	87	76	41	8	85	**118**
% total	73.7%	64.4%	34.7%	6.8%	72.0%	
Cost of projects	$ 962,419,223	$ 954,169,223	$ 563,352,391	$ 302,000,000	$ 784,581,249	**$ 1,169,907,301**
% total	82.3%	81.6%	48.2%	25.8%	67.1%	

450. **Policy 9.7, Moving goods and delivering services.** In tandem with people movement, maintain efficient and reliable movement of goods and services as a critical transportation system function. Prioritize freight system reliability improvements over single-occupancy vehicle mobility where there are solutions that distinctly address those different needs.

CC2035 meets this policy with an emphasis on supporting the Central City as a regional hub (policies 3.1-3.2) as well as supporting loading (Policy 3.15); enhancing the freight system in the Central Eastside (Policy 3.CE-2) and Lower Albina (Policy 3.LA-2) and preserving rail and inter modal access in the Albina Yards (Policy 3.LA-3).

Further, there are several TSP freight specific projects and studies that will increase and protect freight movement and the Central City's role as a multimodal system and hub. TSP Freight district and freight street classifications also address this policy. Major freight-related projects in CC2035 include the Broadway/Weidler (Rose Quarter) Interchange Project (now an adopted project in the City's TSP), Central Eastside Access and Circulation project, N River St Reconstruction, Yamhill & Water Traffic Improvements, I-405/Glisan Traffic Improvements, SW Broadway Traffic Improvements, and Southern Triangle Access Improvements.

451. **Policy 9.8, Affordability.** Improve and maintain the transportation system to increase access to convenient and affordable transportation options for all Portlanders, especially those who have traditionally been under-served or under-represented or have historically borne unequal burdens.

CC2035 proposes an expansion of new, and enhancement of existing transit options and active transportation infrastructure between the Central City and other areas of the city, including those that have historically been under-represented, to provide better access to affordable multimodal transportation options, consistent with Policy 9.8.

452. **Policy 9.9, Accessible and age-friendly transportation system.** Ensure that transportation facilities are accessible to people of all ages and abilities, and that all improvements to the transportation system (traffic, transit, bicycle, and pedestrian) in the public right-of-way comply with the Americans with Disabilities Act of 1990. Improve and adapt the transportation system to better meet the needs of the most vulnerable users, including the young, older adults, and people with different abilities.

CC2035 meets this policy with Goal 3.A's emphasis on walking, bicycling and transit plus streetscape and optimized street network polices in each district.

453. **Policy 9.10, Geographic policies.** Adopt geographically-specific policies in the Transportation System Plan to ensure that transportation infrastructure reflects the unique topography, historic character, natural features, system gaps, economic needs, demographics, and land uses of each area. Use the Pattern Areas identified in Chapter 3: Urban Form as the basis for area policies.

CC2035 meets this policy since it is a geographically specific plan that also has district policies that reflect unique topography, historic character, natural features, system gaps, economic needs, demographics, and land uses of each area.

Land use, development, and placemaking

454. **Policy 9.11, Land use and transportation coordination.** Implement the Comprehensive Plan Map and the Urban Design Framework though coordinated long-range transportation and land use planning. Ensure that street policy and design classifications and land uses complement one another.

CC2025 meets this policy since BPS and PBOT worked cooperatively on the CC2035 plan and Chapter 3. Transportation of the CC2035 has an emphasis on transportation supporting different land uses in the districts/quadrants. Further, the plan proposes significant FAR increases at key station areas where various connections to the Central City's multimodal network exists.

455. **Policy 9.12, Growth strategy.** Use street design and policy classifications to support Goals 3A-3G in Chapter 3: Urban Form. Consider the different design contexts and transportation functions in Town Centers, Neighborhood Centers, Neighborhood Corridors, Employment Areas, Freight Corridors, Civic Corridors, Transit Station Areas, and Greenways.

CC2035 meets this policy by including street classification policy descriptions and maps that were adopted in 2007 or as part of the Comp Plan in 2016.

456. **Policy 9.13, Development and street design.** Evaluate adjacent land uses to help inform street classifications in framing, shaping, and activating the public space of streets. Guide development and land use to create the kinds of places and street environments intended for different types of streets.

CC2035 meets this policy with the inclusion of the street classification, streetscape and optimized street network policies; street diversity polices as well as projects that reflect the classifications and additional studies to refine projects.

Streets as public spaces

457. **Policy 9.14, Streets for transportation and public spaces.** Integrate both placemaking and transportation functions when designing and managing streets by encouraging design, development, and operation of streets to enhance opportunities for them to serve as places for community interaction, environmental function, open space, tree canopy, recreation, and other

community purposes.

458. **Policy 9.15, Repurposing street space.** Encourage repurposing street segments that are not critical for transportation connectivity to other community purposes.

CC2035 meets this goal with the policies and actions emphasizing the development of the Green Loop, celebrating Portland's civic and cultural life, and designing streets to be great places. Policies related to streetscapes, optimized street networks, street diversity and street policies specific to the different districts in the Central City address this policy as well. There are also projects and studies that will create additional connections with transportation and public spaces. Major projects that meet this policy include the Burnside/10th Pedestrian Improvements, Burnside/Broadway Pedestrian Improvements, Burnside/20th Pedestrian Improvements, Collins Circle Public Space Improvements, Firefighters Park Public Space Improvements, Clackamas Flexible Street Strategy, Cultural District Streetscape Plan.

459. **Policy 9.16, Design with nature.** Promote street alignments and designs that respond to topography and natural features, when feasible, and protect streams, wildlife habitat, and native trees.

CC2035 meets this goal with the policies and actions emphasizing the development of the Green Loop, celebrating Portland's civic and cultural life, and designing streets to be great places. Additional policies support connections to the river; green streets and connections to parks.

Modal policies

460. **Policy 9.17, Pedestrian transportation**. Encourage walking as the most attractive mode of transportation for most short trips, within and to centers, corridors, and major destinations, and as a means for accessing transit.

461. **Policy 9.18, Pedestrian networks.** Create more complete networks of pedestrian facilities, and improve the quality of the pedestrian environment.

462. **Policy 9.19, Pedestrian safety and accessibility.** Improve pedestrian safety, accessibility, and convenience for people of all ages and abilities.

CC2035 meets these policies because Goals 3.A and 3.8 prioritize walking. Projects and studies in the plan increase walking opportunities and infrastructure. The policies and actions relate to developing the Green Loop, designing streets as public spaces and enhancing the Willamette for people also meet this policy. Optimized street network policies in each district, street diversity policies and green street polices also enhance the pedestrian network. Pedestrian street classifications and Pedestrian Districts increase the emphasis on walking in the Central City. CC2035 has 85 projects that focus on pedestrian safety and access.

463. **Policy 9.20, Bicycle transportation**. Create conditions that make bicycling more attractive than driving for most trips of approximately three miles or less.

464. **Policy 9.21, Accessible bicycle system.** Create a bicycle transportation system that is safe, comfortable, and accessible to people of all ages and abilities.

CC2035 meets these policies because Goals 3.A and 3.9 prioritizes bicycling. Projects and studies in the plan that increase bicycling opportunities and infrastructure. The policies and actions related to developing the Green Loop, designing streets as public spaces and enhancing the Willamette for people also meet this policy. Optimized street network policies in each district, street diversity policies and green street policies also enhance the bicycling network. Bicycle street classifications

and Bicycle Districts increase the emphasis on bicycling in the Central City. CC2035 has 85 projects that focus on bicycle safety and access.

465. **Policy 9.22, Public transportation**. Coordinate with public transit agencies to create conditions that make transit the preferred mode of travel for trips that are not made by walking or bicycling.

466. **Policy 9.23, Transportation to job centers.** Promote and enhance transit to be more convenient and economical than the automobile for people travelling more than three miles to and from the Central City and Gateway. Enhance regional access to the Central City and access from Portland to other regional job centers.

467. **Policy 9.24, Transit service.** In partnership with TriMet, develop a public transportation system that conveniently, safely, comfortably, and equitably serves residents and workers 24 hours a day, 7 days a week.

468. **Policy 9.25, Transit equity.** In partnership with TriMet, maintain and expand high-quality frequent transit service to all Town Centers, Civic Corridors, Neighborhood Centers, Neighborhood Corridors, and other major concentrations of employment, and improve service to areas with high concentrations of poverty and historically under-served and under-represented communities.

469. **Policy 9.26, Transit funding.** Consider funding strategies and partnership opportunities that improve access to and equity in transit service, such as raising metro-wide funding to improve service and decrease user fees/fares.

470. **Policy 9.27, Transit service to centers and corridors.** Use transit investments to shape the city's growth and increase transit use. In partnership with TriMet and Metro**,** maintain, expand, and enhance Portland Streetcar, frequent service bus, and high-capacity transit, to better serve centers and corridors with the highest intensity of potential employment and household growth.

