

Cully Boulevard Main Street Map Amendments

Exhibit B: Findings

August 2012



Bureau of Planning and Sustainability

Acknowledgements

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Introduction

The Cully Main Street and Local Street Plan project addresses a shortfall of commercially zoned land and local-serving businesses in central Cully along the regionally designated Cully Boulevard main street area. The project also includes strategies to improve multi-modal local street connectivity and safety in the Cully neighborhood.

The findings presented in this report only consider the Comprehensive Plan Map and Zoning Map proposals for the Cully main street area. Local street plan recommendations that update the Transportation System Plan (TSP) will be addressed with findings at a future date when amendments to the TSP are proposed.

For the purposes of this exhibit, the Comprehensive Plan Map and Zoning Map proposals will be referenced as “Cully Main Street Proposal”.

Relationship to Statewide Land Use Planning

Comprehensive land use planning in Oregon was mandated by the 1973 Legislature with the adoption of Senate Bill 100 (ORS Chapter 197). Under this Act, the State Land Conservation and Development Commission (LCDRC) was created and directed to adopt statewide planning Goals and Guidelines. These Goals and Guidelines were adopted by LCDRC in December 1974 and became effective January 1, 1975. Under state law, comprehensive plans must comply with the statewide planning goals. Portland's *Comprehensive Plan* meets this requirement. The Cully Main Street Proposal revises Portland's *Comprehensive Plan* map only and not the *Comprehensive Plan's* goals and policies.

The zoning code is a municipal tool for carrying out the intent of the Comprehensive Plan. The Cully Main Street Proposal revises the Zoning Map only and does not amend any zoning code language.

How This Document is Structured

This document is organized into four sections: Statewide Planning Goals Findings, *Metro Urban Growth Management Functional Plan* Findings, Portland *Comprehensive Plan* Findings, and *Cully Neighborhood Plan* Findings. Within these sections, the individual findings generally consist of two parts: (1) a brief explanation of the criteria (goal, policy, objective, further statement, etc. against which the Cully Main Street Proposal is judged for consistency; and (2) statements that support a determination of consistency. If a finding on a given measure (goal, title, policy, objective, further statement, etc.) is not included in this document, it is because it has been determined to be inapplicable to the Cully Main Street Proposal.

Statewide Planning Goals Findings

State planning statutes require cities to adopt and amend comprehensive plans and land use regulations in compliance with state land use goals. Only the state goals addressed below apply to the Cully Main Street Proposal.

1. **Goal 1, Citizen Involvement**, requires provision of opportunities for citizens to be involved in all phases of the planning process. Preparation of the Cully Main Street Proposal provided numerous opportunities for public involvement, including:
 - a. A public outreach program beginning in April 2011 and continuing through the first public hearings with the Portland Planning Commission on May 22, 2012.
 - b. On April 8, 2011 an e-mail was sent to the public to introduce the project and ask for members to join the Project Working Group.
 - c. On June 21, 2011 the Project Working Group met to discuss the existing conditions in the neighborhood.
 - d. On June 25, 2011 a Roll and Stroll event was held where residents walked or bicycled around the main street area. People learned about the project and shared their vision and aspirations for the area.
 - e. On October 18, 2011 the Project Working Group met to discuss the needs, opportunities, and challenges identified for the Cully neighborhood. Zoning designation options were presented and main street character was defined.
 - f. On October 27, 2011 an Open House was held at Rigler Elementary School for public review of the existing conditions, needs, opportunities and constraints report. Attendees offered their thoughts on existing conditions and shared ideas about what a future successful main street and local street system would look like.
 - g. On January 17, 2012 the Project Working Group met to discuss the draft set of rezoning proposals and gather feedback on whether they met community expectations.
 - h. On February 21, 2012 the Project Working Group met to discuss a draft set of proposals for achieving Cully's transportation infrastructure and funding needs.
 - i. On March 7, 2012 a Community Workshop was held where staff presented an updated rezoning proposal for questions, discussion and comments. Information regarding transportation proposals was also presented.
 - j. Staff participated at Rigler School PTA, Hacienda Somali and Latino resident meetings, and Cully Association of Neighbors meetings. Presentations were made to the Pedestrian Advisory Committee, Bicycle Advisory Committee, and the Portland Commission on Disabilities.
 - k. Planning staff periodically met with and engaged in telephone and email exchanges with property owners, developers, members of the business community and other interested parties in regard to the project.
 - l. The project website was regularly updated to include notices of upcoming events and other pertinent information. Press releases about the project were widely distributed at key milestones/events.
 - m. The project received media coverage from the Oregonian, periodically from the Hollywood Star, the Daily Journal of Commerce, and Cully Neighbor News.
 - n. Notice of Proposed Amendment was sent to the State Department of Land Conservation and Development (DLCD) and Metro on April 13, 2012.

- o. A public hearing notice regarding the May 22, 2012 Portland Planning Commission hearing on the Cully Main Street Proposal was sent to over 928 interested parties on April 20, 2012.
- p. Measure 56 notification of the May 22, 2012 public hearing on the Cully Main Street Proposal was sent to all property owners potentially affected by proposed zoning map changes on April 20, 2012.
- q. On May 9, 2012, the Bureau of Planning and Sustainability published the *Draft Cully Main Street and Local Street Plans Implementation Report*, planning staff's proposal to the Portland Planning and Sustainability Commission. The document was made available to the public through the project website on May 9, 2012 and hard copies of the document were available at the bureau office.
- r. The Portland Planning and Sustainability Commission held an evening hearing regarding the Cully Main Street Proposal on May 22, 2012 at Rigler Elementary School in Cully. The community had the opportunity to offer public testimony on the proposal.
- s. A public hearing notice regarding the August 29, 2012 City Council public hearing on the Cully Main Street Proposal was sent to [REDACTED] interested parties on August [REDACTED], 2012.
- t. On August 15, 2012, the Bureau of Planning and Sustainability published the *Cully Main Street and Local Street Plan – Recommended Draft*, the Planning and Sustainability Commission's recommendation to City Council. The document was made available to the public through the project website on August 15, and hard copies of the document were available at the bureau office.
- u. The Portland City Council held an evening public hearing regarding the Cully Main Street Proposal on August 29, 2012 at Rigler School in Cully. The community had an opportunity to offer public testimony on the proposal.

2. **Goal 2, Land Use Planning**, requires the development of a process and policy framework that acts as a basis for all land use decisions and assures that decisions and actions are based on an understanding of the facts relevant to the decision. The amendments are consistent with this goal because:

a) The Zoning Code contains procedures that were followed and criteria that have been satisfied for the development and adoption of the Cully Main Street Proposal. The amendments are consistent with this goal because the required legislative process as described in Portland City Code 33.740 was followed. In addition, the applicable approval criteria for legislative Comprehensive Plan Map Amendments, described in 33.810, for Goal, Policy, and Regulation Amendments, described in 33.835, for Zoning Map Amendments, described in 33.855, and have been evaluated and satisfied as described in the findings below.

b) *Portland Comprehensive Plan* findings on Goal 1, Metropolitan Coordination, and its related policy also support this goal.

3. **Goal 9, Economic Development**, requires provision of adequate opportunities for a variety of economic activities vital to public health, welfare, and prosperity.

The Cully Main Street Proposal supports this goal by increasing the availability of commercially zoned parcels in a neighborhood where currently only two percent of land is zoned for commercial activity, compared to ten percent, which is more common for other Portland neighborhoods. It prioritizes commercial zoning designations that have traditionally encouraged a greater mix of commercial and residential activity, such as Storefront Commercial (CS), Mixed Commercial (CM), Central Employment (EX), and Comprehensive Plan designation Urban Commercial (UC). The welfare of residents is advanced by providing greater opportunity for uses like child day care, local restaurants, and general retail. Access to these goods and services by Cully residents is likely to improve as businesses develop within the designated main street area.

