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MEMO

DATE: September 24, 2014
TO: Joe Zehnder
FROM: Eric Engstrom
CC:
SUBJECT: Change Memos for Portland's Comprehensive Plan Update

Attached is a collection of memos that summarize the changes to the Chapters between the Working Draft and the Proposed Draft of the 2035 Comprehensive Plan Policy document.

These memos are intended to provide the context for the changes made during the time between the release of the Working Draft in January 2013, and the Proposed Draft in July 2014. The intended audience of these memos are people who participated in the writing or review of earlier drafts. We value public participation, and this set of memos helps provide additional transparency for the many people who have had input into this plan.

It should be noted that the layout of the Goals and Policies was altered so that Chapters within the Working Draft do not align with the Proposed Draft. Some key changes include the creation of a new Chapter 1 to provide an overview of the Plan and Guiding Principles. In addition, the Urban Design Goals formally in Chapter 5 were split into two chapters, 3 & 4. This has caused some of the other Chapters to be rearranged. The table on the back of this page compares the organization of the Working Draft and the Proposed Draft.

More information on each of the changes within the Chapters is contained within the following memos.



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Comparison of Chapter Organization

Working Draft	Proposed Draft
Vision and Integrated Goals	Introduction
Urban Design Framework	About the Comprehensive Plan
Ch. 1: Community Involvement	Ch. 1: The Plan and Guiding Principles
Ch. 2: Housing	Ch. 2: Community Involvement
Ch. 3: Economic Development	Ch. 3: Urban Form
Ch. 4: Watershed Health and Environment	Ch. 4: Design and Development
Ch. 5: Urban Design and Development	Ch. 5: Housing
Ch. 6: Public Facilities and Services	Ch. 6: Economic development
Ch. 7: Transportation	Ch. 7: Environment and Watershed Health
Chapter 8: Administration and Implementation	Ch. 8: Public Facilities and Services
	Ch. 9: Transportation
	Ch. 10: Administrative and Implementation





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MEMO

DATE: September 16, 2014
TO: Joe Zehnder
FROM: Eric Engstrom
CC: Shannon Buono
SUBJECT: Summary of changes to Chapters 1 and 10

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

This memo summarizes the changes made to Chapters 1 and 10 (The Plan and Guiding Principles, and Administration) These policies (formerly Chapter 8) were substantially re-organized, putting topics that define what the plan is in Chapter 1, and more administrative topics like amendment procedures and land use designation descriptions in Chapter 10.

Policies were added, removed or revised to reflect public and agency feedback made during review of the Working Draft. Some policy sections were also restructured and much of the narrative and policy text was edited to improve clarity and readability. Sub-policies, in many cases, were incorporated into related policies, promoted as a stand-alone policy, or deleted in the case of duplication.

Guiding Principles

The most substantive change was an update to the “Guiding Principles”, which were called the “Integrated Goals” in the earlier draft. These principles were re-formatted to recognize that they are not written as goals or policies, but instead are bigger-picture ideas intended to guide implementation tools and future amendments.

The Principles incorporate the Portland Plan priorities of equity, prosperity, and health into the Comprehensive Plan. The principles are intended to guide balanced decision-making, encourage



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integrated multi-disciplinary approaches, and breakdown barriers between topics such as housing, economic development and transportation. The decision to create a new chapter for these two elements of the plan was made based on a desire to introduce readers to the fundamental core of the Plan right at the beginning.

Compliance with the Comprehensive Plan means that on the whole, one strikes a reasonable balance among applicable goals and policies. There is flexibility to determine which policies and goals are applicable to any given decision, and how to reach a balance. That said, the Guiding Principles provide a list of topics that should always be considered.

Other changes to these chapters include:

Chapter 1, The Plan and Guiding Principles

- A chapter introduction was added.
- Policies that describe the elements of the Comp Plan and the implementation tools were moved from Administration to Chapter 1.
- Language that describes the function of the Comprehensive Plan was updated based on advice from the City Attorney. Policies that describe the elements of the Comp Plan and the implementation tools were moved here from Chapter 10. Having those elements in one place helps to better introduce what the Comprehensive Plan is.
- A description of the elements of the Comp Plan was updated to align with language in the plan introduction and to respond to City Attorney Comments.
- A graphic illustrating the structure and elements of the Comprehensive Plan was added.
- An explanation was added to illustrate the relationship between the Comprehensive Plan and existing community, area or neighborhood plans adopted under the previous Comprehensive Plan.

Chapter 10, Administration

- The criteria for amending a core element or an implementation tool of the Comprehensive Plan were clarified.
- Criteria focused on environmental justice have been added for Comprehensive Plan Map and Zoning Code amendments. The criteria ensure that Comprehensive Plan Map and Zoning Code amendments extend benefits to, and do not promote an unequal distribution of burden on, communities of color, low-income populations, and other underserved or under-represented groups.
- Land Use designation names were updated to eliminate confusing references to allowed building types. The descriptions of each Comprehensive Plan land use designation were revised



for consistency and moved from a different section to the Administration and Implementation chapter.

- A West Hayden Island designation description was added.
- Table 10-1 was updated to more accurately reflect designation names and add proposed mixed use designations.





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MEMO

DATE: September 16, 2014

TO: Eric Engstrom and Joe Zehnder

FROM: Marty Stockton

SUBJECT: Changes to Chapter 2: Community Involvement
Changes to Chapter 10: Administration

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

This memo summarizes the changes made to Chapter 1, Community Involvement (now Chapter 2). Policies were added, removed or revised to reflect public and agency feedback made during review of the Working Draft Part 1. Policy sections were added and much of the narrative and policy text was edited to improve clarity and readability. Sub-policies, in most cases, became policies or were deleted as there was some duplication.

