



**Exhibit B**  
**Amended**

***122nd Avenue Station Area Study:***  
***Implementation Amendments***  
**Findings Report**

**August 2, 2006**

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## Introduction

The *122nd Avenue Station Area Study: Implementation Amendments* is the product of effort by residents, business people, property owners, city staff, and other interested stakeholders to determine the future of this unique area. When adopted by City Council, the amendments will update the Portland *Comprehensive Plan* for this part of Portland and update the Zoning Map, Zoning Code, and Community Design Guidelines that guide public and private decision-making and investment in the transit station area. The findings in this document show how the amendments comply with the State Land Use Planning Goals, the Metro *Urban Growth Management Functional Plan* and the Portland *Comprehensive Plan*.

### 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 (LCDC) was created and directed to adopt statewide planning Goals and Guidelines. These Goals and Guidelines were adopted by LCDC 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 *122nd Avenue Station Area Study: Implementation Amendments* revises Portland's *Comprehensive Plan* through the revision to the Outer Southeast Community Plan, Subarea Policy V, Objective 1.

### How This Document is Structured

This document is organized into several sections: this introduction, Statewide Planning Goals Findings, Metro *Urban Growth Management Functional Plan* Findings, and Portland *Comprehensive Plan* Findings, including the *Outer Southeast Community Plan*, and *Hazelwood 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 amendments are judged for consistency; and 2) statements that support a conclusion of consistency. If a finding against a given measure (goal, title, policy, objective, further statement, etc.) is not included in this document, it is because it has been determined to not be relevant to the *122nd Avenue Station Area Study Implementation Amendments*.

## General Findings

- I. The *122nd Avenue Station Area Study: Implementation Amendments* (ordinance) amends the *Comprehensive Plan*, *Comprehensive Plan* map, *Zoning Map*, *Zoning Code*, and *Community Design Guidelines*. The amendments do not change other land use regulations. Therefore, the following *Comprehensive Plan* goals, policies and objectives apply to the amendments and the amendments satisfy the applicable goals, policies and objectives for the reasons stated below.
- II. During the course of public hearings, the Bureau of Planning, and the Planning Commission provided interested parties opportunities to identify, either orally or in writing, any other *Comprehensive Plan* goal, policy or objective that might apply to the amendments. No additional provisions were identified.

## Statewide Planning Goals Findings

1. State planning statutes require cities to adopt and amend comprehensive plans and land use regulations in compliance with the state land use goals. Because of the limited scope of the amendments in this ordinance, only the state goals addressed below apply.
2. **Goal 1, Citizen Involvement**, requires provision of opportunities for citizens to be involved in all phases of the planning process. The preparation of these amendments has provided numerous opportunities for public involvement. Portland *Comprehensive Plan* findings on Goal 9, Citizen Involvement, and its related policies and objectives support this goal. See also the public involvement section of *122nd Avenue Station Area Study Implementation Amendments*. The amendments are supportive of this goal in the following ways:
  - a) In 2003, Portland City Council considered testimony on the Gateway Planning Regulations Project. During that public process, community members, including key stakeholders and property owners, urged City Council to direct the Bureau of Planning to evaluate the regulatory environment for development around the 122<sup>nd</sup> Avenue transit station.
  - b) During summer and fall of 2004, the Planning Bureau began scoping a study to evaluate conditions and opportunities at 122<sup>nd</sup> Avenue. The Bureau of Planning was awarded a TGM quick response grant which funded a consultant team to study land use design and transportation issues.
  - c) A study working group (SWG) composed of representatives from four local neighborhood and two business associations, as well as representatives from key property owners/stakeholders, and key agencies (TriMet and Metro) was formed in Autumn 2004 and held its first meeting in December. The group served as an advisory body, not a decision-making body, to consider the interests of the community and represent a range of perspectives on planning issues. The SWG met 8 times prior to the Planning Commission public hearing. Their feedback helped inform the development of the plan.
  - d) The *122nd Avenue Station Area Study* process included a public outreach program beginning February 2005 and continuing through the first public hearings with the Portland Planning Commission on November 22, 2005.

- e) In winter 2005, a postcard invitation was mailed to over 3,000 addresses within and near the 122nd Avenue Station Area Study area inviting the public to attend a kick-off event in February 2005.
- f) On February 7, 2005, over 40 community members attended a kick-off open house for the *122nd Avenue Station Area Study* where they responded to questions about their goals for the area, and their experience as users of the area. Community concerns and desires were recorded to assist in the land use and transportation alternatives.
- g) On April 2, 2004, a community open house was attended by over 40 community members. Participants were asked to weigh-in on land use, urban design, transportation, circulation and streetscape issues. Community members were specifically asked to evaluate four concept scenarios for development in the 122<sup>nd</sup> Avenue area.
- h) A third community workshop was held on June 4, 2005, to further evaluate refined concepts for land use development, design of uses with exterior display and storage, streetscape and pedestrian improvements, and a revised circulation/connectivity plan.
- i) Staff attended meetings with local business associations (Midway Business Association and Gateway Area Business Association) and neighborhood associations (Hazelwood Neighborhood Association, Mill Park Neighborhood Association) during winter-spring 2005 to inform neighbors about participation in the study process.
- j) On June 28, 2005, a final presentation of the study recommendations and a question and answer session was held.
- k) Input from all public meetings was used to refine the concept plans and develop implementation recommendations.
- l) Implementation concepts were shared with the study working group at a meeting on September 12, 2005. A draft of the *122nd Avenue Station Area Study: Proposed Implementation Amendments* was shared with the study working group and Hazelwood Neighborhood Association at a meeting on October 17, 2005.
- m) Notice of the Planning Commission and Design Commission hearings on the *122nd Avenue Station Area Study Proposed Implementation Amendments* was mailed in October 2005 to 687 interested parties and property owners.
- n) An open house to share information about the *122nd Avenue Station Area Study Proposed Implementation Amendments* was held on November 15, 2005. Approximately 20 community members attended this event.
- o) The *122nd Avenue Station Area Study* process was the focus of articles in The Oregonian, The Portland Tribune, and was covered by local newspapers including the East County News, and Mid County Memo.
- p) The City of Portland Planning Commission held a hearing on the *122nd Avenue Station Area Study Proposed Implementation Amendments* on the evening of November 22, 2005. The City of Portland Design Commission held a hearing on the *122nd Avenue Station Area Study Proposed Implementation Amendments* on the evening of January 5, 2006. The community had the opportunity to offer public testimony on the proposed amendments.

- q) The City of Portland Planning Commission held a second hearing on revision to the *122nd Avenue Station Area Study Proposed Implementation Amendments* on the evening of April 25, 2006. The community had the opportunity to offer public testimony on the proposals.
  - r) The Portland City Council held a public hearing on the *122nd Avenue Station Area Study Recommended Implementation Amendments* on June 15, 2006. The hearing was continued to June 28, 2006 and August 2, 2006 to consider amendments to the recommendations. Public testimony was taken on the recommendations and amendments being considered.
  - s) The Bureau of Planning held a community meeting on July 20, 2006 to further discuss aspects of proposed amendments prior to the continued City Council hearing on August 2, 2006.
3. **Goal 2, Land Use Planning**, requires the development of a process and policy framework which 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 supportive of 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 *122nd Avenue Station Area Study Implementation Amendments*. The amendments are supportive of 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 have been evaluated and satisfied as described in the findings below.
  - b) The amendments are also supportive of this goal because documents identifying existing conditions, community issues and desires, and documents analyzing economic and transportation issues affecting the plan area were prepared to assist in the creation of plan alternatives for the *122<sup>nd</sup> Avenue Station Area Study*. These documents include:
    - *122nd Avenue Station Area Study Economic Analysis*;
    - *122nd Avenue Station Area Study Phase One Report and Recommendations*;
    - *122nd Avenue Station Area Study Implementation Amendments*;
    - *122nd Avenue Station Area Study Regulatory Impact Assessment*.
  - c) Portland Comprehensive Plan findings on Goal 1, Metropolitan Coordination, and its related policies and objectives also support this goal.
4. **Goals 3 and 4, Agricultural Lands and Forest Lands**, requires the preservation and maintenance of the State's agricultural and forest lands, generally located outside of urban areas. The amendments are supportive of this goal because the *122nd Avenue Station Area Study: Implementation Amendments* support the provision of additional housing, commercial, employment and recreational opportunities within an urbanized area, thereby reducing pressure on agricultural and forest lands and pressure to expand the urban growth boundary.
5. **Goal 6, Air, Water and Land Resource Quality**, requires the maintenance and improvement of the quality of air, water, and land resources. The amendments are consistent with this goal because the *122nd Avenue Station Area Study: Implementation Amendments* generally encourage a compact mixed-use development of commercial and residential uses and emphasizes a balanced multi-modal transportation system by encouraging the use of alternative modes, such as walking,

bicycling, and transit. Compact urban development helps maintain natural resources by accommodating growth and development in urban areas and by protecting and conserving rural area natural resources. Compact mixed-use development with a balanced transportation system should reduce vehicle miles traveled in the study area and positively impact air quality. Portland Comprehensive Plan findings on Goal 8, Environment, and its related policies and objectives, also support this goal.