Proposed changes foster a positive identity for the area, support a local economy, and encourage housing to support and retain other community amenities. Proposed increases in housing and mixed-use development intend to strengthen existing and future commercial development by expanding the base of potential customers and employees located within close proximity. See finding for Portland Comprehensive Plan *Goal 5, Economic Development*.

4. **Goal 10, Housing**, requires provision for the housing needs of citizens of the state. The Cully Main Street Proposal supports this policy because it up-zones a stretch of Cully Boulevard from very low density multi-dwelling residential (Residential 3,000) to a slightly more dense multi-dwelling residential designation (Residential 2,000). It also up-zones 6.5 acres from low density multi-dwelling residential (Residential 2,000) to a medium density multi-dwelling residential (Residential 1,000) designation. The zones allow for a variety of housing types that include duplexes, town homes and apartments.

Additionally, proposed Storefront Commercial (CS) and Mixed Commercial (CM) zoning designations are expected to develop with housing, based on development trends in those zones across other parts of the city. The CS zone allows up to 100 percent housing projects, as well as a combination of commercial retail and housing. Multi-story residential development such as apartments, condominiums, and townhouses often occur in the CS zone. The CM zone requires at least 50 percent of a new development's square footage to be for housing.

Of the acreage that is currently zoned residential, but proposed to change to non-residential designations, 57 percent is being converted to either CS or CM. A conservative development scenario finds that the Cully Main Street Proposal increases residential units by eleven percent from 427 units to 476. That projection does not include the possibility for more housing in properties that are rezoned to Central Employment (EX). See finding for Portland Comprehensive Plan *Policy 4.2* below.

5. **Goal 11, Public Facilities and Services**, requires planning and development of a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for development. The Cully main street proposal includes strategic map changes in an area with a basic level of urban public facilities and services. Transportation, storm water management, water, fire and police protection, sewer, and solid waste collection systems are in place especially along location where the bulk of the map amendments are proposed. This includes the recent completion of the multi-modal Cully Blvd. Green Street. The local street plan portion of the project aims to see enhancements to the local street system to better serve Cully. The zoning amendments increase intensity of commercial and residential use at a small scale and can be accommodated by the existing and planned infrastructure improvements. One of the rezoning proposals to Open Space is for City parks property currently under planning for a soon to be constructed neighborhood park. See findings for Portland Comprehensive Plan *Policy 6.18* and *Goal 11A*. Also see findings for Statewide *Goal 12, Transportation*.

6. **Goal 12, Transportation**, requires provision of a safe, convenient, and economic transportation system.

The Cully Main Street and Local Street Plans aim to promote a vibrant pedestrian oriented Cully main street area that is served by a balanced multi-modal transportation system, which is consistent with the city's Transportation System Plan and Comprehensive Plan. Supporting this plan are numerous implementing actions addressing enhancements needed to improve local circulation.

The Portland Bureau of Transportation Planning Division prepared a transportation analysis of the Cully Main Street rezoning proposal, which consists of transportation modeling along with a policy assessment of the findings. This assessment addresses provisions of the State Transportation Planning Rule (Plan and Land Use Regulation Amendments, OAR 660-012-0060) and provides residents and decision-makers with information related to traffic impacts resulting from this proposal.

Analysis was conducted to determine if the zoning proposal would degrade the performance of Oregon Department of Transportation (ODOT) facilities. This analysis addresses provisions of the State Transportation Planning Rule (Plan and Land Use Regulation Amendments, OAR 660-012-0060) as they relate to ODOT facilities.

Section 660-012-0045 of the Transportation Planning Rule (TPR) requires local governments to adopt land use regulations that designate “types and densities of land uses adequate to support transit” and those that “reduce reliance on the automobile and allow transit-oriented developments on land along transit routes.”

The Cully main street rezoning and local street proposals support these requirements by fostering an accessible main street with mixed-use development (Storefront Commercial (CS), Mixed Commercial (CM), Central Employment (EX), and Comprehensive Plan Urban Commercial designations) near two transit lines (TriMet routes #71 and #72). The proposed plan aims to improve access to the commercial area for people traveling by foot, bicycle, or transit, thereby reducing reliance on the automobile.

The TPR requires certain findings if the rezone proposal will significantly affect an existing or planned transportation facility. Section 660-012-0060(1) of the TPR requires “amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation that would significantly affect an existing or planned transportation facility,” to ensure that allowed land uses are consistent with the identified function, capacity and performance standards of the affected facility.

The proposed rezone would primarily create relatively small-scale, community-serving housing, commercial and office development opportunities, which are not projected in the Cully Main Street rezoning proposal transportation analysis to add significant trip demand onto the regional transportation system.

In order to address concerns about the proposal to rezone the triangular parcel at the Killingsworth and Cully intersection from Neighborhood Commercial (CN2) to Central Employment (EX), staff conducted a more detailed analysis of this site and the potential impacts on the Killingsworth and I-205 interchange.

The analysis assumed a redevelopment scenario consisting of commercial, office and industrial uses with relatively high trip generation rates, without assuming a residential component, which would result in lower trip generation rates. The resulting trip generation in the PM peak hour would add 100 additional trips compared to the reasonable worst case under existing CN2 zoning, of which approximately 23 trips would be assumed to travel to the Killingsworth and I-205 interchange in 2035 (the transportation analysis' horizon year).

In December 2011, revisions to the Highway Mobility Policy (1F) of the Oregon Highway Plan (OHP) modified the threshold for adequate mitigation of significant effects above the mobility targets. Action 1F.5 of the OHP states that “ODOT considers calculated values for volume-to-capacity (v/c) ratios that are within 0.03 v/c of the adopted target to be considered in compliance with the target.” Because the forecasted 23 additional trips at the Killingsworth interchange constitutes less than a 0.03 v/c degradation, ODOT has stated that mitigation is not required to support the rezone proposal.

7. **Goal 13, Energy Conservation**, requires development of a land use pattern that maximizes the conservation of energy based on sound economic principles.

The Cully Main Street Proposal is consistent with this goal because its Comprehensive Plan Map and Zoning Map amendments generally promote the establishment of a compact urban form, including a mix of uses. Allowing more businesses to locate in the neighborhood reduces the need for residents to take basic need trips (grocery store, barber shop, day care, café) outside of the neighborhood. This urban form together with local street plan efforts to improve the multi-modal transportation system may result in decreased use of single-occupancy vehicles and a reduction of

fuel consumption. Also, recent completion of multi-modal Cully Boulevard Green Street supports more walking and bicycling along the main street area.

Findings on Metro Urban Growth Management Functional Plan

Metro has adopted an Urban Growth Management Functional Plan (UGMFP) that requires local jurisdictions to adopt and amend comprehensive plans and land use regulations that are not inconsistent with its provisions. The following elements of the *Metro Urban Growth Management Functional Plan* are relevant and applicable to the Cully Main Street Proposal.

