

Exhibit C – Revised  
Code Reconciliation Project – Supplemental Findings

## Findings on Portland’s Comprehensive Plan, Goals and Policies

### The Plan: Guiding Principles

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

*The amendments support Economic Prosperity the following reasons. The amendments revise allowances for office uses in multiple plan districts in various parts of the city, including East Portland, to make them consistent with the 2035 Comprehensive Plan. Office uses provide for employment opportunities.*

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

*The amendments support Human Health for the following reasons. The amendments further effective implementation of the 2035 Comprehensive Plan, which was developed, in part, to better address human health in Portland. These amendments further support this goal by specific changes that limit some non-active land uses in pedestrian and transit oriented locations, and emphasize transportation safety and alternative modes in land use decisions. These provisions emphasize active pedestrian-oriented land uses which helps to reduce reliance on auto travel and has air quality benefits, and create a safer transportation system which reduces physical health risk.*

3. **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 amendments support Environmental Health for the following reasons. The amendments support landscaping requirements in new Commercial/Mixed Use zones. Landscaping and trees may provide multiple environmental benefits, including reducing urban heat island effects, improving air quality, and providing habitat. The amendments also limit some non-active and auto-oriented land uses in pedestrian and transit oriented locations, and emphasize transportation safety and alternative modes in land use decisions.*

4. **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 amendments support Equity for the following reasons. The amendments extend the adopted Inclusionary Housing zoning requirements to the adopted 2035 Comprehensive Plan implementing zoning code. They also further the provision of affordable commercial*

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*space through bonuses in Commercial/Mixed Use zones. Both provisions are aimed to address equity issues in Portland.*

5. **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 amendments support Resilience for the following reasons. The amendments include updates to provide more affordable housing options, more affordable commercial space options, and to improve environmental conditions by requiring more landscaping and greening in development in Portland. These changes will help meet the city's resiliency goals in the future.*

### The Plan: Goals

6. **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.

*The amendments support Goal 1.D for the following reasons. The amendments revise elements of the Portland Zoning Code to better comply with and implement the Comprehensive Plan. The amendments align existing zoning regulations with newly adopted zoning designations and regulations by changing code references and updating development standards and requirements where necessary for effective implementation.*

### The Plan: Policies

#### The Comprehensive Plan

##### Implementation tools

7. **Policy 1.4, Zoning Code.** Maintain a Zoning Code that establishes the regulations that apply to various zones, districts, uses, and development types.

*The amendments support Policy 1.4 for the following reasons. The amendments revise various elements of the Portland Zoning Code to better comply with and implement the 2035 Comprehensive Plan. The amendments align existing zoning regulations with newly adopted zoning designations and regulations by changing code references and updating development standards and requirements where necessary to ensure effective implementation of the Comprehensive Plan by aligning development regulations. The amendments address several specific types of uses and districts.*

##### Administration

8. **Policy 1.10, Compliance with the Comprehensive Plan.** Ensure that amendments to the

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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 as a whole 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.

*The amendments support Policy 1.10.a for the following reasons. The amendments support the Comprehensive Plan Guiding Principles as show herein in previous findings.*

17. **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.

*The amendments support Policy 1.16 for the following reasons. The PSC held a public hearing and took testimony on the amendments on October 24, 2017. The PSC deliberated and held work sessions on November 14, 2017, December 12, 2017 and January 9, 2018. The PSC amended the proposal and voted on January 9, 2018 to recommend the proposal as amended to Portland City Council for adoption.*

### Community Involvement: Goals

18. **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.

*The amendments support Goal 2.E for the following reasons. The project conducted outreach to several different neighborhood groups and communities in the initial project phase to engage interested parties in changes that were more substantive than technical. The project included an analysis of populations that are not English proficient to determine if additional outreach to such communities was warranted for situations where a substantive change was contemplated. The project process included mailed notification to owners of property where uses allowed by zoning will change; this notice included information in multiple languages, further providing an opportunity for stakeholders to engage with decision makers. More information about public participation is included in the Code Reconciliation Project – Recommended Draft (Exhibit A).*

### Community Involvement: Policies

#### Transparency and accountability

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19. **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.