6. **Goal 8, Recreational Needs**, requires satisfaction of the recreational needs of both citizens and visitors to the State. The amendments are consistent with this goal because the *122nd Avenue Station Area Study: Implementation Amendments* promote a safe and walkable main street that is inviting to both community members and visitors.
7. **Goal 9, Economic Development**, requires provision of adequate opportunities for a variety of economic activities vital to public health, welfare, and prosperity. The amendments are consistent with this goal. The *122nd Avenue Station Area Study: Implementation Amendments* call for the development of a vital commercial area along 122<sup>nd</sup> Avenue at the nodes of Glisan, Stark and Burnside streets. The amendments are designed to strengthen existing businesses and attract new businesses that foster a positive identity for the area, support a local economy, and encourage housing to support retail and other community amenities. The potential for housing and mixed use development is intended to strengthen support of existing commercial development by allowing for an increase in potential customers and employees located within close proximity to existing and new businesses. Portland Comprehensive Plan findings on Goal 5, Economic Development, and its related policies and objectives also support this goal.
8. **Goal 10, Housing**, requires provision for the housing needs of citizens of the state. The amendments are consistent with this goal. The *122nd Avenue Station Area Study: Implementation Amendments* promote an urban form that supports the development of vital commercial areas supported by additional opportunities for housing and mixed-used residential development. Portland Comprehensive Plan findings on Goal 4, Housing, and its related policies and objectives also support this goal.
9. **Goal 11, Public Facilities and Services**, requires planning and development of timely, orderly and efficient public service facilities that serve as a framework for urban and rural development. The 122<sup>nd</sup> Avenue Station Area Study contains recommendations addressing the pedestrian environment, vehicle circulation, and transit. Portland Comprehensive Plan findings on Goals 11 A through 11 I, Public Facilities, and related policies and objectives also support this goal.
10. **Goal 12, Transportation**, requires provision of a safe, convenient and economic transportation system. The *122nd Avenue Station Area Study* is consistent with this goal because it encourages transit-oriented and pedestrian-accessible development in the area near the station area.

The Transportation Planning Rule (TPR) was adopted in 1991 to implement State Goal 12. Section 660-012-0045 of the TPR requires local governments to adopt land use regulations that designate “types and densities of land uses adequate to support transit” and those that “reduce reliance on the automobile and allow transit-oriented developments on land along transit routes.” The *122nd Avenue Station Area Study* supports these requirements because it includes changes to commercial zones that will allow new housing and mixed-used development in the area, which is served by a MAX light rail, and two frequent service bus lines.

Section 660-012-0060(1) of the TPR requires “where an amendment to a functional plan, an acknowledged comprehensive plan or a land use regulation would significantly affect an existing

or planned transportation facility, the local government shall put in place measures to assure that allowed uses are consistent with the identified function, capacity and performance standards of the affected facility.” This requirement can be met by “adopting measures that demonstrate allowed land uses are consistent with the planned function, capacity, and performance standards of the transportation facility.”

Proposed changes in Comprehensive Plan designations and zoning are not anticipated to increase automobile trips because the changes result in nearly identical housing units and jobs along the corridor although the zoning pattern shifts. Since these minor changes will not generate additional trips beyond what could occur under existing zoning, there is no significant impact anticipated on 122<sup>nd</sup> Avenue or adjacent streets and no change to the function, capacity, or performance standards of the street over the planning period. The change of zoning from CS to CXd is essentially a design-related change, as the development envelopes allowed currently in the CS zone in the East Corridor Plan District exceed those allowed in the CX “base” zone. The current maximum floor area ratio allowed is 4 to 1, with an additional 2 to 1 available (a total of 6 to 1) when 80 percent of floor area is in residential use. The maximum allowed height is currently 100 feet. No changes are proposed to the maximum allowed height or floor area. Further, the allowed uses in the CX zone are similar to those allowed in the CS zone. Other zone changes in the study area are diminimus, and have been applied to create consistency in the zoning pattern or minimize nonconforming use situations. The *122nd Avenue Station Area Study* also recommends various transportation actions designed to improve the capacity of the transportation system to handle existing trips as well as those that will occur over the planning period.

Portland Comprehensive Plan findings on Goal 6, Transportation, and its related policies and objectives also support this goal.

11. **Goal 13, Energy Conservation**, requires development of a land use pattern that maximizes the conservation of energy based on sound economic principles. The *122nd Avenue Station Area Study* is consistent with this goal because the Comprehensive Plan Map and Zoning Map and Code amendments generally promote the establishment of a compact urban form, including a mix of uses supported by an enhanced pedestrian and transit system. This urban form and supporting multi-modal transportation system may result in decreased use of single-occupant vehicle usage and a reduction of fuel consumption. Portland Comprehensive Plan findings on Goal 7, Energy, and its related policies and objectives also support this goal.
12. **Goal 14, Urbanization**, requires provision of an orderly and efficient transition of rural lands to urban use. The amendments are consistent with this goal because the *122nd Avenue Station Area Study* supports providing additional development opportunities for residential, commercial, employment and industrial land uses, and implements main street concepts of Metro’s Urban Growth Management Functional Plan (UGMFP). The implementation of this plan and the opportunities it provides for additional development capacity reduce long-term pressure to expand the UGB and convert rural land for urban purposes. Portland Comprehensive Plan findings on Goal 2, Urban Development, and its related policies and objectives also support this goal.

## **Metro Urban Growth Management Functional Plan (UGMFP) Findings**

13. **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. During the development of the *122nd Avenue Station Area Study* such an analysis was conducted, based on the land use designations existing and proposed within the plan area. This analysis found that there is little change in the number of housing units based on calculated capacity if the plan and corresponding land use designation changes were adopted and implemented. Using a methodology that accounts for residential development that occurs in commercial zones, there is, on balance, a slight increase in housing potential. In addition, capacity for employment is maintained or improved by using a combination of commercial land use designations. Thus, the amendments are not inconsistent with this title.
14. **Title 2, Regional Parking Policy**, regulates the amount of parking permitted by use for jurisdictions in the region. This title is already addressed by the Portland Zoning Code and the City's Transportation System Plan which set limits for the number of parking spaces required and allowed for different uses and areas along transit corridors. The plan furthers this goal by promoting a compact urban form supported by enhanced transit system and pedestrian and bicycle circulation system. Thus, the amendments are not inconsistent with this title.
15. **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 title is addressed by existing City policies and regulations. Thus, the amendments are not inconsistent with this title.
16. **Title 4, Retail in Employment and Industrial Areas**, calls for retail development in Employment and Industrial areas that supports these areas and does not serve a larger market area. This plan is consistent with requirements of this title as it does not propose to weaken or modify existing regulations protecting industrially designated lands. Thus, the amendments are not inconsistent with this title.
17. **Title 6, Central City, Regional Centers, Town Centers and Station Communities**, defines Metro's policy regarding areas outside of the Urban Growth Boundary. The intent of this title is to enhance Centers designated on Metro's 2040 Growth Concept Map by encouraging growth within Centers. The *122nd Avenue Station Area Study* and associated planning process are directly tied to this title as 122<sup>nd</sup> Avenue is a designated main street, and the area is a station community. The amendments will comply with this title by providing regulations that allow housing in the transit station area, which will support existing commercial uses and will promote additional commercial growth along the main street. Thus, the amendments are not inconsistent with this title.
18. **Title 7, Affordable Housing**, recommends that local jurisdictions implement tools to facilitate development of affordable housing. The amendments propose a land use and zoning pattern that fosters a mix of housing types, and redevelopment opportunities in the area, with a range of housing options. The transit-oriented development limited tax abatement is available in this area and supports development of housing available to a range of incomes. Thus, the amendments are not inconsistent with this title.