8. **Title 1, Requirements for Housing and Employment Accommodation**, requires that each jurisdiction contribute its fair share to increasing the development capacity of land within the Urban Growth Boundary. This requirement is to be generally implemented through citywide analysis based on calculated capacities from land use designations. The Cully Main Street Proposal is consistent with this title because it will increase the development capacity of the city by applying Urban Commercial/Commercial Storefront, Medium Density Multi-Dwelling, Central Employment, and General Employment designations to the project area that enable retail, housing, and employment opportunities beyond what is currently allowed. See findings under Portland Comprehensive Plan *Goal 4, Housing* and *Goal 5, Economic Development*. Also see findings for Statewide *Goal 9, Economic Development* and *Goal 10, Housing*.
10. **Title 3, Water Quality and Flood Management Conservation**, calls for the protection of the beneficial uses and functional values of resources within Metro-defined Water Quality and Flood Management Areas by limiting or mitigating the impact of development in these areas. This Metro title is generally implemented in Portland through citywide planning processes. On April 10, 2003 Metro Council adopted a Compliance Order that declares that Portland is in full compliance with the Urban Growth Management Functional Plan. The Cully Main Street Proposal is consistent with this title for the reason that proposals therein are in accord with the Portland Comprehensive Plan.
11. **Title 4, Industrial and Other Employment Areas**, limits retail and office development in employment and industrial areas to those that are most likely to serve the needs of the area and not draw customers from a larger market area. The City implements this title through regulations governing land in industrial zones. The Cully Main Street Proposal is consistent with this title because it does not propose to weaken or modify existing regulations protecting industrially-designated lands
12. **Title 7, Affordable Housing**, ensures opportunities for affordable housing at all income levels, and calls for a choice of housing types. This proposal is consistent with this title because it promotes opportunities for a diversity of additional housing types along sections of NE Killingsworth Street and NE Cully Boulevard. The proposal adds Residential 1,000 (R1), Residential 2,000 (R2), Storefront Commercial (CS), Mixed Commercial (CM), and Central Employment (EX) designations to the zoning mix of the neighborhood. Proposals allow for a variety of housing options such as duplexes, townhouses, condominiums and row houses. Hacienda Community Development Corporation, an affordable housing developer who has nearly 300 units of affordable housing in Cully, owns a portion of the up-zoned area, making an increase in affordable housing more likely. Proposals increase the number of multi-dwelling lots, which will increase opportunity for affordable rentals or ownerships in an area consisting primarily of single family lots. See statewide planning *Goal 10, Housing*.

Findings on Portland's Comprehensive Plan Goals, Policies, and Objectives

Portland's Comprehensive Plan was adopted on October 16, 1980 through Ordinance No. 150580 and acknowledged for compliance with Statewide Planning Goals on May 3, 1981. On January 25, 2000, the Land Conservation and Development Commission completed its review of the city's final local periodic review order and periodic review work programs, and re-acknowledged the plan's compliance with the statewide planning goals. The following goals, policies and objectives of the Portland Comprehensive Plan are relevant and applicable to the Cully Main Street Proposal.

13. **Goal 1, Metropolitan Coordination**, calls for the Comprehensive Plan to be coordinated with federal and state law and to support regional goals, objectives and plans. The Cully Main Street Proposal is consistent with this goal because proposals therein do not change policy or intent of existing regulations relating to metropolitan coordination and regional goals. The comprehensive plan map, zoning map changes, and strategic transportation plan proposals put forth are to be implemented within the existing regional goals, objectives and plans.

Cully Boulevard and portions of Killingsworth Street have been identified in the Metro 2040 Growth Concept Plan as a main street. The proposals in this plan align the Portland Comprehensive Plan map and zoning map to an existing Metro policy.
14. **Policy 1.4, Intergovernmental Coordination**, requires continuous participation in intergovernmental affairs with public agencies to coordinate metropolitan planning and project development and maximize the efficient use of public funds. Regional and State agencies were noticed and participated in the project. The Oregon Department of Transportation was consulted on the traffic analysis findings. Staff recommendations include for BPS and PBOT to work with the TriMet transit agency on a strategy to improve transit service along the main street corridor.
15. **Goal 2, Urban Development**, calls for maintaining Portland's role as the major regional employment and population center by expanding opportunities for housing and jobs, while retaining the character of established residential neighborhoods and business centers. The Cully Main Street Proposal supports this goal because the land use and zoning pattern proposed for the Cully main street area increases opportunity for additional residential and commercial use along two main corridors (Cully Boulevard and Killingsworth Street), that make up the Cully main street area, while retaining the single family character of the overall neighborhood area. Zoning proposals are modest and tailored to small scale development that is geared towards local, not regional consumption. Small scale development is more likely to preserve Cully's cultural diversity and residential character. Proposals add or up-zone a combined eleven acres of land to be dedicated to commercial and employment development. Thirteen acres are up-zoned to a higher residential density. Additional capacity for housing development is added as part of the Storefront Commercial (CS), Mixed Commercial (CM), and Central Employment designations.
16. **Policy 2.1, Population Growth**, calls for accommodating the projected increase in city households. The Cully Main Street Proposal supports this policy because the proposals expand the potential to develop additional housing units in the area. Zoning changes from Residential 3,000 (R3) to Residential 2,000 (R2) and from R2 to Residential 1,000 (R1) increase the maximum allowed number of housing units in the neighborhood. Comprehensive Plan Amendments to Urban Commercial in Area 2 accommodates for an even longer term need for housing. The Storefront Commercial (CS) and Mixed Commercial (CM) designations have development potential for residential units to be built above retail establishments, or to be entirely residential projects. See findings for Metro Urban Growth Management Functional Plan *Title 1, Housing and Employment Accommodation*.
17. **Policy 2.2, Urban Diversity**, calls for promoting a range of living environments and employment opportunities in order to attract and retain a stable and diversified population. The Cully Main Street Proposal supports this policy by proposing eight acres of residential rezoning to commercial and two acres of rezoning to employment. The increase in commercially zoned lots increases opportunities for a variety of local business and local employment. The Cully Main Street Proposal also increases housing stock availability of various types (townhouses, duplexes, apartments, and condominiums) within one of Portland's most racially diverse neighborhoods—Cully has sizeable Hispanic, Black, and Asian populations. It does so through rezoning proposals to Residential 2,000 (R2), Residential 1,000 (R1), Storefront Commercial, (CS), Mixed Commercial (CM), and Central Employment (EX). The rezoning to EX allows a diverse set of commercial, employment, and housing uses to occur within the same lot. Proposals to rezone non-conforming residential lots to Neighborhood Commercial (CN1), Neighborhood Commercial 2 (CN2), General Employment 1

(EG1), and Storefront Commercial (CS) bring approximately six acres with non-conforming uses into compliance. Doing so supports diversity of businesses in size and by uses.

18. **Policy 2.6, Open Space**, requires that opportunities for recreation and visual relief be provided. The Cully Main Street Proposal supports this policy because of a proposal to designate a future neighborhood park site with an Open Space (OS) Comprehensive Plan and Zoning Map classification.
19. **Policy 2.9, Residential Neighborhoods**, calls for allowance of a range of housing types to accommodate increased population growth while improving and protecting the city's residential neighborhoods. See findings for Portland Comprehensive Plan *Policy 2.1 and 2.2* and Metro Urban Growth Functional Plan *Title 7, Affordable Housing*.
20. **Policy 2.12, Transit Corridors**, calls for providing a mixture of activities along major transit routes and main streets that supports the use of transit and is compatible with the surrounding area. The Cully Main Street Proposal supports this policy because it promotes development that includes a variety of transit-supportive commercial, residential, and employment zoning and future development opportunities along TriMet frequent service bus route #72 and also route #71. Specifically, zones such as CS, CM, R2, R1, and Comprehensive Plan Urban Commercial (UC) provide short to long term additional density and intensity of uses. Inclusion of the Central Employment (EX) designation adds significantly to the mix and takes advantage of the proximity to employment zones to the north. EX brings an opportunity for a larger number of daily trips by transit.
21. **Policy 2.18, Transit-Supportive Density**, calls for establishing average minimum residential densities of fifteen units per acre within one quarter mile of existing transit streets and main streets. Killingsworth Street is classified as a Major Transit Priority Street and Cully Boulevard is classified as a Transit Access Street in the Comprehensive Plan (Amended 2006). Despite its Transit Access Street designation Cully Boulevard does not have continuous service along its entire stretch through the neighborhood. By increasing the housing density and encouraging commercial and mixed-use development along the street, the Cully Main Street Proposal increases the feasibility of contiguous and more frequent bus service.