Changes to the Community Involvement chapter include:

- The order of the Goals (Goals 2.A through 2.G) were revised for greater emphasis on Goal 2.B Social justice and equity.
- Goal 2.G The Strong civic infrastructure goal was added per feedback from Mike Houck, Planning and Sustainability Commissioner.
- Policies were organized into seven new sections:
 1. Partners in decision making



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2. Invest in education and training
 3. Community assessment
 4. Transparency and accountability
 5. Community involvement program
 6. Process design and evaluation
 7. Information design and notification
- Several wording changes were recommended by the City Attorney to add “in land use decisions” in places to clarify the scope of impact of the Comp Plan (it does not govern every outreach effort carried out by the City).
 - A policy about funding levels was removed on the advice of the City Attorney and OMF. The budget is not a land use decision.
 - Several changes to emphasize “meaningful involvement”, rather than “involvement. Wording was also changed to avoid creating the impression that all stakeholder feedback is always incorporated. There is often conflicting feedback, and decision-makers must often choose which perspective they agree with.
 - Policies in the “**Partners in decision making**” section were revised to list individuals and a wide range of formal and informal organizations that represent a variety of interests. The purpose for listing partners is to communicate the need for the City of Portland to broaden, build and maintain partnerships. Especially within the context of community involvement in land use and infrastructure planning, policy, investment, and development decisions.
 - A new policy was added to the “**Partners in decision making**” section to support working with the neighborhood and business associations to increase diversity and to help them reflect the diversity of people and institutions they serve.
 - Policies in the “**Invest in education and training**” section were revised to reflect both the community and City staff need for ongoing education and training to work together as effective partners.
 - Two new policies were added to the “**Invest in education and training**” section, they include:
 - Greater land use literacy, specifically the public’s understanding of land use, transportation, housing and related topics.



- Agency capacity building, which involves increasing City staff’s capacity, tools and skills needed to design and implement processes that engage a broad diversity of affected and interested communities.
- Policies in the “**Community assessment**” section were added or revised to describe the need for City staff to continually build their understanding of community demographics, trends, and needs; why needs exist and why it is important for needs to be addressed. This section also calls out for community members to have opportunities to share how needs affect the quality of life for the larger community. This section emphasizes two-way communication between City of the Portland government and communities and encourages community-level data gathering and information sharing. Within community analysis, the inclusion of community verified data was a recommendation from the Public Involvement Advisory Council (PIAC) in their review of the draft.
- The “**Transparency and accountability**” section was revised to group many of the existing draft policies from the Working Draft Part 1.
- New policies were added to the “**Community Involvement program**” to support direction from “[Putting People into Planning – A Primer on Public Participation](#),” including:
 - The need for a Community Involvement Manual that is kept current by staff and used by the Community Involvement Committee, which would be a subcommittee of the Planning and Sustainability Commission.
 - Evaluation measures for the overall program and for processes during a project.
 - Sharing engagement methods with government and community partners.
- New, and amended policies in the “**Process design and evaluation**” section were grouped together to guide the design of project-specific community involvement processes and build on the community knowledge, understanding, relationships and training supported by the on-going community involvement policies. The former “**Representation**” policy was separated into three policies: “**Demographics**”, the revised “**Representation**” and the “**Participation monitoring**” to more fully discuss the steps required in a process in identifying an audience based on demographics, deliberately engaging these communities and tracking the results. New policies in this section include:
 - Historical understanding.
 - Culturally-appropriate processes.
 - Inclusive participation beyond Portland residents.
 - Process evaluation.



- Policies in the “**Information design and notification**” section were added to address the City of Portland’s Civil Rights Title VI Plan in regards to providing access to information for limited English proficient (LEP individuals), consistent with federal regulations. The accommodation policy was also added to underscore the Title II requirement to enable individuals with disabilities access to participate, consistent with federal regulations.

Changes to The Plan and Guiding Principles chapter include:

- **Policy 1.10 Community Involvement Committee**, was moved to this chapter to support the administrative aspect of identifying a body. A Planning and Sustainability Commission subcommittee would serve as the recognized committee to oversee the Community Involvement Program.





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MEMO

DATE: September 16, 2014

TO: Eric Engstrom and Joe Zehnder

FROM: Bill Cunningham

CC: Tom Armstrong, Mark Raggett, Roberta Jortner

SUBJECT: Summary of changes to policies in Chapter 3 (Urban Form and Design) and Chapter 4 (Design and Development), formerly located together in Chapter 5 of the Comprehensive Plan Working Draft

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

This memo summarizes key revisions made to policies now located in Chapter 3 (Urban Form and Design) and Chapter 4 (Design and Development). In the January 2013 Working Draft, these policies were located together in Chapter 5 (Urban Design and Development). Policies most closely related to the overall urban form of the city were moved into Chapter 3, while policies more relevant to design at the scale of development sites and buildings were moved into Chapter 4. This memo focuses on major, substantive changes to policies. It is organized by the policy sections of chapters 3 and 4, except in the case of Working Draft policy sections that were not continued in the Proposed Draft.

Policies were added, removed or revised to reflect feedback from the public, PEGs and intergovernmental partners during review of the Working Draft. Some policy sections were also restructured and much of the narrative and policy text was edited to improve clarity, readability, and consistency. The introduction of each chapter was rewritten to reflect the focus of each chapter.



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Chapter 3 (Urban Form and Design)

Goals

- A new goal was added addressing **climate and hazard resilient urban form, Goal 3B**. This acknowledges that goals to reduce Portland's carbon footprint and to respond successfully to natural hazards and climate change will need to be key considerations in guiding the future evolution of the form and organization of Portland.
- A goal was added for **employment districts, Goal 3F**, acknowledging that Portland's employment lands are an integral part of Portland's urban form and structure.
- A goal was added for **nature in the city, Goal 3G**, acknowledging the importance of natural areas and habitat corridors in Portland's form and structure.

Citywide Design Development

- Policy **3.1** was added that defines and links the **Urban Design Framework (UDF)** diagram and its component maps to the Chapter 3 policies. The UDF was not part of the Working Draft policies, but were part of a non-policy section that illustrated and summarized how the goals and policies are intended to shape the form and structure of the city. The UDF and its component maps (Centers, Corridors, Transit Station Areas, Greenways, Urban Habitat Corridors, Employment Areas, Pattern Areas) show the locations of urban form elements that are the focus of the Chapter 3 policies.
- Policy **3.2** was added regarding **growth and development**, calling for evaluating impacts to current residents and the physical characteristics of neighborhoods when making land use decisions. This new citywide policy focuses on public decision making, in contrast to related policies encouraging new development to be designed to consider such impacts.