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

**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.

**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.

*The amendments are supportive of and consistent with Policies 2.12-2.15 for the following reasons. The process for developing and approving these amendments included public notification and information sharing at the outset. Because the amendments are largely technical, extra emphasis was placed on outreach to specific geographies where more potentially substantive change was anticipated. This is addressed in the Code Reconciliation Project – Recommended Draft (Exhibit A). In addition, a Discussion Draft was published and two public drop-in informational sessions were held to inform interested parties and answer questions. The process included a public hearing by the Planning and Sustainability Commission and Portland City Council. Notification about the public hearings was sent to a broad array of community members. Feedback from meetings, and testimony from hearings is documented and has been responded to as directed by the recommending and decision-making bodies.*

### Process design and evaluation

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

*The amendments support Policy 2.27 for the following reasons. The project primarily focused on technical amendments that align code. In some cases, more substantive amendments are also proposed. The project included an analysis of demographics and specifically populations that are not English proficient to determine if additional outreach to such communities was warranted for situations where a more substantive change was contemplated. Additional information is in the Code Reconciliation Project – Recommended Draft (Exhibit A).*

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### Information design and development

21. **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 both property owners and renters.

*The amendments support Policy 2.39 for the following reasons. The project notified a broad range of community members through email updates and other notifications throughout the process. The project included a mailed and emailed legislative notice to a variety of stakeholders, including organizations that represent underrepresented communities. The project included a mailed notification to owners of property where uses allowed by zoning will change; this notice included information in multiple languages, further providing an opportunity for stakeholders to engage with decision makers. For more information about public participation and notifications, refer to the Code Reconciliation Project – Recommended Draft.*

22. **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.

*The amendments support Policy 2.40 for the following reasons. A project website was maintained and regularly updated with relevant information. Periodic project updates were provided via meeting appearances (project specific meetings, neighborhood associations, district coalitions, DRAC, CWLUG, etc.) and via email.*

23. **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.

*The amendments support Policy 2.41 for the following reasons. The project included an analysis of populations that are not English proficient to determine if additional outreach to such communities was warranted for situations where a substantive change was contemplated. The project included a mailed notification to owners of property where uses allowed by zoning will change; this notice included information in multiple languages, providing an opportunity for stakeholders to engage with decision makers. For more information about public participation and notifications, refer to Exhibit A the Code Reconciliation Project – Recommended Draft.*

### Urban Form: Policies

#### Citywide design and development

24. **Policy 3.3, Equitable development.** Guide development, growth, and public facility investment to reduce disparities; encourage equitable access to opportunities, mitigate the impacts of development on income disparity, displacement and housing affordability; and produce positive outcomes for all Portlanders.

**3.3.d,** Incorporate requirements into the Zoning Code to provide public and

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community benefits as a condition for development projects to receive increased development allowances.

*The amendments support Policy 3.3.d for the following reasons. The amendments provide public benefits; they support equitable housing and affordable housing opportunity by including provisions that implement Inclusionary Housing by providing for affordable housing bonuses in the adopted base zones of the zoning code. They also update plan districts to include Inclusionary Housing bonuses to allow for feasible development. Further, the provisions further the goal of providing affordable commercial space in development by amending provisions for an affordable commercial space bonus in the Commercial/Mixed Use Zones.*

### Corridors

25. **Policy 3.48, 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 amendments support Policy 3.48 for the following reasons. The amendments maintain landscaping requirements in the adopted Commercial/Mixed Use zones, which provides and opportunity tree planting and other green infrastructure and landscape features.*

### Civic Corridors

26. **Policy 3.50, 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.

*The amendments support Policy 3.50 for the following reasons. The amendments include provisions that will require design review for Self-Service Storage uses, as well as active ground floor uses when low-activity Self-Service Storage facilities are proposed in areas of pedestrian- and transit-oriented development such as along key corridors and near transit stations.*

### Neighborhood Corridors

27. **Policy 3.53, 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 amendments support Policy 3.53 for the following reasons. The amendments support vibrant neighborhood business districts because they include provisions that will require design review for Self-Service Storage uses, as well as active ground floor uses when low-activity Self-Service Storage facilities are proposed in areas of pedestrian- and transit-oriented development.*

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### Transit Station Areas

28. **Policy 3.54, 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.