CC2035 meets these policies because Goal 3.A and Policy 3.10 prioritizes transit. Incorporated TriMet service enhancement plans and there are projects and studies in the plan increase transit opportunities and infrastructure. Major transit-related studies include the Central City Transit Network Study, Central City Light Rail Stations Study, Central City Transit Capacity Study, and the River Transit Feasibility Study. Major transit-related projects include the Portland Streetcar Operational Improvements, SW Main/Madison Bikeway and Transit Improvements, Oregon/Grand and Grand/Weidler Streetcar Turnarounds, and Steel Bridge Transit Improvements.

The Council finds this policy has not been satisfied to date around the MAX stations in the New Chinatown/Japantown historic district. The policy supports high-density development along MAX routes, and City Council recognizes the memo submitted by Tim Ramis on May 8, 2020 as evidence in the record that demonstrates the height limits on some blocks created a disincentive for redevelopment in the historic district. The Council acknowledges the transit investment was made by TriMet. and this policy encourages the city to shape growth around MAX stations with height and FAR to support transit use. The adopted height limits strike the appropriate balance between historic preservation and increased use of the transit investments made in the MAX light rail, and the new height limits are equally or more supportive of the Comprehensive Plan than the existing height limits.

471. **Policy 9.28, Intercity passenger service**. Coordinate planning and project development to expand intercity passenger transportation services in the Willamette Valley, and from Portland to Seattle and Vancouver, BC.

CC2035 meets this policy through Policy 3.OT-2, Union Station multi-modal hub which calls for enhancing Union Station and there is also a project for upgrading Union Station.

472. **Policy 9.29, Regional trafficways and transitways**. Maintain capacity of regional transitways and existing regional trafficways to accommodate through-traffic.

CC2035 meets this policy with polices 3.1 and 3.2 related to the Central City as a regional hub.

473. **Policy 9.30, Multimodal goods movement.** Develop, maintain, and enhance a multimodal freight transportation system for the safe, reliable, sustainable, and efficient movement of goods within and through the city.

474. **Policy 9.31, Economic development and industrial lands.** Ensure that the transportation system supports traded sector economic development plans and full utilization of prime industrial land, including brownfield redevelopment.

475. **Policy 9.32, Multimodal system and hub.** Maintain Portland's role as a multimodal hub for global and regional movement of goods. Enhance Portland's network of multimodal freight corridors.

476. **Policy 9.33, Freight network.** Develop, manage, and maintain a safe, efficient, and reliable freight street network to provide freight access to and from intermodal freight facilities, industrial and commercial districts, and the regional transportation system. Invest to accommodate forecasted growth of interregional freight volumes and provide access to truck, marine, rail, and air transportation systems. Ensure designated routes and facilities are adequate for over-dimensional trucks and emergency equipment.

477. **Policy 9.34, Sustainable freight system.** Support the efficient delivery of goods and services to businesses and neighborhoods, while also reducing environmental and neighborhood impacts. Encourage the use of energy efficient and clean delivery vehicles, and manage on- and off-street loading spaces to ensure adequate access for deliveries to businesses, while maintaining access to homes and businesses.

CC2035 meets this policy with polices 3.1 and 3.2 related to the Central City as a regional hub. In addition, polices 3.LA-2 and 3.CE-2 are to emphasize freight movement and access improvements in Lower Albina and the Central Eastside. There are also several freight specific projects and studies that will increase and protect freight movement and the Central City's role as a multimodal system and hub. Freight district and freight street classifications also address this policy. Major freight-related projects in CC2035 include the Broadway/Weidler (Rose Quarter) Interchange Project, Central Eastside Access and Circulation, N River St Reconstruction, Yamhill & Water Traffic Improvements, I-405/Glisan Traffic Improvements, SW Broadway Traffic Improvements, and Southern Triangle Access Improvements.

478. **Policy 9.35, Freight rail network.** Coordinate with stakeholders and regional partners to support continued reinvestment in, and modernization of, the freight rail network.

CC2035 meets this policy with policy 3.LA-3, Rail and Marine in Lower Albina. In addition, there is a Central Eastside quiet zone study.

479. **Policy 9.37, Portland Heliport.** Maintain Portland's Heliport functionality in the Central City.

CC2035 is consistent with this policy as nothing in the plan, projects or studies, impedes maintaining Portland's Heliport functionality in the Central City.

480. **Policy 9.38, Automobile transportation.** Maintain acceptable levels of mobility and access for

private automobiles while reducing overall vehicle miles traveled (VMT) and negative impacts of private automobiles on the environment and human health.

Modeling indicates that the Central City will maintain acceptable levels for automobiles. Further, consistent with Policy 9.38, there are projects and studies that assist to maintain these levels.

481. **Policy 9.39, Automobile efficiency.** Coordinate land use and transportation plans and programs with other public and private stakeholders to encourage vehicle technology innovation, shifts toward electric and other cleaner, more energy-efficient vehicles and fuels, integration of smart vehicle technology with intelligent transportation systems, and greater use of options such as car-share, carpool, and taxi.

Modeling indicates that the Central City will maintains acceptable levels for automobiles, and there are ITS projects in the plan that assist to maintain efficiency, including I-405 Corridor ITS and Central City TSM. The plan also contains policies and actions to support the use of electric vehicles and development of charging stations in the Central City.

482. **Policy 9.40, Emergency response**. Maintain a network of accessible emergency response streets to facilitate safe and expedient emergency response and evacuation. Ensure that police, fire, ambulance, and other emergency providers can reach their destinations in a timely fashion, without negatively impacting traffic calming and other measures intended to reduce crashes and improve safety.

CC2035 meets this policy with the incorporation of the new Secondary Emergency Response Routes and all other Emergency Response Route Classifications as proposed on TSP Stage 3. Emergency Response classification maps have been updated in CC2035.

System management

483. **Policy 9.45, System management**. Give preference to transportation improvements that use existing roadway capacity efficiently and that improve the safety of the system for all users.

484. **Policy 9.46, Traffic management**. Evaluate and encourage traffic speed and volume to be consistent with street classifications and desired land uses to improve safety, preserve and enhance neighborhood livability, and meet system goals of calming vehicle traffic through a combination of enforcement, engineering, and education efforts.

485. **Policy 9.47, Connectivity**. Establish an interconnected, multimodal transportation system to serve centers and other significant locations. Promote a logical, direct, and connected street system through street spacing guidelines and district-specific street plans found in the Transportation System Plan, and prioritize access to specific places by certain modes in accordance with policies 9.6 and 9.7.

CC2035 meets these policies with an emphasis in Goal 3.A on an efficient and accessible transportation that prioritizes walking, bicycling and transit and addresses district and street specific needs in projects and studies.

During City Council review of this plan, there was extensive testimony in opposition to the proposed I-5 Broadway/Weidler Interchange Improvements Facility Plan. That plan is a joint City of Portland and Oregon Department of Transportation project to improve bicycle, pedestrian, and automobile safety in the vicinity of the I-5 and I-84 interchange, Broadway/Weidler off-ramps, and Broadway/Weidler street over passes. Many, but not all, who testified stated an opposition to the project and characterized it as a freeway widening project designed to increase capacity of the freeway system.

Much of this testimony was presented during CC2035 hearings because this project was initially addressed during the N/NE Quadrant Plan process. However, since the adoption of that plan by City Council on October 25, 2012, the I-5 Broadway/Weidler Interchange Improvements Facility Plan and its associated transportation projects were adopted as part of the City of Portland's Transportation Systems Plan (TSP) and it is no longer an element of the Central City 2035 Plan. The TSP amendments were adopted by Ordinance 187832.

486. **Policy 9.51, Multimodal Mixed-Use Area.** Designate a Central City Multimodal Mixed-Use Area (MMA) in the geography indicated in Figure 9-2, which will render state congestion / mobility standards inapplicable to proposed plan amendments under OAR 660-0012-0060(10), subject to ODOT concurrence and execution of an agreement between ODOT and the City of Portland. The agreement should emphasize potential safety and operational impacts.

A Central City MMA has been established, consistent with this policy, incoordination between the City of Portland and Oregon Department of Transportation. Specific MMA findings are presented earlier in this report under Goal 12, Transportation in the "Findings on Statewide Planning Goals" section of these findings.

Additionally, Central City 2035 Policy 3.5, Regional multimodal access, calls for the City to "*Work with the Oregon Department of Transportation on improvements to 1-405, 1-5 and US Highway 26 to enhance regional access to the Central City. Minimize through traffic on Central City streets, improve pedestrian and bicycle connectivity across freeways and create opportunities for capping freeways to lessen the barrier effect of the freeway and open new areas for potential development and/or parks, open space, and recreational opportunities."* Thus, these elements of the plan are consistent with Policy 9.51, and others related to coordinating efforts to increase multimodal access to and through the Central City.

Transportation Demand Management

487. **Policy 9.52, Outreach**. Create and maintain TDM outreach programs that work with Transportation Management Associations (TMA), residents, employers, and employees that increase the modal share of walking, bicycling, and shared vehicle trips while reducing private vehicle ownership, parking demand, and drive-alone trips, especially during peak periods.

