



CITY OF MILWAUKIE

AGENDA

February 11, 2020

PLANNING COMMISSION

City Hall Council Chambers
10722 SE Main Street
www.milwaukieoregon.gov

- 1.0 **Call to Order - Procedural Matters** — 6:30 PM
- 2.0 **Planning Commission Minutes** — Motion Needed
 - 2.1 January 14, 2020
- 3.0 **Information Items**
- 4.0 **Audience Participation** — This is an opportunity for the public to comment on any item not on the agenda
- 5.0 **Public Hearings** — Public hearings will follow the procedure listed on the reverse side
 - 5.1 Summary: Comprehensive Plan Draft Policy Document
 - Applicant: City of Milwaukie
 - Address: 10722 SE Main St
 - File: CPA-2019-001
 - Staff: David Levitan, Senior Planner
- 6.0 **Planning Department Other Business/Updates**
- 7.0 **Planning Commission Committee Updates and Discussion Items** — This is an opportunity for comment or discussion for items not on the agenda.
- 8.0 **Forecast for Future Meetings**
 - February 25, 2020
 - 1. Hearing Item: S-2018-001, Railroad Ave Subdivision
 - 2. Hearing Item: CPA-2019-001, Comp. Plan Recommendation
 - March 10, 2020
 - No items are currently scheduled for this meeting.
 - March 24, 2020
 - 1. Work Session Item: PC Bylaws; Annual NDA Leadership Meeting

Milwaukie Planning Commission Statement

The Planning Commission serves as an advisory body to, and a resource for, the City Council in land use matters. In this capacity, the mission of the Planning Commission is to articulate the Community's values and commitment to socially and environmentally responsible uses of its resources as reflected in the Comprehensive Plan

1. **PROCEDURAL MATTERS.** If you wish to speak at this meeting, please fill out a yellow card and give to planning staff. Please turn off all personal communication devices during meeting. For background information on agenda items, call the Planning Department at 503-786-7600 or email planning@milwaukieoregon.gov. Thank you.
2. **PLANNING COMMISSION and CITY COUNCIL MINUTES.** City Council and Planning Commission minutes can be found on the City website at www.milwaukieoregon.gov/meetings.
3. **FORECAST FOR FUTURE MEETING.** These items are tentatively scheduled, but may be rescheduled prior to the meeting date. Please contact staff with any questions you may have.
4. **TIME LIMIT POLICY.** The Commission intends to end each meeting by 10:00pm. The Planning Commission will pause discussion of agenda items at 9:45pm to discuss whether to continue the agenda item to a future date or finish the agenda item.

Public Hearing Procedure

Those who wish to testify should come to the front podium, state his or her name and address for the record, and remain at the podium until the Chairperson has asked if there are any questions from the Commissioners.

1. **STAFF REPORT.** Each hearing starts with a brief review of the staff report by staff. The report lists the criteria for the land use action being considered, as well as a recommended decision with reasons for that recommendation.
2. **CORRESPONDENCE.** Staff will report any verbal or written correspondence that has been received since the Commission was presented with its meeting packet.
3. **APPLICANT'S PRESENTATION.**
4. **PUBLIC TESTIMONY IN SUPPORT.** Testimony from those in favor of the application.
5. **NEUTRAL PUBLIC TESTIMONY.** Comments or questions from interested persons who are neither in favor of nor opposed to the application.
6. **PUBLIC TESTIMONY IN OPPOSITION.** Testimony from those in opposition to the application.
7. **QUESTIONS FROM COMMISSIONERS.** The commission will have the opportunity to ask for clarification from staff, the applicant, or those who have already testified.
8. **REBUTTAL TESTIMONY FROM APPLICANT.** After all public testimony, the commission will take rebuttal testimony from the applicant.
9. **CLOSING OF PUBLIC HEARING.** The Chairperson will close the public portion of the hearing. The Commission will then enter into deliberation. From this point in the hearing the Commission will not receive any additional testimony from the audience, but may ask questions of anyone who has testified.
10. **COMMISSION DISCUSSION AND ACTION.** It is the Commission's intention to make a decision this evening on each issue on the agenda. Planning Commission decisions may be appealed to the City Council. If you wish to appeal a decision, please contact the Planning Department for information on the procedures and fees involved.
11. **MEETING CONTINUANCE.** Prior to the close of the first public hearing, *any person* may request an opportunity to present additional information at another time. If there is such a request, the Planning Commission will either continue the public hearing to a date certain, or leave the record open for at least seven days for additional written evidence, argument, or testimony. The Planning Commission may ask the applicant to consider granting an extension of the 120-day time period for making a decision if a delay in making a decision could impact the ability of the City to take final action on the application, including resolution of all local appeals.

The City of Milwaukie will make reasonable accommodation for people with disabilities. Please notify us no less than five (5) business days prior to the meeting.

Milwaukie Planning Commission:

Robert Massey, Chair
Lauren Loosveldt, Vice Chair
Joseph Edge
Greg Hemer
Kim Travis
John Henry Burns

Planning Department Staff:

Denny Egner, Planning Director
David Levitan, Senior Planner
Brett Kelder, Associate Planner
Vera Koliass, Associate Planner
Mary Heberling, Assistant Planner
Dan Harris, Administrative Specialist II
Alicia Martin, Administrative Specialist II



CITY OF MILWAUKIE

PLANNING COMMISSION MINUTES

City Hall Council Chambers
10722 SE Main Street
www.milwaukieoregon.gov

January 14, 2020

Present: Kim Travis, Chair
John Henry Burns, Vice Chair
Greg Hemer
Lauren Loosveldt
Robert Massey

Staff: Denny Egner, Planning Director
David Levitan, Senior Planner
Mary Heberling, Assistant Planner
Justin Gericke, City Attorney

Absent: Joseph Edge

1.0 Call to Order – Procedural Matters*

Chair Travis called the meeting to order at 6:30 pm and read the conduct of meeting format into the record.

Note: The information presented constitutes summarized minutes only. The meeting video is available by clicking the Video link at <http://www.milwaukieoregon.gov/meetings>.

2.0 Planning Commission Minutes

2.1 March 12, 2019

2.2 April 9, 2019

2.3 May 14, 2019

2.4 November 12, 2019

2.5 December 10, 2019

Vice Chair Burns noted that there was a typo on the March 12 minutes describing him as “Vice Chair Travis”.

Commissioner Hemer motioned to approve the March 12 notes as amended, and the other four sets of notes as submitted. **Chair Travis** called for a vote without anyone seconding the motion. The Planning Commission voted 5-0 in favor of Commissioner Hemer’s motion.

3.0 Information Items

Denny Egner, Planning Director, noted that the Ledding Library had reopened in its new building

4.0 Audience Participation

No public comments were submitted for this portion of the meeting.

5.0 Public Hearings

5.1 Summary: Comprehensive Plan Draft Policy Document
Applicant: City of Milwaukie

Address: 10722 SE Main St
File: CPA-2019-001
Staff: David Levitan, Senior Planner

Chair Travis called the hearing to order and read the conduct of the legislative hearing format into the record. She asked if any commissioner wished to declare any bias, ex parte contact, or conflict of interest. None of the commissioners acknowledged any bias or conflict of interest regarding ex parte contacts.

David Levitan, Senior Planner, presented the staff report via PowerPoint describing the circumstances of the application. Key points were as follows:

- This hearing was primarily intended to take public testimony and to begin discussion of the document.
- The Comprehensive Plan is the city's primary land-use document.
- The last major update of the document took place in 1989.
- The portions of the Comprehensive Plan being updated were the introduction and background, the goals and policies (excluding transportation goals policies), and the maps and graphics (excluding the Land Use Map).
- The policy work was broken up into four "blocks", the contents of which were pinned down by a series of City Council resolutions.
- Public feedback was solicited extensively over the course of the past two years and integrated into the updated plan.
- Staff recommended, based on feedback from the City Council, that the Planning Commission continue to serve as the city's Community Involvement Advisory Committee.
- Staff recommended minor edits to land use designations to simplify the existing policies.
- Staff recommended that the development of a Diversity Equity and Inclusion Committee (DEIC) not be codified in the Comprehensive Plan as it was already addressed in the city's Vision and extended beyond land use.
- Staff recommended a minor update to Policy 5.4.1 to clarify that development in the floodplain is not limited to private uses.

Public Testimony

Chair Travis, based on City Council precedent and city staff recommendation, limited testimony to three minutes for individuals and 10 minutes for group testimony.

David Aschenbrenner, 11505 SE Home Ave, expressed thanks for the work that had gone into the Comprehensive Plan. He testified that Policy 2.1.1 did not list the Historical Society/Milwaukie Museum on the Cultural Resources Map. He felt that the Comprehensive Plan should include additional references to the Milwaukie Historical Society. He also indicated that there appeared to be a missing key for the list of historical resources. He asked about the methodology of calculating the housing stock growth target listed in Policy 3. He also expressed concerns about the outflow of Minthorn Pond into Minthorn Creek, as well as Minthorn Pond being included on the Buildable Lands Map when it should not be. He felt that street tree replacement should be enforced after one year, and that property setbacks should not be reduced or infringed. He also asked for additional clarification of terms and parking-enforcement strategies.

Mr. Levitan confirmed, in response to a question from Commissioner Hemer, that housing density had not been changed from the existing 1989 Comprehensive Plan, except for an

adjustment to high-density residential zoning (R-1 and R-1-B) which brought the current plan in-line with the current Zoning Code.

Celestina DiMauro, 9557 SE 32nd Ave, expressed thanks for the work that had gone into the Comprehensive Plan. She also expressed support for the comments submitted by Ben Rousseau (Rousseau Comments) as submitted in the packet. She stated that she agreed with Mr. Rousseau that DEIC should be referenced in the Comprehensive Plan, and that the inclusion of this reference was consistent with references already in the plan to other groups not exclusively limited to land use.

In response to a question from Commissioner Hemer she stated that housing regulation, access, affordability, and other land use considerations had historically been used in actively inequitable ways, and so a failure of the city to actively consider equity in land use policies would create an opportunity for inequity.

Ken Kraska, 9975 SE 36th Ave, expressed thanks for the work that had gone into the Comprehensive Plan. He stated that he felt that many of the public comments included in the staff report packet had been dismissed by city staff with insufficient justification. He expressed concern that the timeline of three Planning Commission hearings proposed by staff was insufficient. He indicated that the plan should be as specific as possible. He emphasized the need for the preservation of large and old-growth trees, fees for building demolition, a focus on form as well as density in zoning, in addition to other adjustments to the Comprehensive Plan.

Dan Eisenbeis, 2415 SE Llewellyn St, expressed thanks for the work that had gone into the Comprehensive Plan. He emphasized the long-term nature of the Comprehensive Plan. He noted the difficulty of translating subjective terms like “neighborhood character” into code language, and that subjective language created the opportunity for litigation. He expressed support for the Rousseau Comments. He stated that he hoped implementation of the city’s Transportation Systems Plan and Land Use Map would proceed quickly following adoption of the Comprehensive Plan. Finally, he stated his hope that Policy 7.3.8 regarding reduction of parking requirements would be interpreted in some instances as an elimination of parking requirements.

Stephan Lashbrook, 4342 SE Rockwood St, expressed thanks for the work that had gone into the Comprehensive Plan, and expressed support for the Rousseau Comments. He noted the importance of tying the Comprehensive Plan back to the Community Vision. He expressed support for neighborhood hubs, woonerfs, and other Comprehensive Plan policies. He indicated the need for more focus on urban renewal, the types of trees being included in the tree canopy, and the removal of invasive plant species. He also asked for stronger wording regarding needed transit service.

In response to questions from Commissioner Hemer, Mr. Lashbrook echoed Ms. DiMauro’s answer, and indicated that the national history of institutionalized housing segregation could be countered with the inclusion of the DEIC as a review body, and potentially as an outreach body.

Vice Chair Burns suggested, and **Chair Travis** agreed, that the time for testimony should be extended to five minutes since all the testimony had been running over the established limit.

Neil Schulman, 2416 SE Lake Rd, testifying on behalf of the North Clackamas Watershed Council (NCWC), provided testimony with the following main points:

- The city should not only maintain existing natural areas, but add to them
- Natural areas should be planned with connectivity in mind
- NCWC supported the removal of Kellogg Dam, as well as the conservation zones described in the plan, and the acknowledgement in the plan that the conditions upstream influence water quality downstream.
- NCWC was concerned about the need for reducing the amount of impervious pavement coverage
- NCWC urged the city to find ways of mitigating the trend of lower late-season water availability.
- Tree canopy should be expanded both through the planting of new trees and the preservation of existing trees. Equity should be part of this planning.

In response to questions from planning commissioners, Mr. Schulman provided the following testimony:

- Milwaukie staff could influence the WES discussions about stormwater policy and water availability as a stakeholder.
- Milwaukie could help with regional wetland expansion
- It would be useful, but challenging, to set a threshold goal for impervious pavement coverage based on available data

Vice Chair Burns invited NCWC to submit a recommendation regarding a threshold goal for the January 28 meeting as well as a response to the staff comments about water quality and quantity recommendations.

Bill Corti, 3963 SE Lake Rd, requested that the zoning for his property on SE Monroe St be rezoned to accommodate higher density.

Elvis Clark, 3536 SE Sherry Ln, testified that he was concerned about the interaction between density and walkability. He requested that the Comprehensive Plan should include a commitment to street upgrades before allowing higher density through zone changes.

Mr. Egner, responding to questions from Commissioner Hemer, stated that when a development significantly impacted a road, road improvements could be required in a way that was roughly proportional to that impact. Townhouses or cottage clusters generally would not trigger these improvement requirements. He further stated that zone changes, although they provided an opportunity for a wider scope of planning, did not constitute “development” that would trigger street improvements.

Justin Gericke, City Attorney, responded to a question from Commissioner Hemer by stating that there were multiple considerations that went into Capital Improvement Plan development. He stated that it might not be feasible to tie that planning, particularly as it related to side streets, to density.

Mr. Egner indicated that he thought it would be theoretically possible to write such a requirement into law.

Ronelle Coburn, 9114 SE 29th Ave, testifying on behalf of **Milwaukie Residential Infill Projects**, provided testimony with the following main points:

- The community welcomed change but wanted more information and engagement.

- The Planning Commission had recently indicated that it did not want to serve as the Community Involvement Advisory Committee (CIAC) and was not equipped to do so.
- Milwaukie RIP proposed a CIAC subcommittee to the Planning Commission as an interim step.

Responding to a question from Vice Chair Burns, she stated that communications with the community should be more focused on educating rather than just informing, and this communication focus distinguished a CIAC from a DEIC. She stated that there should be 1-3 percent of the population of the city in attendance at the current meeting based on the city having mailed postcards to every resident announcing the meeting, and that a communication strategy formulated by a CIAC could have brought in that many members of the public.

Ben Rousseau, 3264 SE Lake Rd, expressed thanks for the work that had gone into the Comprehensive Plan, and expressed support for the Rousseau Comments (his comments). He emphasized the way that the creation of the DEIC had been an important part of developing the Community Vision, and that that creation was listed in the Vision as part of the Comprehensive Plan revision. He noted that there was no other opportunity to ensure that the DEIC was developed. He cited examples of racist housing policies in Milwaukie's history to underscore the importance of a DEIC.

Planning Commission Deliberation

Mr. Egner provided a brief overview of the Comprehensive Plan Implementation Process going forward. He noted the role of the CPIC as an advisory committee, and an opportunity for community involvement in the implementation of the Comprehensive Plan.

Commissioner Hemer offered notes about the formatting of the document and word usage, as well as an apparent conflict between the Comprehensive Plan statement that park master plans would no longer be used, and the repeated references to park master plans throughout the document. He stated that he did not believe that the Planning Commission should serve as either the CIAC or the DEIC because the scope of the Planning Commission was limited to land use. He expressed concern that writing the DEIC into the Comprehensive Plan would limit it to land use issues.

City staff and the **Planning Commission** discussed the potential tradeoffs between developing a standalone CIAC or including the CIAC as part of an expanded Planning Commission. The commissioners generally agreed that the goals of the CIAC and DEIC extended beyond land use and that the Planning Commission should remain focused on land use.

- **Chair Travis** particularly emphasized the benefits of using existing boards and committees, including the Neighborhood District Associations.
- **Commissioner Massey** stated his concern that a standalone CIAC might not be closely enough involved with stakeholders, as compared to the Planning Commission which is by default closely tied to land use committees.

City staff and the **Planning Commission** discussed density and zoning and how zoning might be simplified or changed in the future.

Chair Travis asked Staff to investigate whether other cities are specifically referencing temporary shelters in their comprehensive plans.

Commissioner Hemer suggested that Policy 4.2.1 and Policy 4.2.2 should be in reverse order for clarity. He also indicated that the Hundred Year Floodplain map might fit better in natural hazards.

Chair Travis asked that the language of the Comprehensive Plan be written such that it could be adapted as technology and climate science developed.

Vice Chair Burns expressed excitement about the earlier discussion around Mr. Clark's idea of allowing provisional zoning density increases to allow more density as streets were improved. He noted that with the correct legislation, a developer might elect to voluntarily make additional street improvements in order to "unlock additional density".

Commissioner Hemer motioned to continue the hearing to a date certain of January 28, 2020. Vice Chair Burns seconded the motion. The Planning Commission voted 5-0 in favor of the motion.

- 5.2 Summary: SE 55th Ave & SE Railroad Ave Subdivision
Applicant: I&E Construction, Inc.
Address: Taxlot 12E31DD03000
File: S-2018-001
Staff: Mary Heberling, Assistant Planner

Chair Travis opened the hearing. Vice Chair Burns motioned to continue the hearing to a date certain of February 25, 2020. Commissioner Hemer seconded the motion. The Planning Commission voted 5-0 in favor of the motion.