## **Metro Regional Transportation Plan (Functional Plan) Findings**

19. The Regional Transportation Plan (RTP) is Metro's functional plan for transportation. The RTP contains a number of requirements that must be addressed when the Comprehensive Plan is being amended.
20. **Policy 1.0, Public Involvement**, establishes a process for involving the public through provision of complete and timely public notice. As detailed earlier in these findings, the *122nd Avenue Station Area Study* process included public involvement opportunities with notice of meetings and public events advertised through the media and on the project web site.
21. **Policy 2.0, Intergovernmental Coordination**, requires coordination among the local, regional, and state jurisdictions that own and operate the region's transportation system. The *122nd Avenue Station Area Study* process included a study working group (SWG) with representatives from the Oregon Department of Transportation, Metro, and TriMet.
22. **Policy 3.0, Urban Form**, facilitates implementation of the 2040 Growth Concept with specific strategies that address mobility and accessibility needs and use transportation investments to leverage the realization of 2040. The *122nd Avenue Station Area Study* identifies several transportation improvements within the area that may be implemented through a subsequent design and construction process.
23. **Policy 4.0, Consistency Between Land-use and Transportation Planning**, ensures that the identified function, design, capacity and level of service of transportation facilities area consistent with applicable regional land use and transportation policies as well as adjacent land use patterns. The *122nd Avenue Station Area Study* is proposing changes to the zoning pattern along the street that leaves the potential density and mix of allowed uses relatively unchanged. Because of this, the street is expected to operate similarly under this scenario as to how it does under current designations.
24. **Policy 7.0, The Natural Environment**, calls for protecting the region's natural environment. The *122nd Avenue Station Area Study* includes concepts and guidelines that promote sustainability in both the private development and public infrastructure realms.
25. **Policy 8.0, Water Quality**, calls for protecting the region's water quality. The development regulations in the *122nd Avenue Station Area Study* includes guidelines that allow for incorporating sustainable stormwater management in the design of on site stormwater systems.
26. **Policy 9.0, Clean Air**, supports protecting and enhancing air quality so that as growth occurs, human health and visibility is maintained in the region. The *122nd Avenue Station Area Study* amendments foster a future development pattern that may result in reduced reliance on the automobile, including improving the pedestrian environment and access to transit.
27. **Policy 11.0, Regional Street Design**, calls for designing regional streets to support the function and character of surrounding land uses. This portion of 122<sup>nd</sup> Avenue is classified as a Regional Boulevard in the RTP. The transportation recommendations call for changes such as landscaped pedestrian refuge islands, medians and wide sidewalks that are consistent with this designation.
28. **Policy 13.0, Regional Motor Vehicle System**, provides for a regional motor vehicle system of arterials and collectors. The *122nd Avenue Station Area Study* amendments support 122<sup>nd</sup> Avenue's designation as a major arterial.

29. **Policy 15.0, Regional Freight System**, provides for efficient, cost-effective and safe movement of freight. The *122nd Avenue Station Area Study* supports the freight designation of 122<sup>nd</sup> Avenue as a Major Truck Street.
30. **Policy 16.0, Regional Bicycle System Connectivity**, provides for a continuous regional network of safe and convenient bikeways. 122<sup>nd</sup> Avenue is identified as a City Bikeway in the Portland TSP.
31. **Policy 17.0, Regional Pedestrian System**, supports designing the pedestrian environment to be safe, direct, convenient, attractive and accessible to all users. The 122<sup>nd</sup> Avenue transit station area is classified as a pedestrian district and 122<sup>nd</sup> Avenue is a multi use facility. The *122nd Avenue Station Area Study* supports this classification because the transportation concept includes additional pedestrian improvements such as curb extensions, improved sidewalks, and marked pedestrian crossings.
32. **Policy 17.2, Regional Pedestrian Access and Connectivity**, provides for direct pedestrian access, as a part of all transportation projects. The *122nd Avenue Station Area Study* transportation recommendations call for establishing a 15-foot sidewalk corridor on both sides of 122<sup>nd</sup> Avenue in the Ventura Park Pedestrian District.
33. **Policy 18.0, Transportation System Management**, supports transportation system management techniques to optimize performance of the region's transportation system. The *122nd Avenue Station Area Study* supports this policy as the recommendations call for further study and enhancement of signal timing and other changes to smooth traffic flow.
34. **Policy 19.1, Regional Parking Management** supports managing and optimizing the efficient use of public and commercial parking in the central city, regional centers, town centers, main streets, and employment centers. The *122nd Avenue Station Area Study* supports this policy because one of the goals of the transportation concept is to maximize permanent on-street parking to serve local businesses.
35. **Policy 20.1, 2040 Growth Concept Implementation**, calls for implementing a regional transportation system that supports the 2040 Growth Concept through the selection of complementary transportation projects. The *122nd Avenue Station Area Study* supports this policy because both the land use and transportation components are intended to reinforce the area's designation as a main street and transit station community.
36. **Street Connectivity Compliance (RTP Section 6.4.5)** requires the development of a future street plan map of key street connections. The *122nd Avenue Station Area Study* supports this policy, as a future street plan for the area was developed and is recommended to be considered and adopted as an update to the Portland Transportation System Plan.
37. **Transit Service Planning Compliance (RTP Section 6.4.10)** requires local jurisdictions to provide direct, logical pedestrian crossings at transit stops and marked transit crossings at major transit stops and to consider stop spacing and location consistent with regional street designs. The *122nd Avenue Station Area Study's* recommendations include new pedestrian crossings to improve safety and facilitate access to transit.
38. **Project Development Compliance (RTP Section 6.7.3)** requires local jurisdictions to consider system management to address or preserve street capacity. The *122nd Avenue Station Area Study* supports this requirement because improvements to signal timing are recommended for further study.

## Portland Comprehensive Plan Goals Findings

39. The City's *Comprehensive Plan* was adopted by the Portland City Council on October 16, 1980, and was acknowledged as being in conformance with the statewide planning goals by the Land Conservation and Development Commission on May 1, 1981. On May 26, 1995, and again on January 25, 2000, the LCDC completed its review of the City's final local periodic review order and periodic review work program, and reaffirmed the plan's compliance with the statewide planning goals.
40. **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. Coordination with state and regional planning efforts has been undertaken with the development of the proposed amendments. The *122nd Avenue Station Area Study* process included participation of representatives from city, regional, and state agencies, ensuring consistency with applicable local, regional and state plans.
41. **Policy 1.4, Intergovernmental Coordination**, calls for continuous participation in intergovernmental affairs with public agencies to coordinate metropolitan planning and project development and maximize the efficient use of public funds. The amendments support this policy because the *122nd Avenue Station Area Study* process identified and included a variety of local, regional, and state agencies in the plan development process. Individuals from these agencies were invited to serve on a study working group (SWG), which participated in the local planning process and reviewed and commented on the *122nd Avenue Station Area Study*.
42. **Policy 1.5, Compliance with Future Metro Planning Efforts**, calls for the review and update of Portland's *Comprehensive Plan* to comply with the Regional Framework Plan adopted by Metro. The amendments support this policy because they implement portions of the Metro UGMFP.
43. **Goal 2, Urban Development**, calls for maintenance of 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 amendments are consistent with this goal because the land use and zoning pattern proposed for the *122nd Avenue Station Area Study* area increases opportunities for additional residential and commercial uses, within areas designated for these land uses. Additionally, the plan provides opportunities for mixed-use development.
44. **Policy 2.1, Population Growth**, calls for accommodating the projected increase in city households. The amendments support this policy because the Comprehensive Plan Map and Zoning Map amendments proposed by the *122nd Avenue Station Area Study* will maintain, and in some cases expand, the long-term potential to develop additional housing units in the plan area.
45. **Policy 2.2, Urban Diversity**, calls for promotion of a range of living environments and employment opportunities for Portland residents. The amendments support this policy because the zoning pattern for the *122nd Avenue Station Area Study* will create a mix of residential and commercial development opportunities within the area.
46. **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. The *122nd Avenue Station Area Study* supports this policy because it maintains higher residential density in areas close to the transit station, while maintaining lower density patterns in existing developed neighborhoods outside of the specified study area.