Centers

- Policy **3.13** was added about locating **government services** in centers (this policy was moved from Chapter 7 in the Working Draft).
- Policy **3.15** was added regarding **accessibility** and designing centers to be compact, safe and attractive for pedestrians and cyclists of all ages and abilities. This is in response to public interest in making centers very walkable and accessible places and responds to PBOT comments about the need for clarity regarding the relationship of centers to the transportation system.
- Other policies related to the design of centers were moved to the **Centers and corridors design and development** section, Policies **4.15 – 4.25** of Chapter 4. The centers policies remaining in Chapter 3 are those that highlight the intended role and function of centers.



- The center typology policies (**Central City 3.18 – 3.21, Gateway 3.22 – 3.25, Town Centers 3.26 – 3.29, Neighborhood Centers 3.30 -3.33**) were modified to focus on a small set of components (services/employment, housing growth, transportation role, public places) that vary according to the regional to more local roles of the various types of centers. Language on the intended scale of development in different types of centers (e.g., mid-rise buildings in town centers) has been revised and clarified.

Corridors

- Policies were added to the **corridors** section that indicate the important role of corridors as transportation connections, acknowledging that their transportation functions are closely related to the corridor land use, growth and design policies. The added policies respond to PBOT requests to strengthen policies linking the growth/land use and the transportation functions of corridors and also acknowledge the role of Civic Corridors in Portland’s freight system.
- Policy **3.42** was created for **neighborhood corridors**. This policy acknowledges the role of mixed-use streets (such as Alberta, Belmont, and Woodstock) not as prominent as civic corridors such as Sandy or Barbur, but which have transportation, land use and design functions that are important at the neighborhood or district level.

Transit Station Areas

- Policies were added creating a **typology of transit station areas, 3.46 – 3.49**, with differing land use priorities, including policies for Center Stations, Employment Stations, Transit Neighborhood Stations, and Destination Stations. These policy concepts were included in the Working Draft’s UDF summary section, but were not policies.

City Greenways

- Policy **3.53** was added on the **design** and green infrastructure of city greenways, bringing together city greenways policies that had been in the Working Draft’s Public Facilities and Services chapter.

Urban Habitat Corridors

- The Urban Form and Design chapter now includes a policy section, **3.54** addressing **urban habitat corridors**, which are a key element of the Urban Design Framework. The new policies include policies originally located in the Working Draft’s Watershed Health and the Environment chapter regarding enhancement of existing habitat corridors and establishment of new habitat corridors.
- This policy section also includes a new policy, **3.55 habitat connection tools**, which calls for the use of multiple tools and approaches to establish urban habitat corridors, recognizing the need to address diverse landscapes and development goals.



- Another new policy, **3.56 connect habitat corridors**, has been added to recognize the inter-relationships and potential synergies between urban habitat corridors, greenways, and other urban design framework elements.

Employment Areas

A policy and accompanying UDF map was added for **employment area geographies**. This acknowledges the importance of employment areas in the function, form, and structure of the city, and provides a linkage between the UDF and the policies in the Economic Development chapter. Freight policies consolidated into Transportation chapter to avoid duplication.

Pattern Areas

- Policies have been added for a new **Rivers** pattern area (incorporating the Willamette and Columbia rivers and adjacent waterfront and land). A smaller number of rivers-related policies were part of the Working Draft's Industrial and River pattern area policies. This new pattern areas section encompassing policies **3.58 – 3.70** acknowledges the importance of the rivers in Portland's form and structure, incorporating direction from the River Concept report (2006). The policies also introduce the North, Central, and South reaches of the Willamette, providing policy direction that recognizes their distinctive uses and users.
- A policy on **inner ring districts, 3.78** has been added to the Inner Neighborhoods pattern area policies. This policy applies to areas adjacent to the Central City (identified in the UDF pattern areas map) and indicates the importance of this area for providing additional housing and employment opportunities close to the Central City.
- New policies have been added to the Central City and the Inner, Eastern, and Western neighborhoods policy sections that address **active transportation** issues and opportunities specific to each of these pattern areas.
- The **Industrial and River** policies of the Working Draft's pattern area policy section have been replaced by the Rivers pattern area policies **3.58 – 3.70** and Employment **chapter 6** policies that are the basis for the UDF Employment Areas mapping.



Chapter 4 (Design and Development)

Goals

- A new goal, **4D**, was added addressing **urban resilience**. This goal relates to a number of Chapter 4 policies that focus on guiding development to contribute to Portland's long-term resilience, and reflects policy guidance from the Climate Action Plan and the Climate Change Preparation Strategy.

General Development Principles

- Several policy sections were consolidated into this policy section, including Working Draft policy sections on Context-Sensitive Design and Development, Public Realm and the Street Environment, and components of the Health and Safety policy section.
- The Working Draft's **neighborhood characteristics** policy language has been deleted. This policy was based on current Comprehensive Plan policies and called for enhancing the positive characteristics of neighborhoods and districts. The intent of this policy is largely continued through policies on **pattern areas**, **community identity**, and **site and context**.
- Most of the policies that were part of the Working Draft's **Public Realm and the Street Environment** policy section were consolidated and moved to the Transportation chapter, **Chapter 9**. These are now located within that chapter's **Land Use, Development, and Placemaking** policy section and the **Streets as Public Spaces** policy section. Their location within the Transportation chapter is intended to highlight the integral relationship between streets and urban design.
- Policy **4.11** was added addressing **alleys**, of which there are over 100 miles in Portland. This policy addresses the role of alleys in the design and function of the places where they are located, providing policy support for their use for parking access and for expanding their community functions.

Residential Areas

- Policy language was edited to focus more on the role of development in lower-density residential areas in expanding housing choices and contributing to resource efficient design and health. This broadens the previous focus of the Working Draft's corresponding policies on these areas being places of relative stability. Language was also added clarifying that a range of architectural expression is appropriate in these areas.