6.0 Planning Department Other Business/Updates

Mr. Egner reminded the commissioners that there were openings for them on the CPIC and the City Hall Disposition Committee.

The Planning Commission decided that Commissioner Hemer should serve on the City Hall committee, and that they would determine which of them would serve on CPIC at the next meeting.

- 6.1 Summary: Planning Commission Officer Elections
Staff: Denny Egner, Planning Director

The Planning Commission discussed who the best candidates for 2020 Chair and Vice Chair would be and determined that Commissioners Massey and Loosveldt were the best candidates.

Vice Chair Burns nominated Commissioners Massey and Loosveldt to be Chair and Vice Chair respectively. Commissioner Hemer seconded the nominations. The Planning Commission voted 5-0 to elect Chair Massey and Vice Chair Loosveldt.

7.0 Planning Commission Committee Updates and Discussion

There were no additional updates.

8.0 Forecast for Future Meetings

- | | | |
|-------------------|----|---|
| January 28, 2020 | 1. | Hearing Item: Comprehensive Plan Draft Policy Document |
| | 2. | Work Session Item: PC Bylaws Amendment; Annual NDA Leadership Joint Meeting |
| February 11, 2020 | 1. | Hearing Item: Comprehensive Plan Recommendation |
| February 25, 2020 | 1. | Hearing Item: S-2018-001, Railroad Ave Subdivision |

Meeting adjourned at approximately 9:30 PM

Respectfully submitted,
Dan Harris
Administrative Specialist II

Robert Massey, Chair



CITY OF MILWAUKIE

To: Planning Commission
Through: Dennis Egner, Planning Director
From: David Levitan, Senior Planner
Date: February 4, 2020, for February 11, 2020 Public Hearing
Subject: Continued Public Hearing for Comprehensive Plan Policy Document

ACTION REQUESTED

Continue the public hearing for application CPA-2019-001, which as proposed would update the Comprehensive Plan policy document, with the exception of the Transportation section. Continue deliberation, including discussion of the oral and written testimony provided to date and staff's proposed edits to the goals and policies. Provide direction on any additional changes needed to the goal/policy language or background information in the policy document prior to the February 25 meeting, when Planning Commission will be asked to recommend City Council approval of application CPA-2019-001 and adopt the recommended Findings of Approval.

History of Prior Actions and Discussions

- [May 22, 2018](#): The Commission provided feedback on the block 1 policies.
- [June 26, 2018](#): The Commission provided additional feedback on the block 1 policies, which were later "pinned down" by City Council resolution on [August 21, 2018](#).
- [November 27, 2018](#): The Commission provided feedback on the block 2 policies, which were later "pinned down" by City Council resolution on [January 15, 2019](#).
- [June 11, 2019](#): The Commission provided feedback on the housing block policies, which were later "pinned down" by City Council resolution on [July 16, 2019](#).
- [June 25, 2019](#): The Commission provided their initial feedback on the public facilities, natural resources, and environmental quality policies.
- [July 9, 2019](#): The Commission reviewed the urban design policies.
- [August 13, 2019](#): The Commission was updated on the status of the block 3 policies, which were subsequently "pinned down" by City Council resolution on [August 20, 2019](#).
- [August 27, 2019](#): The Commission provided more comments on the urban design policies.
- [November 12, 2019](#): Staff provided an update on the process to adopt the Comprehensive Plan policy document and discussed upcoming implementation work for 2020-2022.

- [December 10, 2019](#): The Commission reviewed and provided feedback on the layout and non-policy content of the Comprehensive Plan policy document.
- [January 14, 2020](#): The Commission opened the public hearing for CPA-2019-001, took oral testimony, and identified key issues for staff to explore and report back about on January 28.
- [January 28, 2020](#): The Commission continued the public hearing, took additional oral testimony, closed the public hearing, and began discussion and deliberation.

BACKGROUND

On January 28, 2020, Planning Commission held a continued public hearing for CPA-2019-001, which as proposed would amend the Comprehensive Plan policy document to include a whole new set of goals and policies, with the exception of Section 13 (Transportation). Commissioners heard oral testimony from nine members of the public, after 10 people provided testimony at the January 14 meeting. Commissioners also received three sets of additional written comments at the January 28 meeting, which are included in Attachment 1. Following oral testimony, Chair Massey closed the testimony portion of the public hearing and commissioners began their deliberations.

Commissioners discussed and deliberated on four of the 12 sets of goals and policies: Sections 2, 3, 5 and 6. Commissioners agreed upon proposed edits and additions to the goals and policies for the four sections, which staff has incorporated into an updated track changes version of the goals and policies (Attachment 2). At Commissioner Loosveldt's request, staff also consulted with Public Work Director Peter Passarelli and Climate Action and Sustainability Coordinator to revise the document's definition of climate change, and to solicit their feedback on the goals and policies in Sections 3, 5 and 6 to make sure they are reflective of the city's recently declared climate emergency. Mr. Passarelli and Ms. Rogers have suggested several minor edits to goals and policies in these three sections, which have been incorporated into Attachment 2. These edits include using the term "clean" or "carbon-free" instead of "renewable" when discussing energy (so as not to exclude hydropower) and other structural, non-substantive changes to policy language.

Commissioners also began deliberating on the Section 4 (Willamette Greenway) goals and policies but decided to skip Section 4 so that staff could review and make changes to the organization, flow and sentence structure of the goals and policies so that they are more consistent with the other sections. Staff has incorporated those changes into Attachment 2 and is also recommending similar edits to goals and policies in Sections 8, 9, and 12. These changes have not resulted in any changes to the focus or intent of the policy language.

When commissioners resume their deliberations on February 11, staff is recommending that they begin with the goals and policies in Section 4, before moving on to Sections 9-12 and concluding with Sections 1, 7 and 8. This is consistent with staff's recommendation at the January 28 public meeting, which was for the Commission to review the goals and policies in sections with fewer public comments before focusing on those that have received a greater amount of community feedback: Sections 1 (Community Engagement), 7 (Housing), and 8 (Urban Design and Land Use). Staff recommends that commissioners continue to utilize the matrix of public comments and staff responses as the guide for their discussion and deliberation, which has been updated to include comments received through the January 28 public hearing (Attachment 3). If needed, the

Commission can continue their deliberation to February 25, prior to making their recommendation to City Council.

The January 28 meeting packet includes a staff report and supplemental staff report that identifies a number of key issues that commissioners are asked to consider as they deliberate on the remaining goals and policies. Below is a brief summary of those key issues grouped by section, and more detail is available in the January 28 meeting packet.

Section 1 (Community Engagement)

- **Community Involvement Advisory Committee (CIAC):** Statewide Planning Goal 1 calls for local jurisdictions to have an officially recognized committee for citizen involvement. Should the Comprehensive Plan call for Planning Commission serve as the CIAC? Should the Comprehensive Plan simply call for City Council to appoint a CIAC?
- **Diversity, Equity and Inclusion (DEI) Committee:** The Comprehensive Plan Advisory Committee (CPAC) has recommended that the Comprehensive Plan include a policy that calls for the creation of a DEI Committee. The January 28 staff reports address this issue in detail, and City Manager Ann Ober provided additional context at the January 28 meeting. Ms. Ober will be attendance at the February 11 meeting to answer any additional questions that commissioner may have.

Section 7 (Housing)

- Are commissioners comfortable with staff's recommended edits to Policy 7.1.8, which were proposed in response to public comments related to expanding permitted structure types and simplifying the permitting process for homeless shelters?

Section 8 (Urban Design and Land Use)

- Several public comments called for a greater discussion of neighborhood integrity and compatibility, specifically as it relates to allowing additional middle housing options in neighborhoods that are currently made up primarily of detached single-family residences. Comments included a request to add a new goal and underlying policies. The CPAC discussed similar policy concepts during the development of the Section 7 housing policies in January-June 2019 and during their initial review of the draft urban design policies at their September 5, 2019 meeting, and were generally opposed to language that could be used to limit new housing opportunities.

QUESTIONS FOR COMMISSIONERS

1. Based on previous suggestions, staff has incorporated several changes to the introduction, background sections, and graphics of the policy document. Are there additional changes that you would like to be made before making a recommendation on the document to City Council?
2. Attachment 2 includes a list of recommended edits to the policies and land use designations based on public comments received through January 28, 2020, and feedback from commissioners at the January 28 public hearing. Are there additional edits to the policies that commissioners would like to recommend? Are there other edits or new policies that are needed based on comments or suggestions from the public? Commissioner Edge has submitted a

number of comments (Attachment 4) on the housing goals and policies and the overarching section goals for the document that would be useful to consult during the Commission’s deliberations.

ATTACHMENTS

Attachments are provided as indicated by the checked boxes. All material is available for viewing upon request.

	PC Packet	Public Copies	E-Packet
1. Additional Public Comments Received since January 23	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Track Changes Version of Recommended Policy Edits	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Matrix of Public Comments and Staff Responses	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. January 28 and February 3 Commissioner Edge Comments	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Key:

PC Packet = paper materials provided to Planning Commission 7 days prior to the meeting.

Public Copies = paper copies of the packet available for review at City facilities and at the Planning Commission meeting.

E-Packet = packet materials available online at <https://www.milwaukieoregon.gov/bc-pc/planning-commission-44>.

David Levitan

From: george rudge <georgerudge@hotmail.com>
Sent: Sunday, January 26, 2020 4:06 PM
To: Milwaukie Comprehensive Plan
Subject: future growth

milwaukie is not portland! we do not need infill and high density housing and development.
what we need is a city government that listens to its people

respectfully
george rudge

David Levitan

From: Renee Moog <rmoogpdx@gmail.com>
Sent: Monday, January 27, 2020 3:19 PM
To: Milwaukie Comprehensive Plan
Subject: comments on Comp Plan

Hello,

I have two separate comments/concerns:

Comment 1:

I live off the Johnson Creek Blvd and consider the ability to access the cool air along the Springwater Corridor, hear owls at dusk and see signs of deer that wander the Johnson Creek Wildlife Corridor an important part of my well-being. Having the opportunity to garden, gather, recreate and experience the natural world in my own back yard is part of my community experience and one that I would hope at some level could be widespread. Having access to open space is increasingly recognized as a necessary and critical component of physical and emotional well-being. If my property and that of my neighbors were developed with the density that is the focus of Milwaukie's proposed Comprehensive Plan and the 2019 Housing Feasibility Analysis I am wondering where my neighborhood's residents would find this individual well-being and sense of place and community.

The City of Milwaukie Community Vision states:

"In this great city, we strive to reach our full potential in the areas of education, environmental stewardship, commerce, culture, and recreation; and are proud to call it home."

I am concerned in a rush to meet housing needs and fulfill obligations mandated by HB2001 and Metro, the community defining life-forces mentioned in the vision statement will not be adequately considered. I understand a vital part of one's wellbeing is having access to affordable housing and I adhere strongly to tenants of equity and social justice. In that end, I am trying to stay abreast of the discussions justifying, describing and determining policies to create density. I acknowledge and appreciate the long term efforts to specifically address housing needs but I am concerned that both in the short term and the long term (when zoning changes are addressed) that critical elements of community development will not be adequately prioritized. I would like to see specifics on how more people with less individual living space within the same geographic constraints are going to have opportunities for individual well-being and community cohesiveness.

There will be an increased need for open spaces and places to gather in each neighborhood: more parks, community gardens, event spaces and community centers, not to mention more diverse commercial offerings, schools, sports facilities, and entertainment options. The Comprehensive Plan Section 9 on Park Development and Maintenance describes these needs. Yet, the Natural Resources and Environmental Quality Section 3, states "...Milwaukie has a limited land supply and natural resource protections can reduce or constrain development opportunities..." and, page 126 of the Comprehensive Plan specifically says "Milwaukie is generally built out and has minimal land available for new parks. As the city continues to grow it may be challenging to serve its growing population with adequate park space." And, Comprehensive Plan Section 12.6.2 states "To use land more efficiently, encourage infill on underutilized parcels ..."

In a rush to meet housing specific obligations, if we fail to protect existing open spaces or identify and adequately set aside or acquire property to develop new parks or other community centers we will end up with a series of housing complexes not a vibrant community. As the Comprehensive Plan is finalized and Zoning review starts, I am looking to the City to develop and enforce quantifiable requirements for increasing non-residential areas in order to meet the shifting needs of a higher density residential population- even if that means less residential infill.

Comment 2:

I live on the city's boundary that zig zags in and out of Milwaukie and Portland and Clackamas and Multnomah counties. My neighborhood along Johnson Creek Blvd has perennially faced challenges with representation, services and safety concerns due to lack of communication and coordination between jurisdictions. The deer that wonder freely from yard to yard along the Johnson Creek Corridor don't stop to consider what county or city has jurisdiction - but my neighbors are concerned about jurisdictions because they want to know when they call 911 that somebody will come.

Since the consequences of having multiple stakeholders are generally unforeseen, I would like to know that the City of Milwaukie is playing a proactive role partnering with colleagues from neighboring jurisdictions. One example of the need to cultivate strong partnerships is spelled out on page 130 of the Comprehensive Plan:

"Milwaukie is not a full-service city and relies on partnerships with the parks district and school district to meet the recreational needs of the Milwaukie community. Strong partnerships and communications will be integral to meeting recreational demand as the city continues to grow."

As various partners in the region are reviewing comprehensive plans and determining how they will meet HB 2001's mandate, how is the City of Milwaukie in communication and collaboration with the City of Portland and other jurisdictions and how will you look to coordinate information and policies?

Thank you, Renee Moog

**Public Comment, Agenda 4.1, Comprehensive Plan - public hearing, January 28, 2020;
meeting of the Planning Commission**

Hello: Chair Massey, Vice Chair Looseveldt, commissioners Hemer, Edge, Burns, and Travis.
Senior Planner, Levitan; and Planning Director Egner

I am much appreciative of the question posed to the Planning Commission by staff:

“Would Planning Commission like to include a policy that ties potential increases in density (via Comprehensive Plan map amendments or rezoning) to sidewalks, street and frontage improvements?” (page 5 of 4.1, tonight’s e-packet.)

I would like to see such a policy tie, in order, to more fully motivate the City and developers to not allow safety for walkers and bicyclists to degrade with increased density on a street within proximity of transit (bus lines). There are numerous streets in Milwaukie within proximity of transit (bus lines) which (1) lack sidewalks and (2) are degraded to poor street condition (rutted, potted, and poor water drainage).

In these cases where street conditions are unsafe for walkers and bicyclists, reliance on automobile increases and therefore increased density on the street increases the competition between car and the walker/bicyclists for space on the street.

With Milwaukie’s relatively low density as generally existing currently, the competition for space on street between cars and walkers/bicyclists is mostly subdued. But with higher density this competition for space most likely becomes more critical, as in safety.

I support a Yes on this question.

Additional background: Currently, the SAFE (Safe Access for Everyone) program is funded by water bills through a fixed monthly fee. There are **two serious questions of fairness** about SAFE. **First**, SAFE is targeted primarily to improving access on arterials, to schools, and to hospital services. **SAFE therefore does not cover most neighborhood streets, even as much of the SAFE funding comes from such residential areas. Two**, developers in areas of SAFE improvements do not have to spend on sidewalks assuming they already exist, water bill users having subsidized new developments via SAFE (one way of seeing it anyways).

Sincerely,
Elvis Clark,
Ardenwald neighborhood,
Milwaukie 97222

David Levitan

From: ken kraska <kenkraska@yahoo.com>
Sent: Tuesday, January 28, 2020 4:38 PM
To: Robert Massey; laurenl@opsisarch.com; kim.travis75@gmail.com; john.henry.burns@gmail.com
Cc: Dennis Egner; David Levitan; Mary Heberling; Lisa Batey; kenkraska@yahoo.com
Subject: written comments for 1-28-20 Planning Commission
Attachments: 1-28-20 PC mtg.pdf

Dear Planning Commissioners & Staff,

Please find attached public comments representing a group of twelve neighbors and myself with thoughts and suggestions for your consideration regarding the Comprehensive Plan. I will have paper copies to distribute, however this can be included in the packets if it's not too late to do so this afternoon. I apologize but I do not have emails for a couple of the commissioners if you could please forward them a copy as well. Looking forward to a robust and democratic discussion,

Ken

Suggested Edits for Commissioner Consideration

3.6.7 Staff comments that “calling for an increase in the fee in the policy is unnecessary.” However, we did not advocate increasing fees in prior comments. We instead suggest the following edit:

Create standards and best practices for the demolition of buildings, including but not limited to setting appropriate annual fee schedules to reduce impacts associated with increased demolition, including creation or release of dust and air pollutants.

5.1 – Goal: We strongly support North Clackamas Watershed Council’s stance on this issue, as well as staff’s inclusion of minor edits to Goal 5.1 to reference avoidance.

5.1.3 Regarding this provision, staff appears to believe that development in areas with high risk of natural hazards that cannot be adequately mitigated should not be prohibited! Without any substantive justification, staff somehow thinks that high-risk developments for which long-term risks to human life and property cannot be adequately mitigated should be merely “restricted” (term undefined).

Suggested edit:

Encourage and prioritize development in areas with low risk of natural hazards and ~~restrict~~ prohibit development in areas with high risk that cannot be adequately mitigated.

5.4.1 Staff characterizes as a “minor edit” a proposal to delete the word “and”, replacing it with “or” in this provision, which currently reads:

In areas where there is a high risk of flooding or other natural hazards, support efforts by the City and other public and private entities to acquire properties for conservation purposes. Restrict development to uses that have a demonstrated community benefit **and** for which the natural hazard risks and environmental impacts can be adequately mitigated.