488. **Policy 9.53, New development**. Create and maintain TDM regulations and services that prevent and reduce traffic and parking impacts from new development and redevelopment. Encourage coordinated area-wide delivery of TDM programs. Monitor and improve the performance of private-sector TDM programs.

489. **Policy 9.54, Projects and programs.** Integrate TDM information into transportation project and program development and implementation to increase use of new multimodal transportation projects and services.

CC2035 meets these policies with an emphasis in Goal 3.A on an efficient and accessible transportation that prioritizes walking, bicycling and transit and policy 3.11 transportation demand management. There are also policies and actions to study and implement TDM. The plan also contains reduced parking ratios for the Central City, encourages shared parking or existing and new parking facilities, and prohibits the development of new surface parking in most of the plan area.

Parking management

490. **Policy 9.55, Parking management.** Reduce parking demand and manage supply to improve pedestrian, bicycle and transit mode share, neighborhood livability, safety, business district

vitality, vehicle miles traveled (VMT) reduction, and air quality. Implement strategies that reduce demand for new parking and private vehicle ownership, and that help maintain optimal parking occupancy and availability.

491. **Policy 9.56, Curb Zone.** Recognize that the Curb Zone is a public space, a physical and spatial asset that has value and cost. Evaluate whether, when, and where parking is the highest and best use of this public space in support of broad City policy goals and local land use context. Establish thresholds to utilize parking management and pricing tools in areas with high parking demand to ensure adequate on-street parking supply during peak periods.

492. **Policy 9.57, On-street parking.** Manage parking and loading demand, supply, and operations in the public right of way to achieve mode share objectives, and to encourage safety, economic vitality, and livability. Use transportation demand management and pricing of parking in areas with high parking demand.

493. **Policy 9.58, Off-street parking.** Limit the development of new parking spaces to achieve land use, transportation, and environmental goals, especially in locations with frequent transit service. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Use transportation demand management and pricing of parking in areas with high parking demand.

494. **Policy 9.59, Share space and resources.** Encourage the shared use of parking and vehicles to maximize the efficient use of limited urban space.

495. **Policy 9.60, Cost and price.** Recognize the high public and private cost of parking by encouraging prices that reflect the cost of providing parking and balance demand and supply. Discourage employee and resident parking subsidies.

CC2035 meets parking policies through many policies and code changes. Shared parking is encouraged and the use of new technologies such as dynamic pricing and balancing other needs of the curb zone further meet these policies. (policies 3.12 – 3315; 3.DT-2; 3.SW-3). The plan and changes to the zoning code, found in the parking section of the Central City Plan District (Volume 3A) emphasize limiting the overall growth of parking while maximizing joint use. The zoning code amendments maintains no minimum auto parking requirements and sets maximums on all uses. It allows for commercial share of parking that is expected to result in better use of existing parking assets and less new parking being built. In addition, the zoning code includes new prohibitions on surface parking lots (except for allowing up to 20 stalls for surface parking for industrial uses only). Transportation modeling done by Metro indicates that the parking policies in the plan lead to a reduction of auto trips and increase in non-auto trips, supporting many City and Central City goals.

496. **Policy 9.61, Bicycle parking.** Promote the development of new bicycle parking facilities including dedicated bike parking in the public right-of-way. Provide sufficient bicycle parking at high-capacity transit stations to enhance bicycle connection opportunities. Require provision of adequate off-street bicycle parking for new development and redevelopment. Encourage the provision of parking for different types of bicycles. In establishing the standards for long-term bicycle parking, consider the needs of persons with different levels of ability.

CC2035 meets this policy through Policy 3.13 which encourages bike parking to serve additional bike trips in the Central City.

Finance, programs, and coordination

497. **Policy 9.62, Coordination**. Coordinate with state and federal agencies, local and regional governments, special districts, other City bureaus, and providers of transportation services when planning for, developing, and funding transportation facilities and services.

498. **Policy 9.63, New development impacts.** Prevent, reduce, and mitigate the impacts of new development and redevelopment on the transportation system. Utilize strategies including transportation and parking demand management, transportation system analysis, and system and local impact mitigation improvements and fees.

499. **Policy 9.64, Education and encouragement.** Create, maintain, and coordinate educational and encouragement programs that support multimodal transportation and that emphasize safety for all modes of transportation. Ensure that these programs are accessible to historically under-served and under-represented populations.

500. **Policy 9.65, Telecommuting.** Promote telecommuting and the use of communications technology to reduce travel demand.

    CC2035 meets this policy through Policy 3.11 Transportation Demand Management which includes encouragement of telecommuting.

501. **Policy 9.66**, **Project and program selection criteria.** Establish transportation project and program selection criteria consistent with goals 9A through 9I, to cost-effectively achieve access, placemaking, sustainability, equity, health, prosperity, and safety goals.

    CC2035 met this policy when the project team used the TSP Project Selection Criteria (based on this policy and the TSP Outcomes) to choose and prioritize projects to be included in the plan and the TSP.

502. **Policy 9.67, Funding.** Encourage the development of a range of stable transportation funding sources that provide adequate resources to build and maintain an equitable and sustainable transportation system.

    CC2035 meets this policy through funding coordination in studies and project implementation with partners such as ODOT, TriMet, and BES. The new proposed TSP projects found in Volume 2B amount to $47 million, and are within a budget allocation for the entire TSP that is financially constrained, being based on assumptions for future funding from past trends and likely sources of revenue.

Land Use Designations and Zoning: Goals

503. **Goal 10.A: Land use designations and zoning.** Effectively and efficiently carry out the goals and policies of the Comprehensive Plan through the land use designations, Zoning Map, and the Zoning Code.

    The CC2035 Plan is consistent with this goal as the plan use land used designations, development standards, use allowances and prohibitions, development incentives, and design guidelines to maintain and guide the development of a Central City urban form that is consistent with and furthers the goals and policies of the different applicable chapters of the Comprehensive Plan, as detailed by the findings of this ordinance.

Land Use Designations and Zoning: Policies

Land use designations

504. **Policy 10.1, Land use designations.** Apply a land use designation to all land and water within the City's Urban Services Boundary. Apply the designation that best advances the Comprehensive Plan goals and policies. The land use designations are shown on the adopted Land Use Map and on official Zoning Maps.

    1. **Open Space.** This designation is intended for lands that serve a recreational, public open space, or ecological function, or provide visual relief. Lands in this designation are primarily publicly-owned but can be in private ownership. Lands intended for the Open Space designation include parks, public plazas, natural areas, scenic lands, golf courses, cemeteries, open space buffers along freeway margins, railroads or abutting industrial areas, and large water bodies. The corresponding zone is OS.

        The CC2035 Plan continues to apply to OS zoned land for these purposes, and amendments to 33.510, Central City Plan District, allow for limited Retail Sales and Service Uses on OS properties in the Central City. Section 33.510.115, Additional Uses Allowed in the Open Space Zone provides that up to 1,000 sq. ft. of such uses are allowed on OS sites 5 acres or less in size, and no more than 10,000 sq. ft. of such uses are allowed on sites larger than 5 acres.

    2. **High-Density Multi-Dwelling.** This designation is intended for the Central City, Gateway Regional Center, Town Centers, and transit station areas where a residential focus is desired and urban public services including access to high-capacity transit, very frequent bus service, or streetcar service are available or planned. This designation is intended to allow high-density multi-dwelling structures at an urban scale. Maximum density is based on a floor-area-ratio, not on a unit-per-square-foot basis. Densities will range from 80 to 125 units per acre. The corresponding zone is RH.

    3. **Central Residential.** This designation allows the highest density and most intensely developed multi-dwelling structures. Limited commercial uses are also allowed as part of new development. The designation is intended for the Central City and Gateway Regional Center where urban public services are available or planned including access to high-capacity transit, very frequent bus service, or streetcar service. Development will generally be oriented to pedestrians. Maximum density is based on a floor area ratio, not on a units-per-square-foot basis. Densities allowed exceed 100 units per acre. The corresponding zone is RX.

        Although analysis has demonstrated that these two land use designations and their corresponding Zoning Map designations have not historically produced as much residential units as the CX and EX zones, the RH and RX zones do work to preserve a primarily residential character where applied. This is because these two zones allow for limited uses outside of housing and set limits on the extent that retail or office uses may be developed. For this reason, these designations continue to be used especially in targeted areas of the Goose Hollow and West End Subdistricts.

    4. **Central Commercial.** This designation is intended to provide for commercial development within Portland's Central City and Gateway Regional Center. A broad range of uses can reflect Portland's role as a commercial, cultural, and governmental center. Development is intended to be very intense with high building coverage, large buildings, and buildings placed close together along a pedestrian-oriented, safe, and attractive streetscape. The corresponding zone is Central Commercial (CX).