Portions of Killingsworth Street and Cully Boulevard are designated as main streets in the Metro 2040 Growth Concept Plan. The Cully Main Street Proposal supports this policy because several proposals therein change existing residential densities along Cully Boulevard to Residential 2,000 (R2) and Residential 1,000 (R1) levels, twenty-two dwelling units per acre (DUA) and forty-three DUA respectively. Storefront Commercial (CS) and Mixed Commercial (CM) designations typically result in denser residential development than the existing zoning. This increase along the road frontage will boost the overall average density within a quarter mile of the transit street.
22. **Policy 2.19, Infill and Redevelopment**, calls for encouraging infill and redevelopment as a way to implement the Livable City growth principles and accommodate expected increases in population and employment. The Cully Main Street Proposal supports this policy because it allows future residential, commercial, and mixed-use development opportunities along a centrally located designated main street area that has lacked redevelopment opportunities especially for businesses. Overall the set of proposals increase commercially zoned land by eight acres, employment by two acres, and housing density is increased along the corridor as well. The increases in intensity and density are meant to accommodate increases in population and employment. See findings for Statewide Planning *Goals 9, Economic Development and Goal 10, Housing*.
23. **Policy 2.20, Utilization of Vacant Land**, calls for providing for full utilization of existing vacant land except in those areas designated as Open Space. The Cully Main Street Proposal supports this policy because it provides land use and zoning designations that encourage development of vacant land and redevelopment of underutilized parcels. The area has enough demand to accommodate growth in local businesses according to the Redevelopment Analysis report that Marketek prepared

for the project. Lack of commercial zoning designations have been a barrier to development and meeting local consumption needs. The proposals remove this barrier.

24. **Policy 2.22, Mixed-use**, calls for continuation of a mechanism that will allow for the maintenance and enhancement of areas of mixed-use character where such areas act as buffers and where opportunities exist for the creation of mixed-use nodes. The Cully Main Street Proposal supports this policy because it preserves and enhances an older commercial area with traces of storefront character. It promotes new development that is compatible with this desired character and provides opportunity for a range of retail, services, housing and employment uses to develop at select locations that will enhance the mixed-use character. Proposals include the Storefront Commercial (CS), Mixed Commercial (CM), and Central Employment (EX) zones to establish mixed-use commercial clusters, including the intersection of Cully Boulevard and Prescott Avenue and the corner of Killingsworth Street and Cully Boulevard. Longer term mixed-use opportunities are provided with parcels recommended for Urban Commercial (UC) Comprehensive Plan Map designations.
25. **Policy 2.23, Buffering**, calls for mitigating the impacts from non-residential uses on residential areas through the use of buffering and access limitations, in particular when residentially zoned lands are changed to commercial, employment, or industrial zones. The proposals rely on Portland Zoning Code development standards for setbacks and other buffering regulations to mitigate impacts between commercial and residential uses. Required setbacks of commercial buildings adjacent to residential lots vary by building height and could be as much as fourteen feet (Title 33, Table 130-4). The minimum setback must include a five-foot deep landscaped area that complies with at least the L3, High Screen standard as stated in chapter 33.248. The standard requires vegetation screening of a minimum height of six feet to provide the physical and visual separation between uses.

Neighborhood Commercial designations allow small scale retail, services, and other uses that are restricted in size to promote a local orientation and to limit adverse impacts on nearby residential areas. The Central Employment (EX) proposal is buffered from single family residential to the south by Killingsworth Street, which is a wide street (approximately 50 feet), and by other commercial uses.

26. **Goal 3, Neighborhoods**, calls for the preservation and reinforcement of the stability and diversity of the city's neighborhoods while allowing for increased density. The Cully Main Street Proposal supports this goal by strategically focusing areas of rezoning along street fronting properties in an under-utilized section of NE Cully Boulevard. Limiting rezoning to this area maintains the overall single family residential character of the neighborhood as a whole, while increasing its stability by improving access to local goods and services. Where appropriate, proposals benefit existing non-conforming businesses with an increased ability to renovate, expand, or build a new. Businesses like the two tiendas along Cully Boulevard would be brought into compliance and have an opportunity to expand. Proposed housing density increases—Residential 2,000 (R2) and Residential 1,000 (R1)—attempt to sustain future commercial activity. R2, R1, Storefront Commercial (CS) and Neighborhood Commercial (CN2) designations support Hacienda Community Development Corporation's mission to retain and grow a diverse population as well as incubator business opportunities. Overall rezoning to R2, R1, CS, Mixed Commercial (CM), and Central Employment (EX) encourages a variety of housing types.
27. **Policy 3.2, Social Conditions**, calls for providing and coordinating programs to promote neighborhood interest, concern and security and to minimize the social impact of land use decisions. The Cully Main Street Proposal supports this policy by recommending the City take steps to implement Portland Plan Action 97; using Cully main street as a case study to develop policies and implementable strategies that anticipate and address displacement impacts of gentrification. Staff sought to minimize the social impact of land use decisions by involving the diverse Cully community throughout the planning process, and shaping recommendations based on public input. See findings for Statewide Planning *Goal 1, Citizen Involvement*.

28. **Policy 3.3, Neighborhood Diversity**, calls for promoting neighborhood diversity and security by encouraging diversity in age, income, race and ethnic background within the city's neighborhoods. The Cully Main Street Proposal is consistent with this policy because it allows for a variety of residential housing types and commercial uses that provide for a broader array of opportunities for the neighborhood. It brings into zoning compliance two Hispanic heritage grocery stores called *tiendas*. Ownership by Hacienda Community Development Corporation of some of the lots identified for rezoning makes it more likely that affordable housing will increase to meet the needs of the lower income non-White populations. The proposed opportunity for apartment, rowhouse, and condominium housing stock diversifies the predominantly single family residential neighborhood. See findings for Comprehensive Plan *Policy 2.1 and 2.2*.
29. **Policy 3.5, Neighborhood Involvement**, provides for the active involvement of neighborhood residents and businesses in decisions affecting their neighborhood. The Cully main street rezoning supports this policy because local neighborhood associations, business associations, and the community at large were invited to and participated at project-related events. Their input was used in developing elements the map proposals. See findings for Statewide Planning *Goal 1, Citizen Involvement*.
30. **Policy 3.6, Neighborhood Plan**, calls for maintaining and enforcing neighborhood plans that are consistent with the Comprehensive Plan and that have been adopted by Council. The Cully Main Street Proposal is subject to the Cully Neighborhood Plan adopted in 1992. See Findings for Cully Neighborhood Plan below.
31. **Goal 4, Housing**, calls for enhancing Portland's vitality as a community at the center of the region's housing market by providing housing of different types, tenures, density, sizes, costs, and locations that accommodates the needs, preferences, and financial capabilities of current and future households. The Cully Main Street Proposal is consistent with this goal because it generally increases the variety and supply of residential developments. The proposed map designations provide a broader array of housing opportunities to serve a variety of incomes, ages, races, and ethnicities. These include multi-dwelling units, rowhouses, and mixed-use and live/work residential situations. See findings for Comprehensive Plan *Policy 2.1 and 2.2*.
32. **Policy 4.1, Housing Availability**, calls for ensuring that an adequate supply of housing is available to meet the needs, preferences, and financial capabilities of Portland's households now and in the future. The Cully Main Street Proposal generally supports this policy because it offers the potential of a variety of housing types. It generally increases the opportunity for new housing units in the neighborhood. Hacienda Community Development Corporation, a significant provider of affordable housing in Cully, can continue to provide affordable housing based on the rezoning proposals from R2 to R1. The zone changes should also make it easier for private developers to produce a variety of housing types that may be affordable. Changes that only affect Comprehensive Plan Map designations while preserving the existing Base Zones are meant to better meet long term needs. Two existing non-conforming properties in close proximity to the main street area that add to the housing availability of the area are rezoned to Residential 2,000 (R2), in order to bring them into compliance.
33. **Policy 4.2, Maintain Housing Potential**, calls for retaining housing potential by requiring no net loss of land reserved for, or committed to, residential or mixed-use. The Cully Main Street Proposal supports this policy because it provides for an increase in residential development potential within the study area by encouraging mixed-uses in the proposed CS, CM, and EX zones, and by upzoning parcels from Residential 3,000 (R3) to Residential 2,000 (R2) and others from R2 to Residential 1,000 (R1). See findings for Statewide Planning *Goal 10, Housing*.
34. **Policy 4.3, Sustainable Housing**, calls for encouraging housing that supports sustainable development patterns by promoting the efficient use of land; conservation of natural resources; easy access to public transit and other efficient modes of transportation; easy access to services