NOTE: Staff believes changing ‘and’ to ‘or’ is an “appropriate edit”, however they do not address the following public comments submitted 1/14/20 that were omitted from the Public Comments matrix:

Under staff’s suggested placement of “or”, if an applicant simply “demonstrates community benefit” (undefined), they would then be presumably allowed to develop in areas with high risk of flooding or other natural hazards. With this language, it appears there would be the choice to either permissively allow a development in hazard areas (if it has an undefined “demonstrated community benefit”) or to prescriptively allow it (when “natural hazard risks and environmental impacts can be adequately mitigated.”) Would, for instance, uses that demonstrate benefit to the “development community” be allowed under this provision?

[Is also inconsistent with existing language in Policy 3.2.4:

“Maintain the City’s regulatory hierarchy that requires a detailed analysis, including alternatives, of how development will 1) avoid, 2) minimize, and 3) mitigate for impacts to natural resources.]

5.4.7 (new): Staff notes that they are “currently in the process of creating an online portal and notification process to make pre-application conferences available for public review.” Where should this improvement be referenced in the Comp Plan?

6.1.1 Encourage, and eventually require, the use of innovative design and building materials that increase energy efficiency and natural resource conservation, ~~and~~ minimize negative environmental impacts of building development and operation, and reflect industry best practices and community priorities.

Staff seems to believe that eventually requiring something “does not add anything substantive.” However, the proposed edit leaves the door open for both encouraging and eventually requiring the use of energy efficient building materials; strategies which, in combination, are more substantive than mere “encouragement” (undefined term). And a combined strategy is consistent with that in current Policy 5.4.4 to “Encourage, **and eventually require,** green infrastructure and development practices.”

Staff also states that “the city’s development code will continue to be modified to reflect industry best practices and community priorities”, yet without explanation recommends against including this laudable goal in the Comp Plan.

6.1.5 Elvis Clark’s testimony of 1-14-20 referenced research indicating that heat island effects are exacerbated by increased population density, and that temperature increases cause by increased local population substantially exceed those induced by climate change. **Staff in their response deems the use of green building materials and techniques and adding trees as adequately addressing heat island effects in Milwaukie, but is silent on the issue of density. Density is a key contributing factor that should be included somewhere in a Comprehensive Plan.**

Section 7: Key Issues- Livability:

[Existing language]:

The City needs to consider the impacts of growth and development on existing residents... Addressing concerns about traffic, tree protection, and quality design will be vital as the city grows.

The City identifies Livability as one of the lenses it utilized in developing the proposed housing goals and policies. However, existing residents’ concerns about traffic resulting from increased density, tree protection, and quality design are not currently adequately addressed in this section’s policies. Staff commendably recommends a more detailed discussion this evening of livability concerns such as density, traffic, and neighborhood compatibility.

7.1.2 [revised edit]

Establish incremental development standards that focus ~~more~~ on regulating size, shape, style, quality, and form, ~~and less on the number of housing units~~ as well as on density in residential neighborhoods.

(Staff indicates in its comments that “this policy has been discussed in depth by the CPAC, and as such (it) recommends against the proposed edits.” However, in Attachment 5 of your packet there is a letter from the CPAC indicating that decisions were often made “with dissent” and that members of the CPAC believe that “changes...[to the Comp Plan] are still needed.”) **Density and style are key issues for the community, and we believe merit additional discussion and examination by the Planning Commission.** (Staff subsequently replies that there was “near consensus” and “insignificant dissent” on this policy in the CPAC.) In any case, **there is significant dissent and lack of consensus by the public on these issues.** Staff commendably indicate they “would like to discuss this comment in greater detail [this evening] as part of the larger discussion on how to address concerns about neighborhood compatibility”, and we would add, address concerns about increased neighborhood density.

“Form-based” zoning code is a current trend favored by developers to maximize profit at the expense of quality, style and space. It is not required by law and should be utilized sparingly and in balanced consideration of other factors such as density, parking, sidewalks and quality streets.

7.2.2 Allow and encourage development of housing types with lower construction costs, provided materials are of good quality and style is specified such that community character and livability are maintained.

Staff comments that community character “can be difficult to define”, yet in Policy 8.2.5 there are very clearly defined “policies to promote community character.” Staff suggests that quality and character be addressed “in another section, if so desired.” **We believe style and quality of building materials are important factors that directly relate to Milwaukie’s livability and community character, especially in residential areas, and agree they should be included somewhere in the Comp Plan.** Staff commendably recommends further discussing “potential edits to this policy in the larger discussion of neighborhood compatibility, community character, and livability [at this evening’s meeting.]”

7.2.6

Staff’s clarifying response is appreciated. We suggest the following edit in congruence with ORS 197.307 (8) (g) which allows cities to “subject a manufactured home and the lot upon which it is sited to any development standard, architectural requirement and minimum size requirement to which a conventional single-family residential dwelling on the same lot would be subject.” Suggested edit:

Support the continued use and preservation of manufactured homes as an affordable housing choice ,~~both on individual lots and within manufactured home parks as an affordable housing choice~~ **and on individual lots subject to single-family developmental standards, architectural and minimum size requirements.**

7.3.8

Staff states that specifying distances “is more appropriate for the zoning code.” Since a commonly cited standard for “walking distance” is within ¼ mile and “close” proximity (as opposed to reasonable

proximity) already is articulating a standard, **we agree** that both considerations are more appropriate for the zoning code. **We propose the following revised edit:**

Allow for a incremental, specified reductions in required off-street parking, in proportion to allowable density, for new development within specified distance of close proximity to light rail stations and frequent bus service corridors running through residential areas.

7.4.1 We concur with staff’s edit of this policy and agree it helps clarify its intent. The proposed edit is also consistent with the intent of its section goal, Livability, in that it enhances the ability of Milwaukee’s neighborhoods to meet community members’ economic, social, and cultural needs and promote their health and well-being. Community members do not desire increased residential density without concomitant support for increases in accessible nearby amenities (like provided for in Neighborhood Hubs- 8.1.4 a)

7.4.2 Require that new housing projects improve the quality and connectivity of active transportation modes by providing infrastructure and connections such as sidewalks and bike paths that make it easier and more direct for people to walk or bike to destinations such as parks, schools, commercial services, and neighborhood gathering places.

We believe that calling out sidewalks and bike paths improves the policy by providing illustrative examples of connections and infrastructure (beyond vehicular lane improvements) that improve the quality and connectivity of active transportation modes. Staff states they do not feel this is necessary, however indicate they will defer to the Planning Commission’s recommendation on this provision.

7.4.3 Administer development code standards that require new housing to engage with the public realm and provide for and define appropriate setback and lot coverage standards.

We recommend improving the policy language with the above edit, as **allowing development code that provides for undefined “appropriate” ad hoc setback and lot coverage standards would be ambiguous and could create significant costs, uncertainty and unintended consequences.**

NOTE: The following suggested edits are to **provide consistent policy regarding scale for residents living in “neighborhood hubs” (8.1.4b), residents living in “transition areas” between lower & higher density residential (7.4.5), and residents living in low density areas near “corridors” (8.1.8e):**

7.4.5 Implement development ~~or~~ and design requirements to help create standards that require transitions between lower and higher density residential development areas where the mass, size, quality or scale of the developments differ substantially. ~~Requirements could including~~ massing, buffering, screening, height, or form, style and setback provisions at a scale that fits with what has been historically permitted in the neighborhood.

Staff indicates they would like to include this policy in the discussion on neighborhood compatibility this evening.

8.1.4 b) Ensure that new development projects are at a scale that fits with the height, bulk, setbacks, style, quality and form of development that have been historically permitted in the neighborhood.

8.1.8 e) Corridors

Maintain development and design standards that provide for a transition in development intensity between the development site and adjoining areas designated or planned for lower density residential uses, that are at a scale that fits in terms of height, massing, setbacks, and building form, style and quality with what has been historically permitted in the neighborhood.

Section 8 At the January 14th Planning Commission meeting, Commissioners and members of the public proposed **provisional increases in density based on infrastructure improvements, through tying CIP funds to density levels and/or through incentivizing developers who make infrastructure improvements (such as adding sidewalks) with density bonuses (e.g. “triggers” to “unlock density”). We tentatively support such measures.**

8.1.8 a) Staff states that specifying distances “is more appropriate for the zoning code.” Since a commonly cited standard for “walking distance” is within ¼ mile and “close” proximity (as opposed to reasonable proximity) already is articulating a standard, both considerations are more appropriate for the zoning code. We propose the following revised edit:

Provide opportunities for incremental medium or higher intensity development in areas within specified walking distance of existing ~~or planned~~ or future established frequent transit service, contingent upon provision of accessible sidewalks to nearby transit stops, and provision of funding for repair and widening of streets to create a quality environment for pedestrians and bicycles. [see policies 10.1.1 & 10.6.5]

Otherwise, as currently written transit service could be “planned” years in advance, yet never built, meanwhile allowing this provision to apply nearly everywhere. ‘Higher’ as well as other levels of ‘intensity’ need to be defined to be meaningful and avoid unwanted consequences. As others have commented, safe and accessible sidewalks are essential to effectively utilize bus transit. Use of vague and insubstantive terms such as “within walking distance” for such a crucial aspect of urban planning is ill advised. Milwaukie’s Planning Director has indicated concern along these lines.

NOTE: The following text was not included in the last Matrix of Public Comments, as staff indicated they were “too long to fit within the spreadsheet.”

During a Planning Commission meeting, Mr. Egnor stated:

“We need to have more discussion about how do the corridors overlap around 32nd. 32nd is a frequent transit corridor, and if we talk about a quarter-mile off of that, that’s a really big swath that you could potentially have more intense development. That could be kind of controversial. I mean when you’re right on 32nd that’s one thing, but when you’re a quarter-mile off of it, or an

eighth of a mile off of it, you’re smack in the middle of the neighborhood. So there’s gonna be some.... We still need to think about that.”

We heartily agree. Lowering density requirements if not well-considered in the Comp Plan will lead to the kind of conditions occurring in nearby areas of Southeast Portland. Several other members of the public have expressed concerns about increased density, and while a goal of affordable housing is laudable, the most affordable, in-demand, and environmentally friendly homes are those that are already built. The quality and functionality of residential neighborhoods would be adversely affected were density, style and building materials standards not to be retained and properly referenced in the City’s guiding land use planning document.

We request further consideration of this very important policy. Compared to a comprehensive plan, zoning code can be changed relatively easily at any time. Although its importance has been downplayed by some, as the guiding document for implementing code, we believe the Comp Plan is as or more important than the code itself.

8.1.8 b)

Ensure that design standards require direct pedestrian connections to the closest transit line in the form of sidewalks. [busy, rundown streets could constitute direct pedestrian connections without this specificity.]

8.2 – Livability

Enhance livability by establishing urban design concepts and standards that help improve the form and function of the built environment, while maintaining current standards for style and quality of materials.

8.2.2 Policies related to parking design include:

a) Establish parking standards ~~that rely on higher~~ based upon periodically measured levels of active transportation and ~~increased~~ use levels of transportation demand management programs to achieve community design patterns that are ~~more~~ both environmentally and functionally sustainable.

The current language of 8.2.2 would base parking standards on a speculative untested assumption about modes and usage levels of future transportation. An empirical approach would more accurately and effectively meet the goals of Section 8.2 and assist in meeting the goals of 8.2.6 to properly measure the City’s success in enhancing livability. Recommend modifying the intent of the policy in consideration of a contingent approach like that in:

Section 9.2.6

Explore conversion of parking lots to parks and recreation opportunities when parking demand decreases.

8.2.5 Policies to promote community character include:

c) Encourage green buildings through a program that allows specified extra building height with the development of a green building.

d) Ensure that policies and codes related to urban design, parking standards, and residential density are consistently and regularly enforced.

The proposed edits improve the policy by assuring that green building height variance limits are properly specified, rather than left vague and undefined. As an integral component of livability, it is important to ensure that codes and policies related to parking and housing density are, along with urban design generally, consistently and regularly enforced.

8.3.2 Ensure that a clear and objective process is available for all housing types that meet design standards, provide adequate open space, and fit into the community, while offering an alternative discretionary path for non-residential projects that cannot meet these standards.

Discretionary design review approaches often result in uncertain, arbitrary, and/or inconsistent decision-making, with potential for conflict over a “more subjective set of design guidelines,” and are inappropriate for residential neighborhoods. Staff indicates that if the Planning Commission has similar concerns, they should delete the second half of the policy (“while offering an alternative...”).

8.3.3 Expand opportunities for neighborhood district associations (NDAs), ~~and~~ other stakeholders, and the public to review information such as pre-application conference notes and provide feedback early in the development process, and respond to community concerns with clear, concise, objective information.

We support the above policy and suggest more specificity in how this will be accomplished. The Planning Department indicates in their response that they have begun making pre-application notes available on the city website and will continue to discuss additional ways to foster early public involvement in the land use process. This is excellent! [Minor suggested edit added above.]

8.3.4 [new] Expand incentives and refine development standards that help to:

f) encourage locally owned and operated developers and builders to invest in Milwaukee
Staff is not opposed to the above edit.

g) encourage construction of owner-occupied housing units

Staff indicates in their response an unsubstantiated belief that “owner-occupied housing.. is exclusionary in nature and provides a negative connotation [in staff’s minds?] of renter-occupied housing.” This is illogical and defies reality. Many of my low-income students are people of color who are striving to own their own home for the stability and economic gains home ownership can provide. There are advantages and disadvantages to both owning and renting one’s home. This need not be a

zero-sum game. We need to be careful not to conflate the terms “affordable” and “inclusive” with the developer-investor terms “profit margin” and “return on investment.” ROI is not the same as DEI.

[f] above aligns with Policy 11.3.3:

Attract and foster businesses that hire local residents and provide... jobs for employees..

8.3.5 Require that comprehensive plan amendment applications to low density residential, medium density residential, high density residential, and mixed-use residential ~~consider~~ adequately address walkability, access to frequent transit service, and proximity to parks, schools and commercial services, through the provision of infrastructure and connections such as sidewalks and bike paths.

Staff states that “the low density residential land use designation is the lowest density Comp Plan designation”, and **apparently feel that comp plan amendment applicants to low density residential need not consider walkability, access to frequent transit service, and proximity to parks, schools and commercial services.**

Staff apparently believe it is not necessary for comprehensive plan amendment applicants in any zone to **adequately address** walkability, access to frequent transit, and proximity to parks, schools and commercial services, rather, it is enough for applicants to simply “consider” these issues.

Staff apparently also believe that it is unnecessary for applicants to address walkability and access to transit through the provision of infrastructure such as sidewalks and bike paths, but rather to merely “consider” these important issues for pedestrians. We encourage the Planning Commission to take a look at the policy language in this section.

Staff would like guidance from the Commissioners on these issues.

8.3.6 (New)

Develop, monitor and periodically update metrics that evaluate the City’s success in achieving Goal 8.2.

8.4 (New) Staff feels that terms such as neighborhood integrity “seem to suggest increasing density will *by nature* have an adverse effect on existing neighborhoods.” However, the proposed new goal actually **encourages increasing overall density that is *effectively designed*.**

8.4.1 (New) Staff claims that this policy “asserts that density is *likely* to threaten or diminish...established neighborhoods.” However, it doesn’t say this is likely across the board. Instead, it actually addresses the fact that **some forms of residential infill do threaten and diminish, while other forms of infill enhance, the stability, quality, and positive character of neighborhoods.**

8.4.2 (New) Staff states that “the components of this recommended policy seem more appropriate for

Section 7 (Housing), if Planning Commission is interested in incorporating [it.]” We strongly support the incorporation of this language into Section 7.

8.4.3 (New) We strongly support this provision.

8.4.4 (New) Staff stipulates they do not recommend the use of some verbs in the Comp Plan. Staff says that to ‘protect’ or ‘maintain’ an established residential neighborhood “connotes a history of exclusionary zoning and the need to protect detached single-family residences from other housing options”, as though a triplex would in itself cause damage to a single-family residence. Does this mean that to “neglect” or “abandon” existing neighborhoods connotes a commitment to inclusionary zoning? Staff and/or consultants seem to believe that calling for compatible design (including but not limited to several options) would somehow “limit infill development to only existing uses.”

We believe this is a misleading approach: **with some creative thinking we can have inclusionary, mixed-income, and racially and ethnically diverse neighborhoods that allow for affordable rental and home ownership opportunities, that are compatible in terms of style, building materials, size and proportion.** The real question is how much of an initial and/or ongoing profit margin are we willing to cede to regional but also out of state and foreign developer-landlords, who are now coveting this area? The idle threat that’s often bandied about is that developers will ‘go elsewhere’ if conditions are not up to their liking, but the fact is this is a ‘hot’ area due to mild climate, nearby mountains and ocean, and good employment market. DEI for POC, low-income and elderly people is not the same as ROI for the “development community.” Does a policy of “demolish, pack and stack” connote a commitment to inclusionary zoning, or does it point to an interest in increasing profits and tax revenues?

8.4.5 (New as of 1-28-20: Kraska et al)

Explore programs such as density bonuses in exchange for specified percentage of below market rate units for individuals between 30% and 60% AMI, based on building capacity or other similar measures.

10.1.1

Maintain and enhance levels of public facilities and services to City residents, businesses, and vulnerable populations as urban development or growth occurs, including but not limited to the provision of sidewalks and repair of streets and roads.

Staff asks for advice on how permissive the language should be.

10.1.2 [second revised edit]

Ensure that ~~existing~~ Milwaukie residents and taxpayers do not pay for services that don’t directly benefit them. ~~Milwaukie residents.~~

We are unclear as to the purpose of the above provision; any clarification is appreciated.