The Central Commercial Comprehensive Plan and Zoning Map designation is the predominately used designation in the Central City. The designation allows for a vibrant mix of retail, institutional, office, and residential uses. Although the zone is described as a commercial mixed use zone, there are more mixed-use residential projects and more housing units per residentially developed acre in the CX than any other zone applied within the Central City. CC2035 results in approximately 728 acres of CX zoned land throughout the Central City Plan District.

Consistent with Policy 10.1, the CX zone continues to be used to further Comprehensive Plan goals and policies regarding housing production, economic development, and job creation and retention.

5. **Central Employment.** The designation allows for a full range of commercial, light-industrial, and residential uses. This designation is intended to provide for mixed-use areas within the Central City and Gateway Regional Center where urban public services are available or planned, including access to high-capacity transit or streetcar service. The intensity of development will be higher than in other mixed-use land designations. The corresponding zone is Central Employment (EX).

   The Central Employment Comprehensive Plan and Zoning Map designation is the second most used designation in the Central City. The designation allows for a vibrant mix of retail, institutional, office, residential, and industrial uses. This zone is usually applied to areas where existing industrial operations are intended to be phased out over time to become more residential/commercial mix (as in the Pearl District), or where mixed-use commercial and residential projects are expected to exist near industrial zoned lands and operations and where the preservation of the Industrial Sanctuary is key objective (such as the Central Eastside District). The CC2035 Plan will result in 669 acres of EX zoned land throughout the Central City Plan District.

   Consistent with Policy 10.1, the EX zone continues to be used to further Comprehensive Plan goals and policies regarding housing production, economic development, job creation and retention, and inclusion of industrial uses and services in the Central City.

6. **Industrial Sanctuary.** This designation is intended to reserve areas that are attractive for manufacturing and distribution operations and encourage the growth of industrial activities in the parts of the city where important freight and distribution infrastructure exists, including navigable rivers, airports, railways, and pipelines. A full range of industrial uses are permitted and encouraged. Nonindustrial uses are significantly restricted to facilitate freight mobility, retain market feasibility for industrial development, prevent land use conflicts, reduce human exposure to freight traffic and potential air quality, noise, and pedestrian safety impacts, and to preserve land for sustained industrial use. The corresponding zones are General Industrial 1 (IG1), General Industrial 2 (IG2), and Heavy Industrial (IH).

   In the Central City, the Industrial Sanctuary Comprehensive Plan Map designation is implemented through the IG1 and IH zones. These two zones are used only within the Lower Albina and Central Eastside Subdistricts, which, despite containing some mixed-use employment zoning, the districts primarily maintain an Industrial Sanctuary designation.

   The IH zone is used in areas that maintain heavy industrial uses as well as uses that still rely on rail and river/marine connections. The Lower Albina Subdistrict continues to contain approximately 15 acres of IH zoned land located adjacent to the Union Pacific Albina Yard facility. In the Central Eastside, only 2 acres remain, and this is only applied to the existing

concrete batch plant operated by Ross Island Sand and Gravel who requested this area remain in that designation despite an earlier proposal to rezone the area to EX.

The Zoning Map and the Zoning Code

505. **Policy 10.2, Relationship of land use designations to base zones.** Apply a base zone to all land and water within the City's urban services boundary. The base zone applied must either be a zone that corresponds to the land use designation or be a zone that does not correspond but is allowed per Figure 10-1 — Corresponding and Less-Intense Zones for Each Plan Map Designation. In some situations, there are long-term or short-term obstacles to achieving the level of development intended by the land use designation (e.g., an infrastructure improvement to serve the higher level of development is planned but not yet funded). In these situations, a less intense zone (listed in Figure 10-1) may be applied. When a land use designation is amended, the zone may also have to be changed to a corresponding zone or a zone that does not correspond but is allowed.

As part of CC2035, the Comprehensive Plan Map and Zoning Map designations have been amended to be consistent with corresponding designations. Prior to the adoption of CC2035 there were a few areas where the designations did not match, mostly a few properties along SE 3rd Avenue and SE 6th Avenue where properties long were within the Central Employment Comprehensive Map designation, but were zoned IG1, implementing the Industrial Sanctuary designation. The areas up-zoned to these more intense Comprehensive Plan Map designations have been found to be capable to handle the resulting intensification of uses due to improvements that have already been made or those proposed by CC2035. Thus, CC2035 is consistent with Policy 10.2.

506. **Policy 10.3, Amending the Zoning Map.**

10.3.a, Amending a base zone may be done legislatively or quasi-judicially.

10.3.b, When amending a base zone quasi-judicially, the amendment must be to a corresponding zone (*see Figure 10-1 — Corresponding and Allowed Zones for Each Land Use Designation*). When a designation has more than one corresponding zone, the most appropriate zone, based on the purpose of the zone and the zoning and general land uses of surrounding lands, will be applied.

10.3.c, When amending a base zone legislatively, the amendment may be to a corresponding zone or to a zone that is does not correspond but is allowed (*see Figure 10-1 — Corresponding and Allowed Zones for each Land Use Designation for zones that are allowed*). A legislative Zoning Map amendment may not be to a zone that is not allowed.

10.3.d, An amendment to a base zone consistent with the land use designation must be approved when it is found that current public services can support the uses allowed by the zone, or that public services can be made capable by the time the development is complete. The adequacy of services is based on the proposed use and development. If a specific use and development proposal is not submitted, services must be able to support the range of uses and development allowed by the zone. For the purposes of this requirement, services include water supply, sanitary sewage disposal, stormwater management, transportation, school district capacity (where a school facility plan exists), and police and fire protection.

10.3.e, An amendment to apply or remove an overlay zone or plan district may be done legislatively or quasi-judicially, and must be based on a study or plan document that identifies a specific characteristic, situation, or problem that is not adequately addressed by the base zone or other regulations.

As noted, CC2035 results in the rezoning of a limited amount of the Central City from one zone to another, and most of the existing zoning has been retained, although various land use regulations and development standards have been amended by the plan. Specifically, the table below identifies the total amount of one land use designation shifting from one to another designation:

Existing Being Rezoned	New OS	New CX	New EX
OS	NA	NA	0.4 acres
RH	NA	15.7 acres	NA
RX	NA	41.4 acres	NA
CG	NA	NA	1.7 acres
CX	2.3 acres	NA	NA
EG1	NA	1.8 acres	9.9 acres
EG2	NA	NA	12.9 acres
EX	NA	0.1 acres	NA
IH	0.8	17.6	NA
IG1	NA	0.3 acres	47.2 acres
Total	3.1 acres	76.9 acres	72.1 acres

These amendments are legislative in nature, and the analysis and background reports of CC2035 support current public services can support the uses allowed by the zone, or that public services can be made capable by the time the development is complete, consistent with Comprehensive Plan Policy 10.3.

507. **Policy 10.4, Amending the Zoning Code.** Amendments to the zoning regulations must be done legislatively and should be clear, concise, and applicable to a broad range of development situations faced by a growing city. Amendments should:

10.4.a, Promote good planning:

Effectively and efficiently implement the Comprehensive Plan.
Address existing and potential land use problems.
Balance the benefits of regulations against the costs of implementation and compliance.
Maintain Portland's competitiveness with other jurisdictions as a location in which to live, invest, and do business.

10.4.b, Ensure good administration of land use regulations:

Keep regulations as simple as possible.
Use clear and objective standards wherever possible.
Maintain consistent procedures and limit their number.
Establish specific approval criteria for land use reviews.
Establish application requirements that are as reasonable as possible, and ensure they are directly tied to approval criteria.
Emphasize administrative procedures for land use reviews.
Avoid overlapping reviews.

10.4.c, Strive to improve the code document:

- Use clear language.
- Maintain a clear and logical organization.
- Use a format and layout that enables use of the document by lay people as well as professionals.
- Use tables and drawings to clarify and shorten the document.
- Identify and act on regulatory improvement suggestions.

Volumes 2A, Parts 1-3, of CC2035 present legislative amendments to the Zoning Code proposed to implement the goals and policies for the Central City, presented in Volume 1 of this ordinance. These amendments have been made in some cases to correct or update existing regulations to be consistent with the direction of CC2035, or to include new regulations and standards to allow implementation of CC2035 as no other provisions may exist to accomplish that task. In all cases, the Zoning Code amendments are presented in as clear and objective of a way possible to ensure the intended uses will be able understand and utilize the Zoning Code as it applies to their development proposals, land use, and properties, consistent with Comprehensive Plan Policy 10.4.

Exhibits Placeholder page:

The City must readopt 10 Central City 2035 Plan documents that were included in the remanded Ordinance 189000. These Exhibits can be found on the project website at the following link: https://beta.portland.gov/bps/cc2035/cc2035-documents

Exhibit B-Volume 1: Central City 2035 Plan: Goals and Policies

Exhibit C -Volume 2A: Zoning Code and Map Amendments – Part 1: Central City Plan District. Also in this exhibit - Comprehensive Plan Map amendments can be found on Page 493 and amendments to the official Zoning Map can be found on page 489.