and parks; resource efficient design and construction; and the use of renewable energy resources. The Cully Main Street Proposal promotes efficient use of land and resources by providing increased opportunity for residential and mixed-use developments located near transit—TriMet route #71 and route #72—, parks, schools, and other community resources. The decreased dependence on the automobile results in reduced fuel consumption and thus conserves natural resources.

35. **Objective C** encourages development of housing at transit-supportive densities near transit streets especially where schools and parks are present. See finding for *Policy 2.18*.
36. **Policy 4.7, Balanced Communities**, calls for striving for livable mixed-income neighborhoods throughout Portland that collectively reflect the diversity of housing types, tenures, and income levels of the region. The Cully Main Street Proposal supports this policy because it provides the potential for multi-dwelling units, rowhouses, and mixed-use and live/work residential situations that will support households of different incomes. See Comprehensive Plan *Policies 2.1, 2.2 and 3.3*.
37. **Objective G** seeks to encourage the development and preservation of housing that serves a range of household income levels at locations near public transit and employment opportunities. The Cully Main Street Proposal increases housing opportunities along bus lines #72 on Killingsworth Street and #71 along part of Cully Boulevard. The addition of commercial zones (CN1, CN2, CS and CM) and EX zoned properties makes it possible to improve proximity to employment. See findings for Metro Urban Growth Management Functional Plan *Title 7* and Comprehensive Plan *Policy 2.17*.
38. **Objective K** seeks to discourage the involuntary displacement of low-income residents from their community as neighborhoods evolve. A Cully Main Street Proposal staff recommendation proposes that the Bureau of Planning and Sustainability, the Portland Housing Bureau, and Portland Development Commission be tasked with implementing Portland Plan Action 97, using Cully as a case study in developing policies and strategies that anticipate and address the involuntary displacement impacts of gentrification. Other City and community-based partnerships and initiatives such as the Cully Boulevard Alliance Neighborhood Prosperity Initiative, intend to encourage local business development to create local wealth and minimize displacement of lower income especially communities of color in Cully.
39. **Policy 4.10, Housing Diversity**, calls for promoting creation of a range of housing types, prices, and rents to (1) create culturally and economically diverse neighborhoods; and (2) allow those whose housing needs change to find housing that meets their needs within their existing community. See findings for Comprehensive Plan *Policy 2.1 and 2.2*.
40. **Policy 4.11, Housing Affordability**, calls for promoting development and preservation of quality housing that is affordable across the full spectrum of household incomes. By increasing supply of housing units the Cully Main Street Proposal will better meet demand and thus maintain housing cost stability. Ownership by Hacienda Community Development Corporation of some of the lots identified for rezoning makes it more likely that affordable housing will increase to meet the needs of the lower income population. Housing options for higher income individuals may develop in Storefront Commercial (CS), Mixed Commercial (CM), Central Employment (EX) lots where condominium apartments are allowed. See finding for *Policy 3.3*.
41. **Goal 5, Economic Development**, calls for promotion of a strong and diverse economy that provides a full range of employment and economic choices for individuals and families in all parts of the city. The Cully Main Street Proposal is consistent with this goal because it enacts zoning changes that encourage a variety of commercial and employment opportunities designed to stimulate the area's economy and meet local goods and service needs of Cully residents. Currently only two percent of land in Cully is zoned for commercial use, while ten percent is more common for neighborhoods in Portland. The addition of Storefront Commercial (CS), Mixed Commercial (CM), Central Employment (EX), and Neighborhood Commercial (CN1 and CN2) designations strengthens existing businesses and may attract new businesses to support a local economy.

Sufficient demand exists to accommodate new businesses according to the Marketek Redevelopment Analysis performed for this project. The report recommends a retail and office inventory of approximately eight acres to meet demand in 2035, which is similar in amount to the new commercial and employment designated parcels being proposed.

The up-zoning of residentially zoned parcels encourages business supportive housing by allowing for an increase in potential customers and employees located within close proximity. The Marketek Redevelopment Analysis report performed for this project describes this essential element for the main street's success, stating that the size and scope of the consumer market must expand so as to promote economic development in the project area.

Another Marketek strategy for economic success is a strong concentration of retail that is focused rather than scattered. Proposals adhere to this advice and concentrate commercial designations in clusters along the main street area. See findings for Statewide Planning *Goal 9, Economic Development*.

42. **Policy 5.1, Urban Development and Revitalization**, calls for encouraging investment in the development, redevelopment, rehabilitation and adaptive reuse of urban land and buildings for employment and housing opportunities. The Cully Main Street Proposal is consistent because the conversion of parcels from residential to commercial, employment, and Comprehensive Plan Map designations will broaden opportunities for development, redevelopment, rehabilitation and adaptive reuse of buildings. Several proposals in the package bring existing legally non-conforming commercial uses into compliance, reducing regulatory and financing barriers for improving their property, thus enabling them to expand and/or rehabilitate the building stock.
43. **Policy 5.2, Business Development**, calls for sustaining and supporting business development activities to retain, expand, and recruit businesses. The Cully Main Street Proposal supports this policy by bringing non-conforming uses into compliance and removing the financing and regulatory barriers to business expansion associated with non-conformance. The proposal also includes Comprehensive Plan Map and Zoning Map amendments to encourage new businesses to locate in rezoned commercial and employment zoned locations.
44. **Policy 5.3, Community Based Economic Development**, calls for supporting community-based economic development initiatives consistent with the Comprehensive Plan and compatible with neighborhood livability. The Cully Main Street Proposal advances this policy by setting up a framework for more opportunities for community based economic development; it increases the supply of commercial and employment zoning. Ongoing efforts from the Cully Boulevard Alliance Neighborhood Prosperity Initiative with community based partners will work to further this policy.
45. **Policy 5.4, Transportation System**, calls for promoting a multi-modal regional transportation system that stimulates and supports long term economic development and business investment. The Cully Main Street Proposal achieves this policy in several ways. It proposes zoning designations that do not require off-street parking, such as Neighborhood Commercial 1 (CN1), Storefront Commercial (CS), and Mixed Commercial (CM). Limiting off-street parking discourages auto use and makes walking or bicycling for short trips more convenient, especially for local residents. Additionally, CS and CM zones consist of development standards that encourage bicycling and walking, such as the maximum ten foot setback and required ground floor windows.

The Cully Main Street Proposal also recommends coordination with TriMet to improve and enhance transit service along the main street area, where some transit service exists including the frequent services bus line #72 along Killingsworth St. Increasing density along the Cully Boulevard main street area makes improved transit service that is continuous with shorter headways feasible.

Recent Green Street improvements to Cully Boulevard have made the pedestrian and bicycling experience more pleasant and safe. The rezoning recommendations provide an opportunity to attract more pedestrians and bicyclists to utilize the recent improvements as businesses are established and patronage increases.