10.1.6 [revised edit]

Require developers to pay their proportionate share of the cost of utilities and facilities needed to support their developments, except in such cases where the City may provide specified incentives to achieve priorities outlined in the City’s vision.

Better integrating the built environment, for example, is a laudable goal. However, developer incentives need to be clearly delineated somewhere, so that uses of tax dollars in the form of developer subsidies are transparent to the public. Staff supports the use of the term “specified” above, but apparently does not feel transparency in city use of tax dollars and developer incentive offers is needed. We urge the Commission to examine this issue more closely.

10.6.5 [revised edit]

Work with partners to require streets be designed and maintained to meet the minimum needs of emergency services providers while also ensuring that street widths are appropriate and create a quality safe and usable environment for pedestrians and bicycles, making needed improvements as urban development or growth occurs.

Staff was not opposed to a previous iteration; however **no staff response or recommendation was included for the above revised edit.**

- 10.8.3** a) Maintain a public safety building which houses City police services.
b) Maintain safe and secure neighborhoods by allocating increased tax revenues resulting from, and commensurate with, increases in density to maintain or exceed present police officer-to-resident ratios in the City.

Staff comments that “the proposed policy addition is a finance and budget issue that is more appropriate for the Community Vision.” However, the American Planning Association’s *Best Practices for Comprehensive Plans* recommends connecting Comp Plans to capital planning and annual budgeting processes. However, staff’s follow-up response on 1/17 does not address the recommendation of the American Planning Association to connect Comp Plans to capital planning and annual budgeting processes. Staff does indicate that “the City has chosen not to have specified levels of service for police” and advises against language maintaining the officer-resident ratio as population density increases! We suggest this be reconsidered, perhaps the City can look at changing its policy to have specified levels of police service based on increased population.

13 Transportation

The City’s Transportation Systems Plan (TSP) and the Comprehensive Plan transportation goals and policies ~~were not~~ will be updated as part of the ~~2019~~ 2020 plan adoption, to ensure

congruence between increased density and traffic capacity planning, exercise due diligence, and avoid costly and foreseeable mistakes and potential litigation. ~~Work on the updated TSP is~~

~~expected to commence in 2020, at which point~~ This chapter will incorporate the updated transportation goals and policies.

Staff indicates “the current work plan does not include an update to the TSP.” We submit that the current work plan can be revised to include this vital aspect of truly comprehensive land use planning. Other progressive cities such as Denver and Boston have concurrently integrated transportation planning into their comprehensive plans.

In both the scientific and professional community, the need to integrate transport and land-use policies in order to achieve more sustainable urban development is widely recognized. Accessibility can provide a conceptual focus for this integration because it relates to both features of the transport system (e.g. speed, and travel costs) as well as the land-use system (e.g. density and functional mix). The concept of accessibility is well known within the scientific literature. The understanding of how it can improve transport land-use planning integration in practice, however, is still limited. In order to address this gap between theory and practice, we discuss two case studies in which policy-makers from both transport and land-use planning developed and used accessibility indicators to generate and select effective combinations of transport and land-use interventions.

Straatemeier, T., & Bertolini, L. (2018). Joint Accessibility Design: a framework developed for and with practitioners to stimulate the integration of regional land-use and transport strategies. *Transportation Research Record, 2077*, 1–8. doi: 10.3141/2077-01 <https://www.tandfonline.com/doi/full/10.1080/09654313.2019.1612326>

Planning staff in their follow-up response indicate they will need direction from the Planning Commission if they are to commit to amending the TSP and transportation section of the Comprehensive Plan as part of this Type V land use application. We urge the Commission to provide the needed direction to accomplish this goal.

Comprehensive Plan Land Use Designations

The following list of land use designations are carried over, with minor edits, from the previous iteration of the Comprehensive Plan's Land Use Chapter and reflect changes through Ordinance 2163. The geographic location and distribution of the eight land use designations are illustrated on the Comprehensive Plan Land Use Map.

The list of permitted housing types and density ranges under each land use designation have been slightly revised from previous Comprehensive Plan policy language in order to match the uses and standards already permitted by the implementing zoning districts, which can be found in Title 19 of the Milwaukie Municipal Code. These land use designations will be further updated to comply with the requirements of House Bills 2001 and 2003, which must occur by June 30, 2022.

Low Density Residential: Zones R-10 (3.5 - 4.4 units/acre) and R-7 (5.0 - 6.2 units/acre)

- a. Permitted housing types include single family detached, accessory dwelling units, and duplexes on large lots.
- b. Access from transportation routes are limited primarily to collectors and local streets.
- c. Sites with natural resource or natural hazard overlays may require a reduction in density.

Moderate Density Residential: Zone R-5 (7.0 - 8.7 units/acre)

- a. Permitted housing types include single family detached on moderate to small lots, accessory dwelling units, and duplexes.
- b. Convenient walking distance to a transit stop or close proximity to commercial and employment areas distinguish moderate density residential from low density residential.

Medium Density Residential: Zones R-3 (11.6 - 14.5 units/acre) and R-2.5/R-2 (11.6 - 17.4 units/acre)

- a. Permitted housing types include single family detached on small lots, duplexes, accessory dwelling units, cottage clusters, and multi-family development.
- b. These areas typically have access to major or minor arterials. Siting should not result in increased traffic through Low Density Residential areas.
- c. Medium Density areas are to be located near or adjacent to commercial areas, employment areas or transit stops.

High Density: Zones R-1 and R-1-B (25.0 - 32.0 units/acre)

- a. A wide variety of housing types are permitted, with the predominant housing type being multifamily units.
- b. These areas should be adjacent to or within close proximity to the downtown or commercial centers, employment areas and/or major transit centers or transfer areas.
- c. Access to High Density areas should be primarily by major or minor arterials.
- d. Office uses are outright permitted in limited areas within close proximity of downtown.

Town Center: Zones DMU and GMU

- a. Mixed-use development combining residential high-density housing with retail, service commercial, and/or offices is encouraged in these districts.
- b. The Downtown and Riverfront Land Use Framework Plan and the Downtown Mixed-Use Zone implement Subarea 1 of the Town Center Master Plan.
- c. Downtown Milwaukie is part of the Milwaukie Town Center, which is a regional destination in the Metro 2040 Growth Concept.
- d. The Town Center Area shall be served by multimodal transportation options; therefore, on-street parking, shared parking, and enclosed parking are the most appropriate parking options in the Town Center

Area.

- e. A variety of higher density housing is desired in the Town Center Area, and the City shall work cooperatively with the private sector to provide a diverse range of affordable housing.
- f. Downtown public improvements should be coordinated with private improvement efforts by local property owners and should aim to stimulate and support private investments in the area.
- g. Central Milwaukie is part of the Milwaukie Town Center that serves the larger Milwaukie community with goods and services and seeks to provide opportunities for a dense combination of commercial retail, office, services, and housing uses.
- h. The City will continue to work closely with Metro and Tri-Met in planning for transit improvements.
- i. More detailed design concepts and principles for these areas are included in the Urban Design section.

Commercial: Zones NMU, C-N, C-L, C-G, C-CS

- a. The City's commercial areas aim to meet a wide variety of local and regional needs for shopping and services.
- b. Larger commercial centers are located along arterials and state highways
- c. Neighborhood Mixed Use Areas are located primarily along collector or arterial roads and provide opportunities for a mixture of neighborhood commercial services and housing which are well-connected to the surrounding neighborhoods by sidewalks and bikeways
- d. Neighborhood hubs are dispersed throughout Milwaukie and provide opportunities for the development of neighborhood commercial services and the provision of amenities and gathering places for nearby residents.
- e. Corridors are located along existing or planned frequent transit lines and provide opportunities for higher intensity development in areas within walking distance of existing or planned frequent transit service.
- f. More detailed design concepts and principles for these areas are included in the Urban Design section.

Industrial: Zones M, BI, MUTSA and NME

- a. Industrial uses are concentrated in three major areas:
 - i. The **North Milwaukie Innovation Area** along McLoughlin Boulevard is one of the City's main employment areas that has identified redevelopment opportunities.
 - ii. The **Johnson Creek Industrial Area** is an important employment area within close proximity of Johnson Creek Boulevard and residential neighborhoods
 - iii. The **International Way Business District** is a major employment area off of International Way and Highway 224
- b. More detailed design concepts and principles for these areas are included in the Urban Design section.

Public: Zone OS and as allowed through Community Service Use process

- a. The Public land use designation is intended for schools, parks, public open space, and other community uses.
- b. With the exception of the downtown Open Space (OS) zone, the City currently lacks a zoning district for public uses. Public parks are approved through park master plans, while schools are approved through the community service use land use process.
- c. The City shall explore the creation of zoning districts that outright permit public uses such as parks and schools.

Section 1: Community Engagement

Overarching Section Goal – Engage community members in city decision-making processes in an inclusive, collaborative, transparent, accountable, and equitable manner through a broad range of strategies that inform and involve a full spectrum of community members, including established neighborhood organizations and other groups, as well as people and groups who have been traditionally left out of the planning process.

Goal 1.1 - Foster Broad, Effective and Collaborative Community Participation: Implement and encourage practices that increase community participation by providing thorough information, consulting with the community, and fostering collaborative partnerships.

Policy 1.1.1: Generate interest and encourage diverse participation in City boards, committees and commissions through broad outreach.

Policy 1.1.2: Ensure publications and printed materials regarding current issues and proposed policies are readily accessible for all ages and abilities, allowing for equitable engagement and informed dialogue between policy-makers and the community.

Policy 1.1.3: Keep the community informed of opportunities for involvement using a range of outreach tactics that may include media, presenting information at fairs and events, and direct outreach to existing organizations.

Policy 1.1.4: Enhance and extend community involvement by using emerging technologies, methods and techniques.

Policy 1.1.5: Improve engagement and dialogue with property owners, tenants, and employees in Milwaukie's commercial and employment areas.

Goal 1.2 - Promote Inclusion and Diversity: Involve a diverse cross-section of the community in community events and decision making related to land use and comprehensive planning, including people from a variety of geographic areas, interest areas, income, races, ethnicities, genders, sexual orientations, and all ages and abilities.

Policy 1.2.1: Build engagement across Milwaukie's diverse communities by notifying and facilitating participation in all land use and Comprehensive Plan related activities.

Policy 1.2.2: Provide information to the community in multiple languages where appropriate.

Policy 1.2.3: Seek public input on major land use issues through community organizations, such as faith groups, business associations, school districts, non-profits, service organizations and other bodies to encourage broad participation.

Policy 1.2.4: Reduce barriers to participation by considering language, meeting time, location, and required level of involvement.

Goal 1.3 - Maintain Transparency and Accountability: Ensure transparency and accountability in City and land use policy decision-making by maintaining access to City leadership, providing timely and respectful

responses to public inquiries, and making a commitment to equitable engagement practices.

Policy 1.3.1: ~~Recognize the Planning Commission as the City's~~ City Council will appoint and maintain a Community Involvement Advisory Committee (CIAC) ~~to evaluate community involvement practices related to land use and comprehensive planning. The CIAC shall meet annually to specifically review community involvement practices~~ that meets the requirements of Statewide Planning Goal 1.

Policy 1.3.2: Establish a Comprehensive Plan Advisory Committee (CPAC) to assist in periodic review or major updates of the Plan that includes representatives from all neighborhoods, groups that have been historically underrepresented, and that reflect a variety of interests and perspectives.

Policy 1.3.3: Evaluate the success of community involvement activities regularly and make results available to the community.

Policy 1.3.4: Maintain an online portal and notification process that makes pre-application conference materials available for public review.

Policy 1.3.5: Prioritize funding in the planning budget to support inclusive community engagement and participation.

Goal 1.4 - Uphold Neighborhood District Associations (NDA): Continue to support, inform, consult, and empower community members through the Milwaukee Neighborhood District Associations (NDAs).

Policy 1.4.1: Encourage and support NDA leadership to develop and implement strategies to nurture new leaders and increase participation while intentionally reflecting the diversity in each neighborhood.

Policy 1.4.2: Provide opportunities for NDAs to give relevant and effective testimony to the City Council and Planning Commission on matters affecting their neighborhoods.

Policy 1.4.3: Assist NDAs by providing financial assistance, subject to budgetary allocations as approved by the City Council.

Policy 1.4.4: Notify NDAs and solicit feedback on proposed land use actions and legislative changes as required by ordinances.

Section 2: History, Arts and Culture

Overarching Section Goal – Encourage and implement arts, cultural and history-based programs, projects, and spaces that celebrate Milwaukie’s diversity and its unique historic, archaeological, and cultural heritage.

Goal 2.1 - Milwaukie’s Heritage: Research, celebrate, document, and protect Milwaukie’s unique and diverse historic, archaeological, and cultural heritage

Policy 2.1.1: Work with local residents, businesses, and organizations to document and preserve Milwaukie’s diverse history.

Policy 2.1.2: Recognize the Milwaukie area’s indigenous cultures, people, and history that existed prior to the establishment of the city and ensure that historic preservation and documentation programs are representative of all cultures and time periods in the area’s history.

Policy 2.1.3: Appropriately memorialize historic sites, objects, or structures through signs or plaques which convey the historic significance of a resource.

Policy 2.1.4: Provide educational materials and information regarding preservation to property owners and other interested persons and assist property owners in applying for designation as a locally significant historic resource.

Policy 2.1.5: Provide land use flexibility for properties with historic resources to encourage the restoration and maintenance of historic resources for both continuing uses and the adaptive reuse of properties.

Policy 2.1.6: Pursue partnerships and private and public sources of funding for use by property owners in the renovation and maintenance of historic or cultural resources.

Policy 2.1.7: Maintain an official inventory of Milwaukie’s historic and cultural resources and regularly update the inventory as additional properties become eligible and are nominated for designation.

Policy 2.1.8: Ensure that City processes for inventorying, altering, removing, or demolishing historic and cultural resources remain consistent with state and federal criteria as well as community priorities.

Policy 2.1.9: Coordinate historic preservation activities with the Milwaukie Historical Society and the Oregon State Historic Preservation Office and follow all state and federal regulations for identifying and protecting archaeological resources.

Goal 2.2 - Art that Reflects the Community: Collaborate with community partners to create art and programs that reflect Milwaukie’s diversity.

Policy 2.2.1: Provide opportunities and programs for art and cultural events to be located throughout Milwaukie.

Policy 2.2.2: Prioritize the commissioning of art that reflects the diversity of Milwaukie’s community.

Policy 2.2.3: Promote visual art as a means of defining vibrant public and private spaces and

neighborhood identity.

Policy 2.2.4: Incentivize development sites to include spaces conducive to public events, community gathering, and the provision of public art.

Policy 2.2.5: Support a wide variety of community events that integrate the arts, showcase Milwaukie's diverse culture and history, and bring recognition and visitors to Milwaukie.

Policy 2.2.6: Encourage a diverse range of community event types and event participants throughout Milwaukie by reducing barriers for holding community events.

Policy 2.2.7: Encourage and support arts education in Milwaukie schools and other community organizations.

Goal 2.3 - Fostering Creative Spaces: Encourage the development of creative spaces throughout Milwaukie.

Policy 2.3.1: Make visual and performing art spaces more accessible to a diverse range of artists and residents throughout Milwaukie.

Policy 2.3.2: Assist in the identification of properties with the potential for artists and other creative spaces which are financially, geographically, and spatially accessible.

Policy 2.3.3: Partner with the [Milwaukie Arts Committee \(artMOB\)](#), local organizations, and educational institutions to market Milwaukie as a place that values the arts.

Section 3: Natural Resources and Environmental Quality

Overarching **Section Goal**: Protect, conserve and enhance the quality, diversity, **quantity** and resiliency of Milwaukie's natural resources and ecosystems, and maintain the quality of its air, land and water. Utilize a combination of development regulations, incentives, education and outreach programs, and partnerships with other public agencies and community stakeholders.

Goal 3.1: Prioritize the protection of Milwaukie's natural resources and environmental quality through the use of best available science **and management practices** and increased community awareness and education.

Policy 3.1.1: Partner with community groups, environmental organizations, and others to pursue legislative and administrative rule changes and regional, state, and federal funding for the acquisition, protection, or enhancement of natural resources.

Policy 3.1.2: Promote public education and encourage collaboration with community partners and organizations when developing strategies to protect air and water quality and other natural resources.

Policy 3.1.3: Support the clean-up and remediation of brownfields and other potentially contaminated land by identifying and pursuing available resources for such work in an effort to protect natural resources and the City's groundwater supply.

Policy 3.1.4: Periodically update the City's inventory of wetlands, floodplains, fish and wildlife habitat and corridors, and other natural resources through both technology and in-field verification.

Goal 3.2: Enhance **water the quality and of Milwaukie's water resources and ensure they have adequate flows and quantity to support their long-term health**.

Policy 3.2.1: Support programs and regulations to enhance and maintain the health and resilience of watersheds, riparian and upland zones, and floodplains.

Policy 3.2.2: Support efforts to restore Kellogg and Johnson Creeks and their tributaries and ~~remove~~ **restore a free-flowing Kellogg Creek at the Kellogg Dam site**.

Policy 3.2.3: Improve and expand coordination with adjacent jurisdictions on the protection and restoration of local rivers, creeks, and other natural resources.

Policy 3.2.4: ~~Maintain the City's regulatory hierarchy that requires~~ **Require** a detailed analysis, including alternatives, of how development will 1) avoid, 2) minimize, and 3) mitigate for impacts to natural resources.

Policy 3.2.5: Regulate floodplains to protect and restore associated natural resources and functions, increase flood storage capacity, provide salmon habitat, minimize the adverse impacts of flood events, and promote climate change resiliency.

Policy 3.2.6: When considering development proposals, take into account changes in water flow, ~~and~~ **quantity and duration of flow** associated with **both development and** climate change and evaluate the downstream impacts of development in upland areas.