Exhibit D – Volume 2A: Zoning Code and Map Amendments - Part 2 Willamette River and Trails. Also in this exhibit – overlay zones on the official Zoning Map pages 192 to 206.

Exhibit E- Volume 2B: Transportation System Plan Amendments. Also in this exhibit – Portland Central City Multimodal Mixed Use Area Agreement between the City of Portland and the Oregon Department of Transportation on page 29 – 33.

Exhibit F-Volume 3A: Central City 2035 Scenic Resources Protection Plan – Part 1: Summary, Results and Implementation;

Exhibit G – Volume 3A, Part 2: Scenic Resources Inventory

Exhibit H – Volume 3A, Part 3: Economic, Social, Environmental and Energy Analysis

Exhibit I - Volume 3B: Willamette River Central Reach Natural Resources Protection Plan

Exhibit J - Volume 4: Background Materials

Exhibit K - Volume 6 – Public Involvement

Note: Exhibits A, L and M will be provided with the Ordinance in the City Council packet.

Central City 2035 Plan

Exhibit L:
Additional Amendments to the 2035 Comprehensive Plan

May 18, 2020

The Ordinance adopting the *Central City 2035 Pla*n (CC2035) amends the adopted *2035 Comprehensive Plan*. Those amendments:

- Add the CC2035 goals and policies
- Repeal and replace previous Central City plans
- Amend Policy 9.51 Multimodal Mixed-Use Area
- Amend the Glossary
- Amend Comprehensive Plan Maps

This document contains additional amendments to the *2035 Comprehensive Plan*, needed for consistency with the *Central City 2035 Plan*. These amendments:

I. Amend policies and tables in Chapter 1
II. Amend a policy in Chapter 10

I. Chapter 1 Amendments

A. Amend the following 2035 Comprehensive Plan policies, as shown:

1.19.a. Area-specific plans that are adopted after ~~[date of Comp Plan adoption]~~ May 24, 2018 should clearly identify which components amend Comprehensive Plan elements, supporting documents, or implementation tools. Such amendments should be appropriate to the scope of the Comprehensive Plan; be intended to guide land use decisions; and provide geographically-specific detail. Such amendments could include policies specific to the plan area, land use designation changes, zoning map changes, zoning code changes, and public facility projects necessary to serve designated land uses. *See Figure 1-3 – Area Specific Plans Adopted by Ordinance After May 24, 2018*

1.19.c. Community, area, neighborhood, and other area-specific plans that were adopted by ordinance prior to [date of Comp Plan adoption] are still in effect. However, the elements of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that are inconsistent with this Plan. *See Figure 1-2 – ~~Community, area, and neighborhood plans adopted before [date of Comp Plan adoption],~~ Area-Specific Plans Adopted by Ordinance Prior to May 24, 2018 and Figure 7-2 — Adopted Environmental Plans.*

B. Amend Figure 1-2, as shown:

Figure 1-2. Area-Specific Plans Adopted by Ordinance Prior to May 24 ~~January 1~~, 2018

Plan	Ordinance No.	Effective dates
~~**Downtown Plan**~~ ~~*Amended (1980)*~~	~~150580~~	~~1972~~
Corbett-Terwilliger-Lair Hill Policy Plan	150580	1977
Terwilliger Parkway Corridor Plan	155244	1983
Cully/Parkrose Community Plan *Cully portion superseded by Cully Neighborhood Plan (1992)*	158942	1986
Wilkes Community and Rockwood Corridor Plan	160174	1987
Sullivan's Gulch Neighborhood Action Plan	159897	1987
Kerns Neighborhood Action Plan	159894	1987
Hosford-Abernethy (HAND) Neighborhood Action Plan	160471	1988
~~**Central City Plan**~~	~~160606~~	~~1988~~
Buckman Neighborhood Plan	164489	1991
Brooklyn Neighborhood Plan	163982	1992
Cully Neighborhood Plan	164922	1991
Brentwood/Darlington Neighborhood Plan	165071	1992

Plan	Ordinance No.	Effective dates
Albina Community Plan	166786, 167054	1993
Arbor Lodge Neighborhood Plan	166786, 167054	1993
Boise Neighborhood Plan	166786, 167054	1993
Concordia Neighborhood Plan	166786, 167054	1993
Eliot Neighborhood Plan	166786, 167054	1993
Humboldt Neighborhood Plan	166786, 167054	1993
Irvington Neighborhood Plan	166786, 167054	1993
Kenton Neighborhood Plan *Amended by Kenton Downtown Plan (2001)*	166786, 167054	1993, 2001
King Neighborhood Plan	166786, 167054	1993
Piedmont Neighborhood Plan	166786, 167054	1993
Sabin Neighborhood Plan	166786, 167054	1993
Woodlawn Neighborhood Plan	166786, 167054	1993
Richmond Neighborhood Plan	168280	1994
~~**University District & River District Plans**~~	~~168702~~	~~1995~~
Woodstock Neighborhood Plan	169488	1995
~~**Downtown Community Association Residential Plan**~~	~~170347~~	~~1996~~
~~**Goose Hollow Station Community Plan**~~	~~169699~~	~~1996~~
Outer Southeast Community Plan	169763	1996
Centennial Neighborhood Plan	169763	1996
Foster-Powell Neighborhood Plan	169763	1996
Lents Neighborhood Plan	169763	1996
Mt. Scott-Arleta Neighborhood Plan	169763	1996
Mill Park Neighborhood Plan	169763	1996
Montavilla Neighborhood Plan	169763	1996
Outer Southeast Business Plan	169763	1996
Pleasant Valley Neighborhood Plan	169763	1996
Powellhurst-Gilbert Neighborhood Plan	169763	1996
Hazelwood Neighborhood Plan	169763	1996
South Tabor Neighborhood Plan	169763	1996
Bridgeton Neighborhood Plan	171238	1997
Hillsdale Town Center Plan	171699	1997
Sellwood-Moreland Neighborhood Plan	171849	1997
Creston Kenilworth Neighborhood Plan	172365	1998
Sunnyside Neighborhood Plan	173725	1999
Southwest Community Plan Vision, Policies and Objectives	174667	2000
Hollywood and Sandy Plan	174325	2000
Kenton Downtown Plan (2001)	175210	2001

Plan	Ordinance No.	Effective dates
Guild's Lake Industrial Sanctuary Plan	176092	2001
Portsmouth Neighborhood Plan	176614	2002
~~**Downtown's West End**~~	~~176193~~	~~2002~~
~~**South Waterfront Plan**~~	~~177082~~	~~2002~~
Marquam Hill Plan	176742, 17777	2002
Northwest District Plan *Remanded (2005)*	177920, 177921, 177993, 178020	2003
Amendments to the Cascade Station/Portland International Center Plan District	17076	2005
Gateway Planning Regulations	178423, 178424	2004
St. Johns/Lombard Plan	178452	2004
DivisonVision Green Street/Main Street Plan	179925	2006
North Interstate Corridor Plan	182072	2008
~~**North Pearl District Plan**~~	~~182319~~	~~2008~~
Hayden Island Plan	183124	2009
Airport Futures City Land Use Plan	184521	2011
SE 122nd Avenue Rezone Project	185682	2012

C. Add a new Figure 1-3, as shown:

Figure 1-3. Area Specific Plans Adopted by Ordinance After May 24, 2018

Plan	Ordinance No.	Effective dates
Central City 2035 Plan	[Insert No.]	2018

II. Chapter 1 Amendments

A. Amend Policy 10.1, as shown:

Policy 10.1 Land use designations. Apply a land use designation to all land and water within the City's Urban Services Boundary. Apply the designation that best advances the Comprehensive Plan goals and policies. The land use designations are shown on the adopted Land Use Map and on official Zoning Maps.

~~*Note: The pending Central City 2035 Plan will revise the Central City-specific land use descriptions or will create new corresponding zones*~~.