46. **Objective D. of Policy 5.4** calls for supporting transit-oriented development and redevelopment along designated transit streets and in the vicinity of transit stations. See findings for Comprehensive Plan *Policies 2.12 and 2.18* above.
47. **Objective E of Policy 5.7**, calls for concentrating the expansion of commercial and mixed-use activities near the intersections of major city traffic or transit streets. The intersection of Cully Boulevard and Prescott Avenue is of two Transit Access streets. The intersection of Killingsworth Street and NE Portland Highway is the intersection of a major transit priority street and a major city traffic street. These intersections are treated as nodes for the concentration of commercial, employment, and residential expansion within the Cully Main Street Proposal.
48. **Goal 6, Transportation**, calls for developing a balanced, equitable, and efficient transportation system that provides a range of transportation choices; reinforces the livability of neighborhoods; supports a strong and diverse economy; reduces air, noise, and water pollution; and lessens reliance on the automobile while maintaining accessibility. The Cully Main Street Proposal is consistent with this goal because commercial and residential zoning amendments and/or Comprehensive Plan Map amendments encourage land use patterns compatible with a transportation system that supports a strong and diverse economy, reduces pollution, and offers greater mode choice by lessening reliance on the automobile. It accomplishes this through compact urban form that more efficiently utilizes heating and cooling systems, water distribution systems, and other infrastructure. Commercial, employment and residential uses become accessible by walking, bicycling, transit, and other non single occupancy vehicle modes, reducing levels of vehicular carbon emissions.
49. **Policy 6.1 Coordination**, calls for carrying out a public involvement process that provides information about transportation issues, projects, and processes to citizens, businesses and other stakeholders, especially those traditionally underserved. See findings for Statewide Planning *Goal 1, Citizen Involvement* and Comprehensive Plan *Policy 3.5* above.
50. **Objective B of Policy 6.6, Major Transit Priority Streets**, states that Major Transit Priority Streets are intended to provide high-quality transit service and that transit-oriented land uses are encouraged to locate along these streets. NE Killingsworth Street is classified as a Major Transit Priority Street and this proposal is consistent because it will allow transit-oriented land uses to occur at the intersection of NE Killingsworth Street and Cully Boulevard with the implementation of Storefront Commercial (CS), Central Employment (EX) and Residential 1,000 (R1) zoning.
51. **Objective C of Policy 6.6, Transit Access Street**, states that Transit Access Streets are intended for district oriented transit service serving main streets, neighborhoods, and commercial, industrial and employment areas. Cully Boulevard and Prescott Street are both designated as Transit Access streets. The Cully Main Street Proposal supports this objective because it provides increased opportunities for transit oriented land uses and development along the main street area. Zones used in the proposal such as Central Employment (EX), Storefront Commercial (CS), Mixed Commercial (CM), Comprehensive Plan Urban Commercial (UC), Residential 2,000 (R2) and Residential 1,000 (R1) tend to be transit supportive because of their density, intensity of use, and shorter distance between uses.
52. **Objective D of Policy 6.11, Community Main Streets** states that Community Main Streets are designed to accommodate motor vehicle traffic, with special features to facilitate public transportation, bicycles, and pedestrians. Sections of Cully Boulevard are designated as Community Main Streets. The Cully Main Street Proposal supports this objective by rezoning along the main streets to increase the commercial activity and residential density of the area to promote this community main street. The proposals include commercial zones and comprehensive plan designations that foster pedestrian and bicycle activities through development standards. See findings for Comprehensive Plan *Goal 6, Transportation* above.
53. **Policy 6.18, Adequacy of Transportation Facilities**, calls for ensuring that amendments to the Comprehensive Plan (including map amendments) zone changes, etc. that change allowed land

uses are consistent with the identified function and capacity of, and adopted performance measures for affected transportation facilities. The Cully Main Street Proposal meets this policy and its objectives. See finding for Statewide Planning *Goal 12, Transportation*.

54. **Policy 6.19, Transit-Oriented Development**, seeks to reinforce the link between transit and land use by encouraging transit-oriented development and supporting increased residential and employment densities along transit streets et al. See findings for Policy 2.12, 2.18, and Objective C of 6.6 above.
55. **Objective A. of Policy 6.19** calls for considering the existing and planned availability of high-quality transit service when adopting more intensive residential, commercial and employment designations. The Cully Main Street Proposal supports this objective as the application of commercial, residential, and employment designations support existing quality (TriMet Route #72) and future anticipated quality transit service (Route # 71) along the complete main street area.
56. **Objective B. of Policy 6.19**, seeks to focus medium-density and high-density development, including institutions, in transit-oriented developments along transit lines. See findings for Policy 2.12, 2.18 and *Objective A of Policy 6.19* above.
57. **Goal 7, Energy**, calls for promotion of a sustainable energy future by increasing energy efficiency in all sectors of the city by ten percent by the year 2000. The Cully Main Street Proposal is consistent with this goal because it promotes a pedestrian and transit-oriented development pattern. This development pattern is likely to reduce the need for single-occupant vehicle trips and encourages transit use, bicycling and walking. Having goods and services available locally may reduce auto use to destinations outside of the neighborhood, thus conserving fuel resources. See finding for Statewide Planning Goal 13 and Policy 7.A.
58. **Policy 7.4, Energy Efficiency through Land Use Regulations**, calls for promoting residential, commercial, industrial, and transportation energy efficiency and the use of renewable resources. Cully Main Street Proposal supports this policy because the proposed land use pattern makes efficient use of land resources and concentrates development into an area served by existing and planned transit services and infrastructure in several ways: (1) it focuses and reinforces commercial activities along a designated main street through use of commercial, multi-dwelling residential, and employment zones; (2) it adds to the housing capacity of the area; (3) it allows for and fosters mixed-use development, which reduces dependency on single occupancy vehicles powered by petroleum based fuels; and (4) it provides opportunity for common wall construction of row houses and multi-dwelling units in commercial, residential and employment zones.
59. **Policy 7.6, Energy Efficient Transportation**, calls for providing opportunities for non-auto transportation and for reducing gasoline and diesel use by increasing fuel efficiency. The Cully Main Street Proposal supports this policy because it provides for a transit-supportive development pattern that will increase opportunities for using transit, walking, and bicycling to destinations for those living, visiting, and doing business in and around the Cully main street area. It also helps reduce trips to destinations outside the neighborhood to fulfill local needs.
60. **Goal 8, Environment**, calls for maintaining and improving the quality of Portland's air, water, and land resources, as well as protecting neighborhoods and business centers from noise pollution. The Cully Main Street Proposal is consistent with this goal because it will facilitate efficient use of land resources, through increasing development opportunities in select locations within an area that is designated as a main street and served by public facilities including some high-quality transit service. Also see findings for Comprehensive Plan *Goal 7, Energy* and Policy 7.4.
61. **Goal 9, Citizen Involvement**, calls for improved methods and ongoing opportunities for citizen involvement in the land use decision-making process, and the implementation, review, and amendment of the Comprehensive Plan. This project followed the process and requirements specified in Chapter 33.740, Legislative Procedure. The Cully Main Street Proposal supports this goal. See the findings for Statewide Planning *Goal 1, Citizen Involvement*.