Policy 3.2.7: Protect water quality of streams by using best available science to help control the amount, temperature, turbidity, duration and quality of runoff that flows into them, in partnership with other regulatory agencies.

Policy 3.2.8: Improve stormwater detention and treatment standards through the use of best available science, technology, and management practices to meet water quality standards and achieve wildlife habitat protection and connectivity goals and standards.

Policy 3.2.9: Establish the City's preference for sustainable stormwater facilities that utilize natural systems and green technology through the use of incentives as well as future code changes.

Policy 3.2.109: Monitor water table levels and ensure protection of the City's groundwater supply, particularly those water resources that provide the City with potable water.

Policy 3.2.110: Coordinate and partner with State and federal regulatory programs to protect the quality of the City's groundwater resources from potential pollution, including potential impacts associated with infiltration from water, wastewater and stormwater pipes.

Goal 3.3: Protect and conserve fish and wildlife habitat.

Policy 3.3.1: Protect habitat areas for indigenous fish and wildlife species that live and move through the City, especially those subject to Native American fishing rights. Focus these efforts on habitat that is part of or helps create an interconnected system of high-quality habitat, and also considers downstream impacts of activities within Milwaukie.

Policy 3.3.2: Consider impacts to habitat connectivity when reviewing development proposals.

Policy 3.3.3: Work with regulatory agencies and private property owners to remove barriers to fish passage and wildlife movement corridors between the Willamette River and its tributaries.

Policy 3.3.4: Protect and enhance riparian vegetation that provides habitat and improves water quality along creeks and streams through the use of best available science and management practices to promote beneficial ecosystem services, such as managing water temperature and providing woody debris for habitat.

Policy 3.3.5: Require mitigation that restores ecological functions and addresses impacts to habitat connectivity as part of the development review process.

Policy 3.3.6: Encourage and incentivize voluntary restoration of natural resource areas, including removal of invasive-species vegetation, on-site stormwater management, and planting of native-species or climate-adapted vegetation.

Policy 3.3.7: Develop a habitat connectivity analysis and strategic action plan that incorporates best practices and identifies critical connections between greenspaces and areas of natural habitat.

Goal 3.4: Develop a healthy urban forest in Milwaukie.

Policy 3.4.1: Implement and maintain an urban forestry program.

Policy 3.4.2: Pursue the City’s goal of creating a 40% tree canopy through a combination of development code and other strategies that lead to preservation of existing trees and planting of new trees and prioritize native and climate-adapted species, while also considering future solar access.

Policy 3.4.3: Provide flexibility in the division of land, the siting and design of buildings, and design standards in an effort to preserve the ecological function of designated natural resources and environmentally-sensitive areas and retain native vegetation and trees.

Policy 3.4.4: Prioritize increased tree canopy in areas that are currently canopy-deficient, vulnerable to urban heat island effect and low air quality, and that can help provide a more equitable distribution of trees in the city, including street trees.

Policy 3.4.5: Enhance Through the development code, ~~protections for~~ existing native-species and climate-adapted trees and create incentives for the retention of large and old-growth trees that contribute to a diverse and multi-aged tree canopy.

Policy 3.4.6: Evaluate the stormwater and water quantity impacts associated with tree removal as part of the development review process.

Policy 3.4.7: Explore and pursue public-private partnerships that can help reduce or share the costs of tree planting and maintenance for lower income residents.

Goal 3.5: Encourage and incentivize sustainable design and development practices.

Policy 3.5.1: Provide information about alternatives to conventional construction and site planning techniques that can help increase energy efficiency, utilize existing buildings and reclaimed materials, and reduce long-term costs

Policy 3.5.2 Incorporate sustainable and low-impact building- and site-planning technologies, habitat-friendly development strategies, and green infrastructure into City codes and standards.

Policy 3.5.3: Identify and develop strategies to remove barriers to sustainable design and development, including affordability and regulatory constraints.

Policy 3.5.4: Identify additional opportunities for partner agencies and environmental organizations to provide early feedback and recommendations on reducing environmental impacts associated with development.

Policy 3.5.5: Examine development code changes that help reduce impacts on wildlife, such as bird-friendly building design and wildlife corridors.

Goal 3.6: Maintain a safe and healthy level of air quality and monitor, reduce, and mitigate noise and light pollution.

Policy 3.6.1: Coordinate with federal and state agencies to help ensure compliance with state and federal air quality standards, while advocating for improved regional air quality standards.

Policy 3.6.2: Advocate for a consistent, effective level of environmental monitoring of local industrial activities by state and federal agencies to ensure that applicable State and federal air quality standards are met.

Policy 3.6.3: Support local efforts such as good-neighbor agreements and partner with community organizations and/or governments that aim to evaluate and reduce local sources of air and noise pollution and their impacts on local residents.

Policy 3.6.4: Encourage or require building and landscape design, land use patterns, and transportation design that limit or mitigate negative noise impacts to building users and residents, particularly in areas near freeways, regional freight ways, rail lines, major city traffic streets, and other sources of noise.

Policy 3.6.5: Continue to enforce and enhance noise standards and pursue other nuisance codes such as odor to address the adverse impacts of industries and vehicles.

Policy 3.6.6: Evaluate impacts to both humans and wildlife related to light and noise pollution and require appropriate mitigation.

Policy 3.6.7: Create standards and best practices for the demolition of buildings to reduce impacts associated with creation or release of dust and air pollutants.

Policy 3.6.8: Incorporate emission reduction and other environmental requirements into the city's contracting process to reduce air quality impacts associated with use of city equipment and activities on city-owned properties or developments.

Willamette Greenway

Overarching ~~Chapter-Section~~ Goal: Protect, conserve, enhance, and maintain the lands and water that comprise the City's portion of the Willamette River Greenway in a manner that recognizes the unique natural, scenic, historical, economic, and recreational qualities that exist along the Willamette River.

Goal 4.1 - Willamette Greenway Boundary: Maintain the Willamette Greenway Boundary and utilize a Greenway Compatibility Review Boundary to implement Statewide Planning Goal 15.

Policy 4.1.1: Utilize the Greenway Compatibility Review Boundary to identify where the highest level of compatibility review will occur. The Greenway Compatibility Review Boundary will apply within 150 feet of the ordinary high-water line of the Willamette River and in other adjacent areas that have been identified as being in the 100-year floodplain of the Willamette River or areas that have unique or significant environmental, social, or aesthetic qualities. The Greenway Compatibility Review Boundary is depicted on Map XX.

Policy 4.1.2: Include Kronberg Park and the area occupied by Kellogg Lake ~~are included~~ within the Willamette River Greenway Boundary.

Goal 4.2 - Greenway Design Plan: Allow preparation of a Greenway Design Plan within the Willamette Greenway Boundary.

Policy 4.2.1: Utilize tThe adopted park master plans for Kronberg Park and Spring Park, the downtown design review approval for Milwaukie Bay Park, and the management plan for Peter Kerr Park at Elk Rock Island ~~management plan will serve the same purpose as thea~~ Greenway Design Plan for each of the parks. All-Adopt future park master plans or amendments to plans ~~will be adopted~~ through the community service use process.

Policy 4.2.2: Consider preparing and adopting a Greenway Design Plan ~~may be prepared and adopted~~ as an ancillary plan to the Comprehensive Plan. The Greenway Design Plan may apply to the entire Willamette Greenway or any portion of the greenway. An adopted Greenway Design Plan may provide an alternative review process for development within the greenway provided it is consistent with the adopted plan, and should be updated periodically to reflect best available science and changing conditions along the greenway, including those induced by climate change.

Goal 4.3 - Land Use Review Process: Coordinate public and private land uses and ensure compatibility of uses within the Willamette Greenway.

Policy 4.3.1: Utilize the Willamette Greenway Zone in combination with underlying land use designations to manage uses and implement City Willamette Greenway objectives and Statewide Planning Goal 15.

Policy 4.3.2: Employ the following tTwo levels of review ~~will be employed~~ to determine the appropriateness and compatibility of new or intensified uses with the Willamette Greenway.

- a. Within the Greenway Compatibility Review Boundary, require a Willamette Greenway Conditional Use Permit ~~must be obtained~~ prior to new construction or intensification of an existing use when

the new or intensified use is not identified as a permitted planned use within an adopted park master plan or the Greenway Design Plan. Special criteria addressing use, siting, size, scale, height, and site improvements will be used to review and guide development within the Compatibility Review Boundary.

- b. Outside of the Greenway Compatibility Review Boundary, allow new construction and intensification of uses ~~will be allowed~~, provided that the scale and nature of the use meets the standards specified in the Willamette Greenway Zone. ~~Employ d~~Development standards for these uses ~~will be used~~ to allow certain forms of development as a use by right.

~~The review process will R~~require consistency with the following plans in the review process: Willamette Greenway Chapter of the Comprehensive Plan, parks master plans, the Greenway Design Plan, and the Downtown and Riverfront Land Use Framework Plan.

Policy 4.3.3: Where appropriate, establish sSetbacks for new or intensified uses ~~may be established~~ through the park master planning process or through a Greenway Design Plan. When not established through these plan processes, the Willamette River Greenway conditional use process will be used to establish setbacks. For uses that are not water-dependent or water related, setbacks will be determined on a case-by-case basis and the uses will be directed away from the river. Existing and proposed uses that are water-dependent and water-oriented may be permitted near or at the water's edge.

Goal 4.4 - Natural Resource Protection: Protect and conserve the natural resources within the Willamette River Greenway while recognizing recreation needs.

Policy 4.4.1: ~~Within the Willamette Greenway, P~~protect and conserve natural resources in the Willamette Greenway through the City's two Natural Resource overlay zones: WQR - Water Quality Resource and HCA – Habitat Conservation Area.

Policy 4.4.2: Promote an increase in tree canopy within the Willamette Greenway through tree planting programs and by mitigating for any lost tree canopy that occurs through development, while recognizing the importance of certain public views of the river.

Policy 4.4.3: Support the removal of the Kellogg Creek Dam ~~and the restoration of~~ other steps to support a free-flowing Kellogg Creek through revegetation of riparian areas with native species and other restoration techniques. Removal of the Kellogg Creek Dam is consistent with the greenway chapter of the plan and will not require greenway review.

Policy 4.4.4: Manage Peter Kerr Park at Elk Rock Island as a natural area park.

Policy 4.4.5: Allow and support environmental education and interpretative displays within the Willamette Greenway.

Goal 4.5 - Recreation: Enhance the recreational use of lands within the Willamette Greenway boundaries while protecting and conserving natural resources.

Policy 4.5.1: Use park master plans to outline the major recreational uses, activities, and conceptual design for each of the parks within the Willamette Greenway.

Policy 4.5.2: Define the primary intent and purpose of each park within the Willamette River Greenway in the Parks and Recreation Chapter of the Comprehensive Plan. The parks within the Willamette River Greenway will serve a variety of needs for the City including:

- Access to the Willamette River for water sports - boating, fishing, swimming, kayaking etc.,
- Recreational trails along the river,
- River and natural area viewing,
- Picnicking, and
- Community events.

~~The Parks and Recreation Chapter of the Comprehensive Plan will define the primary intent and purpose of each park.~~

Policy 4.5.3: Within the Willamette Greenway, accommodate a trail system along the river that is intended to connect with future Willamette Greenway trails to the north and south of the City. Develop a trail plan, acquire right-of-way, and build trail segments as funding becomes available.

Policy 4.5.4: Connect City bicycle and pedestrian trail systems with the trail system through the Willamette Greenway.

Goal 4.6 - Public Access and View Protection: Provide, improve, and maintain public access and visual access to the lands and water that make up the Willamette River Greenway.

Policy 4.6.1: Encourage new public access and views within the greenway and to the Willamette River, through dedications, easements, acquisitions or other means.

Policy 4.6.2: Undertake efforts to make existing points of public access more accessible and usable through maintenance and signing.

Policy 4.6.3: As part of the Greenway Compatibility Review process, evaluate proposals for new development and intensification of use for their effect on visual access to the Willamette River and Kellogg Creek from publicly owned land and the public right-of-way. Where impacts are significant, ~~efforts will be made~~ make efforts to preserve visual access to the river and creek through dedications, easements, acquisitions or other means.

Policy 4.6.4: As part of the planning effort for parks and other public improvements, ensure that trees and other features are intentionally placed to frame and enhance views of the Willamette River and Kellogg Creek. -Enhancing riparian vegetation along Kellogg Creek to improve aquatic habitat conditions for native species will be a higher priority than maintaining or improving views of the creek.

Policy 4.6.5: ~~Based on the Public Use Doctrine, the City acknowledges~~Acknowledge that the public has the right to recreate on land and water below the ordinary high-water line of the Willamette River, consistent with the Oregon Public Trust Doctrine.

Goal 4.7 – Downtown: Maintain Milwaukie Bay Park, Dogwood Park, and Kronberg Park as the key public amenities in the downtown that attract people to the area to enjoy the open space, public trails, riverfront access, and riverfront-related development, consistent with the Downtown and Riverfront Land Use Framework Plan and park master plans.

Policy 4.7.1: Provide safe pedestrian connections between the downtown Milwaukie and the Willamette River consistent with the Downtown and Riverfront Land Use Framework Plan.

Policy 4.7.2: Work with Clackamas County Water Environment Services to accommodate recreational and water-related uses at the treatment plant site. This could include full redevelopment and relocation of the facility, shrinking the footprint, adding wetland features, adding a community water quality education center, providing physical access to the river, or capping the treatment plant with park facilities over the plant.

Policy 4.7.3: Within the Willamette Greenway, provide opportunities for limited commercial and recreational services that are focused to support users of the river, the parks, or the trail systems.

Section 5: Natural Hazards

Overarching ~~Chapter~~-Section Goal: Protect the Milwaukie community from the threats of natural hazards, including those induced by climate change, through risk minimization, education, and adaptation.

Goal 5.1 – Identifying, Avoiding and Reducing Hazard Potential: Identify areas with high natural hazard potential and develop policies and programs to avoid or reduce potential negative impacts.

Policy 5.1.1: Ensure that City natural hazard maps stay updated and reflect the most recent information and best available science for natural hazard areas, including flooding, landslides, liquefaction, unstable soils, wildfire, earthquakes, drought and sea level rise.

Policy 5.1.2: Require the submittal and neutral third-party review of detailed technical reports for proposed development within high risk flood, liquefaction and landslide hazard areas.

Policy 5.1.3: Encourage and prioritize development in areas with low risk of natural hazards and restrict development in areas with high risk that cannot be adequately mitigated.

Policy 5.1.4: Regulate floodplain areas in a manner that protects the public, recognizes their natural functions as waterways and critical habitat, and provides open space/recreational opportunities.

Goal 5.2 - Partnerships and Education: Continue and expand partnerships with government agencies, utilities, and other groups that can help Milwaukie residents prepare for natural hazards.

Policy 5.2.1: Continue to coordinate with regional, state and federal agencies on disaster preparedness efforts

Policy 5.2.2: Work with agency partners to address and respond to increased episodes of poor air quality resulting from wildfires in the region.

Policy 5.2.3: Ensure that mapping of the 100- and 500-year floodplain areas stays current and accurate.

Policy 5.2.4: Work with the county, state, and regional partners to regularly update the City's Hazard Mitigation Plan.

Policy 5.2.5: Increase outreach and education for hazard awareness and natural disaster preparedness, especially for low-income, elderly, non-English speaking, and other vulnerable populations.

Goal 5.3 - Infrastructure and Building Resiliency: Ensure that the City's built environment and infrastructure are adequately prepared for natural disasters.

Policy 5.3.1: Ensure that relevant sections of the Milwaukie Municipal Code, most notably those that deal with Flood Hazards, Seismic Conditions, and Soils, are maintained to reflect best available science.

Policy 5.3.2: Increase the quality, resiliency, diversity and redundancy of utility and transportation infrastructure to increase chances of continued service following a natural disaster.

Policy 5.3.3: Promote the retrofitting of buildings for better natural disaster resiliency through education and potential incentives for residential and commercial property owners.

Policy 5.3.4: Encourage development that exceeds minimum building code standards and is built to withstand high intensity natural disasters.

Policy 5.3.5: Prohibit essential public facilities and uses ~~with that serve~~ vulnerable populations from being located within areas at high risk of flooding, landslides, liquefaction, and fire, and aim to relocate existing uses in these areas.

Goal 5.4 - Adaptation and Mitigation: Develop programs that inform the public about the increased risks from natural hazards and create strategies for how to deal with them.

Policy 5.4.1: In areas where there is a high risk of flooding or other natural hazards, support efforts by the City and other public and private entities to acquire properties for conservation purposes. Restrict development to uses that have a demonstrated community benefit and for which the natural hazard risks and environmental impacts can be adequately mitigated.

Policy 5.4.2: Increase requirements for protecting large trees, riparian vegetation and wetlands that have the potential to consume and retain large amounts of surface and storm-water.

Policy 5.4.3: Coordinate with local, regional, state and federal agencies on disaster preparedness efforts, including coordination for major seismic and flooding events.

Policy 5.4.4: Encourage, ~~and eventually require,~~ green infrastructure and development practices.

Policy 5.4.5: Support expansion of ~~the City's the Milwaukie~~ Community Emergency Response Team (CERT) to aid in responding to natural hazard events.

Policy 5.4.6: Create designated emergency routes and provide an array of disaster recovery facilities, with emergency supplies, that can withstand major natural hazard events, and keep the public informed of them through a variety of different outreach methods.

Policy 5.4.7: Ensure that proposed development in natural hazard areas is provided with consultation on green infrastructure and development best practices early in the application process.