Transitions and Offsite Impacts

- A new sub-policy has been added on **air quality impacts, 4.28.d**. This new policy responds in part to community concerns about adverse air quality impacts to residents along freeways and



heavily-trafficked streets, especially in the context of the large amount of future housing anticipated along civic corridors and around light rail stations adjacent to freeways

- A new sub-policy has been added on **light pollution, 4.28.e**. This responds to concerns raised by community members about the negative impacts on people and wildlife of poorly-directed outdoor lighting.

Scenic Resources

- This policy section was moved from the Working Draft's Watershed Health and the Environment chapter.
- A new policy was added on **new public views, 4.34**, which encourages the creation of additional public views and is based on an existing Comprehensive Plan policy.
- A new policy was added regarding **street views 4.35**. This policy addresses the continuation of public views of prominent landmarks, such as statues and landmark buildings that are visual focal points along streets. **(Note: This policy is repeated in Policy 9.17 in the Transportation chapter)**

Historic and Cultural Resources

- A new policy was added regarding the **historic resources inventory, 4.40**. It addresses the need to survey historic resources in areas of anticipated growth and change, reflecting policy guidance from the Portland Plan and comments from community members about the need to balance growth with preservation of historic resources.
- A new policy was added that encourages the adaptive reuse of **community structures, 4.44**, such as meeting halls and places of worship, in response to community concerns about the loss of such structures when they become no longer viable for their original intended uses.

Public Art

- The Working Draft's **Arts and Culture** policies have been consolidated into a single policy **4.46** (their policy intent is also supported by Proposed Draft policies 4.25 [Public art] and 4.29 [Significant places]). The earlier draft's subpolicy on allocating a portion of spending on public projects to public art has been removed, as it is not within the scope of what the Comprehensive Plan can impact.

Resource-Efficient and Healthy Development and Design

- This section consolidates a number of policies from the Working Draft on sustainable design and development.



- New policies have been added that address **optimizing benefits 4.53**, and **ecodistricts 4.56**. These policies acknowledge the importance of creating mechanisms and processes to evaluate and coordinate efforts toward resource efficiency.
- The **energy efficiency policy 4.54** has been modified to be more specific about encouraging development to exceed the energy requirements of the Statewide Building Code.

Designing with Nature

- Most of the former Working Draft, Chapter 5 **Designing with Nature** section have been consolidated and/or moved to other chapters to reduce redundancy between and within the chapters. Specifically, policies entitled Natural Landscape, Mimicking Nature, Hydrologic Function, Ecosystem Services, and Habitat and Wildlife-friendly Design, were moved to **Chapter 7** (Environment and Watershed Health). The policy to green the built environment was integrated with policies relating to centers and corridors in this chapter and in Chapter 3 Urban Form.

Hazard-Resilient Design

- Policies have been added to the **Hazard-resilient Design (policies 4.60–4.64)** section to facilitate effective disaster recovery through land use planning, and to reduce urban heat island effects through development, building, and infrastructure design.

Note regarding Neighborhood Centers PEG recommendations

The Neighborhood Centers PEG was the policy expert group whose deliberations were most closely related to the majority of policies in Chapter 3 and Chapter 4. Most of the Neighborhood Centers PEG’s recommendations were accommodated in the Proposed Draft policy revisions. An exception was a request for a policy commitment to area-specific planning for centers, in order to accommodate differences in their characteristics and community needs. This was not included among the Proposed Draft policies as it concerns implementation, rather than policy.





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MEMO

DATE: September 16, 2014

TO: Joe Zehnder and Eric Engstrom

FROM: Uma Krishnan

CC: Tom Armstrong

SUBJECT: Summary of changes to goals and policies in Chapter 5: Housing

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

Policies were added, removed or revised to reflect feedback from the public, PEGs and intergovernmental partners during review of the Working Draft. Some policy sections were also restructured and much of the narrative and policy text was edited to improve clarity, readability, and consistency. Subpolicies, in many cases, were incorporated into related policies, promoted as a stand-alone policy, or deleted in the case of duplication.

This memo focuses on major, substantive changes to policies. It is organized by goals and the policy sections in the Proposed Draft while drawing connections to the sections in the Working Draft.

The primary changes to the Housing chapter include:

Goals

- A new goal (**Goal 5.E, High-performance housing**) was added to address the need to encourage development of green and high performance housing. This goal fills the aspirational gap tied to sustainable housing stock from the Working Draft.



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- The goal for affordable housing (**Goal 5.D Affordable housing**), was broadened to accommodate the affordability needs of a wider section of the population than just capturing resident needs' that are met best by availability of permanently affordable housing. The policy section on housing affordability includes a specific policy, Policy 5.24 (Permanently affordable housing) that covers this need and so this revision eliminates any redundancy between a goal and a policy.
- Several informational maps/tables were removed because they were more akin to commentary and not tied to any specific policy.

Diverse and expanding housing supply

- This section maps to the policies and subpolicies of the *Housing supply and variety* section in the Working Draft. Noteworthy change to the set of policies is the revision in language that clarifies the role of land use programs.
- A new policy, **Policy 5.2 Housing growth**, was added with the intent to help the City track its development activity in comparison to Portland Metro area. Further, the intent is to monitor Jobs-Housing balance as the Economic Development chapter holds a companion policy on jobs capture rate.

Housing Access

- This section maps to the policies and subpolicies of the *Housing Discrimination* section in the Working Draft. Noteworthy change to the set of policies is keeping the cluster focused on issues of housing discrimination, gentrification/displacement risk, and aging in place. The set of locational policies were moved to a separate distinct section. Policy language was amended to highlight the land use connection.
- Some fair housing policies prohibiting discrimination in the housing market and making reasonable accommodation (formerly policy 2.4 and subpolicy 2.4.b.) have been deleted in the Proposed Draft because enforcing fair housing act requirements are not land use decisions or programs.
- A new policy, **Policy 5.11 Impact analysis**, was added in response to recent significant rule changes to the federal Fair Housing Act and to further strengthen the City's efforts to address housing discrimination.
- A new policy, **Policy 5.16 Rebuild communities**, was added to respond to displacement of communities of color from neighborhoods of historic significance like North/Northeast Portland.
- Subpolicy on mobile home parks (formerly subpolicy 2.6.b.) was moved to the housing affordability section (Policy 5.30) of the Proposed Draft and subpolicy on impact of housing development on schools (formerly subpolicy 2.6.d.) was moved to the section on housing location (Policy 5.22) of the Proposed Draft for better match of policies to sectional themes.