Central City 2035 Plan

Exhibit M:
2035 Comprehensive Plan Map CON-05

2035 Comprehensive Plan Map CON-05, Significant Scenic Resources, is replaced by CON-05-A and CON-05-B.

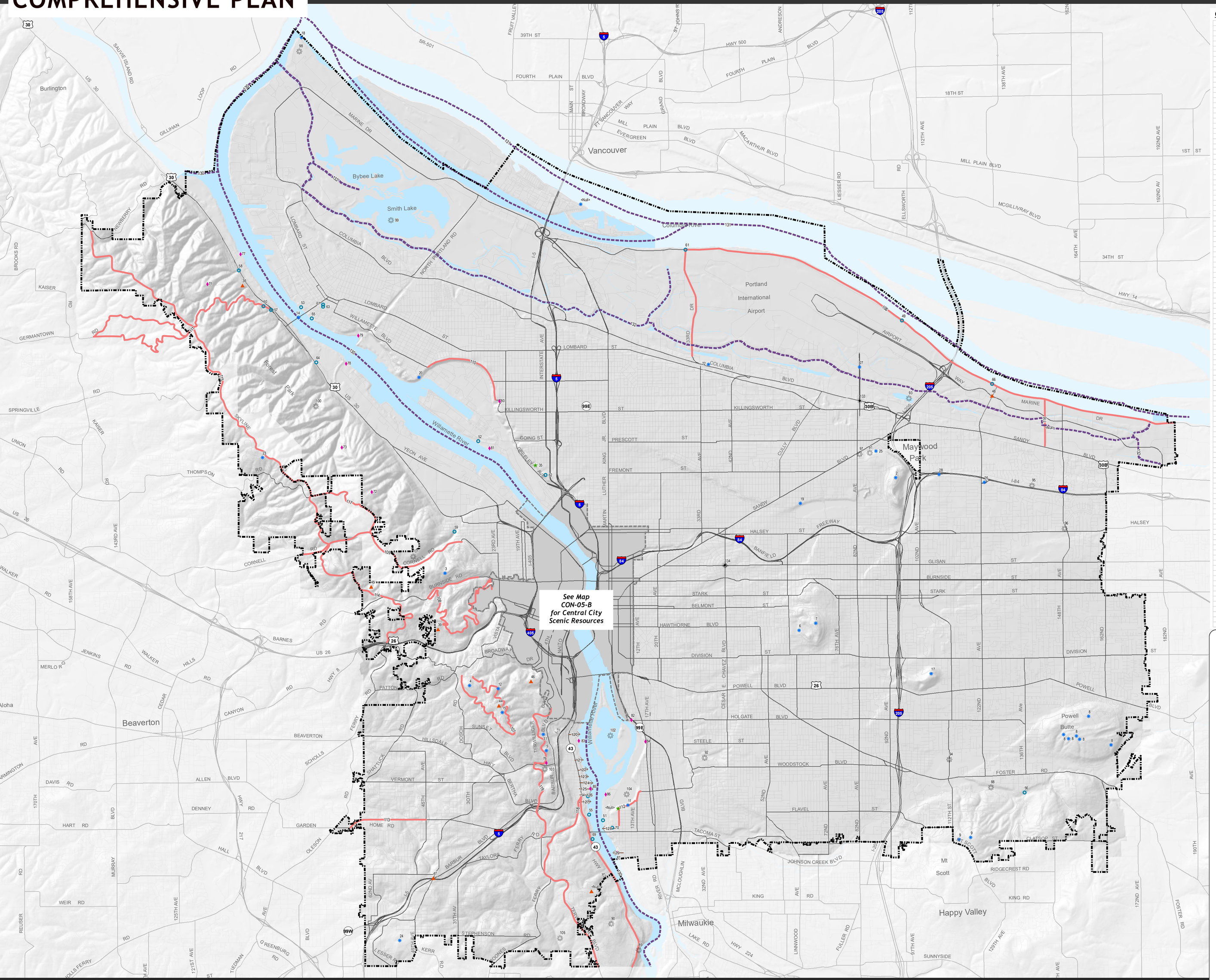
- CON-05-A is the map of significant scenic resources outside of the Central City. There are no amendments to the resources shown on this map.
- CON-05-B is the map of significant scenic resource within the Central City and is amended to reflect the results of the Central City Scenic Resources Protection Plan (Volume 3A, Part 1-3).

EXHIBIT M

COMPREHENSIVE PLAN

Significant Scenic Resources - CON-05-A - REV-1

BUILDABLE LANDS



Citywide Scenic Resources Map Number

Number	Name/Location	Inventory #
2	Rocky Butte	VP 19-06
3	Pittock Mansion	VP 23-12
4	Council Crest	VP 30-02
5	Elk Point	VP 31-28
6	Above Mount Tabor Reservoir	VP 25-04
7	Top of Mount Tabor	VP 25-02
8	Powell Butte	VP 34-08
9	Willamette National Cemetery	VP 40-02
11	S.E Sellwood Boulevard	VP 38-03
12	S.W. Fairmount Boulevard	VP 30-07
14	From St. Johns Bridge	VP 09-01
15	S.W. McDonnell at Council Crest	VP 30-06
17	Kelly Butte	VP 33-02
18	Kelley Point Park	VP 01-02
19	Rose City Golf Course	VP 18-01
20	University of Portland Bluff	VP 10-04
22	Broadmoor Golf Course	VP 12-02
23	Skyline Memorial Gardens	VP 15-04
24	PCC Sylvania Campus	VP 43-02
25	The Grotto	VP 19-14
26	N.E. 122nd Ave	VP 20-13
27	N.E. 82nd near Portland International Airport	VP 13-07
28	N.E. 108th and N.E. Klickitat	VP 19-01
31	S.W. Terwilliger Boulevard above S.W. Harrison Ct.	
35	Albina Railyards from Overlook House	VC 17-07
36	Mountains and River from N.W. Willark Ave.	VM 04-04
39	Mt. Hood from Oregon Vietnam Living Memorial	VM 23-19
44	Mt. Hood from S.W. Patrick Way	VM 30-05
45	Mt. St. Helens from Mt. Calvary Cemetery	VM 23-23
46	Mt. Hood from the Oregon Health Sciences University	VM 31-25
47	Mt. Hood from S.W. Capitol Highway and Huber St.	VM 37-01
48	Mt. Hood from Airport Way	VM 14-03
49	Interstate 205 Bridge from N.E. Marine Drive	VB 13-06
51	Sellwood Bridge from Sellwood Riverfront Park	VB 38-26
52	Fremont Bridge from Swan Island	VB 16-02
53	St. Johns Bridge from Cathedral Park	VB 09-03
54	Sellwood Bridge from Willamette Park	VB 38-25
55	Sellwood Bridge from Macadam Bay Club	VB 38-23
56	Covered Bridge over Johnson Creek	VB 41-03
57	St. Johns Bridge from the Bridge Approach above St. Helens Road	VB 09-13
58	St. Johns Bridge from St. Helens Road	VB 04-03
59	N.W. Thurman St. Bridge	VB 16-06
60	St. Johns Bridge from N.W. Germantown Road	VB 09-14
61	Interstate 5 Bridge from Marine Drive	VB 07-02
62	Fremont Bridge from Overlook Park	VB 17-05
63	St. Johns Bridge from N. Willamette	VB 09-12
64	St. Johns Bridge from St. Helens Road	VB 09-15
65	St. Johns Bridge from UDAG Site	VB 09-10
66	Interstate 205 Bridge from N.E. Marine Drive	VB 14-02
67	St. Johns Bridge from N. Burlington	VB 09-11
69	Sellwood Bridge from Ira Powers Park	VB 38-21
70	Sellwood Bridge from Pioneer Church	VB 38-24
71	Forest Park North	
72	Inspiration Point	
73	Forest Park South	
76	S.W. Terwilliger Boulevard	
77	West Willamette Riverfront at Linnton in the Vicinity of N.W. 107th A*	
78	West Willamette Riverbank near the Railroad Bridge	
79	East Willamette Riverbank near the Railroad Bridge	
80	Willamette Boulevard at N. Jessup St.	
81	Swan Island	
82	McLoughlin Boulevard near S.E. Holgate Boulevard	
83	West Willamette Riverfront at S.E. Boundary St.	
84	Milwaukie Boulevard at S.E. Mitchell	
85	West Willamette Riverfront at the S.W. California St. Alignment	
86	East Willamette Riverfront near the Oregon Yacht Club	
87	East Willamette Riverfront at S.E. Linn St.	
88	Leach Botanical Garden	SS 41-02
89	Bishop's Close	SS 44-01
90	Berry Botanical Garden	SS 44-02
91	The Grotto	SS 19-15
92	Reed College	SS 32-04
93	Johnson Lake	SS 13-03
94	Beggar's Tick Marsh	SS 33-05
95	Water Tower at N.E. Rose Parkway	SS 20-09
96	Open Space at N.E. 148th and N.E. Halsey St.	SS 20-08
97	Shriner's Hospital	SS 19-19
98	Kelley Point Park	
99	Smith and Bybee Lakes	
100	Forest Park	
101	Macleary Park	
102	Ross Island	
103	Marquam Ravine (Himes Park)	
104	Oaks Bottom	
105	Tryon Creek State Park	
106	N.E. 33rd and Marine Drives	SD 12-04
106	N.E. 33rd and Marine Drives	SD 12-04
107	S.W. Fairmount Boulevard Loop	SD 30-03
108	Washington Park and Hoyt Arboretum Loop	SD 23-25
109	N.W. Cornell Road	SD 23-16
109	N.W. Cornell Road	SD 23-16
110	Willamette Boulevard	SD 10-07
111	N.W. Germantown Road	SD 09-17
112	Sellwood Boulevard	SD 38-29
113	S.W. Multnomah Boulevard from S.W. 45th Ave. to S.W. Garden Home Road	SD 37-03
114	S.W. Skyline Boulevard	SD 23-21
115	N.W. Skyline Boulevard	SD 15-09
116	Cross-dike	SD 20-10
117	N.W. Thompson Road	SD 15-05
118	S.W. Macadam/S.W. Taylors Ferry/S.W. Boones Ferry/S.W. Terwilliger Loop	SD 38-27
119	S.W. Terwilliger Boulevard	
120	SW Richardson St	
121	SW Pendelton St	
122	SW Carolina St	
123	SW Nebraska St	
124	SW Vermont St	
125	SW California St	
126	SW Nevada St	
127	SW Miles St	
128	SE Linn St	
128	SE Spokane St	
130	Willamette River from Elk Rock Island to Kelley Point Park	SD 01-04
130	Willamette River from Elk Rock Island to Kelley Point Park	SD 01-04
131	Columbia River from N.E. 185th Ave. to Kelley Point Park	SD 02-01
132	Columbia Slough from N.E. 185th Ave. to Kelley Point park	SD 11-03
133	Columbia Boulevard at 82nd Ave.	
134	S.E. Glisan St. at Cesar E. Chavez Boulevard	