Section 6: Climate Change and Energy

Overarching Section Goal: ~~Promote energy efficiency and mitigate~~ ~~Conserve energy and be prepared for~~ the anticipated impacts of climate change in Milwaukie through the use of efficient land use patterns, multimodal transportation options, wise infrastructure investments, and increased community outreach and education as outlined in the City's Climate Action Plan. ~~and incorporating strategies from the City's Climate Action Plan.~~

Goal 6.1 - Built Environment: Create a built environment that prioritizes energy efficiency and climate resiliency and seamlessly integrates the natural environment.

Policy 6.1.1: Encourage the use of innovative design and building materials that increase energy efficiency and natural resource conservation, and minimize negative environmental impacts of building development and operation.

Policy 6.1.2: Provide flexibility in development standards and permitted uses for projects that address climate change and energy conservation through strategies identified in the Climate Action Plan and/or best available science.

Policy 6.1.3: Advocate at the local, state, and federal level for building codes that increase energy conservation and facilitate emission reductions, and be a model for implementing these higher standards.

Policy 6.1.4: Develop standards and guidelines that contribute to a 40% citywide tree canopy.

Policy 6.1.5: Create a more energy efficient land use pattern that includes but is not limited to infill and cluster development, neighborhood hubs and increased density.

Policy 6.1.6: Encourage the creation of compact, walkable neighborhoods and neighborhood hubs throughout the city that provide a mix of uses and help reduce transportation emissions and energy usage.

Policy 6.1.7: Work with property owners and developers to facilitate the adaptive reuse of existing buildings.

Policy 6.1.8: Incorporate climate change criteria into city decision making processes, including land use applications and development review.

Policy 6.1.9: Streamline review for solar projects on rooftops, parking lots, and other areas with significant solar capacity.

~~Policy 6.1.10:~~ Prioritize natural stormwater management systems.

Goal 6.2 - Transportation and Utility Infrastructure: Maintain and expand Milwaukie's transportation and utility infrastructure in a manner that facilitates greater redundancy, resiliency, energy conservation, and emissions reductions.

Policy 6.2.1: Increase the quantity, quality and variety of Milwaukie's transit and active transportation options, including trails, bike lanes, and sidewalks, ~~and transit.~~

Policy 6.2.2: Work with local businesses and regional partners to increase transit usage and develop last mile solutions to Milwaukie homes, businesses, and neighborhood hubs.

Policy 6.2.3: Identify desired transportation mode splits and use best available science to develop programs and standards to ensure that they are met.

Policy 6.2.4: Reduce barriers to developing renewable carbon-free energy projects and systems, including distributed energy resources and storage.

Policy 6.2.5: Aim to increase the use of renewable electric and other clean energy vehicles through a mix of infrastructure improvements, incentives, and development requirements.

Policy 6.2.6: Account for rapidly changing technologies such as autonomous vehicles and other intelligent transportation systems during site development review and capital improvement planning.

~~**Policy 6.2.7:** Prioritize natural stormwater management systems.~~

Goal 6.3 - Adaptation and Mitigation: Ensure that the Milwaukie community is informed and prepared to address a changing climate and the need to modify historic norms and behavior.

Policy 6.3.1: Educate residents, businesses, developers and other community members on climate science and the most effective ways they can take action to adapt and mitigate for a changing climate, including transportation and energy choices, local food production and consumption, the sharing economy, sustainability at work programs and waste reduction.

Policy 6.3.2: Be an advocate and early adopter of emerging technologies and strive to be a model for how small cities can adapt to climate change.

Policy 6.3.3: Incorporate best available science related to energy conservation and climate change adaptation into planning and development review.

Policy 6.3.4: Regularly update the City's Climate Action Plan to identify strategies for addressing climate change and include emerging technologies and programs.

Policy 6.3.5: Promote climate-resilient vegetation, landscaping, and local food systems.

Policy 6.3.6: Pursue the development of heat shelters and shading sites, including indoor community spaces that can serve as clean air and cooling centers and shaded outdoor community spaces.

Policy 6.3.7: Encourage property owners to retrofit their properties to accommodate renewable clean energy production.

Policy 6.3.8: Explore opportunities for increasing distributed carbon-free renewable energy generation through community solar projects and other collective efforts.

Policy 6.3.9: Consider equity and affordability when developing city programs and development standards related to energy conservation and climate change and identify strategies for reducing potential impacts related to increased costs.

Policy 6.3.10: Consider increased population growth due to climate refugees, moving to the area to escape less hospitable climates, and identify metrics and triggers for when additional planning is needed to address potential impacts to housing, infrastructure, and the economy.

Policy 6.3.11: Encourage the use of materials and site development techniques that can mitigate for climate-change induced impacts such as heat island effect and increased flooding.

Section 7: Housing

Overarching Section Goal – To provide opportunities for development of housing of a variety of types and at a range of price levels that enhances the community’s livability and meets the needs of a full spectrum of Milwaukie residents in an environmentally sustainable and equitable manner.

Goal 7.1 - Equity: Provide housing options and reduce housing barriers for people of all ages and abilities, with a special focus on people of color, aging populations, and people with low incomes.

Policy 7.1.1: Provide the opportunity for a wider range of rental and ownership housing choices in Milwaukie, including additional middle housing types in low and medium density zones.

Policy 7.1.2: Establish development standards that focus more on regulating size, shape, and form and less on the number of housing units.

Policy 7.1.3: Promote zoning and code requirements that remove or prevent potential barriers to home ownership and rental opportunities for people of all ages and abilities, including historically marginalized or vulnerable populations such as people of color, aging populations, and people with low incomes.

Policy 7.1.4: Leverage resources and programs that aim to keep housing (including existing housing) affordable and available to residents in all residential neighborhoods of Milwaukie.

Policy 7.1.5: Encourage development of new homes and modification of existing homes to accommodate people of all ages and abilities through use of universal design.

Policy 7.1.6: Consider cultural preferences and values when adopting development and design standards, including but not limited to the need to accommodate extended family members and provide opportunities for multi-generational housing.

Policy 7.1.7: Support the Fair Housing Act and other federal and state regulations that aim to affirmatively further fair housing.

Policy 7.1.8: Collaborate with community partners to provide a continuum of programs that address the needs of unhoused persons and families, including temporary shelters, [alternative shelter models such as conestoga huts and sleeping pods](#), long-term housing, and supportive services.

Policy 7.1.9: Reduce the displacement of renters through tenant protection policies.

Policy 7.1.10: Develop, monitor and periodically update metrics that evaluate the City’s success in achieving Goal 7.1.

Goal 7.2 - Affordability: Provide opportunities to develop housing that is affordable at a range of income levels.

Policy 7.2.1: Continue to research, leverage and implement housing affordability strategies that meet the needs of Milwaukie households and can adapt to changing market conditions.

Policy 7.2.2: Allow and encourage development of housing types with lower construction costs and sales prices per unit that can help meet the needs of low or moderate-income households, including middle housing types in low and medium density zones as well as larger apartment and condominium developments in high-density and mixed-use zones.

Policy 7.2.3: Consider programs and incentives that reduce the impacts that development/design standards and fees have on housing affordability, including modifications to parking requirements, system development charges, and frontage improvements.

Policy 7.2.4: Provide a simplified permitting process for the development of accessory dwelling units (ADUs) or conversion of single-family homes into duplexes or other “middle housing” types.

Policy 7.2.5: Expand partnerships with non-profit housing developers and other affordable housing providers and agencies that preserve or provide new low to moderate income-housing units, create opportunities for first-time homeownership, and help vulnerable homeowners maintain and stay in their homes.

Policy 7.2.6: Support the continued use and preservation of manufactured homes, both on individual lots and within manufactured home parks as an affordable housing choice.

Policy 7.2.7: Support the use of tiny homes as an affordable housing choice, while addressing adequate maintenance of these and other housing types through the City’s code enforcement program.

Policy 7.2.8: Clearly define and implement development code provisions to permit shelters and transitional housing for people without housing.

Policy 7.2.9: Monitor and regulate vacation rentals to reduce their impact on availability and long-term affordability of housing.

Policy 7.2.10: Work with other jurisdictions as well as regional and state agencies to identify the region’s housing needs and pursue a shared approach to improve housing affordability across all household income ranges.

Policy 7.2.11: Develop, monitor and periodically update metrics that evaluate the City’s success in achieving Goal 7.2.

Goal 7.3 – Sustainability: Promote environmentally and socially sustainable practices associated with housing development and construction.

Policy 7.3.1: Ensure that the scale and location of new housing is consistent with city goals to preserve open spaces, achieve a 40% citywide tree canopy, and protect wetland, floodplains, and other natural resource or hazard areas.

Policy 7.3.2: Provide additional flexibility in site design and development standards in exchange for increased protection and preservation of trees and other natural resources.

Policy 7.3.3: Use incentives to encourage, and where appropriate require, new housing development, redevelopment, or rehabilitation projects to include features that increase energy efficiency, improve building durability, produce or use [renewable-clean](#) energy, conserve water, use deconstructed or sustainably produced materials, manage stormwater naturally, and/or employ other environmentally sustainable practices.

Policy 7.3.4: Promote the use of active transportation modes and transit to provide more reliable options for neighborhood residents and help reduce driving.

Policy 7.3.5: Increase economic opportunities for locally owned and operated businesses by encouraging the development and redevelopment of more housing near transit, shopping, local businesses, parks, and schools.

Policy 7.3.6: Encourage the adaptive reuse of existing buildings in residential and mixed-use areas that can help meet Milwaukie's housing needs.

Policy 7.3.7: Prepare, regularly monitor and periodically update an inventory of the buildable supply of residential land that can help meet the City's future housing needs in an efficient and sustainable manner.

Policy 7.3.8: Allow for a reduction in required off-street parking for new development within close proximity to light rail stations and frequent bus service corridors.

Policy 7.3.9: Advocate for additional frequent transit service in areas with the potential for significant residential growth.

Policy 7.3.10: Develop, monitor and periodically update metrics that evaluate the City's success in achieving Goal 7.3.

Goal 7.4 - Livability: Enhance the ability of Milwaukie’s neighborhoods to meet community members’ economic, social, and cultural needs, and promote their contributions to health, well-being, and universal access and design.

Policy 7.4.1: Implement land use and public investment decisions and standards that foster creation of denser development in centers and neighborhood hubs and along, corridors, and that foster development of accessible neighborhood hubs to support community gathering places, commercial uses, and other amenities that give people provide opportunities for people to socialize, shop, and recreate together.

Policy 7.4.2: Require that new housing projects improve the quality and connectivity of active transportation modes by providing infrastructure and connections that make it easier and more direct for people to walk or bike to destinations such as parks, schools, commercial services, and neighborhood gathering places.

Policy 7.4.3: Administer development code standards that require new housing to engage with the public realm and provide for appropriate setback and lot coverage standards.

Policy 7.4.4: Require that multi-family housing units have access to adequate and usable open space, either on-site or adjacent to the site.

Policy 7.4.5: Implement development or design requirements to help create transitions between lower and higher density residential development areas where the mass, size or scale of the developments differ substantially. Requirements could include massing, buffering, screening, height, or setback provisions.

Policy 7.4.6: Reduce development code barriers to cohousing and other types of intentional communities that help foster a sense of community.

Policy 7.4.7: Create and monitor performance measures and metrics that track the City’s 1) success in developing new housing and preserving existing housing for households of all income levels, household sizes, and housing tenure and 2) infrastructure improvements needed to accommodate future growth targets.

Policy 7.4.8: Develop, monitor and periodically update metrics that evaluate the City’s success in achieving Goal 7.4.

Section 8: Urban Design and Land Use

Overarching Section Goal – To foster the design of private development and public spaces and facilities in a way that enhances community livability, environmental sustainability, social interaction, connectivity for all modes of travel, and high-quality landscape and architectural design, and supports the unique form and function of all Milwaukie neighborhoods.

Goal 8.1 - ~~Design~~- Use a design framework that considers location and development typology to guide urban design standards and procedures that are customized by zoning district.

Policy 8.1.1: Downtown Milwaukie Policies

- a) Allow for a variety of dense urban uses in multi-story buildings that can accommodate a mix of commercial, retail, office and higher density residential uses.
- b) Provide a high-quality pedestrian environment that supports safe, convenient access to the area's multiple transportation modes.
- c) Prioritize pedestrian access and movement in the downtown while also improving safety and access for cyclists. Establish mode split targets in the Transportation System Plan (TSP) for alternative transportation modes.
- d) Encourage development that takes advantage of proximity to and views of the Willamette River and the Willamette Greenway.
- e) Ensure that buildings are designed with storefront windows and doors, weather protection, and details that contribute to an active, pedestrian oriented streetscape.
- f) Ensure that design standards and guidelines reflect a well-defined community vision for the downtown.
- g) Encourage a diverse mix of commercial services and amenities that serve downtown residents and employees as well as local and regional visitors.
- h) Support uses that contribute to the vibrancy of the downtown area, including special events and outdoor uses such as the Milwaukie Farmer's Market.

Policy 8.1.2: Central Milwaukie Policies

- a) Ensure that new development and redevelopment supports better transportation connectivity through the Central Milwaukie district, especially for pedestrians and cyclists. Increased connectivity should include pedestrian and bicycle improvements through large sites.
- b) Enhance Highway 224 intersections to increase the safety and comfort for pedestrians and cyclists traveling on cross streets. Implement these safety improvements through the Transportation Systems Plan.

- c) Ensure buildings and sites are designed to support a pedestrian-friendly streetscape and establish a storefront environment along key streets as set out in the Central Milwaukie Land Use and Transportation Plan.
- d) Manage the bulk and form of buildings to provide a transition between Central Milwaukie and adjacent areas with a lower density residential comprehensive plan designation.
- e) Broaden the scope of the Central Milwaukie Land Use and Transportation Plan to include the Milwaukie Market Place, Providence Hospital, and the Hillside Development.

Policy 8.1.3: Neighborhood Mixed Use (NMU) Policies

- a) Provide opportunities for a mixture of neighborhood commercial services and housing which are well-connected to the surrounding neighborhoods by sidewalks and bikeways.
- b) Ensure that development is designed to minimize impacts to surrounding residential areas through appropriate setbacks, building placement, buffers, and landscaping.
- c) Require that new development connect to surrounding neighborhoods for pedestrians and others using active transportation modes to travel to and within the district.
- d) Ensure that new mixed use and commercial buildings provide a commercial storefront environment with sidewalks and amenities appropriate to create an active, pedestrian-focused streetscape.
- e) Ensure that new development is designed to create a transition to adjoining residentially zoned properties in terms of height, massing, setbacks and building form.

Policy 8.1.4: Neighborhood Hubs (outside of NMU areas) Policies

- a) Provide opportunities for the development of neighborhood commercial services and the provision of amenities and gathering places for residents of the surrounding area.
- b) Ensure that new development projects are at a scale that fits with the height, bulk and form of development that have been historically permitted in the neighborhood.
- c) Ensure new development contributes to a pedestrian friendly environment along the property frontage, recognizing that a storefront environment is not mandatory in a neighborhood hub setting.
- d) Encourage development of multi-season outdoor seating areas and pedestrian plazas.
- e) Provide for a high level of flexibility in design and incentives to accommodate a variety of start-up uses and explore innovative techniques for waiving or deferring full site development and parking requirements.
- f) Provide a process to allow start-up and temporary uses that take advantage of incentives and deferral programs to make a smooth transition to status as a permanent use.

Policy 8.1.5: North Milwaukie Innovation Area Policies

- a) Provide opportunities for a wide range of employment uses including manufacturing, office, and limited retail uses, as well as mixed-use residential in the area close to the Tacoma Station Area.
- b) Ensure that the design of new development and redevelopment projects contribute to a pedestrian and bike friendly environment within the Tacoma Station Area.
- c) Provide for active transportation connections throughout the NMIA.
- d) Implement provisions of the North Milwaukie Innovation Plan.

Policy 8.1.6: International Way Business District Policies

- a) Provide flexibility to allow a wide variety of employment uses including industrial, research, office, and limited commercial in the district.
- b) Protect natural resources in the district including Minthorn Natural Area and the waterways that connect to it. Daylight the creek where feasible.
- c) Require landscaping along street frontages in the district.
- d) As new development and redevelopment occurs, require pedestrian and active transportation improvements throughout the district.
- e) Work to ensure that the district is well-served by public transportation options and that transit stops and shelters are safe, comfortable, and easy to access.

Policy 8.1.7: Johnson Creek Industrial Area Policies

- a) Provide opportunities for a wide variety of manufacturing, industrial, production and warehousing uses as well as more limited office and commercial uses.
- b) Protect Johnson Creek and the adjacent riparian areas.
- c) Consider the impacts of business operations on adjacent residential areas, including to air and water quality
- d) Encourage development that takes advantage of the area's access to transit and the Springwater Trail and helps improve the pedestrian environment.

Policy 8.1.8: Corridors Policies

- a) Provide opportunities for higher intensity development in areas within walking distance of existing or planned frequent transit service.
- b) Ensure that design standards require direct pedestrian connections to the closest transit line.
- c) If new development includes a commercial component, require a storefront design.

- d) Ensure that all new development contributes to a safe, well-connected, and attractive pedestrian environment.
- e) Maintain development and design standards that provide for a transition in development intensity between the development site and adjoining areas designated or planned for lower density residential uses.

Policy 8.1.9: Regional Center Policies

- a) Develop and adopt a planning framework and zoning for the Clackamas Regional Center recognizing that this area is within the area subject to the Milwaukie Urban Growth Management Agreement and will eventually be annexed to the City.
- b) Within the Regional Center:
 - Provide for high-intensity development to accommodate projected regional increases in housing and employment, including mixed-use development;
 - Provide for and capitalize on frequent and dependable transit service;
 - Allow for a mix of land uses to support public transportation and bicycle and pedestrian usage;
 - Provide for the open space and recreation needs of residents and employees of the area; and
 - Support a multimodal street network.