47. **Policy 2.11, Commercial Centers**, calls for expanding the role of major established commercial centers that are well served by transit in a manner compatible with the surrounding area. The *122nd Avenue Station Area Study* supports this policy because it provides for continued commercial use of properties along the established main street. The amendments will allow expansion of established larger-scale commercial uses along 122<sup>nd</sup> Avenue, and provides opportunities for additional small scale commercial to serve local residents.
48. **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 *122nd Avenue Station Area Study* supports this policy because it allows development that includes commercial and residential uses that are transit supportive in a transit station area, along an identified transit Frequent Bus route and designated main street.
49. **Policy 2.13, Auto-Oriented Commercial Development**, calls for allowing auto-oriented commercial development to locate on streets designated as Major City Traffic Streets by the Transportation Element; and calls for allowing neighborhood level, auto-oriented commercial development near neighborhoods where allowed densities will not support transit- and pedestrian-oriented development. The amendments support this policy. NE/SE 122<sup>nd</sup> Avenue is classified a Major City Traffic Street and has long been the location of auto-oriented commercial development. However, allowed residential densities in the area will increasingly support pedestrian oriented uses. The amendments create a balance on the street, as they allow limited auto oriented commercial development in an area that is also designated a transit center and pedestrian district.
50. **Policy 2.15, Living Closer to Work**, calls for locating greater residential densities, including affordable housing, near major employment centers, including Metro-designated regional and town centers, to reduce vehicle miles traveled per capita and maintain air quality; and calls for encouraging home-based work where the nature of the work is not disruptive to the neighborhood. The *122nd Avenue Station Area Study* supports this policy because the zoning proposal provides for additional housing opportunities including in mixed use developments, and employment opportunities in commercial zones in the transit station area.
51. **Policy 2.16, Strip Development**, calls for discouraging the development of new strip commercial areas and focusing future activity in such areas to create a more clustered pattern of commercial development. The amendments support this policy because they call for retaining and emphasizing the existing commercial clusters at key intersections.
52. **Policy 2.17, Transit Stations and Transit Centers**, calls for encouraging transit-oriented development patterns at transit stations and at transit centers to provide for easy access to transit service. Establish minimum residential densities on residentially-zoned lands within one-half mile of transit stations and one-quarter mile of transit centers that support the use of transit. The design and mix of land uses surrounding transit stations and transit centers should emphasize a pedestrian- and bicycle-oriented environment and support transit use. The amendments support this policy because they maintain transit supportive residential densities within the one-half and one-quarter mile radii, and they promote pedestrian orientation in commercial development near the transit center, including pedestrian orientation for the type of uses that have traditionally developed in an auto-oriented pattern.
53. **Policy 2.18, Transit Supportive Density**, calls for establishing average minimum residential densities of 15 units per acre within one-quarter mile of existing and planned transit streets, Main

Streets, town centers, and transit centers, and 25 units per acre within one-half mile of light rail stations and regional centers. Where existing development patterns preclude these densities, this policy calls for encouraging infill through accessory units or allowing increased density on vacant lots. The amendments support this policy because it generally allows development in excess of these densities in the transit station area.

54. **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 amendments support this policy because they provides for infill at densities that are generally higher than existing densities. Increases in development potential may provide an incentive for redevelopment and better accommodate future increases in population and employment.
55. **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 amendments support this policy because they provide land use and zoning designations that may encourage development of vacant land and redevelopment of underutilized land.
56. **Policy 2.21, Existing Housing Stock**, calls for providing for full utilization of larger single-dwelling homes with conditions that preserve the character of the neighborhood and prevent speculation. The amendments support this policy because they generally maintain single-dwelling designations in neighborhood areas outside of the transit station area.
57. **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 amendments support this policy because the land use and zoning designations applied generally allow mixed-use development.
58. **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 amendments support this policy because they include land use and zoning designations that buffer and transition lower density residential areas from commercial uses and higher-density residential uses at decreasing densities. The amendments do this by “stepping down” levels of intensity and height limits through zoning and design tools.
59. **Policy 2.27, Outer Southeast Community Plan**, calls for promoting the economic vitality, diverse residential character, environmental quality, and livability of Outer Southeast Portland by including the Outer Southeast Community Plan as part of the Comprehensive Plan. The amendments support this policy because they allow for reinvestment and revitalization of commercial uses, and are consistent with policies of the Comprehensive Plan as well as the policies of the Outer Southeast Community Plan and the Hazelwood Neighborhood Plan as shown in this document.
60. **Goal 3, Neighborhoods**, calls for preservation and reinforcement of the stability and diversity of the city's neighborhoods while allowing for increased density. The amendments are consistent with this goal because they focus areas of significant change into a transit station area and on a main street, which has been identified as a place where change, growth and development are expected to occur over time. To maintain stability of neighborhoods, no change to land use or zoning is proposed outside of the primary or secondary study area. This approach helps promote neighborhood stability by strategically focusing change into areas where change can be beneficial

for meeting policy objectives, including use of existing and planned infrastructure and services, and for redevelopment over time of underutilized areas.

61. **Policy 3.3, Neighborhood Diversity**, calls for promoting neighborhood diversity and security by encouraging a diversity in age, income, race and ethnic background within the City's neighborhoods. The amendments support this policy because they offer a range of land use and zoning designations that allow for a variety of residential and commercial uses. The amendments feature changes that will provide a broader array of housing and commercial opportunities in the study area, and that can serve a diverse array of incomes, ages, races, and ethnicity.
62. **Policy 3.5, Neighborhood Involvement**, provides for the active involvement of neighborhood residents and businesses in decisions affecting their neighborhood. The amendments support this policy because neighborhood associations, business associations, and the community at large were involved in developing elements of the proposal for this area. A study working group, composed of representatives from four neighborhood associations and two business associations and other community members, also played a key role in providing feedback on the amendments and communicating with identified community organizations.
63. **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 City Council. The findings in this report demonstrate that the amendments are consistent with the Comprehensive Plan, including the Adopted Outer Southeast Community Plan, and Hazelwood Neighborhood Plan.
64. **Policy 3.9, Outer Southeast Community Plan Neighborhoods and Business Plan**, calls for using the Neighborhood Plans to guide decisions on land use, transportation and capital expenditures, community development programs, where applicable. The findings in this report demonstrate that the amendments are consistent with the Comprehensive Plan, including the Adopted Outer Southeast Community Plan, and Hazelwood Neighborhood Plan.
65. **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 amendments are consistent with this goal because they generally maintain the variety and supply of residential development opportunities. The amendments maintain residential land use designations that will provide a broad array of housing opportunities in the plan area that can serve a diverse array of incomes, ages, races and ethnicity. These include multi-dwelling units, row houses, and mixed-use and live/work residential situations. The plan also supports single-dwelling areas by focusing multi-dwelling and more intense residential uses within the plan area. Single-dwelling areas outside of the defined plan area are retained.
66. **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 amendments support this policy because they offer a variety of housing types and generally increase the supply of, and opportunity for, new housing in and around the transit station area.
67. **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 amendments, on balance, support this policy because they maintain opportunities for residential and mixed use development potential within the plan area. The amendments are estimated to have a slight net decrease (4%) in the maximum potential number of housing units based on the zoned capacity. Zoned capacity is

the maximum number of housing units allowed in residential zones and the mixed commercial zone. However, the zoned capacity does not take into consideration housing built in commercial zones. An analysis of the capacity based on research regarding the number of housing units that commercial zones historically produce, estimates a marginal increase in the number of housing units. In addition, the loss of any zoned capacity is offset significantly by other Portland legislative projects that have increased housing unit potential in other parts of the city over the past two years. Specifically, the housing potential affected by the 122<sup>nd</sup> Avenue Station Area Study Amendments is more than offset by increases in housing recently allowed in the nearby Gateway Regional Center as part of the *Gateway Planning Regulations Project*. The 122<sup>nd</sup> Avenue Station Area Study is a follow up of the *Gateway Planning Regulations Project* (2004), in which the East Corridor Plan District and 122<sup>nd</sup> Avenue Station Area were separated from the Gateway Plan District. The *Gateway Planning Regulations Project* added significant housing capacity in the area generally; because this study is linked as a follow up to the Gateway project, the housing potential in both efforts should be considered in meeting this policy. The increased housing units resulting from the Gateway project provide additional housing potential in this general district in addition to the units replaced in this specific set of amendments.