Housing Location

- This section maps to the *Opportunity area* policy and related subpolicies (formerly Policy 2.5 and subpolicies 2.5.a., 2.5.b., and 2.5.c.) in the Working Draft. Noteworthy change to the set of policies is revisions to the policy language in ways that clarifies the land use connections.
- A new policy, **Policy 5.18, Coordinate housing needs in high poverty areas**, was added in response to suggestion from the Centers PEG and several public comments that the Working Draft lacked a policy/sub policy that addressed the needs of residents living in areas that are not only lacking in supply of affordable housing stock but are also lacking in access to active transportation, jobs, open spaces, high-quality schools and supportive services and amenities.

Housing Affordability

- This section maps to the policies and subpolicies of the *Housing affordability* section in the Working Draft. Noteworthy change to the set of policies is the revision in language that highlights the role of land use programs.
- The subpolicy on live/work units (formerly subpolicy 2.9.a) was removed from the Proposed Draft since various home occupations are allowed by the zoning code and any further revisions to the list would be undertaken through the RICAP (Regulatory Improvement Code Assessment Package) process.
- A new policy, **Policy 5.33, Compact single-family options** was added to provide framework to encourage preservation and production of small units as a tool to address housing affordability.
- **Policy 5.34, Affordable homeownership** was revised from its version in the Working Draft to highlight the role of land use programs rather than housing programs. References to programs intended to bridge the gaps in homeownership rates among various racial/ethnic groups were removed on the recommendation of the City Attorney because they are not within the scope of things that a Comprehensive Plan can impact – they are not land use programs. The deletion of these policies were not based on their merit as City policies, but rather on their appropriateness for the Comprehensive Plan.
- The set of policy and relevant subpolicies on homelessness (formerly policy 2.11) was moved from affordability to create a separate and distinct section covering homelessness.

Homelessness

- This section relates to the *Homelessness* policy and related subpolicies (formerly Policy 2.11 and subpolicies 2.11.a, 2.11.b. and 2.11.c.) in the Working Draft. Noteworthy change to the set of policies is revisions to the policy language in ways that clarifies the land use connections.
- Some homelessness policies were removed on the recommendation of the City Attorney because they are not within the scope of things that a Comprehensive Plan can impact – they are not land



use programs. The deletion of these policies were not based on their merit as City policies, but rather on their appropriateness for the Comprehensive Plan.

Health and safety

- This section maps to the policies and subpolicies of the *Health and safety* section in the Working Draft. Noteworthy change to the set of policies is the revision in language that highlights the role of land use programs.
- Subpolicies related to maintenance of existing housing stock (formerly subpolicies 2.13.b. through 2.13.e, 2.13.g and 2.13.h.) were removed from the Proposed Draft since these policies are implemented through programs and projects that are beyond the scope of the Comprehensive Plan. They are not land use programs.
- A new policy, **Policy 5.42, High-performance housing** was added to carry out the related goal on encouraging High-performance housing.





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MEMO

DATE: September 16, 2014
TO: Joe Zehnder and Eric Engstrom
FROM: Steve Kountz
SUBJECT: Changes to Chapter 6: Economic Development

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

This memo summarizes the changes made to Chapter 3, Economic Development (now Chapter 6). Policies were added, removed or revised to reflect feedback from the public, PEGs and intergovernmental partners during review of the Working Draft. Some policy sections were also restructured and much of the narrative and policy text was edited to improve clarity, readability, and consistency.

Primary changes to the Economic Development chapter include:

- The policies in the **Transportation and Public Facilities section** of Chapter 3 were moved to the Urban Form, Public Facilities, and Transportation chapters (Chapters 3, 8 and 9 respectively) and reworded, in order to better integrate economic considerations into implementation direction. This change is consistent with the approach taken in other chapters. We also added cross-references to these other chapters as an extra communication step. The concept of multimodal freight hub growth is now a goal in Chapter 9. Transit-oriented employment areas are addressed in Policy 3.47. Investment in the transportation system to support full utilization of vacant and underutilized lands is an element of the City's economic development strategy. Policies 9.31 through 9.33 address this.
- New policies were added to the Industrial and Employment Districts section to incorporate the strategies advanced in the **Industrial Land/Watershed Health** Working Group to overcome growth



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capacity shortfalls and improve watershed health. These changes address one of the main tensions brought up between chapters in comments on the working draft.

- Several West Hayden Island policies were added that clarify its map designation, development limitations, and future job growth capacity expectations.
- New policies were added to the Land Development section to strengthen the City’s regulatory **business climate**. These changes address one of the main themes of the comments by the Economic Development PEG, business workshop participants, and business representatives.
- Wording changes recommended by the City Attorney to clarify the scope of impact of the Comprehensive Plan. In some instances policies were re-worded to emphasize “coordination” or “alignment” with other economic development programs, while making it clearer that those programs are not land use programs.
- Some economic development and workforce development policies were removed on the recommendation of the City Attorney because they are not within the scope of things that a Comprehensive Plan can impact – they are not land use programs.
- New policies and clarification were added to the **Equitable Household Prosperity** section addressing income self-sufficiency, East Portland job growth, and Minority-Owned, Woman-Owned, and Emerging Small Business (MWESB) assistance. These changes respond to another theme of comments received to more clearly connect the dots between equity and economic development.
- Introductory statements were added about the economy being dynamic and increasingly competitive, with need to adapt to technology, social change, and global trends.
- New policies were added to the **Diverse, Expanding City Economy** section calling out other benefits sought through economic growth (fiscal stability, economic resilience, low-carbon economy, and the sharing economy) and additional location strengths that support growth (business environment and small business development). Many commenters suggested adding policies to support growth for specific industries or business types. Instead, policies in this section support economic diversity overall and balanced growth.
- The citywide **brownfield redevelopment metric** in the Land Development section was reduced from 80% to 60% of brownfield acreage by 2035 in order to set an implementation target that is both aspirational and realistic.
- New policies were drafted on **Multimodal Freight Corridors**, comparable to Civic Corridors, and then moved to Chapter 9 to eliminate duplication. These policies call for integrated direction on land use, transportation, and economic development.
- Central City policies were combined into a brief **Central City section**, consistent with the other employment land use sections on Industrial Districts, Campus Institutions, and Neighborhood



Business Districts. We also added a cross reference to the more complete set of Central City policies in the Central City 2035 plan.