*The amendments support Policy 3.54 for the following reasons. The amendments support transit-oriented development because they include provisions that will require active ground floor uses when low-activity Self-Service Storage facilities are proposed in areas of pedestrian- and transit-oriented developments. This will provide greater opportunity for transit-oriented development and transit-supportive concentrations of housing and jobs in key locations on corridors and adjacent to high-capacity transit stations.*

29. **Policy 3.57, 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.

**Policy 3.58, Employment stations.** Encourage concentrations of jobs and employment-focused land uses in and around stations in employment-zoned areas.

**Policy 3.59, 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.

**Policy 3.60, Destination stations.** Enhance connections between major destinations and transit facilities and strengthen the role of these station areas as places of focused activity.

*The amendments support Policies 3.57-3.60 for the following reasons. The amendments include provisions that will require active ground floor uses when low-activity Self-Service Storage facilities are proposed in areas proximate to transit stations. Self-service Storage are a component of urban development, but their location near transit stations may produce inactivity at the ground level that is inappropriate for transit rich locations.*

### Urban habitat corridors

30. **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.

*The amendments support Policy 3.65 for the following reasons. The amendments maintain landscaping requirements, which include trees, in Commercial/Mixed Use base zones. Trees can provide habitat and in development situations may help connect habitat areas.*

### Design and Development: Goals

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31. **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.

*The amendments support Goal 4.C for the following reasons. The amendments support active and sustainable design because they include provisions that will limit some non-active uses (Self-Service Storage) in pedestrian and transit oriented locations, and will help mitigate heat island effects and improve habitat through required landscaping and tree preservation. New landscaping requirements adopted in Title 33 (33.130) support planting of trees in more development situations, which increases opportunity for urban habitat, helps to mitigate urban heat islands, improves air quality and better integrates nature in urban developments.*

## Design and Development: Policies

### Contexts

32. **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 amendments support Policy 4.4 for the following reasons. The recently adopted landscaping requirements of Title 33 (33.130) provide opportunities for natural features and green infrastructure in development. These landscaping requirements are maintained in the code revisions, which supports preservation and planting of trees in more development situations. This increases opportunity for urban habitat, helps to mitigate urban heat islands, improve air quality and better integrates nature in urban developments.*

33. **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 amendments support Policy 4.5 for the following reasons. The amendments include provisions that will require design review for Self-Service Storage uses; these design provisions foster pedestrian-oriented design. They also require active ground floor uses when low-activity Self-Service Storage facilities are proposed in areas of pedestrian- and transit-oriented development.*

34. **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.



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*The amendments support Policy 4.6 for the following reasons. The amendments include provisions that will require design review for Self-Service Storage uses; these design provisions foster pedestrian-oriented design. They also require active ground floor uses when low-activity Self-Service Storage facilities are proposed in areas of pedestrian- and transit-oriented development. The amendments also include dimensional and orientation standards for active uses when they are required.*

#### Transitions

35. **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.

*The amendments support Policy 4.31 for the following reasons. The amendments include new provisions for exterior development in Employment and Industrial base zones that require setbacks from adjacent residential and commercial zones and landscaping. These features serve as a buffer/transition and are applied more broadly than they were previously, affecting and providing transitional elements in more situations.*

36. **Policy 4.32, Industrial edge.** Protect non-industrially zoned parcels from the adverse impacts of facilities and uses on industrially zoned parcels through the use of 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.

*The amendments support Policy 4.32 for the following reasons. The amendments include provisions for exterior development in Employment and Industrial base zones that require setbacks from adjacent residential and commercial zones and landscaping. These features serve as a buffer/transition and are applied more broadly than they were previously, affecting and providing transitional elements in more situations.*

#### Off-site impacts

37. **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 particular attention to limiting and mitigating impacts to under-served and under-represented communities.

*The amendments support Policy 4.33 for the following reasons. The amendments include provisions for exterior development in Employment and Industrial base zones that require setbacks from adjacent residential and commercial zones and landscaping. These features serve as a buffer/transition and are applied more broadly than they were previously, affecting and providing transitional elements that help mitigate impacts in more situations.*

#### Resource-efficient design and development

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38. **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.

*The amendments support Policy 4.65 for the following reasons. The adopted zoning code includes a planned development bonus that has a requirement for energy-efficient buildings. Development of administrative rules and guidelines for energy efficient building required for planned development bonuses in Commercial/Mixed Use zones is a component of the implementation work for this project.*

39. **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.