68. **Objective A**, calls for allowing the replacement of housing potential to be accomplished by such means as: 1) rezoning (and redesignating) existing commercial, employment, or industrial land to residential; 2) rezoning (and redesignating) lower density residential land to higher density residential land; and 3) rezoning to the CM zone; or 4) building residential units on the site or in a commercial or employment zone if there is a long-term guarantee that housing will remain on the site. The amendments support this objective because they redesignate and rezone different parts of the plan area to compensate for other parts of the plan area where housing potential has been reduced. Specifically, areas were redesignated from town house multidwelling (R3) to medium-density multidwelling (R1) designations. Other changes that may increase housing potential include redesignating areas from Office Commercial (CO1) to Storefront Commercial (CS); this will increase the potential for residential and mixed-use development by increasing the building height from 30 feet (CO1 zone) to 45 feet (CS zone), and by increasing floor area ratio from .75 to 1 (C01 zone) to 3 to 1 (CS zone).
69. **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 amendments support this policy because they promote efficient use of land and resources by providing medium- to high-density multi-dwelling housing near transit, parks and other community resources. In addition, this type of development is typically more efficient than detached houses in terms of energy consumption for heating and cooling.
70. **Policy 4.6, Housing Quality**, calls for encouraging the development of housing that exceeds minimum construction standards. The amendments support this policy because the amendments over time will improve the appearance and quality of new development through application of the design overlay zone and through new development. This is expected to have a positive effect on neighborhood livability and potential spillover benefits to encourage rehabilitation and improvements. The amendments further support this policy in part because they apply the design overlay zone to sites zoned commercial and mixed-use, which allow residential uses. The

amendments also apply design standards and guidelines that will shape commercial development and protect housing from excessive off-site impacts, and minimize the conflicts between uses.

71. **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 amendments support this policy because they provide for a variety of housing types in the area. The area features the potential for multi-dwelling units, row houses, and mixed-use residential situations. The housing diversity in the community is supportive of a broad range of incomes and tenures.
72. **Policy 4.8, Regional Housing Opportunities**, calls for ensuring opportunities for economic and racial integration throughout the region by advocating for the development of a range of housing options affordable to all income levels throughout the region. The amendments support this policy because they provide additional opportunities for a broad array of housing that can serve a broad income range.
73. **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. The amendments support this policy because they provide additional opportunities for a broad array of housing that can serve a broad income range.
74. **Policy 4.11, Housing Affordability**, calls for promoting the development and preservation of quality housing that is affordable across the full spectrum of household incomes. The amendments support this policy because they provide additional opportunities for housing that can serve a broad range of incomes.
75. **Policy 4.13, Humble Housing**, calls for ensuring that there are opportunities for development of small homes with basic amenities to ensure housing opportunities for low-income households, members of protected classes, households with children, and households supportive of reduced resource consumption. The amendments support this policy because they offer opportunities for development of a variety of multifamily, attached and detached housing in and around the plan area.
76. **Policy 4.14, Neighborhood Stability**, calls for stabilizing neighborhoods by promoting: 1) a variety of homeownership and rental housing options; 2) security of housing tenure; and 3) opportunities for community interaction. The amendments support this policy because the amendments provide options for a variety of housing types that will provide ownership and rental options in the community.
77. **Policy 4.15, Regulatory Costs and Fees**, calls for considering the impact of regulations and fees in the balance between housing affordability and other objectives such as environmental quality, urban design, maintenance of neighborhood character, and protection of public health, safety, and welfare. The amendments support this policy because the design overlay zone as applied allows residential development to comply with a set on clear and objective design standards.
78. **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 amendments are consistent with this goal because they provide for a variety of commercial land uses in the plan area and provide development regulations that allow for expansion of businesses in the area.

79. **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 amendments support this policy because they facilitate reinvestment in existing businesses, foster new investment that supports job growth, and anticipate adaptive reuse and incremental additional to development by encouraging, through zoning standards, development forms that do not preclude reuse and adaptation.
80. **Objective A** calls for ensuring that there are sufficient inventories of commercially and industrially-zoned, buildable land supplied with adequate levels of public and transportation services. The amendments support this objective because they slightly expand the existing supply of commercial land in the area.
81. **Policy 5.2, Business Development**, calls for sustaining and supporting business development activities to retain, expand, and recruit businesses. The amendments support this policy because they provide opportunities for continued and expanded commercial uses and activities. The amendments change a number of zoning regulations, including allowances for exterior display and exterior storage and minimum floor area ratios, to recognize existing commercial uses, and allow businesses to reinvest and expand.
82. **Policy 5.3, Community-Based Economic Development**, calls for supporting community-based economic development initiative consistent with the *Comprehensive Plan* and compatible with neighborhood livability. The amendments support this policy because they include actions for economic development designed to enhance local market conditions and stimulate development and investment in the area. Further, the amendments propose use of the design overlay zone to enhance development compatibility and overall livability.
83. **Policy 5.4, Transportation System**, calls for promotion of a multimodal regional transportation system that stimulates and supports long term economic development and business involvement. The *122<sup>nd</sup> Avenue Station Area Study* supports this policy because it includes transportation recommendations that foster a balanced transportation system. These include improvements to enhance the pedestrian environment, improve pedestrian safety, provide public realm amenities, and support access to transit.
84. **Objective C** calls for working closely with public agencies, such as TriMet, and the private sector to deliver an efficient and effective transportation system and network, and improving transit connections between residential communities and work sites. The *122nd Avenue Station Area Study* is supportive of this objective because the recommendations include design elements that will improve access to transit. In addition, the amendments generally foster a transit supportive and transit-oriented development pattern.
85. **Objective D** calls for supporting transit-supportive development and redevelopment along designated transit streets and in the vicinity of light rail stations. The amendments support this objective. The amendments foster a transit supportive and transit-oriented development pattern along the western portion of the 122<sup>nd</sup> Avenue main street, and at key intersection nodes. The eastern side of the main street accommodates auto oriented uses in the near term, but zoning provisions allow and may encourage higher density redevelopment as land market dynamics change over time.
86. **Objective E** calls for promoting safe and pleasant bicycle and pedestrian access to and circulation within commercial areas, and providing convenient, secure bicycle parking for employees and

shoppers. The amendments support this objective because they continue to provide pedestrian and bicycle access.

87. **Objective F** calls for encouraging a wide range of goods and services in each commercial area in order to promote air quality and energy conservation. The study supports this objective because they provide land use and zoning designations that will support a wide range of commercial goods and services along the main street. Additionally, land use and zoning designations will foster additional residential development in the area to help bolster the market area and help support commercial uses.
88. **Objective H** calls for pursuing transportation and parking improvements that reinforce commercial, industrial, and residential districts and support development of new districts. The *122nd Avenue Station Area Study* is supportive of this objective because the transportation recommendations call for consideration of on- and off-street parking opportunities. The proposed amendments do not affect existing parking requirements.
89. **Policy 5.6, Area Character and Identity Within Designated Commercial Areas**, calls for promotion and enhancement of the special character and identity of Portland's designated commercial areas. The amendments support this policy because they recognize the unique character of the 122<sup>nd</sup> Avenue Station area, and apply land use, zoning, and design designations designed to enhance the character of the area as a retail location, while improving compatibility between adjacent uses.
90. **Policy 5.7, Business Environment Within Designated Commercial Areas**, calls for promotion of a business environment within designated commercial areas that is conducive to the formation, retention, and expansion of commercial businesses. The amendments support this policy because they allow for a broad array of commercial activities in the commercial areas and expand the opportunity for development types, including those with exterior display and storage, that were previously prohibited.
91. **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 amendments are consistent with this goal for the reasons stated in the Goal 6 policies and objectives, stated below.
92. **Policy 6.1, Coordination**, calls for coordinating with affected state and federal agencies, local governments, special districts, and providers of transportation services when planning for and funding transportation facilities and services. The *122nd Avenue Station Area Study* supports this policy because other agencies, including TriMet, Metro, and ODOT, were involved in the planning process and represented on the project technical advisory group.
93. **Policy 6.2, Public Involvement**, supports a public involvement process that provides information about transportation issues and projects. The *122nd Avenue Station Area Study* process supports this policy because a number of public involvement opportunities were included in the planning process. Further development of transportation recommendations will include additional public involvement opportunities.
94. **Policy 6.5, Traffic Classification Descriptions**, describes the hierarchy of traffic streets. The land use recommendations balance auto accommodating uses with transit and pedestrian needs, and are consistent with the classifications for the area.