- The **Centers policies** were integrated into the Neighborhood Business Districts section, where they are geographically located.





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MEMO

DATE: September 16, 2014

TO: Joe Zehnder and Eric Engstrom

FROM: Roberta Jortner

CC: Sallie Edmunds, Rachael Hoy, Shannon Buono, Marie Walkiewicz

SUBJECT: Summary of changes to Chapter 7, Environment and Watershed Health (formerly Chapter 4 in the Working Draft)

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

This memo focuses on Chapter 7, Environment and Watershed Health. Between the Working Draft and the Proposed Draft, policies were added, removed or revised to reflect feedback from the public, PEGs and inter-governmental partners, and specialists in equity-related issues, during review of the Working Draft. Some changes also reflect public comments received during Part 2 of the Comprehensive Plan update, where such comments related to the draft goals and policies.

Changes also include restructuring of some policy sections, addition of narratives to introduce policy sections, and policy text edits to improve clarity, readability, and consistency. Former sub-policies were consolidated or incorporated into related policies, elevated to stand-alone policies, or deleted to reduce duplication. Some policies were consolidated to reduce redundancy within or between Comp Plan chapters, or were moved to other chapters. Key changes are outlined below.



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Chapter Title – was updated to put the broader concept first.

Goals

- **Goal 7.A Climate**, has been added, linking the City’s carbon emission reduction goals and with its commitment to a healthy environment and watersheds.
- Working draft goals were streamlined somewhat, and the array of benefits associated with a quality environment and healthy watersheds has been incorporated into the chapter introduction – “What’s this chapter about?” And “Why is this important?”.
- **Goal 7.E Community stewardship**, has been added, responding to public comments that the Comp Plan should recognize and support the community as a partner in maintaining a quality environment and healthy watersheds.
- **Goal 7.B. Healthy Watersheds and the Environment**, has been simplified, and provide clearer intention to both maintain ecosystem and ecological functions, and to improve watershed conditions over time.
- **Goal 7.D. Environmental Equity**, formerly titled Environmental Justice, has been renamed in response to comments that the former title was not appropriate since the policy didn’t comport with the federal definition of environmental justice. Environmental justice, which focuses on public participation and access to decision-making is addressed in other chapters of the Comprehensive Plan.

Policies

The citywide policies in this chapter have been reorganized into three sections. One sections provides policy guidance for land use and infrastructure planning, while another applies in the context of evaluating development proposals. A third section provides overarching direction to improve environmental quality and avoid environmental degradation.

Planning for natural resource protection

- **Policy 7.1 Environmental quality**, includes additional language that links air, water, and soil quality to public health and safety.
- **Policy 7.2 Climate Action**, has been added to call for continued update and implementation of the City’s Climate Action Plan.
- **Policies 7.5 Natural Resource Inventory, 7.6 Environmental protection programs, and 7.7 Environmental protection program updates**, were added. These policies establish the City’s intention to maintain and improve its environmental protection programs (required by State Land Use Planning Goal 5) based on: 1) the best available scientific data and information, and 2)



evaluation of tradeoffs, impacts on under-served and under-represented communities, and ability to meet multiple city goals.

- **Policy 7.8, Land acquisition priorities and coordination**, has been added, carrying over existing Comprehensive Plan policy into the updated Comprehensive Plan. This policy and recognizes the importance of this investment tool as part of the City’s programs to protect and conserve water quality and natural resource function, extend the life of City infrastructure facilities, and comply with state and federal regulatory mandates. This policy also calls for coordinating willing-seller land acquisition with other city programs, including efforts to maintain adequate land capacity to meet the demand for industrial and employment jobs.

Protecting natural resources in development situations

- Working draft policies to **address cumulative impacts** and **sustain the carrying capacity of air, land and water resources** have been eliminated but the policy direction is generally carried forward in the Proposed Draft. **Policy 7.9** calls for evaluation of potential adverse impacts of development, which would also include addressing cumulative adverse impacts. And the combined effect of Chapter 7 policies to protect and improve environmental quality and watershed health will help to sustain carrying capacity. Although the PEG supported the former draft policy, using the term carrying capacity in the policies is problematic since there is no widely accepted approach to evaluate and measure impacts on carrying capacity.
- **Policy 7.11 Mitigation effectiveness**, has been retitled and revised. The new title places additional emphasis on mitigation success. The revised text retains the general preference to mitigate on site or as close to the impact on natural resources as possible. However, the revised policy now provides direction to mitigate off-site if to do so would improve mitigation effectiveness. The narrative introducing this policy section retains the intention that unavoidable impacts on significant natural resources be fully mitigated.
- **Policy 7.12 State and federal coordination**, has been added, establishing the intent that Comprehensive Plan implementation and state and federal permitting activities be coordinated to be as efficient and well-integrated as possible.
- **Policy 7.13 Ecosystem services**, has been added, recognizing that the services are an integral component of natural resource functions and must be considered in evaluating new development proposals.