62. **Policy 9.1, Citizen Involvement Coordination**, calls for encouraging citizen involvement in land use planning projects through coordination with community organizations, availability of planning reports and notice of public hearings. The proposal supports this policy because it was developed with feedback and input from representatives of local neighborhood and business associations, property owners, local residents, and other interested people. Community organizations were informed of the process and given project updates; participation from these groups and individuals was also solicited. See the findings for Statewide Planning *Goal 1, Citizen Involvement*.
63. **Policy 9.3, Comprehensive Plan Amendment**, calls for allowing for the review and amendment of the adopted *Comprehensive Plan* which ensures citizen involvement opportunities for the city's residents, businesses, and organizations. The proposal supports this policy because a public review process including public hearings on the proposed amendments to the Comprehensive Plan Map and Zoning Map was conducted with input and feedback from local neighborhood and business associations, local residents, and other groups and individuals. See findings for Statewide Planning *Goal 1, Citizen Involvement*.
64. **Goal 10, Plan Review and Administration**, states that Portland's Comprehensive Plan will be implemented in accordance with State law and the Goals, Policies and Comprehensive Plan Map contained in the adopted Comprehensive Plan. The Cully Main Street Proposal is consistent with this goal based on Exhibit A and the findings in this exhibit, as described in more detail in the findings for Policies 10.6-10.8.
65. **Policy 10.6, Amendments to the Comprehensive Plan Goals, Policies, and Implementing Measures**, requires that all proposed amendments to implementing ordinances be reviewed by the Planning and Sustainability Commission prior to action by the City Council. The Cully Main Street Proposal supports this policy because the Planning and Sustainability Commission reviewed the proposed Comprehensive Plan Map and Zoning Map amendments, took public testimony, and finalized its recommendations to City Council at a public hearing on May 22, 2012. The Planning and Sustainability Commission's recommendations were forwarded to City Council for a public hearing to be held on August 29, 2012.
66. **Policy 10.7, Amendments to the Comprehensive Plan Map**, requires that amendments be supportive of the overall *Comprehensive Plan (Amended 2006)* and Comprehensive Plan Map, be consistent with the Statewide Planning Goals, and be consistent with any adopted applicable area plans. When the amendment is from a residential or urban commercial to another non-residential designation, the policy requires that there be no net loss of housing units. The Cully Main Street Proposal supports this policy because a conservative development scenario finds that the Cully Main Street Proposal increases residential units in Cully by eleven percent from 427 units to 476. Even though some residentially zoned parcels are being rezoned to non-residential, this is offset by the up-zoning of thirteen acres of residential parcels to a higher allowed density—for example the up-zone from Residential 3,000 (R3) to Residential 2,000 (R2). Additionally, housing is expected to occur to some degree in the Storefront Commercial (CS) lots. Not included in the projection is the possibility that the properties rezoned to Central Employment (EX) could redevelop with housing, although it is not an ideal location for housing. See findings for Statewide Planning *Goal 10, Housing*.
67. **Policy 10.8, Zone Changes**, states that base zone changes within a Comprehensive Plan Map designation must be to the corresponding zone stated in that designation. When a designation has more than one corresponding zone, the most appropriate zone will be applied based on the purpose of the zone and the zoning and general land uses of surrounding lands. Zone changes must be granted when it is found that public services are presently capable of supporting the uses allowed by the zone. The Cully Main Street Proposal supports this policy because base zone changes conform to the Comprehensive Plan Map designations. For example, existing Neighborhood Commercial lots are rezoned to Storefront Commercial (CS) zones along with a change to the corresponding Comprehensive Plan designation Urban Commercial.

There are two exceptions to this dual change requisite, a change from Residential 2,000 to Residential 2,000 (Urban Commercial) and a change from Residential 5,000 to Residential 5,000 (Neighborhood Commercial). These changes allow for long term opportunities for commercial and/or mixed-use development at specific main street locations. Statewide Planning Goals guidance allows for base zones to remain only if they are less intense than the Corresponding Zone. Residential zones are less intense than the corresponding Urban Commercial zone (Comprehensive Plan, p.10-6).

Care was taken in choosing designations to apply new zones where public services are presently capable of supporting the uses that the zone allows. The context of surrounding land uses was also considered.

68. **Goal 11 A, Public Facilities, General**, calls for provision of a timely, orderly, and efficient arrangement of public facilities and services that support existing and planned land use patterns and densities. The Cully Main Street Proposal is consistent with this goal because the area that includes the proposal is supported by a basic level of sewer, water, police, and fire service; and with a neighborhood park in the planning and development stage. The main street area where most of the rezoning proposals are situated is served by adequate streets with storm water management. Some of the local streets surrounding the main street study area are deficient in street amenities and storm water management. The broader Cully Main Street and Local Street Plan proposal includes a City Council resolution for adoption that is for a local street plan that will improve street connectivity and affordable options for implementation of local streets as part of the future Transportation System Plan update. See finding for Statewide Planning *Goal 12, Transportation*.
69. **Policy 11.2, Orderly Land Development**, states that urban development should occur only where urban public facilities and services exist or can be reasonably made available. See finding for *Goal 11A*.
70. **Policy 12.2, Enhancing Variety**, calls for promoting the development of areas of special identity and urban character. The Cully Main Street Proposal supports this policy because it recognizes the unique character of the Cully neighborhood and applies land use and zoning designations designed to maintain and enhance community-desired qualities, like a “quiet residential down home feel” and “racial, economic and cultural diversity” (Implementation Report Page 8, Exhibit A). Neighborhood Commercial designations are used when development would be in the presence of a primarily residential area. Storefront Commercial is used only along Cully Boulevard, Prescott Street, and Killingsworth Street frontages. Up-zoned residential intensity is capped at medium density, Residential 1,000. The existence of Residential 2,000 zoning in the neighborhood prior to these proposals suggests compatibility with multi-dwelling residential uses.
71. **Policy 12.6, Preserve Neighborhoods**, calls for preserving and supporting the qualities of individual neighborhoods that help to make them attractive places. The Cully Main Street Proposal includes minimal changes to the residential area outside the Cully Boulevard and Killingsworth Street frontage, preserving the stability of established residential areas while providing opportunity for economic development at two main intersections—Cully Boulevard and Prescott Street & Cully Boulevard and Killingsworth Street.

Cully Neighborhood Plan Findings

Portland Comprehensive Plan Policy 3.6 - Neighborhood Plan encourages the creation of neighborhood and area plans that address issues and opportunities at a scale that is more refined and more responsive to neighborhood needs than can be attained under the broad outlines of the Comprehensive Plan. Area and neighborhood plans describe and promote land use patterns, urban design, infrastructure facilities and services that encourage and contribute to the economic, social, and physical health, welfare, and safety of the specific area or neighborhood and the city as a whole. The Cully Main Street Proposal is consistent with the Cully Neighborhood Plan as described below.

72. **Policy Area IA, Develop a strong neighborhood identity**, calls for creating a sense of place and belonging for residents of the neighborhood and unifies residential, commercial, and industrial interests into a cooperative force for mutual improvement and advancement. The proposal allows for a transformation of the main street area to a mixed-use neighborhood center of activities that creates a sense of place. Adding acreage of commercial and employment zoned land allows more opportunity for locally serving businesses that contribute to a distinct Cully identity. The pedestrian oriented nature of the zoning designations will promote a locally accessible community gathering place.
73. **Objective 4 of Policy Area IA, Beautify the appearance of the Cully Neighborhood**, calls for upgrading specific buildings and landscaping. Investments of new development and redevelopment along the main street area is expected to improve the quality of existing building stock, or create new building stock that conforms to development standards. The application of Neighborhood Commercial 1 (CN1), Storefront Commercial (CS), and Mixed Commercial (CM) designations minimizes off-street parking lots and maximizes the construction of welcoming storefront facades. The rezoning of nonconforming businesses to commercial zones allows the buildings for these uses to be renovated and upgraded to be more attractive.
74. **Objective 3 of Policy Area IB**, calls for promoting sensible and balanced solutions to the transition or intensification of commercial and industrial uses. It also calls for discouraging incompatible uses. The Cully Main Street Proposal is consistent because the proposals were carefully selected to fit within the existing mostly residential neighborhood context. The zones proposed such as CS, CM, Central Employment (EX), and CN1, CN2 are located along neighborhood collector streets that already serve some commercial establishments. The proposals balance the need to serve the existing population and accommodate a forecasted population with basic goods and services while maintaining the overall single dwelling residential feel of the neighborhood. Focusing future growth along the main street corridors of Cully Boulevard and Killingsworth Street accomplishes the growth objectives while maintaining the character of the bulk of the neighborhood.
75. **Objective 2 of Policy Area 2A, Develop neighborhood “gateway” areas with family oriented businesses**, calls for a strategy to support family oriented businesses. The Cully Main Street Proposal recognizes two gateways into the Cully neighborhood, one at Cully Boulevard and NE Portland Highway and another at Shaver and Cully Boulevard. Proposals amend the Comprehensive Plan Map and zoning map so these gateways can become centers of activity and be able to accommodate family oriented businesses.
76. **Policy Area 2B, Urban character and historic preservation**, calls for maintaining and improving the historic character of the neighborhood’s existing physical environment while attracting compatible development. The Cully Main Street Proposal is consistent with this proposal because it expands commercial and multi-dwelling zoning in the main street area where such uses already exist. In places like along Cully Boulevard south of Prescott Street, the proposed CS designations respond to existing building stock with street front characteristics.
77. **Objective 4 of Policy Area 2B, Careful planning and design**, calls for the careful planning and design of new development and redevelopment to enhance neighborhood livability. The Cully Main Street Proposal is the result of a one year public engagement process. It involved input from a body of interested local residents and community members organized into a Project Working Group. See