95. **Objective B Major City Traffic Streets, Land Use/Development.** Major City Traffic Streets should provide motor vehicle connections among the Central City, regional centers, town centers, industrial areas, and intermodal facilities. Auto-oriented development should locate adjacent to Major City Traffic Streets, but should orient to pedestrians along streets also classified as Transit Streets or within Pedestrian Districts. The amendments support this objective because they require features in auto-oriented developments that will make them more accessible to, and provide higher levels of amenity for, pedestrians, through orienting buildings to sidewalk and pedestrian areas, and improving landscaping.
96. **Policy 6.6, Transit Classification Descriptions,** describes the hierarchy of transit streets. The land use recommendations balance auto accommodating uses with transit and pedestrian needs, and are consistent with the classifications for the area.
97. **Policy 6.7, Bicycle Classification Descriptions,** describes the hierarchy of bicycle streets. The land use recommendations balance auto accommodating uses with transit and pedestrian needs, and are consistent with the classifications for the area.
98. **Policy 6.8, Pedestrian Classification Descriptions,** describes the hierarchy of pedestrian streets and the function of pedestrian districts. The land use recommendations balance auto accommodating uses with transit and pedestrian needs, and are consistent with the classifications for the area.
99. **Objective A, Pedestrian Districts, Land Use.** Zoning should allow a transit-supportive density of residential and commercial uses that support lively and intensive pedestrian activity. Auto-oriented development should be discouraged in Pedestrian Districts. Institutional campuses that generate high levels of pedestrian activity may be included in Pedestrian Districts. Exceptions to the density and zoning criteria may be appropriate in some designated historic districts with a strong pedestrian orientation. The amendments support this objective, as they generally limit or prohibit auto-oriented development, except where pedestrian amenities and other site development features improve compatibility with the function of a pedestrian district.
100. **Policy 6.9, Freight Classification Descriptions,** describes the hierarchy of truck streets, railroad lines, and intermodal freight facilities. The land use recommendations generally balance auto accommodating uses, transit and pedestrian needs, and freight mobility needs, and are consistent with the classifications for the area.
101. **Policy 6.11, Street Design Classification Descriptions,** describes the hierarchy of street design for Portland's streets. The land use recommendations balance auto accommodating uses with transit and pedestrian needs, and are consistent with the classifications for the area.
102. **Policy 6.17, Coordinate Land Use and Transportation,** calls for implementing the Comprehensive Plan Map and the 2040 Growth Concept through long-range transportation and land use planning and the development of efficient and effective transportation projects and programs. The *122nd Avenue Station Area Study* supports this policy because development of the concept for the area was an effort between the Bureau of Planning and Office of Transportation. The study recommendations propose both land use and transportation system changes that are consistent with and supportive of the Transportation System Plan functional classifications, as well as the policies and map designations of the 2040 Growth Concept.
103. **Policy 6.18, Adequacy of Transportation Facilities,** calls for ensuring that amendments to the Comprehensive Plan (including goal exceptions and map amendments), zone changes, conditional

uses, master plans, impact mitigation plans, and land use regulations that change allowed land uses are consistent with the identified function and capacity of, and adopted performance measures for, affected transportation facilities. The *122nd Avenue Station Area Study* amendments are consistent with this policy, as the proposed amendments to the Comprehensive Plan Map, Zoning Map and Zoning Code will have little effect on maximum development potential, compared with the existing designations and allowances. The most significant change is the redesignation and rezoning of approximately 48 acres from the Urban Commercial (UC) designation (CS and CM zones) to the Central Commercial (CX) designation and zone. While the “base” zone standards of the designations suggest a different development potential, the development standards of the existing, adopted, East Corridor Plan District (33.521) provide for special development standards and allowances in the existing UC areas that exceed both the base CS and CM zone allowance, as well as the base zone CX allowances. The East Corridor Plan District (33.521) currently allows for a maximum floor area ratio (FAR) of 4 to 1, with an additional 2 to 1 available for development in the Ventura Park Pedestrian District in which 80 percent of the floor area is in residential use. The maximum height for development in the East Corridor Plan District (33.521) in this area is 100 feet. Comparison of the allowed uses between the CS and CX zones as modified by the current plan district and proposed amendments show that allowed uses are equivalent, with minor exceptions. The amendments do not propose any changes to the maximum allowed FAR or height limits in the district, so no additional development capacity is offered. Other amendments to the Comprehensive Plan Map and Zoning Map are minor, and the traffic impact from development of these areas is expected to be insignificant, compared to currently allowed uses.

104. **Policy 6.19, Transit-Oriented Development**, calls for reinforcing the link between transit and land use by encouraging transit-oriented development and supporting increased residential and employment densities along transit streets, at existing and planned light rail transit stations, and at other major activity centers. The amendments support this policy because they maintain opportunities for high-density residential, commercial, and mixed use development in the vicinity of the transit station area.
105. **Objective C** calls for requiring commercial and multifamily development to orient to and provide pedestrian and bicycle connections to transit streets and, for major developments, provide transit facilities on a site or adjacent to a transit stop. The amendments support this objective because they reinforce the pedestrian orientation of buildings, including those that are auto accommodating.
106. **Objective D** calls for examining the benefits of limiting drive-through facilities in existing or planned areas of high-intensity development and high levels of pedestrian, bicycle, and transit activity when planning studies are being done for these areas. The amendments support this objective because the zoning map and code maintain prohibitions on drive-through facilities in the transit station and pedestrian district area (Ventura Park Pedestrian District), except in instances where they have been found to provide other community benefits such as trip consolidation.
107. **Policy 6.20, Connectivity**, supports development of an interconnected, multimodal transportation system to serve mixed-use areas, residential neighborhoods and other activity centers. The amendments support this policy as they maintain requirements for improving connectivity in the transit station area. Moreover, the 122<sup>nd</sup> Avenue Study is supportive of this policy as the study

recommendations call for development of a master street plan for the area that will improve connectivity in the transit station area.

108. **Policy 6.22, Pedestrian Transportation**, calls for planning and completing a pedestrian network. The amendments support this policy because they call for new development that will enhance the pedestrian realm, and maintain zoning code provisions for improving connectivity.
109. **Policy 6.24, Public Transportation**, supports development of a public transportation system that conveniently serves city residents and workers. The amendments support this policy because they continue to foster a transit-oriented development pattern near the transit station area.
110. **Policy 6.27, Off-Street Parking, and Objective A** support regulating off-street parking to promote good urban form. The amendments support this policy because they continue zoning code provisions that limit required parking areas, and limit the amount of street frontage that may be used for vehicle areas, which include parking.
111. **Objective B** encourages the redevelopment of surface parking lots into transit-supportive uses. The amendments support this objective, as they allow high density commercial and residential uses on properties near the transit station area, and require minimum amounts of floor area in new development near the transit station.
112. **Policy 6.30, Truck Mobility**, supports developing, managing and maintaining a safe, efficient, and reliable freight street network. The amendments do not directly affect the street network and are not in conflict with this policy.
113. **Policy 6.36, Far Northeast Transportation District**, calls for focusing transit and traffic movement on a well-defined system of arterials, implementing demand management measures, and encouraging walking and bicycling in the Far Northeast. The amendments support this policy because they focus traffic generating uses and development on major arterials such as 122<sup>nd</sup> Avenue, and Glisan and Stark streets, and also include elements that will encourage walking, bicycling and taking transit.
114. **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. The amendments support this policy because the proposed land use pattern makes efficient use of land resources and concentrates development into areas that are well served by existing transit service and infrastructure.
115. **Objective A**, calls for promoting land use patterns that increase energy efficiency in buildings and transportation systems by making energy efficiency a critical element when developing new zoning regulations and modifying old regulations and the comprehensive map. This objective applies to the following long-range planning efforts: (1) Downtown, regional and neighborhood commercial service centers and central industrial areas with a balance of complementary retail and employment activities. Locate them near major arterials and transit lines; (2) Medium and high-density residential zones in and adjacent to the downtown core. Develop other general commercial centers and medium-density residential zones adjacent to neighborhood service centers; (3) Housing adjacent to employment areas; (4) Planned unit developments to include mixed uses; (5) Zero lot line/common wall construction in designated low and medium density residential zones (6) Buildable “substandard” lots; (7) Secondary rental units in single-family, owner-occupied homes. The amendments support this objective in several ways: 1) they focus and reinforce commercial activities in a transit station and along a main street area through use of

appropriate zones; 2) they focus high- and medium-density multi-dwelling residential zones (RH and R1) in locations near the transit station; 3) they maintain housing potential in the area which is well-served by transit; and 4) they allow for and foster mixed-use development in a variety of situations.