Improving environmental quality and preventing degradation

- **General**— Several policies in this section were updated as recommended by the City Attorney to clarify the Comp Plan’s scope of impact. Policies were re-worded to emphasize “coordination”, “consistency”, and “advancing efforts” pertaining to urban forest management, watershed planning, and stormwater programs, to make clear that these important related efforts are not land use programs.
- **Policies 7.14 Air quality** and **7.16 Water quality**, include new language calling for consideration of health impacts on all Portlanders, with an emphasis on under-served and under-represented communities. This responds to extensive public comment regarding the importance of clean air and water as key equity issues.
- **Policies 7.15 Hydrology, 7.16 Water quality, 7.17 Habitat and biological communities, and 7.18 Habitat connectivity**, reflect and provide explicit support for Portland Watershed Management Plan goals and objectives.
- The former **Policy 4.7 Habitat Corridors**, was consolidated and moved to Chapter 3, Urban Form, where it establishes direction for the Urban Design Framework. **Policy 7.18 Habitat connectivity**, is retained in this chapter and provides specific guidance to maintain and improve ecological function.
- **Policy 7.19 Urban forest**, has been consolidated and updated to establish direct links and directions for land use planning and infrastructure investment, and to explicitly support the achievement City tree canopy targets.
- **Policies 7.22, Natural hazards, 7.23 Low-impact development and best practices, 7.25 Hazards to Wildlife, and 7.26 Access to Nature**, have been consolidated, reworked and moved from Chapter 4, Design and Development (formerly Chapter 5 in the Working Draft) to improve Chapter 7 cohesiveness and reduce redundancy between chapters. These policies should be viewed holistically with policies in Chapter 4 sections entitled Designing with Nature and Hazard-resilient Development.
- **Policies 7.27 Carbon Sequestration** and **7.28 Climate adaptation and resilience**, have been added, responding to comments that the Working Draft did not provide sufficient direction or support for the City’s climate change related goals and plans.
- **Policy 7.28 Brownfield remediation**, was added to recognize its importance to environmental quality and watershed health. The policy also calls integrating ecological restoration into brownfield clean-up and redevelopment, which is a component of the proposal Industrial Land/Watershed Health strategy.
- **Policies 7.31 Restoration partnerships** and **7.33 Community Stewardship**, have been added to support cost-effective investment in watershed restoration and foster community participation



in improving watershed health through land use planning and infrastructure project and program-related investments.

- **Policy 7.32 Coordinated stormwater management**, has been added, recognizing the opportunity to improve watershed health and make best use of public dollars by coordinating stormwater and transportation system planning.
- The former **Policy 4.15, Efficient use of land**, was deleted (as was a similar policy in from the former Chapter 3 Economic Development), since this concept should apply as a broad planning principle rather than in the context of specific policy topics.
- The **Scenic Resources Policies**, were updated and moved to Chapter 4 Design and Development, and are presented prior to the **Historic and Cultural Resource Policies**.
- The **Watershed-specific policies** have been updated to reduce redundancy with citywide policies, provide more specific guidance relative to the distinct characteristics and resource management issues of Portland's individual watersheds. The narrative section explains the role and function of these policies, which are to support the goals of the Portland Watershed Management Plan through implementation of the Comprehensive Plan.





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MEMO

DATE: September 16, 2014
TO: Eric Engstrom and Joe Zehnder
FROM: Michelle Kunec-North
CC: Crim, Michele
SUBJECT: Summary of changes to Chapter 8: Public Facilities and Services

The purpose of this memo is to summarize changes made from the Working Draft to the Proposed Draft. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

This memo summarizes the changes made to Chapter 6. Public Facilities and Services (now Chapter 8). Policies were added, removed or revised to reflect public and agency feedback made during review of the Working Draft. Some policy sections were also restructured and much of the narrative and policy text was edited to improve clarity and readability. Sub-policies, in many cases, were incorporated into related policies, promoted as a stand-alone policy, or deleted in the case of duplication.

The primary changes to the Public Facilities and Services chapter include:

- The City Attorney's Office recommended that Comprehensive Plan policies be more closely limited to those related to **land use decisions**. This recommendation resulted in the deletion of programmatic, operational, and financial policies that were not related to land use decisions. The deletion of these policies were not based on their merit as City policies, but rather on their appropriateness for the Comprehensive Plan. In addition, policy language was amended throughout the chapter to tie policies to the provision of public facilities and other applicable land use decisions.
- Policies that re-iterate the need to comply with state of federal mandates were removed.



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- The order and structure of the former “**General Policies**” (Policies 8-1 through 8-36) was revised for better clarity. The policies were also divided into six topic-specific sections: service provision, service coordination, service extension, public investment, funding, and community benefits.
- Policies formerly included in system-specific sections that pertained to all infrastructure services (such as policies related to maintenance) were moved to the general policy sections (Policies 8-1 through 8-32). This improved the accuracy and applicability of these policies and reduced redundancies.
- Policies in the “**Service provision**”, “**service coordination**” and “**service extension**” sections were revised to accurately reflect service providers and ensure adequate policies for annexation. In addition, Policy 8.3. Supporting facilities and systems, was added to reflect the contribution of supporting City facilities, such as public buildings, fleet, and technology, in providing infrastructure services.
- New policies were added to the “**Public Investment**” section to support a balanced infrastructure investment approach that includes maintaining existing infrastructure; meeting regulatory requirements; providing basic services equitably throughout the city; protecting and improving safety; upgrading infrastructure systems; and serving new residents as the city grows.
- Policies in the “**Funding**” section were added or revised to support cost-effective and equitable service provision and the consideration of lifecycle costs.
- The “**Community Benefits**” sections was revised to add support for community participation in public facility planning and design. In addition, Policy 8.28 relates public facility planning and design to the Guiding Principles described in Chapter 1, which include equity and environmental justice, economic prosperity, human health, environmental health, and resilience. This new policy replaces former policies specific to each of these topics.
- Policies were added to the “**Public rights-of-way**” to support appropriate commercial functions and encourage integration of green infrastructure within rights-of-way.
- Street vacation policy was re-written to be more general. The intent is that some of the code-like provisions of the current policy will be incorporated into Title 17 during Task 5.
- “**Sanitary sewer**” policies related to subsurface disposal and sewer connections were clarified.
- Policies in the “**Stormwater system**” section were clarified to reflect the role of both grey infrastructure (e.g. pipes) and public and private green infrastructure (e.g. natural systems and features like streams, wetlands and trees) in the City’s stormwater management system.
- A new “**Flood Management**” policy section was added to address the City’s and partners’ roles in floodplain protection and restoration as well as flood conveyance and management.