Goal 8.2 – ~~Livability~~: Enhance livability by establishing urban design concepts and standards that help improve the form and function of the built environment.

Policy 8.2.1: ~~Policies to promote a great P~~pedestrian and bicycle environment ~~for all include:~~design policies

- a) Prioritize enhancement of the environment for pedestrians, bicyclists and people using other active transportation modes when expending public funds on street improvements.
- b) Ensure that improvements are inclusive and provide access for people of all ages and abilities
- c) Require new development and public improvements to be designed in a manner that contributes to a comfortable and safe environment for everyone, including pedestrians and other non-motorized users in the public right-of-way.
- d) Enhance pedestrian spaces through adequate landscaping, trees, public art, and amenities such as benches and lighting.
- e) Encourage small-scale storefront retail to be developed along street frontages in commercial and mixed-use districts.
- f) Provide for pedestrian connectivity and access by other active transportation modes.
- g) Use urban design features to reduce trips or slow traffic through areas where pedestrian safety is especially a concern, e.g. NMU districts and neighborhood hub areas.

- h) To enhance the pedestrian experience, explore opportunities for woonerf and living street designs in areas with appropriate traffic volumes.
- i) Prioritize the safety of pedestrians and bicyclists when designing and improving the public right of way.
- j) Provide a regularly scheduled review process that evaluates pedestrian comfort, safety, and accessibility using the best available science.

Policy 8.2.2: ~~Policies related to parking design include~~ Parking design policies:

- a) Establish parking standards that rely on higher levels of active transportation and increased use of transportation demand management programs to achieve community design patterns that are more sustainable.
- b) As technology, development patterns, and transportation options evolve, plan for the potential conversion of parking spaces within the public right-of-way and encourage the redevelopment or conversion of existing private and public parking lots to other uses.
- c) In the town center, buffer parking lots from the pedestrian environment with a combination of landscaping, stormwater facilities, public art, or decorative walls.
- d) Encourage on-street parking on frontages that have commercial storefronts.
- e) Ensure that public and private parking remains available for those that cannot walk or bike
- f) Maintain lighting, walkway, and other design standards that contribute to improved public safety
- g) Restrict off-street parking between the public sidewalk and the front of any new commercial retail or mixed-use building.
- h) Expand the number of electric vehicle charging stations in both public and private parking areas
- i) Require canopy trees and swales in parking lots to reduce stormwater runoff and better manage urban temperatures.
- j) Prioritize pedestrian and bicycle safety over parking convenience to minimize conflicts between modes.

Policy 8.2.3: ~~Policies to enhance integration of the urban and natural environment include~~ Natural environment integration policies:

- a) Maintain landscaping design standards that require landscape plan approval as part of the development review process.
- b) Use the landscape plan review process to ensure that new development provides tree canopy cover consistent with city urban forestry objectives and to achieve better habitat connectivity throughout the City.

- c) Allow for vertical landscaping or green roofs to substitute for ground landscaping in situations where sites are constrained and there is a public benefit associated with the project.
- d) Encourage, and in the case of new development require, the undergrounding of utilities.
- e) Ensure that street trees are climate resilient, consistent with the City’s urban forestry goals, and consider potential benefits to pollinators and local wildlife.
- f) Utilize green infrastructure (bioswales, rain gardens, pervious pavement, and green roofs) to minimize impervious surfaces and to capture and treat stormwater on site.
- g) Where appropriate, integrate natural features such as trees, creeks, wetlands, and riparian areas into the site planning process while also ensuring that designated natural resources are protected and conserved.
- h) Encourage the daylighting of creeks and drainages.

Policy 8.2.4: ~~Policies for the design of public spaces include:~~ Public space design policies

- a) Provide clear standards for the design and improvement of public spaces and streets as set forth in design objectives of adopted project plans or special area plans.
- b) Design streets to provide for the equitable allocation of space for different modes including pedestrians, bicycles, and transit.
- c) Provide multi-season seating in public spaces where people are intended to gather. Areas of public seating should have access to direct sunlight and shade as well as options for rain protection.

Policy 8.2.5: ~~Policies to promote community character include:~~ Community character design policies

- a) Limit the size and display characteristics of commercial signage, especially along Highway 224 and Highway 99E.
- b) Where feasible, design of buildings should include views and orientation toward the Willamette river or other waterways.
- c) Encourage green buildings through a program that allows extra building height with the development of a green building.
- d) Ensure that policies and codes related to urban design are consistently and regularly enforced.

Goal 8.3 –~~Process:~~ **Provide a clear and straight forward design review process for development in Milwaukie along with incentives to achieve desired outcomes.**

Policy 8.3.1: Use a two-track Development Review process to ensure that new non-residential development and redevelopment projects are well designed. Provide a clear and objective set of standards as well as an optional, discretionary track that allows for greater design flexibility provided design objectives are satisfied.

Policy 8.3.2: Ensure that a clear and objective process is available for all housing types that meet design standards, provide adequate open space, and fit into the community, while offering an alternative discretionary path for projects that cannot meet these standards.

Policy 8.3.3: Expand opportunities for neighborhood district associations (NDAs) and other stakeholders to review and provide feedback early in the development process and respond to community concerns with clear, concise, objective information.

Policy 8.3.4: Expand incentives and refine development standards that help to:

- a) Provide flexibility for commercial use of existing residential structures within Neighborhood Hubs and Neighborhood Mixed Use districts.
- b) Provide flexibility for the types of uses permitted as home occupations where it can be demonstrated that the home occupation will help meet the daily needs of residents in the surrounding neighborhood.
- c) Consider the use of vertical housing tax abatements and other financial tools to encourage development in Neighborhood Hubs
- d) Improve housing affordability
- e) Incorporate universal design standards that improve access for people of all ages and abilities and expand opportunities for aging in place

Policy 8.3.5: Require that comprehensive plan amendment applications to medium density residential, high density residential, and mixed-use residential consider walkability, access to frequent transit service, and proximity to parks, schools and commercial services.

Section 9: Parks and Recreation

Overarching ~~Chapter~~ Section Goal: To provide for the recreational needs of present and future City residents, while also preserving natural areas. The City will maximize the use of existing public facilities, encourage development of indoor public or private recreational facilities and trails, support dedication and acquisition of land for recreational use and/or habitat conservation, and maintain, expand, and establish new existing natural areas for conservation. Future expansion and development of recreational uses and natural areas should be encouraged and focused in existing underserved areas of the Milwaukie community and accessible for all ages and abilities.

Goal 9.1 – Partnerships and Funding: Continue to work with the City’s parks and recreation provider, other public and governmental agencies, and private organizations in providing park and recreational facilities and services, and habitat conservation.

Policy 9.1.1: Work with the City’s “parks and recreation provider” to complete, adopt, and maintain an overall parks comprehensive plan and a trails master plan.

Policy 9.1.2: ~~The City will e~~Continue to initiate and support joint-use construction and maintenance agreements with the North Clackamas School District (NCSD) and work to provide recreational opportunities on school properties.

Policy 9.1.3: ~~The City will p~~Participate in regional recreation planning and implementation programs through Metro, and will coordinate activities with Clackamas County parks and utility providers and relevant state and federal agencies.

Policy 9.1.4: Pursue prioritizing proportional contributions from new development and redevelopment for the expansion of public recreation opportunities in underserved areas of Milwaukie.

Policy 9.1.5: Maintain a flexible system with the City’s park provider where the City can accept land or developed park and trail facilities, when appropriate, in lieu of System Development Charges (SDCs).

Policy 9.1.6: Continue to support and work with public or private organizations on habitat conservation and rehabilitation of natural areas.

Goal 9.2 – Planning and Design: Plan, develop, and enhance natural areas, parks, and recreation opportunities that meet the needs of community members of all ages, abilities, cultures, and incomes while creating solutions that are environmentally sustainable.

Policy 9.2.1: Tailor the eExpansion and/or redevelopment of parks and new recreation opportunities ~~shall be tailored~~ towards the needs and abilities of diverse communities.

Policy 9.2.2: Pursue solar power and other forms of renewable-clean energy with updates to and expansions of existing parks and recreation opportunities and the creation of new parks and recreation opportunities.

Policy 9.2.3: Investigate the feasibility of providing park and open space amenities on land owned by other public agencies, considering safety and security of users and facilities.

Policy 9.2.4: Work with local, regional, state, and federal partners to plan, design and protect areas for habitat viability, including the safe movement of wildlife necessary to maintain biodiversity and ecological balance.

Policy 9.2.5: Pursue the creation of community gardens and urban food forests in public parks and on land owned by the City and partner agencies.

Policy 9.2.6: Explore conversion of parking lots to parks and recreation opportunities when parking demand decreases.

Policy 9.2.7: Enhance community use of the open space at Kellogg Water Treatment Plant site and consider options for park uses covering treatment plant facilities. Incorporate a public education component at the treatment plant site.

Goal 9.3 – Transportation and Connectivity: Increase safe and convenient access to and between natural areas, parks, and recreation opportunities for community members of all ages and abilities through a variety of transportation options.

Policy 9.3.1: Provide an active transportation network to increase connectivity and access between natural areas, parks, and recreation opportunities, including routes identified in the City’s Transportation System Plan and Metro Regional Trails System Plan.

Policy 9.3.2: ~~Ensure that b~~Bicycle trails, sidewalks, and walking trails provide convenient access for pedestrians and bicyclists to natural areas, parks, and recreation opportunities.

Policy 9.3.3: Encourage transit access to community parks and facilities.

Policy 9.3.4: Encourage North/South trail connections along the Willamette River.

Goal 9.4 – Park Development and Maintenance: Maintain, develop, and expand a City-wide park and recreation system which meets the needs and delivers services for all neighborhoods and members of the City as a whole.

Policy 9.4.1: Establish a Parks, Recreation, and Open Space zone within the Municipal Zoning Code.

Policy 9.4.2: Utilize the park classifications in Appendix XX to guide maintenance, development, and expansion.

Policy 9.4.3: Encourage interim recreation opportunities on vacant and underutilized sites on private or public land to be community member initiated, with a fixed time frame for the proposed use.

Policy 9.4.4: ~~The City will w~~Work with the parks district to acquire land for parks, trails, recreational uses, and habitat conservation.

Policy 9.4.5 – ~~Encourage P~~private industry ~~will be encouraged~~ to provide recreation opportunities and facilities for employees in employment areas ~~and -n~~New commercial development ~~is encouraged~~ to provide parks and other recreational amenities for the general enjoyment of the public.

Policy 9.4.6: ~~When appropriate, require~~ ~~N~~ew residential projects ~~may be required~~ to dedicate land or build facilities for public park, green space, or public open space uses if the development corresponds to areas where park deficiencies, natural areas, or habitat linkages have been identified.

Policy 9.4.7: In exchange for the dedication of park land, ~~the allowable~~ allow increases in density on the remaining lands ~~may be increased~~, so that the overall parcel density remains the same. When appropriate, allow a density bonus ~~may be allowed~~ for including larger proportions of land dedication for open spaces that protect and conserve habitat or provide identified needs in public park and recreational uses by the park district or the parks comprehensive plan.

Section 10: Public Facilities and Services

Overarching ~~Chapter~~ Section Goal – Plan, develop and maintain an orderly and efficient system of public facilities and services to serve urban development.

Goal 10.1: Provide high quality public services to current and future Milwaukie residents.

Policy 10.1.1: Maintain and enhance levels of public facilities and services to City residents, businesses, and vulnerable populations as urban development or growth occurs.

Policy 10.1.2: Ensure that existing residents and taxpayers do not pay for services that don't directly benefit Milwaukie residents.

Policy 10.1.3: As an element of the Comprehensive Plan, maintain a Public Facilities Plan, in conformance with Statewide Planning Goals, that incorporates key components of the master plans for water, wastewater, stormwater, and other public facilities under City control.

Policy 10.1.4: Use the Public Facilities Plan to help guide the programing of improvements as the City's Capital Improvement Plan is updated, and to establish Public Work Standards that identify the public facilities improvements that are required for properties to develop.

Policy 10.1.5: Use public facilities to strategically invest in different parts of the City and to help reduce disparities, enhance livability, promote growth and redevelopment, and to maintain affordability.

Policy 10.1.6: Require developers to pay their proportionate share of the cost of utilities and facilities needed to support their developments, except in such cases where the City may provide specified incentives to achieve priorities outlined in the City's vision.

Policy 10.1.7: To maximize the efficient provision of all services and to encourage cooperation and coordination, maintain up-to-date intergovernmental agreements with all public service agencies and service agreements with the providers of private services.

Policy 10.1.8: Work with other regional service providers in to plan for supply security, new technologies, and resiliency in the delivery of urban services.

Policy 10.1.9: Provide infrastructure, facilities and systems that are resilient to changes in climate, can reasonably withstand natural or man-made disasters, and will continue to function during an emergency event.

Policy 10.1.10: Design, upgrade and maintain systems to ensure that they are sustainable and resilient and utilize best available science and technology.

Goal 10.2: Provide an adequate supply and efficient delivery of water services.

Policy 10.2.1: Maintain and safeguard clean groundwater as the primary water supply source for the community. Utilize wellhead protection zones and land use restrictions to avoid impacts on wells and to maintain water quality.

Policy 10.2.2: Increase storage capacities and provide interconnections with the water systems of other providers in the region to ensure a reliable water supply for use during emergencies or periods of extremely high demand and to mitigate the impacts of climate change.

Policy 10.2.3: Continue to develop water storage and well sources to provide adequate water supply and water pressure in all areas of the City, including levels sufficient for firefighting throughout the City.

Policy 10.2.4: Provide a self-sufficient and resilient water system that meets the demands of current and future City residents.

Policy 10.2.5: Develop programs and establish targets for water conservation by customers of the City's water system and achieve them through community outreach and education, clearly identified metrics, and incentives.

Policy 10.2.6: Encourage and remove code barriers to the use of grey water systems and rainwater collection, with clear strategies and targets for expanding water supply and reducing the demand for water provided by the City.

Goal 10.3: Continue to provide adequate wastewater collection and treatment services to all Milwaukee residents.

Policy 10.3.1: Comply with federal and State clean water requirements in managing the wastewater collection system.

Policy 10.3.2: Maintain and improve the existing sanitary sewer collection system through preventive maintenance and ongoing appraisal.

Policy 10.3.3: Encourage alternative distributive systems and other wastewater microsystems that help increase the efficiency and resiliency of the wastewater system.

Policy 10.3.4: Encourage the optimization and improvement of the Kellogg Water Resource Recovery Facility (the sewage treatment plant). Encourage capacity expansion through water conservation and the use of pre-treatment by heavy users.

Policy 10.3.5: Work with plant operators to minimize or eliminate external impacts of the wastewater treatment process by reducing the overall physical footprint of the plant, covering portions of the plant, reducing vehicle trips, eliminating odors, or other viable strategies.

Policy 10.3.6: Participate in developing long-term plans for the treatment plant, including examining the potential for generating energy from plant and system operations, recovery of nutrients and other resources, and the possible acquisition of the plant by the City.

Goal 10.4: Maintain and improve the City's stormwater management system to ensure that waterways are clean and free flowing.

Policy 10.4.1: Preserve and restore natural functioning and historic floodplains and healthy uplands to better manage flood events, provide and enhance wildlife habitat, improve water quality, ensure late season water availability, and increase climate change resiliency.

Policy 10.4.2: Require that stormwater be managed and treated on-site, except where to the City determines it to be infeasible.

Policy 10.4.3: To the extent possible, stormwater should be managed with green infrastructure such as green roofs, water quality swales, rain gardens, and the intentional placement of appropriate trees.

Policy 10.4.4: Restrict development within drainageways and their buffers to prevent erosion, regulate stormwater runoff, protect water quality, and protect and enhance the use of drainageways as wildlife corridors.

Policy 10.4.5: Provide resources and tools to facilitate stormwater retrofits for existing development.

Policy 10.4.6: Consider potential stormwater impacts during the land use review process.

Policy 10.4.7: Examine the feasibility of daylighting creeks that provide opportunities to conserve or enhance vegetation and wildlife habitat.

Policy 10.4.8: Expand public outreach and education programs on how the community can help protect Milwaukie waterways.

Policy 10.4.9: Encourage ~~and~~ incentivize and identify targets for the reduction of impervious surfaces for both existing development and redevelopment.

Policy 10.4.10: Collaborate with jurisdictions upstream in the Kellogg-Mt Scott, Johnson Creek, and Willamette watershed to reduce downstream impacts in Milwaukie through a series of watershed protections related to land use, impervious surfaces, stormwater management, water quality, and water quantity.

Goal 10.5: Improve and expand solid waste services available to City residents.

Policy 10.5.1: Utilize franchise agreements with private operators to coordinate the collection of solid waste, recyclable materials, and yard/food waste, reduce environmental impacts, identify strategies to reduce waste generation, and provide educational materials and programs to Milwaukie residents.

Policy 10.5.2: Manage and monitor the adequacy of the solid waste hauler service and communicate with private operators when problems arise.

Policy 10.5.3: Require solid waste haulers to provide curbside or onsite recycling and composting services.

Policy 10.5.4: Examine and pursue strategies to reduce food waste and expand opportunities for composting.

Policy 10.5.5: Require new development to provide on-site and enclosed space for recycling.

Policy 10.5.6: Create an equity and inclusion strategy that aims to increase opportunities for underrepresented groups and reduce the potential for monopolies through implementation and enhancement of the City's solid waste franchise system.

Policy 10.5.7: Work with partners, including haulers, to educate residents on recycling and waste reduction.