116. **Objective C**, calls for promoting medium to high-density residential near proposed transit stations and medium-density residential development along major transit routes. The amendments support this objective because they sustain a transit-oriented development pattern with high-density multifamily residential zoning near the transit station, and medium-density residential zoning in areas farther away from the transit station, or along transit streets.
117. **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 amendments are consistent with this goal because they will facilitate efficient use of land resources, through intensifying development opportunity in an area that is currently urbanized and served by public facilities.
118. **Goal 9, Citizen Involvement**, calls for improved methods and ongoing opportunities for citizen involvement in the land use decision-making process. The amendments are consistent with this goal because the planning process included opportunities for citizen involvement, including the provision of web-based information. Also see State Goal 1 of this document.
119. **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 amendments support this policy because the study was developed with feedback and input from representatives of local neighborhood associations and business associations. Other community organizations were informed of the process and given updates; participation from these groups and individuals was also solicited.
120. **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 amendments support this policy because they include a review and amendment to the *Comprehensive Plan* that was conducted in a public process that provided input and feedback from local neighborhood and business associations and other groups and individuals.
121. **Goal 10, Plan Review and Administration**, requires that Portland's *Comprehensive Plan* undergo a periodic review. The amendments support this policy because they include a review and amendment to the *Comprehensive Plan*. The proposed amendments were first sent to the Department of Land Conservation and Development for review in October 2005, prior to the first evidentiary hearings on the amendments.
122. **Policy 10.2, Comprehensive Plan Map Review**, calls for implementing a community and neighborhood planning process for review and update of the *Comprehensive Plan Map*. The amendments support this policy because they are a review and amendment to the *Comprehensive Plan*, at the community and neighborhood plan level.
123. **Policy 10.4, Comprehensive Plan Map**, calls for the *Comprehensive Plan Map* to be the official long-range planning guide for uses and development in the city. The amendments are consistent with this policy because they include amendments to the *Comprehensive Plan Map* which guides

uses and development within the city and is implemented by the Portland Zoning Code and Zoning Map.

124. **Policy 10.5, Corresponding Zones and Less Intense Zones**, requires that base zones either correspond to the *Comprehensive Plan* Map designation or be a zone less intense than the corresponding zone. The amendments support this policy because the applied base zones correspond to, or are less intense than, the *Comprehensive Plan* Map designation.
125. **Policy 10.6, Amendments to the Comprehensive Plan Goals, Policies, and Implementing Measures**, requires that the Planning Commission review and make recommendations to the City Council on all proposed amendments to the Comprehensive Plan Goals and Policies and implementing ordinances. The amendments support this policy because the Planning Commission reviewed the proposed amendments and took public testimony at a public hearing on November 22, 2005. The Planning Commission held a subsequent work sessions and finalized its recommendation to Portland City Council on February 14, 2006. The Planning Commission held a second hearing, on April 25, 2006, to consider revisions to the proposal. The Planning Commission approved these revisions on April 25, 2006. The Planning Commission recommendations were forwarded to City Council for a public hearing on June 15, 2006.
126. **Policy 10.7, Amendments to the Comprehensive Plan Map**, requires that amendments be supportive of the overall *Comprehensive Plan* and 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 amendments support this policy because they are consistent with the *Comprehensive Plan* and Map, Statewide Planning Goals, and adopted area plans as shown in this findings report. The amendments do not result in a net loss of housing. Using a methodology that considers the number of housing units historically developed in commercial zones (Urban Growth Management Functional Plan Compliance Report), the overall land use pattern established with the changes in the *122<sup>nd</sup> Avenue Station Area Study* results in a net increase in anticipated housing units. Additionally, housing potential in this general area has also been increased in the recently-adopted *Gateway Planning Regulations Project* (2004). The *122<sup>nd</sup> Avenue Station Area Study* is directly linked to the *Gateway Planning Regulations Project* which considered issues in the 122<sup>nd</sup> Avenue area. The previous Gateway Plan District encompassed the 122<sup>nd</sup> Avenue Station Area, which was split and resulted in creation of the East Corridor Plan District – Zoning Code Chapter 33.521. The methodology used in this analysis differs from the maximum zoned capacity methodology used to evaluate housing potential in quasi-judicial actions and in some past legislative efforts. Using a maximum zoned capacity methodology, there would be a marginal decrease (4%) in maximum units since this methodology does not account for or capture the significant housing potential in most commercial zones. See also Policy 4.2, Maintain Housing Potential.
127. **Policy 10.10, Amendments to the Zoning and Subdivision Regulations**, requires amendments to the zoning and subdivision regulations to be clear, concise, and applicable to the broad range of development situations faced by a growing, urban city. The amendments support this policy because they offer clear and concise standards and direction for most development, and offer the flexibility of a review process for situations where meeting standards it is infeasible or impracticable. The amendments include Zoning Code amendments that modify an existing plan district for the area. The amendments create a subdistrict for the 122<sup>nd</sup> Avenue transit station area that foster urban development in a way that is more tailored for the unique circumstances of area,

by allowing flexibility for existing and future uses and development forms that are typically prohibited in transit station areas.

128. **Policy 10.13, Design Review**, calls for development of recommendations for City Council consideration for additional areas where design review would be appropriate and preparation of design review standards for both existing and proposed areas. The amendments support this policy because they apply design review to development in the 122<sup>nd</sup> Avenue MAX station area and Main Street, which are areas that are expected to grow and change substantially over time to efficiently accommodate population growth in the region. The amendments maintain the design overlay zone that is currently applied to R1 and RH multifamily residential zones, and broaden application of the design overlay zone to commercially zoned properties near the 122<sup>nd</sup> Avenue MAX transit station where it was previously not applied.
129. **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 amendments are consistent with this goal because the planned land use pattern and density is generally consistent with the existing planned density in the plan area.
130. **Policy 11.2, Orderly Land Development**, calls for urban development to occur only where urban public facilities and services exist or can be reasonably made available. The amendments support this policy because they focus transit-oriented and supportive development in the Metro 2040 designated station community area, where urban public facilities and services, including a station that provides access to a regional high capacity fixed rail transit system, currently exist.
131. **Policy 11.4, Capital Efficiency**, calls for supporting maximum use of existing public facilities and services by encouraging higher density development and development of vacant land within already developed areas. The amendments support this policy because they focus development at higher densities near the 122<sup>nd</sup> Avenue transit station, which is a developed area.
132. **Goal 11 B, Public Rights-of-Way**, supports improving Portland's transportation system by carrying out projects to implement the 2040 Growth Concept, preserving public right-of-way, implementing street plans, maintaining and improving the city's streets, and allocating limited resources to identified needs of neighborhoods, commerce, and industry. The *122nd Avenue Station Area Study* supports this policy because it includes a transportation concept that may form the basis for future street improvements in the area.
133. **Policy 11.10, Street Design and Right-of-Way Improvements**, call for designing improvements to transportation facilities to implement transportation and land use goals and objectives. The *122nd Avenue Station Area Study Phase One Report and Recommendations* support this policy because the street design recommended called for improvements to the pedestrian and vehicular transportation network that will support the land use pattern called for by the amendments.
134. **Policy 11.11, Street Plans**, promote a logical, direct, and connected street system. The *122nd Avenue Station Area Study* supports this policy because the amendments maintain zoning code provisions that require improving connectivity in the area. Moreover, the *122nd Avenue Station Area Study* supports this policy because it includes a draft "connectivity plan" that may form the basis of a future master street plan for the 122<sup>nd</sup> Avenue station area. The draft connectivity plan recommends full street connections and bike and pedestrian connections at intervals that are consistent with Objectives D and E of this policy.