- New Public Trails and Recreation Facilities policies were added to the “**Parks and Recreation**” section to address provision of these facilities. A trail system map was also added.
- Policies in the “**Public safety and emergency response**” section were revised to more clearly reflect the need for Emergency response and recovery planning and to prepare for and respond to both natural and human-caused disasters.
- Policies in the “**School facilities**” section were added to support pedestrian and bike-friendly access to schools and greater collaboration with private institutions.
- Policies in the “**Technology and communications**” section were revised to apply broadly to technology and communications infrastructure, including broadband. Policies were also added to support investment to preserve and enhance capacity and reliability in both the City’s and private technology’s communication systems.





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MEMO

DATE: September 16, 2014

TO: Joe Zehnder, Eric Engstrom

FROM: Courtney Duke, Rodney Jennings

SUBJECT: Summary of changes made to Working Draft Chapter 7: Transportation in Proposed Draft Chapter 9: Transportation

The purpose of this memo is to summarize changes made from the Working Draft Chapter 7 Transportation to the Proposed Draft Chapter 9 Transportation. This provides additional context for the current draft, especially for people who participated in the writing or review of earlier drafts. We value public participation, and this memo helps provide additional transparency for the many people who have had input into this plan.

Policies were added, removed or revised to reflect feedback from the public, PEGs and intergovernmental partners during review of the Working Draft. Some policy sections were also restructured and much of the narrative and policy text was edited to improve clarity, readability, and consistency. Changes are summarized in sequential order below. However, they can be sorted into four types, which are:

- 1) Substantive changes to goals and policies;
- 2) New goals and policies;
- 3) Movement of policies from another chapter into the transportation chapter;
- 4) Expansion of single policies with multiple sub-policies into multiple policies;

The primary changes to Chapter 9: Transportation include:

- A new explanation of the Transportation System Plan (TSP) was added to the chapter introduction and a diagram was added at the end of the chapter showing the relation of the TSP to other plans.
- Goals 9.G and 9.H were added. They address safety and cost effectiveness.



- Working draft Policy 7.1 Street design provided general outlines of what factors should be considered when designing streets. It has been replaced with proposed draft Policy 9.1 Street design classifications, which provides a specific reference to street design classifications that will be in the Transportation System Plan, and which will provide details of intended design of streets based on their classification.
- Working draft policy 7.1 Street design has been augmented in the proposed draft with additional policy groupings under the headings **Land use, development, and placemaking** and **Street as public spaces**. The policies located under these groupings provide guidance for how street design should relate to surrounding land uses and how the use of streets as public spaces should be reflected in their design. The policies under **Land use, development, and placemaking** are Policy 9.10 Land use and transportation coordination, Policy 9.11 Growth strategy, Policy 9.12 Centers, Corridors, and Transit Station Areas and Policy 9.13 Development and street design. The policies under **Streets as public spaces** are Policy 9.14 Streets for transportation and public spaces, Policy 9.15 Repurposing street space, Policy 9.16 Design with nature, and Policy 9.17 Street views. Policy 9.16 Design with nature was re-worded based on a recommendation from BES.
- Working draft Policy 7.6 Green and active transportation hierarchy (which is Policy 9.6 Transportation hierarchy for people movement in the proposed draft) has been changed to recognize the special needs of the freight mode by taking freight out of the policy and creating a separate freight policy, Policy 9.7 Moving Goods and delivering services. Changes were also made in the list of factors in the transportation hierarchy that are to be considered when implementing the hierarchy. This change was made to make it clear how the factors will be considered when prioritizing modes. Also, the hierarchy was modified to address zero emission vehicles.
- A deficiency identified in the Working Draft was a lack of policies related to facilities for air transport. Two new policies, policy 9.37 Portland International Airport, and 9.38 Portland Heliport were created for the Proposed Draft.
- Some policies were moved into Chapter 9 from chapters other than Working Draft Chapter 7. They are found mostly in the Chapter 9 policy group **Streets as public spaces**. These include Policy 9.14 Streets for transportation and public spaces, Policy 9.15 Repurposing street space, Policy 9.16 Design with nature, and Policy 9.17 Street views. These policies were previously found in the public facilities and urban design chapters. Because they relate to uses occurring within public streets and the design of streets as it relates to those uses, they have been consolidated at this location.
- Policy 9.57 Telecommuting was added back in after having been deleted in an earlier draft.
- There were 32 policies in the working draft transportation chapter 7 and there are 59 policies in the proposed draft transportation chapter 9. Most of these additional policies are the result of



the expansion of one policy that had multiple sub-policies into multiple policies. Chapter 7 policies that were expanded into multiple policies in chapter 9 include:

- Policy 7.8 Pedestrian transportation became Policy 9.18 Pedestrian transportation, Policy 9.19 Pedestrian networks, and Policy 9.20 Pedestrian safety and accessibility.
- Policy 7.9 Bicycle transportation became Policy 9.21 Bicycle transportation, Policy 9.22 Accessible bicycle system, and Policy 9.23 Bicycle classifications.
- Policy 7.10 Public Transportation became Policy 9.24 Public transportation, Policy 9.25 Transportation to job centers, Policy 9.26 Transit service, and Policy 9.27 Transit equity. These policies were also re-worded to emphasize the partnership role with Trimet.
- Policy 7.13 Multimodal freight system became Policy 9.7 Moving goods and delivering services, Policy 9.31 Multimodal goods movement, Policy 9.32 Multimodal system and hub, Policy 9.33 Freight network, Policy 9.34 Sustainable freight system, Policy 9.35 Freight rail network, and Policy 9.36 Portland Harbor. Freight policies were also updated to incorporate concepts previously located in the Economic Development chapter.
- Policy 7.14 Automobile transportation became Policy 9.39 Automobile transportation, and Policy 9.40 Automobile efficiency.
- Parking policies were rewritten and reorganized on the recommendation of PBOT management. Policy 7.22 Parking management became Policy 9.48 Parking management, Policy 9.49 Central City and centers parking, Policy 9.50 On-street parking, Policy 9.51 Off-street parking, Policy 9.52 Share space and resources, and Policy 9.53 Bicycle parking.

