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Millicent D. Williams Director

September 26, 2025

Re: Response to comments concerning the draft Code Alignment Project Updates to TRN-1.30 (Thresholds for Frontage Improvement and Dedication Requirements) during the public comment period (August 19 to September 19, 2025).

Dear Public Comment Respondents,

Thank you for submitting comments on the draft Code Alignment Project Updates to TRN-1.30 (Thresholds for Frontage Improvement and Dedication Requirements), which the bureau posted for public comment from August 19 to September 19, 2025. PBOT appreciates your interest and time spent reviewing and preparing comments for this administrative rule. Your input helps improve our work.

Summary of Comments and Responses

PBOT received comments from residents who work in development, from Oregon Walks, and one ask for clarification from a colleague at the City.

Comment: Comments from residents who work in development were largely supportive of the proposal, and also voiced ideas for further policy development.

Response: The ideas for further policy development are out-of-scope of this particular Code Alignment Project. However, PBOT will note these ideas in future work to update frontage improvement requirements.

Comment: The comment from Oregon Walks appreciated the overall goals of the Code Alignment Project, but highlighted the role that development plays in making sidewalk improvements. Oregon Walks also noted strategies/policies to advance pedestrian networks in Portland.

Response: The ideas for further policy development are out-of-scope of this particular Code Alignment Project. However, PBOT will note these ideas in future work.



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