Scenic Resources

Views

- Panoramas
- Views of City
- Views of Mountains
- Views of Bridges
- Viewpoints
- Scenic Sites
- Gateways & Focal Points

Drives and Corridors

- Scenic Drives
- Scenic Waterways
- Scenic Trail/Path
- Scenic Aerial Tram

View Streets

- View Street
- View Street Extent
- Central City 2035 Update area
- City Boundary

Note: Number on map corresponds to number on Scenic Resources Inventory Map.

Scenic Resources Inventory:
City of Portland Planning & Sustainability.
March 1991. Central City updated July 2018

NORTH

0 0.25 0.5 1 1.5 Miles

Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.
City of Portland, Oregon
Ted Wheeler, Mayor • Susan Anderson, Director

April 2020 **City of Portland | Bureau of Planning and Sustainability | Geographic Information System**

The information on the map was derived from digital data-bases on the City of Portland, Bureau of Planning and Sustainability GIS. Care was taken in the creation of this map but it is provided "as is". The City of Portland cannot accept any responsibility for error, omissions, or positional accuracy, and therefore, there are no warranties which accompany this product. However, notification of any errors will be appreciated.

This work was supported in part by a periodic review grant from the Oregon Department of Land Conservation and Development.

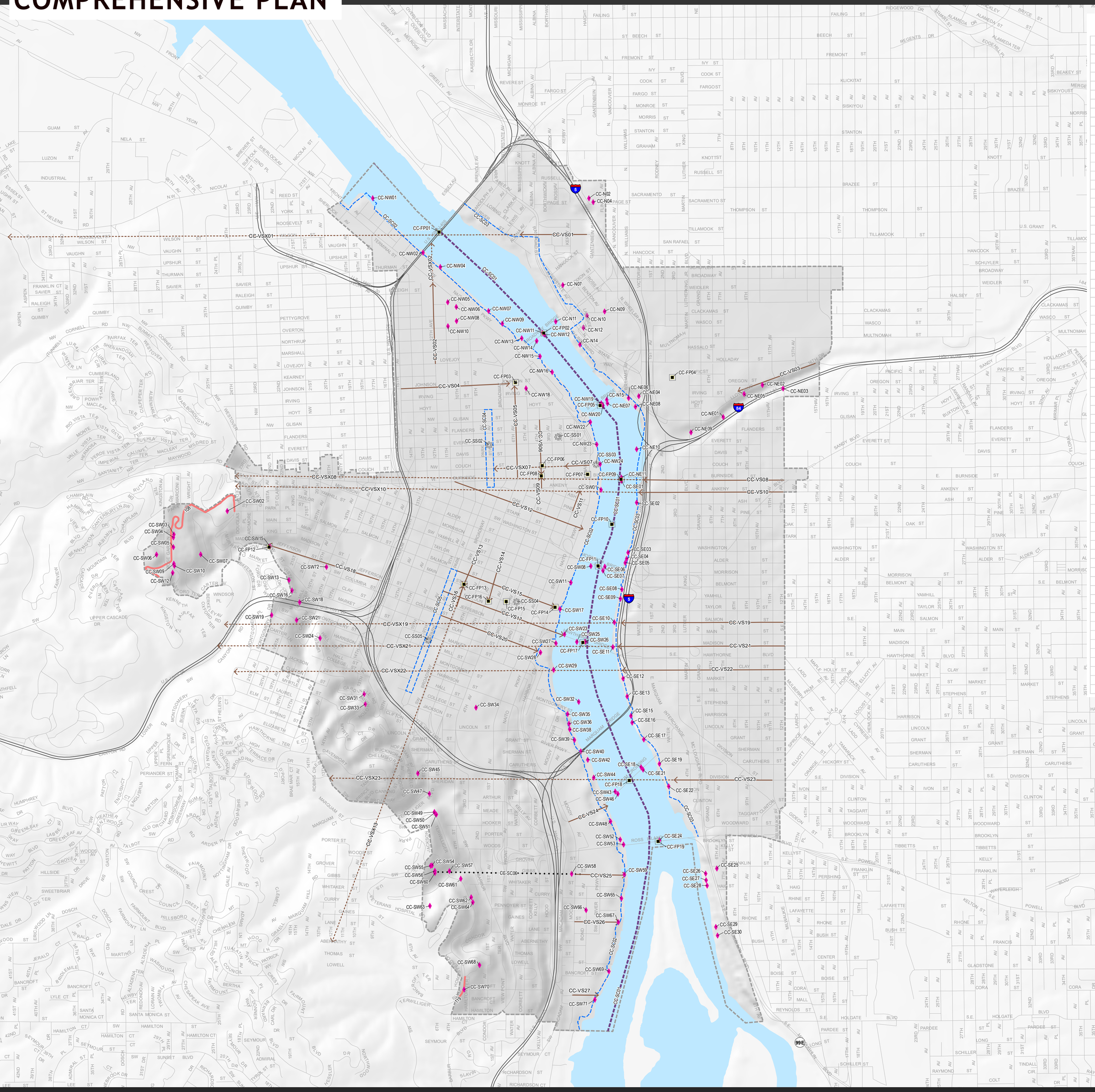
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EXHIBIT M