135. **Goal 11 C, Sanitary and Stormwater Facilities**, calls for an efficient, adequate, and self-supporting wastewater collection treatment and disposal system which will meet the needs of the public and comply with federal, state and local clean water requirements. The amendments are consistent with this goal because they call for increased landscaping on sites with exterior display and storage, which are generally areas typified by large amounts of impervious surface. The landscaped areas provide opportunity for a more sustainable on-site stormwater management system. Wastewater systems are in place, and are either currently adequate or can be made adequate to accommodate future development.
136. **Policy 11.26, Impervious Surfaces**, calls for limiting the increase of Portland's impervious surfaces without unduly limiting development in accordance with the Comprehensive Plan. The amendments support this policy because they require additional landscaping for sites that include exterior display and exterior storage areas, which reduces the amount of impervious surface on sites. The amendments further support this policy by encouraging, through design review, use of on-site landscaping for managing storm water.
137. **Goal 12, Urban Design**, calls for the enhancement of Portland as a livable city, attractive in its setting and dynamic in its urban character by preserving its history and building a substantial legacy of quality private developments and public improvements for future generations. The amendments are consistent with this goal because they call for broader application of the design overlay zone in the transit station area, and include special features to address and enhance the quality and design of new development.
138. **Policy 12.1, Portland's Character**, calls for enhancing and extending Portland's attractive identity by building on design elements, features and themes identified within the city. The amendments support this policy because they recognize the unique attributes of land uses in the 122<sup>nd</sup> Avenue station area, and utilize the design overlay zone and amendments to the Community Design Guidelines to evoke special characteristics for development and increase compatibility of various uses and development forms in the transit station area.
139. **Policy 12.2, Enhancing Variety**, calls for promoting the development of areas of special identity and urban character. The amendments support this policy because they include application of the design overlay and amendments to the Community Design Guidelines, including specific "Desired Characteristics and Traditions" that are designed to address the special characteristics of this transit station and main street area.
140. **Policy 12.4, Provide for Pedestrians**, calls for providing a pleasant, rich and diverse experience for pedestrians which includes comfortable, safe and attractive pathways. The amendments support this policy because they include design standards and guidelines designed to improve the aesthetics of the pedestrian realm through strategic allowances for exterior display, and requirements for higher levels of building, site, and landscape design. Further, the study recommendations call for improvements to the sidewalk environments over time to improve the public realm and provide and enhanced pedestrian experience.
141. **Policy 12.6, Preserve Neighborhoods**, calls for preserving and supporting the qualities of individual neighborhoods that help to make them attractive places. The amendments support this policy by focusing the areas proposed for substantial change on the area generally within ¼ mile of the transit station, and by applying tools such as the design overlay zone to help improve the quality and compatibility of development.

142. **Policy 12.7, Design Quality**, calls for enhancing Portland's appearance and character through development of public and private projects that are models of innovation and leadership in the design of the built environment. The amendments support this policy because they call for innovative designs for development with exterior display and exterior storage that promote compatibility with other uses, promote improved water quality through landscaping and on-site storm water management, foster site plans and building forms that allow future adaptive reuse and future augmentation of development on large sites.
143. **Policy 12.8, Community Planning**, calls for considering urban design issues as part of area plans. The amendments support this policy because they address and consider urban design as part of the *122nd Avenue Station Area Study*.

## Outer Southeast Community Plan Findings

144. The **Economic Development Policy** calls for improving the vitality of outer southeast business districts and employment centers. The amendments support this policy because: 1) they change the regulatory framework for this area to foster reinvestment in and development of commercial uses that will provide jobs; 2) they include provisions that will encourage higher levels of design in development to improve the attractiveness of this area as a place to invest and do business; and 3) they provide opportunities for both regional-serving and local-serving businesses in this densifying transit station area.
145. The **Transportation Policy** calls for supporting a network of streets that provide for efficient travel throughout the community, and reducing congestion and pollution caused by the automobile by creating land use patterns that support transit, bike, and pedestrian travel. The amendments support this policy because they continue to support a land use pattern that focuses higher density, transit-supportive, and pedestrian-oriented development near the MAX station at 122<sup>nd</sup> and Burnside, while allowing some flexibility for auto-oriented uses and development forms.
146. **The Housing Policy** calls for providing for a variety of housing choices for residents of all income levels by maintaining existing sound housing and promoting new housing development. The amendments support this policy because they maintain opportunities for the retention and development of a variety of multifamily, attached and detached housing in and around the MAX station area that serve a broad range of incomes.
147. The **Open Space and Environment Policy** calls for providing for parks and open spaces to meet projected recreational needs. The amendments are consistent with this policy because nearby existing parks and designated open space areas are preserved. Further, the amendments call for landscaping in some forms of development, adding to the greening of the area, and providing opportunities for storm water management.
148. The **Urban Design Policy** calls for fostering a sense of place and identity by reinforcing the existing character-giving elements and encouraging new ones. The amendments support this policy because they include application of the design overlay zone, include amendments to the Community Design Guidelines with specific “Desired Characteristics and Traditions” statements that apply to this area, and include other features such as recommendations for future streetscape enhancements that will enhance the unique identity and character of this area.
149. The **Public Safety Policy** calls for using crime prevention through environmental design principles and street and building designs that provide natural surveillance. The amendments are supportive of this policy because they encourage active uses and buildings along the street that promote surveillance of the public realm and improve safety for pedestrians, residents, and others, including MAX and transit riders.
150. **Subarea Policy V: MAX LRT Corridor**, calls for ensuring that private development reinforces and is reinforced by the public light rail investment by encouraging development of intense commercial and dense residential uses near the MAX light rail stations. The amendments are supportive of this policy because they allow for high density and high intensity residential and commercial uses in this area, and require minimum floor area ratios for new development. They also make provisions to allow for uses and development forms with exterior display and storage that have located and formed a concentration in this area.

151. **Objective 1**, calls for encouraging the redevelopment of large underused or auto-oriented sites along 122<sup>nd</sup> Avenue to a mixture of commercial and residential uses. The amendments call for an amendment to this objective, as follows: “*Encourage the long term redevelopment and intensification of large underused or auto-oriented sites along 122nd Avenue to a mixture of commercial and residential uses.*” This amendment is intended to support reinvestment in sites with exterior display and exterior storage until market conditions favor more dense and intense site development forms. These types of uses may be integrated into this MAX station area through site development plans and urban forms that encourage buildings near the street, limit the street frontage allowed for vehicle parking and exterior merchandise display, and allow for adaptive reuse of buildings and future augmentation and intensification of development on site.

## Hazelwood Neighborhood Plan Findings

152. **Policy 1, Public Safety**, calls for fostering and maintaining a safe environment for residents, businesses, and visitors in the Hazelwood Neighborhood by reducing crime and fear of crime. The amendments support this policy because they include changes that will foster development that promotes local surveillance of the public realm and increases safety for pedestrians, transit users, and others.
153. **Policy 2, Economic Development**, calls for preserving and enhancing the commercial viability of businesses within Hazelwood by stimulating business growth, investment and a high level of livability. The amendments support this policy because they include changes that will foster reinvestment and development in commercial areas and businesses while improving design quality of buildings, site and landscaping.
154. **Policy 4, Transportation**, calls for improving accessibility in, around and through Hazelwood. Develop, improve and expand paths, trails and streets that serve as links between recreational, commercial, and residential areas while maintaining the livability of residential areas. The amendments generally support this policy because they support development of future streets and connections that will improve connections between residential areas, commercial area, and rail and bus transit facilities.
155. **Policy 5, Housing**, calls for maintaining and reinforcing Hazelwood housing as affordable for families and individuals, which provides for a stable population of responsible homeowners and renters. The amendments are consistent with this policy because they maintain opportunities for higher density and more affordable housing near the transit station, while maintaining lower density neighborhoods in the surrounding area.
156. **Policy 6, Community Design and Livability**, calls for maintaining Hazelwood as an affordable, attractive neighborhood, which provides a friendly, safe, and pleasing community for everyone. The amendments support this policy because they broaden application of the design overlay zone in the transit station area, and include amendments to the Community Design Guidelines that are supportive of desired local characteristics such as landscaping, display windows, and high quality building materials.
157. **Policy 7, 122<sup>nd</sup> Avenue Subarea** calls for ensuring that 122<sup>nd</sup> Avenue commercial area develops in a nodal pattern to maintain the quality of adjacent neighborhoods and enhance the pedestrian and bicycle-friendly nature of areas in-between commercial nodes. The amendments support this policy because they call for focusing the most pedestrian-oriented development into key locations at transit intersections while allowing for less-intense forms of development, including those with exterior display and exterior storage, in other areas in the 122<sup>nd</sup> Avenue transit station area. The amendments also support a nodal pattern of development where commercial activities are supported by residential uses.