*The amendments support Policy 4.68 for the following reasons. The adopted zoning code includes a planned development bonus that has a requirement for energy-efficient buildings. Development of administrative rules and guidelines for energy efficient building required for planned development bonuses in Commercial/Mixed Use zones is a component of the implementation work for this project.*

### Designing with nature

40. **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.

*The amendments support Policy 4.73 for the following reasons. The amendments will incorporate trees and vegetation in development because they continue and further the landscaping requirements of the new Commercial/Mixed Use and Employment and Industrial base zones. This supports preservation and planting of trees in more development situations.*

### Hazard-resilient design

41. **Policy 4.83, Urban heat islands.** Encourage development, building, landscaping, and infrastructure design that reduce urban heat island effects.

*The amendments support Policy 4.83 for the following reasons. The amendments will reduce heat island effects because they continue and further the landscaping requirements of the new Commercial/Mixed Use and Employment and Industrial base zones. This supports preservation and planting of trees in more development situations and helps to mitigate urban heat islands, improve air quality and better integrate nature in urban developments.*

### Housing: Goals

42. **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.

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*The amendments support Goal 5.D for the following reasons. The amendments reconcile and weave-in inclusionary housing requirement through affordable and other housing bonuses in the new 2035 Comprehensive Plan Commercial/Mixed Use zones, Campus Institutional, and other base zones. They also integrate Inclusionary Housing and bonus provisions into multiple plan districts applied throughout the city.*

## Housing: Policies

### Housing affordability

43. **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.

*The amendments support Policy 5.26 for the following reasons. The amendments support development of additional affordable units. They reconcile and weave-in inclusionary housing requirement through affordable and other housing bonuses in the new 2035 Comprehensive Plan Commercial/Mixed Use zones, Campus Institutional, and other base zones. They also integrate Inclusionary Housing and bonus provisions into multiple plan districts applied throughout the city.*

44. **Policy 5.27, Funding plan.** Create a funding plan that includes financial and/or regulatory mechanisms to achieve the regulated affordable housing target set forth for 2035.

*The amendments support Policy 5.27 for the following reasons. The amendments support this for the following reasons. The amendments contain regulatory mechanisms to ensure provision of regulated affordable housing units by weaving-in inclusionary housing requirement through affordable and other housing bonuses in the new 2035 Comprehensive Plan Commercial/Mixed Use zones, Campus Institutional, and other base zones. They also integrate Inclusionary Housing and bonus provisions into multiple plan districts applied throughout the city.*

45. **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.

*The amendments support Policy 5.35 for the following reasons. The amendments reconcile and weave-in inclusionary housing requirement through affordable and other housing bonuses in the new 2035 Comprehensive Plan Commercial/Mixed Use zones, Campus Institutional, and other base zones. They also integrate Inclusionary Housing and bonus provisions into multiple plan districts applied throughout the city.*

## Economic Development: Policies

### Land development

46. **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:

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**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.

*The amendments support Policy 6.16 for the following reasons. The amendments offer clear development standards for most types of projects. The amendments include new standards for transitions between Employment and Industrial zones and Residential zones that are applied uniformly for predictability. They also allow use of design standards in many Commercial/Mixed Use buildings that are 55 feet or less in height. Discretionary design review is generally reserved for projects of a large scale (over 55 feet tall) or in other situations, such as historic districts or in the Central City, where a discretionary review is required.*

#### **Campus institutions**

47. **Policy 6.60, Campus edges.** Provide for context-sensitive, transitional uses, and development at the edges of campus institutions to enhance their integration into surrounding neighborhoods, including mixed-use and neighborhood-serving commercial uses where appropriate.

*The amendments support Policy 6.60 for the following reasons. The amendments include provisions for transitional residential densities in areas adjacent to sites zoned for Campus Institutional uses. They also include new development standards to more uniformly address and improve development at edges of campuses.*

#### **Neighborhood business districts**

48. **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. The amendments support this for the following reasons.

**6.70.b,** Encourage the preservation and creation of affordable neighborhood commercial space to support a broad range of small business owners.

*The amendments support Policy 6.70 for the following reasons. The amendments foster the provision of affordable commercial space in Commercial/Mixed Use zones through an affordable commercial space bonus.*

### **Environmental and Watershed Health: Policies**

#### **Improving environmental quality and resilience**

49. **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.