finding for Statewide Planning Goal 1 for additional public input opportunities in the planning and design of the Cully main street area's future. Proposed comprehensive plan and zoning map designations are chosen to see a more pedestrian oriented main street transformed with new businesses, housing, and mixed use development over time. Overall, the scale of new development will be similar to what is allowed today.

78. **Objective 2 of Policy 2C, Improved safety**, calls for encouraging appropriate landscaping, lighting and environmental design to create safer streets, yards and open spaces. The Cully Main Street Proposal supports this objective by increasing the activity potential of the Cully main street corridor. More formal activity and eyes on the street from new businesses and residents tends to discourage illicit activity. Landscaping, lighting and general design parameters are found in the zoning code.
79. **Policy Area 3A, Preserve Housing and Promote New Development**, calls for preserving, protecting, and improving existing housing stock while providing opportunities for new housing for people of all ages, family types and income levels. The Cully Main Street Proposal accomplishes this policy by focusing new development along main street areas where there is opportunity for infill and where redevelopment would have minimal impact on the majority of the Cully neighborhood single family residential housing stock. Even while protecting the bulk of Cully's existing housing stock, the proposals promote new housing and mixed use development along the main street area through commercial zones like Storefront Commercial (CS) and Mixed Commercial (CM). Housing potential is increased because CS does not have maximum density limitation. Goal 3 of the Cully Neighborhood Plan describes NE Cully Boulevard as a potential corridor for new multifamily development. The Cully Main Street Proposal reinforces this concept and increases the density along the residential segment of the corridor from the existing Residential 3,000 to a proposed Residential 2,000 that will allow the construction of apartments, townhouses and common wall construction row houses. (See findings for Statewide Planning Goal 10, Housing)
80. **Objective 2 of Policy Area 3A, Improved and maintained residential properties**, calls for encouraging multifamily development on properly zoned land with access to transit service, within walking distance to commercial, schools and parks. The Cully Main Street Proposal accomplishes this by up-zoning to provide multi-dwelling and commercial opportunities mostly along streets with existing access to transit—TriMet routes #71 and #72. A strategy recommendation to be adopted by resolution requests that TriMet be asked to consider bus service along the entire Cully Boulevard main street corridor. (See findings for Comprehensive Plan Policy 2.12, 2.18, and Goal 4, Housing)
81. **Objective 4 of Policy Area 3A, Owner Occupied Multi-Family**, calls for encouraging good quality owner-occupied multi-family residential use on transit arterials. The Cully Main Street Proposal is consistent with this policy by increasing opportunity for owner occupied multi-family, especially in the proposed Central Employment (EX) designation, which could result in condominium units. The lots are located on Killingsworth Street along TriMet route #72.
82. **Goal 4, Land Use and Recreation**, states that the existing land use in the Cully neighborhood is predominantly single family residential, with some multi-family uses and central commercial node at Five Corners—the Cully Boulevard, Prescott Street and NE 60th Street intersection. The Cully Main Street Proposal honors this concept of the existing neighborhood. It makes minimal zoning changes to the bulk of Cully's existing single dwelling zoned housing stock while concentrating rezoning along the Cully main street area where existing multi-family residential is located. The Five Corners commercial node is recognized and expanded towards the south along Cully Boulevard, while a new node at Killingsworth and Cully Boulevard is developed in recognition of recent opportunities, proximity to major transportation infrastructure (Portland Highway is a Regional/Major City Traffic Street, Killingsworth Street a District Collector, and the node falls within a recognized *community main street* as specified in Metro's 2040 Growth Concept Plan.)

Rezoning proposals address a shortfall of local retail goods and services to meet resident needs. A Marketek redevelopment analysis report states that local residents are meeting these needs by

traveling outside of the neighborhood. The most accessible and compatible location in the Cully neighborhood to ameliorate this need is along the designated main street area.

83. **Objective 1 of Policy 4B, New Business**, calls for encouraging new businesses to locate within the Cully neighborhood on commercially zoned properties. The Cully Main Street Proposal addresses the lack of business opportunity in Cully due to insufficient commercial zoning. It strategically identifies lots in the designated main street area where future commercial growth should locate. The proposed zoning helps to reduce haphazard commercial and employment growth within the entire neighborhood area, concentrating it instead along a corridor with adequate transportation infrastructure and complementary land uses. It provides appropriate commercial zoning for existing local businesses that had been residentially zoned.
84. **Objectives 3 and 4 of Policy 4D, Recreation**, calls for preserving and encouraging open space within the neighborhood, as well as establishing community gardens and community outdoor activities. The Cully Main Street Proposal supports this policy through its proposal to rezone a property under planning for a neighborhood park to Open Space (OS).
85. **Objective 3 of Policy Area 6B, Transit Service**, calls for improving, maintaining and encouraging greater use of transit service and transit incentives. See findings for Comprehensive Plan *Policy 2.12* and *2.18*.
86. **Objective 1 of Policy Area 6C, Pedestrians and Bicycling**, encourages bicycling and walking as an alternative to automobile trips. The Cully Main Street Proposal carries out this policy objective in two ways: 1) utilizing main street zoning designations like Storefront Commercial (CS), Mixed Commercial (CM), and Neighborhood Commercial 1 (CN1) that create storefront development that is more accessible to pedestrians and bicyclists; 2) providing more opportunity for residents to meet their needs locally and in closer proximity, thus reducing dependence on the automobile.
87. **Objective 1 of Policy Area 7A, Appearance of Commercial and Industrial Areas**, calls for effective buffers between industrial and commercial land uses and residential land uses to mitigate noise, traffic and unsightliness in residential areas. See findings for Comprehensive Plan *Policy 2.23*
88. **Objective 4 of Policy Area 7A, Business Growth and Development**, calls for retaining and expanding existing businesses and employment opportunities and encouraging new commercial uses which provide goods and services to the local residents and industrial activities to locate in appropriately zoned areas. The Cully Main Street Proposal supports this objective by addressing the shortage of commercially zoned land and local serving businesses in the neighborhood. It adds eight acres of commercial land while simultaneously increasing the housing capacity. The additional commercial and employment zoned land creates opportunities for local employment, the provision of needed goods and services. Proposals bring non-conforming uses into compliance and remove barriers for expanding existing businesses. See findings for Statewide *Goal 9, Economic Development* and *10, Housing*)