COMPREHENSIVE PLAN

Significant Scenic Resources - CON-05-B - REV-1

BUILDABLE LANDS



Central City Scenic Resources Map Number

Number	Name/Location	Inventory #	Number	Name/Location	Inventory #
CC-N01	N Russell St under Interstate 5	CC-N01	CC-SW08	Morrison Bridge - south side, west	CC-SW08
CC-N02	Lillis Albina Park - West Edge by trees	CC-N02	CC-SW09	Intl Rose Garden - near garden shop, north point	CC-SW09
CC-N04	Lillis Albina Park - south side by parking	CC-N04	CC-SW10	Intl Rose Garden - near garden shop, south point	CC-SW10
CC-N05	N Tillamook St and N Lewis Ave	CC-N05	CC-SW13	SW Vista Ave north of SW Montgomery - north point	CC-SW13
CC-N07	N Larrabee Ave between N Dixon St and N Hancock St	CC-N07	CC-SW14	SW Market Dr above SW 20th Ave	CC-SW14
CC-N09	N Winning Wy and N Flint Ave	CC-N09	CC-SW16	SW Vista Ave north of SW Montgomery - above stairs	CC-SW16
CC-N10	N Larrabee Ave and N Winning Wy	CC-N10	CC-SW17	Greenway Trail West - at Salmon St Springs	CC-SW17
CC-N12	N Larrabee Ave and N Interstate Ave	CC-N12	CC-SW18	SW Mill St Terrace	CC-SW18
CC-N13	N Drexler Dr.and N Interstate Ave	CC-N13	CC-SW19	SW Montgomery Dr north of SW Carter Ln	CC-SW19
CC-N15	Steel Bridge - north side, east	CC-N15	CC-SW21	SW Montgomery Dr at Frank L Knight City Park	CC-SW21
CC-NE01	I-84 bike-pedestrian bridge NE 7th Ave to SE 8th Ave	CC-NE01	CC-SW25	Hawthorne Bridge - south side, center	CC-SW25
CC-NE02	NE Lloyd Blvd west of NE 11th Ave	CC-NE02	CC-SW26	Hawthorne Bridge - north side, center	CC-SW26
CC-NE03	NE 12th Ave I-84 overpass - west side, south	CC-NE03	CC-SW29	Greenway Trail West - at SW Clay St	CC-SW29
CC-NE05	NE Lloyd Blvd west of NE 9th Ave	CC-NE05	CC-SW30	SW 18th Ave at SW Clifton St	CC-SW30
CC-NE06	Mid-ramp on bike/ped path to Steel Bridge	CC-NE06	CC-SW31	SW Cardinell Dr at top of stairs	CC-SW31
CC-NE07	Steel Bridge - lower deck, center	CC-NE07	CC-SW33	SW Rivington Dr	CC-SW33
CC-NE08	Eastbank Esplanade - south of Steel Bridge	CC-NE08	CC-SW34	Lovejoy Fountain	CC-SW34
CC-NE09	NE MLK Blvd and I-84 overpass	CC-NE09	CC-SW35	Greenway Trail West - south of Riverplace dock	CC-SW35
CC-NE10	Duckworth Dock - south end	CC-NE10	CC-SW36	Greenway Trail West - SW Montgomery gardens, south	CC-SW36
CC-NE11	Burnside Bridge - north side, center	CC-NE11	CC-SW37	SW Lincoln St and pedestrian trail by sculputre	CC-SW37
CC-NW01	Riverscape Pier	CC-NW01	CC-SW38	Greenway Trail West - b/w SW Montgomery St & Hall	CC-SW38
CC-NW02	Greenway Trail West - under Freemont Bridge	CC-NW02	CC-SW39	Greenway Trail West - at SW Hall St	CC-SW39
CC-NW04	Greenway Trail West - just south of Fremont Bridge	CC-NW04	CC-SW40	Greenway Trail West - under Marquam Bridge	CC-SW40
CC-NW05	The Fields Park - NW Quimby St and NW 11th Ave	CC-NW05	CC-SW41	SW Davenport St at Govern's Park	CC-SW41
CC-NW06	The Fields Park - east path	CC-NW06	CC-SW42	Greenway Trail West - south of Marquam Br north pt	CC-SW42
CC-NW07	Greenway Trail West - at approx. NW 9th Ave	CC-NW07	CC-SW43	Tilikum Crossing - north side, west	CC-SW43
CC-NW08	The Fields Park - southeast path	CC-NW08	CC-SW46	Tilikum Crossing - south side, west	CC-SW46
CC-NW09	Greenway Trail West - at approx. NW Northrup St	CC-NW09	CC-SW47	Duniway Park	CC-SW47
CC-NW10	The Fields Park - NW Overton St and NW 11th Ave	CC-NW10	CC-SW48	Greenway Trail West - north of Tilikum Crossing	CC-SW48
CC-NW11	Broadway Bridge - north side, center	CC-NW11	CC-SW52	Greenway Trail West - north of Ross Island Bridge	CC-SW52
CC-NW12	Broadway Bridge - south side, center	CC-NW12	CC-SW53	Ross Island Bridge - north side, west	CC-SW53
CC-NW13	Greenway Trail West - north of Broadway Bridge	CC-NW13	CC-SW55	OHSU Peter O Kohler Pavilion - upper level	CC-SW55
CC-NW15	Greenway Trail West - south of Broadway Bridge	CC-NW15	CC-SW56	Aerial Tram OHSU Terminal - north platform	CC-SW56
CC-NW17	Union Station pedestrian bridge - east	CC-NW17	CC-SW57	SW Terwilliger Blvd at Campus Dr	CC-SW57
CC-NW18	Union Station pedestrian bridge - west	CC-NW18	CC-SW58	SW Gibbs Street Pedestrian Bridge	CC-SW58
CC-NW19	Steel Bridge - north side, center	CC-NW19	CC-SW59	Greenway Trail West - at Zidell	CC-SW59
CC-NW20	Steel Bridge - south side (upper deck), center	CC-NW20	CC-SW60	Aerial Tram OHSU Terminal - south platform	CC-SW60
CC-NW21	NW Glisan St and NW 4th Ave	CC-NW21	CC-SW61	SW Terwillger - south of SW Campus Dr	CC-SW61
CC-NW22	Greenway Trail West - south of Steel Bridge	CC-NW22	CC-SW65	Greenway Trail West - at SW Curry St	CC-SW65
CC-NW23	Greenway Trail West - stairs near NW Everett St	CC-NW23	CC-SW66	Caruthers Park - SW Bond Ave & SW Pennoyer	CC-SW66
CC-NW24	Greenway Trail West - at NW Couch St	CC-NW24	CC-SW67	Greenway Trail West - at SW Gaines St	CC-SW67
CC-SE01	Burnside Bridge - south side, center	CC-SE01	CC-SW68	Eagle Point	CC-SW68
CC-SE02	Eastbank Esplanade - south of Burnside Bridge	CC-SE02	CC-SW69	Greenway Trail West - at SW Bancroft St	CC-SW69
CC-SE03	Eastbank Esplanade - at SE Washington St	CC-SE03	CC-SW71	Greenway Trail West - SW Unnamed Rd	CC-SW71
CC-SE04	Eastbank Esplanade - between SE Washington & Alder	CC-SE04	CC-SW72	SW Jefferson St at SW 18th Ave	CC-SW72
CC-SE05	Eastbank ESplanade - at SE Alder St	CC-SE05	CC-FP01	Fremont Bridge	CC-FP01
CC-SE06	Morrison Bridge - north side, east	CC-SE06	CC-FP02	Broadway Bridge	CC-FP02
CC-SE07	Morrison Bridge - south side, east	CC-SE07	CC-FP03	Union Station Clock Tower	CC-FP03
CC-SE08	Eastbank Esplanade - south of SE Belmont St	CC-SE08	CC-FP04	Convention Center Spires	CC-FP04
CC-SE11	Eastbank Esplanade - north of Hawthorne Bridge	CC-SE11	CC-FP05	Steel Bridge	CC-FP05
CC-SE12	Greenway Trail East - at Holman Dock	CC-SE12	CC-FP06	Hung Far Low Sign	CC-FP06
CC-SE14	SE Stephens St and SE 3rd Ave	CC-SE14	CC-FP07	White Stag Sign	CC-FP07
CC-SE15	Greenway Trail East - OMSI north point	CC-SE15	CC-FP08	Chinatown Gate	CC-FP08
CC-SE16	Greenway Trail East - OMSI middle point	CC-SE16	CC-FP09	Burnside Bridge	CC-FP09
CC-SE17	Greenway Trail East - OMSI south point	CC-SE17	CC-FP10	Willamette River	CC-FP10
CC-SE18	Tilikum Crossing - north side, east	CC-SE18	CC-FP11	Morrison Bridge	CC-FP11
CC-SE19	Greenway Trail East - SE Caruthers St	CC-SE19	CC-FP12	Vista Bridge	CC-FP12
CC-SE20	MLK Viaduct above SE Caruthers St	CC-SE20	CC-FP13	Portland Sign	CC-FP13
CC-SE21	Tilikum Crossing - south side, east	CC-SE21	CC-FP14	Salmon Street Springs	CC-FP14
CC-SE22	Greenway Trail East - between SE Division and Ivon	CC-SE22	CC-FP15	Elk Fountain	CC-FP15
CC-SE23	MLK Viaduct above SE Division St	CC-SE23	CC-FP16	Portlandia	CC-FP16
CC-SE24	Ross Island Bridge - north side, center	CC-SE24	CC-FP17	Hawthorne Bridge	CC-FP17
CC-SE26	Springwater Corridor - Franklin/Haig, north point	CC-SE26	CC-FP18	Tilikum Crossing	CC-FP18
CC-SE27	Springwater Corridor - Franklin/Haig, middle point	CC-SE27	CC-FP19	Ross Island Bridge	CC-FP19
CC-SE28	Springwater Corridor - Franklin/Haig, south point	CC-SE28	CC-SS01	Lan Su Chinese Garden	CC-SS01
CC-SE29	Springwater Corridor - SE Rhone St, north point	CC-SE29	CC-SS02	North Park Blocks	CC-SS02
CC-SE30	Springwater Corridor - SE Rhone St, north point	CC-SE30	CC-SS03	Japanese American Historical Plaza	CC-SS03
CC-SW01	Greenway Trail West - at SW Ankeny St	CC-SW01	CC-SS04	Mark O Hatfield US Courthouse 8th Floor Terrace	CC-SS04
CC-SW04	Intl Rose Garden - top of stairs near telescope	CC-SW04	CC-SS05	South Park Blocks	CC-SS05
CC-SW05	Intl Rose Garden - top of stairs above gazebo	CC-SW05	108	Washington Park and Hoyt Arboretum Loop	SD-23-25
CC-SW06	Portland Japanese Garden	CC-SW06	119	SW Terwilliger Boulevard	-
CC-SW07	SW Sherwood Blvd above reservoir four	CC-SW07			

Scenic Resources

Views

- Viewpoints
- Scenic Sites
- Gateways & Focal Points

Drives and Corridors

- Scenic Drives
- Scenic Waterways
- Scenic Trail/Path
- Scenic Aerial Tram

View Streets

- View Street
- View Street Extent
- Central City 2035 Update area

Note: Number on map corresponds to number on Scenic Resources Inventory Map.

Scenic Resources Inventory:
City of Portland Planning & Sustainability,
March 1991. Central City updated July 2018

NORTH

0 0.0625 0.125 0.25 0.375 Miles

Bureau of Planning and Sustainability
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City of Portland, Oregon
Ted Wheeler, Mayor • Susan Anderson, Director

April 2020 **City of Portland | Bureau of Planning and Sustainability | Geographic Information System**

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