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**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 support Policy 7.4 for the following reasons. The amendments continue landscaping requirements in Commercial/Mixed Use zones where none previously existed. Planting trees as required enhances the urban forest, increase tree canopy overall, and are beneficial in mitigating urban heat island effects.*

50. **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 support Policy 7.5 for the following reasons. The amendments help to improve air quality and mitigate heat island effects by continuing the landscaping requirements in new Commercial/Mixed Use zones where none previously existed. Planting trees as required enhances the urban forest, increase tree canopy overall, and are beneficial in mitigating urban heat island effects.*

51. **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.

**7.11.a, Tree preservation.** Require or encourage preservation of large healthy trees, native trees and vegetation, tree groves, and forested areas.

**7.11.c, Tree canopy.** Support progress toward meeting City tree canopy targets.

**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.

*The amendments support Policy 7.11 for the following reasons. The amendments help to improve air quality and mitigate heat island effects by continuing the landscaping requirements in new Commercial/Mixed Use zones where none previously existed. Planting trees as required enhances the urban forest, increase tree canopy overall, and are beneficial in mitigating urban heat island effects.*

## Public Facilities and Services: Policies

### Parks and recreation

52. **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. *See also Policy 7.10.*

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*The amendments support Policy 8.98 for the following reasons. The amendments help to provide green infrastructure by continuing the landscaping requirements in new Commercial/Mixed Use zones where none previously existed. Planting trees as required enhances the urban forest, increase tree canopy overall, and are beneficial in mitigating urban heat island effects.*

### Transportation: Goals

53. **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.

*The amendments support Goal 9.A for the following reasons. The amendments revise the evaluation factors for some quasi-judicial land use reviews in 33.815 by emphasizing safety more prominently in evaluation factors.*

54. **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.

*The amendments support Goal 9.B for the following reasons. The amendments meet multiple goals by revising the evaluation factors for some quasi-judicial land use reviews in 33.815 by emphasizing safety more prominently in evaluation factors. They also support multimodal goals by calling for multimodal evaluations, and system improvements for pedestrians and bicyclists.*

### Transportation: Policies

#### System management

55. **Policy 9.44, System management.** Give preference to transportation improvements that use existing roadway capacity efficiently and that improve the safety of the system for all users.

*The amendments support Policy 9.44 for the following reasons.*

*The amendments revise evaluation factors and the approval criteria for some quasi-judicial land use reviews in Chapter 33.815 by emphasizing safety in evaluation factors and multi-modal options in mitigation measures.*

56. **Policy 9.48, Performance measures.** Establish multimodal performance measures and measures of system completeness to evaluate and monitor the adequacy of transportation services based on performance measures in goals 9.A. through 9.I. Use these measures to evaluate overall system performance, inform corridor and area-specific

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plans and investments, identify project and program needs, evaluate and prioritize investments, and regulate development, institutional campus growth, zone changes, Comprehensive Plan Map amendments, and conditional uses.

*The amendments support Policy 9.48 for the following reasons. The amendments revise evaluation factors and the approval criteria for some quasi-judicial land use reviews in Chapter 33.815 by emphasizing safety in evaluation factors and multi-modal options in mitigation measures.*

### **Parking management**

57. **Policy 9.60, 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.

*The amendments support Policy 9.60 for the following reasons. The amendments provide greater flexibility for bicycle parking in new development by amending 33.130.230.B.3 to allow a greater percentage of ground floor windows to look into bicycle parking areas.*

### **Land Use Designations and Zoning: Goals**

58. **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 amendments support Goal 10.A for the following reasons. The amendments better align the adopted zoning code with existing Title 33, Title 32, Title 11, and Title 18 provisions to more effectively implement the 2035 Comprehensive Plan.*

### **Land Use Designations and Zoning: Policies**

#### **The Zoning Map and the Zoning Code**

59. **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.

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- 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.

*The amendments support Policy 10.4 for the following reasons. The amendments better align the adopted zoning code with existing Title 33, Title 32, Title 18, and Title 11 provisions to more effectively implement the 2035 Comprehensive Plan. The amendments have been developed to be as concise as possible to effectively implement the 2035 Comprehensive Plan policies, and were developed in a public process and reviewed by the Portland Planning and Sustainability Commission and the Portland City Council.*