Policy 10.5.8: Establish clear targets for waste reduction by residential, commercial, and industrial customers.

Goal 10.6: Maintain facilities and personnel to respond to public safety needs quickly and efficiently.

Policy 10.6.1: Support efforts to implement Crime Prevention Through Environmental Design (CPTED) principles in building and site design and transportation corridors.

Policy 10.6.2: Increase public awareness of crime prevention methods and involve the community in crime prevention programs.

Policy 10.6.3: Coordinate with the fire department to address fire safety in the design of buildings and through site planning, consistent with state fire code requirements and other best practices for fire protection.

Policy 10.6.4: Distribute resources throughout the city for responding to fires, floods, and other natural and human-induced disasters, including staff designated to help coordinate the city's response.

Policy 10.6.5: Work with partners to require streets be designed and maintained to meet the minimum needs of emergency services providers while also ensuring that street widths are appropriate and create a quality, safe and usable environment for pedestrians and bicycles.

Goal 10.7: Coordinate with local partners in planning for schools, medical facilities, and other institutional uses.

Policy 10.7.1: Coordinate community development activities and public services with the school district.

Policy 10.7.2: Work with the district, in coordination with the City's park and recreation provider, to meet community and neighborhood recreational and educational needs.

Policy 10.7.3: Provide transportation improvements such as sidewalks and bikeways that promote safe access to schools.

Policy 10.7.4: Support creation of a master plans for institutional uses such as parks, schools and hospitals.

Policy 10.7.5: Support the provision of temporary housing for the families of local medical patients.

Policy 10.7.6: Establish a Transportation Demand Management (TDM) program for schools and other large institutions and businesses.

Goal 10.8: Provide high quality administrative services to the people of Milwaukie while maintaining cost-effectiveness and convenience.

Policy 10.8.1: Maintain the efficiency of the City's land development processing, including provision of a one-stop development permit center.

Policy 10.8.2: Maintain and improve library service levels and facilities that keep pace with the demands of existing and future residents.

Policy 10.8.3: Maintain a public safety building which houses City police services.

Policy 10.8.4: Strive to consolidate public-facing city services (other than public safety) in one city facility.

Goal 10.9: Ensure that energy and communications services are adequate to meet residential and business needs.

Policy 10.9.1: Coordinate with public utility and communications companies to provide adequate services, while minimizing negative impacts on residential neighborhoods, natural and scenic resources, and recreational areas.

Policy 10.9.2: Encourage grid modernization to promote energy security and grid resiliency and to work toward producing enough [renewable-clean](#) energy to fully meet the community's energy demand.

Policy 10.9.3: Encourage the provision of electric vehicle charging stations in appropriate locations.

Policy 10.9.4: Explore opportunities to create a public communications utility to expand equitable access to high speed broadband internet service.

Policy 10.9.5: Work with utility companies to underground utility systems and infrastructure to improve aesthetics and reduce damage from storm events and other natural disasters.

Policy 10.9.6: Promote and prioritize [renewable-clean](#) energy production and use.

Section 11: Economic Development

Overarching Section Goal: To support a vibrant, resilient, and inclusive local economy that enhances the prosperity and economic well-being of Milwaukie businesses, workers and residents.

Goal 11.1 - Current and Future Economic Land Use: Provide a diverse range of uses, services and amenities that contribute to a sustainable, equitable and resilient economy and are adaptable to changing land uses and technology.

Policy 11.1.1: Coordinate the City's economic strategies and targeted industries with those in the Milwaukie Planning Area and surrounding communities.

Policy 11.1.2: Adapt to industry trends and emerging technologies that have the potential to affect employment, land use, and infrastructure needs, such as automation, the sharing economy, autonomous vehicles and other future technological advances.

Policy 11.1.3: Develop strategies to help stabilize existing businesses and mitigate displacement in areas experiencing increased investment and redevelopment.

Policy 11.1.4: Work to maintain a diverse set of local businesses and traded sector industries in an effort to strengthen economic resiliency in the event of a natural disaster or economic collapse.

Policy 11.1.5: Focus industrial and manufacturing uses in the City's three existing major industrial and employment areas along Johnson Creek Blvd, Highway 99-E and Highway 224, with limited light manufacturing uses permitted in the City's mixed-use and commercial zones.

Policy 11.1.6: Allow shared spaces, co-location, artist space and other emerging uses in industrial areas.

Policy 11.1.7: Encourage the creation of community amenities such as green spaces and gathering places within commercial and employment areas.

Policy 11.1.8: Facilitate the development of housing that meets the needs of local employees across a wide range of price ranges and housing types in zones that allow residential development.

Policy 11.1.9: Foster a series of distinct neighborhood hubs that include services and amenities such as child care, gathering places, restaurants and fresh food sources to which residents can walk, bike, or ride transit.

Policy 11.1.10: Make Downtown Milwaukie a regional destination with uses and amenities that capitalize on its proximity to the Willamette waterfront and multimodal transportation options.

Policy 11.1.11: Aim to reduce Milwaukie's carbon footprint by encouraging local food production, import substitution, rail access, [low carbon and renewable clean and carbon-free](#) energy, and active transportation.

Goal 11.2 - Economic Land Supply: Ensure the City has an adequate supply of land with access to reliable public services that meets the City's economic and employment needs.

Policy 11.2.1: Frequently monitor the City's vacant employment land to help inform short- term and long-term economic growth.

Policy 11.2.2: Improve infrastructure and utilities throughout the City in a manner that facilitates greater economic development

Policy 11.2.3: Help businesses flourish in Milwaukie, either on their current site or on sites that provide more opportunity for growth and expansion.

Policy 11.2.4: Support increased employment density in the City's industrial and commercial areas.

Policy 11.2.5: Support more of the City's projected employment growth within home-based businesses.

Policy 11.2.6: Pursue the study and clean-up of brownfields and other contaminated sites.

Policy 11.2.7: Assist existing and new employers in identifying and/or assembling properties that meet their needs and support economic development goals.

Goal 11.3 - Workforce, Training, and Collaboration: Help local businesses attract and develop a skilled workforce that positions Milwaukie to be one of the strongest economies in the region.

Policy 11.3.1: Partner with state and regional agencies, local businesses, non-profits, and educational institutions to help provide the workforce and training needed to make Milwaukie businesses competitive in the region and beyond.

Policy 11.3.2: Focus recruiting and marketing efforts on businesses that can capitalize on Milwaukie business clusters (groups of businesses in the same industry) or serve an identified community need.

Policy 11.3.3: Attract and foster businesses that hire local residents and provide job training, continuing education opportunities and family-wage jobs for employees in a variety of different industries.

Policy 11.3.4: Support programs that encourage entrepreneurship, business incubation, business retention and expansion and the sharing of ideas and resources.

Section 12: Urban Growth Management

Overarching Section Goal: To coordinate future urban growth, development and provision of city services in a logical, cost-effective, and livable manner, in cooperation with other local, regional and state government agencies and service providers.

Goal 12.1 - Regional Coordination: Coordinate with Metro, Clackamas County, Happy Valley, Portland, and other governmental agencies to plan for and manage growth and development in Milwaukie and the surrounding area.

Policy 12.1.1: Utilize the Urban Growth Management Agreement (UGMA) with Clackamas County as an effective tool to guide planning and growth management decisions in the area surrounding Milwaukie.

Policy 12.1.2: Maintain Urban Service Agreements with special service districts to ensure that the ability of the City to provide its residents with urban services is not compromised while ensuring that the community has access to excellent urban services at reasonable costs.

Policy 12.1.3: Maintain Intergovernmental Agreements with the cities of Portland and Happy Valley to clearly establish urban service area boundaries.

Goal 12.2 - Milwaukie Planning Area: Identify the future urban service area and jurisdictional boundary for the City of Milwaukie in order to better coordinate planning actions.

Policy 12.2.1: Maintain a Milwaukie Planning Area (MPA) map that is included as part of the UGMA with Clackamas County, urban service agreements with special districts, and IGA's with adjoining cities to identify the areas for which the City of Milwaukie will be the ultimate provider of urban services or will be the coordinating body for the delivery of the services. The MPA map identifies the areas that, over time, are expected to annex to the City of Milwaukie.

Policy 12.2.2: Identify a Jurisdictional Impact Area (JIA) on the MPA map. The JIA is generally the area within a ½ mile of the MPA boundary and is an area under the jurisdiction of Clackamas County or a neighboring city and where their land use and transportation decisions may have a significant impact on the City of Milwaukie.

Goal 12.3 - Urban Growth Management Agreement with Clackamas County: Use the Urban Growth Management Agreement (UGMA) with Clackamas County to enable the City to work toward annexation of areas within the MPA and to better coordinate regarding County land use and transportation decisions in the area surrounding the City.

Policy 12.3.1: Within the UGMA, define the procedures and responsibilities for City and County staff for the review of plans and development applications for the unincorporated areas identified in the MPA and the JIA. The UGMA may define subareas within the MPA where the City Comprehensive Plan and implementation ordinances apply and where development applications are reviewed by the City. In the areas where subareas are not designated, County planning documents and procedures shall apply.

Policy 12.3.2: Ensure that tThe UGMA ~~shall~~ clearly acknowledges that the MPA represents the area

that is envisioned as the area that will ultimately be annexed to the City and come under City jurisdiction.

Goal 12.4 - Annexation: Annex lands within the Milwaukie Planning Area.

Policy 12.4.1: Maintain a proactive annexation program that encourages and promotes annexation to the City of Milwaukie.

Policy 12.4.2: Develop annexation plans and consider the use of financial and service incentives to promote annexation of land within the MPA.

Policy 12.4.3: Ensure that annexation programs respect Milwaukie's community identity and maintain levels of service for current Milwaukie residents.

Policy 12.4.4: As part of the overall annexation program, prioritize annexation of properties that are surrounded by land within the incorporated city limits.

Policy 12.4.5: Require annexation where properties receive or utilize City utilities or where intergovernmental agreements allow for annexation in exchange for providing City services.

Policy 12.4.6: Support City annexation of property within the MPA and oppose annexation of land within the MPA by another city.

Goal 12.5 - Urban Services: The City of Milwaukie will coordinate the provision of urban services for land within the MPA.

Policy 12.5.1: Coordinate with special districts to ensure that the full range of urban services are available while ensuring that the City's ability to provide services within the MPA is not compromised.

Policy 12.5.2: ~~Unless created in partnership with the City,~~ Oppose any new special service district or the expansion of a special service district within the MPA unless it is created in partnership with the city.

Policy 12.5.3: ~~Unless established through an intergovernmental agreement,~~ Oppose efforts by another City to provide urban services within the MPA unless such services are set forth through and intergovernmental agreement.

Policy 12.5.4: ~~While implementing the community vision to create a highly livable city,~~ Seek cost-effective means of providing urban service to properties within the MPA while also ensuring that Milwaukie remains a highly livable city consistent with the community vision.

Policy 12.5.5: Coordinate with Clackamas County and special service districts to maintain an integrated public facilities plan (PFP) for the MPA. The PFP shall clearly state who has responsibility for each urban service in the MPA.

Goal 12.6 - Urban Form: Ensure that the City of Milwaukie (City) maintains an urban form that supports a highly livable community and the efficient use of land and resources.

Policy 12.6.1: Support and implement key aspects of the Metro 2040 Growth Concept for Milwaukee and the surrounding area (see map) that help protect resource lands outside of the regional urban growth boundary (UGB) and achieve an efficient and transit-friendly urban form inside the UGB.

Policy 12.6.2: To use land more efficiently, encourage infill on underutilized parcels and encourage intensification or redevelopment of land and buildings in the downtown, mixed use districts, and areas designated for commercial, industrial or employment use.

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Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Dan Eisenbeis	1/14/2020	General	<i>This Comprehensive Plan is a long-term update. The policies in it need to endure for at least 20 years.</i>	Comment noted.
Stephan Lashbrook	1/14/2020	General	<i>This document stays true to the core concepts of the City's Vision Statement. It will not be easy to achieve Milwaukie's Vision for 2040, but it certain is worth striving for and this document will help the community move towards its Vision.</i>	Comment noted.
David Aschenbrenner	1/14/2020	General	<i>Is the city really going to grow by 14% by 2024?</i>	The city's Housing Needs Analysis (HNA) estimates that the city will grow by 14% by 2040, not 2024. This projection is derived from data provided by Portland State University's Population Research Center and Johnson Economics.
Ken Kraska	1/14/2020	General	<i>Recognize the Comp Plan as the guiding legal document for implementing city development code and employ reasonable specificity to avoid ambiguity or unintended consequences.</i>	Comment noted.
George Rudge	1/26/2020	General	<i>milwaukie is not portland! We do not need infill and high density housing and development. What we need is a city government that listens to its people.</i>	Comment noted.
Renee Moog	1/27/2020	General	<i>Staff note: Ms. Moog had extensive comments on the general quality of life and well-being in the city, the need for additional open space and natural areas, the need to plan cooperatively with adjacent jurisdictions, and perceived impacts resulting from House Bill 2001 and increased density. Her full letter is included in Attachment 1.</i>	Comments noted. Staff met Ms. Moog during the January 30 DLCD open house for House Bills 2001 and 2003 and discussed several of her comments directly with her.
Ken Kraska	1/28/2020	General	<i>Summary of 1/28 Oral Testimony: Does not feel this document should be rushed. Feels that the most affordable house is the one that is standing. And the greenest house is the one already standing. Does not want Milwaukie to follow Sellwood. Thinks the new housing is using cheap materials, blocks solar access for other homes, and has close setbacks. Does not want a mismatch in building styles within neighborhoods, such as multi-"skinny"-units. Also thinks we need reasonable limits on residential density.</i>	Comment noted. Planning Commission is scheduled to discuss the Section 7 (Housing) and Section 8 (Urban Design) goals and policies on February 11.
Rob and Anna Garmon	1/28/2020	General	<i>Summary of 1/28 Oral Testimony: Do not like the pictures in Sellwood. Does not want Milwaukie to become Sellwood or Portland. Concerned about the lack of sidewalks and potholes, but sees that taxes are going towards bike lane development versus fixing our streets and adding sidewalks. Developers will bring rentals and can change the dynamic of neighborhoods in negative ways. We didn't know this was going on. It needs to be better communicated.</i>	Comment noted. Planning Commission is scheduled to discuss the Section 1 (Community Engagement), 7 (Housing), and 8 (Urban Design) policies on February 11, which touch on the issues raised by the Garmons in their oral testimony.
Michelle Greeley	1/28/2020	General	<i>Summary of 1/28 Oral Testimony: Just heard about this. No communication is happening. Mass mailing is required. Does not feel transparent.</i>	Comment noted. As staff mentioned during the January 28 public hearing, the Comprehensive Plan Update has been featured multiple times in the Milwaukie Pilot, on the city website and social media, at multiple City Council and Planning Commission meetings and NDA meetings, and distributed via the project email list. A citywide mailing also went out in late December informing people of the January 14 and 28 public hearings. However, staff will continue to make efforts to improve its outreach to the community.
Ronelle Coburn	1/14/2020	1 - Section	<i>Concerned about community engagement, people need information. Believes that the Planning Commission should not be the CIAC. The CIAC should have people who are experienced in marketing, digital outreach, social media, etc. on it, not Planning Commissioners.</i>	There was extensive discussion about the role and make-up of the CIAC at the January 14 meeting, and staff has provided several options for Planning Commission to consider.

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Matrix of Public Comments through January 28, 2020

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Ronelle Coburn	1/28/2020	1- Section	<i>Summary of 1/28 Oral Testimony: Clear that the Planning Commission can or wants to handle broad community outreach, education, and engagement. This is something that the city needs and is currently not meeting. The Planning Commission has made it clear that they cannot fill the role of CIAC. Does not think 1 or 2 meetings a year will work, it needs to be monthly. Open to the ideas from the last PC meeting about how to achieve the CIAC through interim ways. Does not feel that additional support for the NDAs to do better engagement will be sufficient.</i>	Comment noted. Planning Commission is scheduled to discuss the Section 1 goals and policies on February 11.
Milwaukie RIP	11/24/2019	1.1 - Goal	Foster Broad, Effective , and Collaborative Community Participation: Implement and encourage practices that increase community participation by providing through complete information, consulting with the community, and fostering collaborative partnerships with community leaders .	No recommendation on what staff views as incidental changes (adding "effective" and replacing "thorough" with "complete"). Staff does not believe that partnerships should only refer to one example ("community leaders") and as such recommends not including that proposed addition.
Milwaukie RIP	11/24/2019	1.1.1	Generate interest and encourage diverse participation in City boards , committees and commissions through broad effective outreach.	Staff is not opposed to adding references to city boards. It believes that "effective" outreach is implied in the policy so is neutral on adding that term, especially if it is added to Goal 1.1.
Milwaukie RIP	11/24/2019	1.1.2	Ensure publications and printed materials regarding current issues and proposed policies are readily accessible, as defined in the preamble , for all ages and abilities, allowing for equitable engagement and informed dialogue between policy-makers and the community.	Staff does not believe that the preamble should be referenced in the policy. Staff is not opposed to adding in the reference to equitable engagement.
Milwaukie RIP	11/24/2019	1.1.3	Keep the community informed of opportunities for involvement using a range of outreach tactics that may include media , through common and preferred surveyed modes of communication including:	Staff does not recommend changes to this policy. It does not believe that a detailed list of outreach methods is needed at the policy level, and should instead be part of the city's public engagement strategies. If Planning Commission believes that a list of examples should be included, staff recommends that the policy should read "may include" instead of "including".
Milwaukie RIP	11/24/2019	1.1.4	U.S. Postal Service, email newsletters, city website, social media (all regular city meetings listed as events on social media with effective informative lay-person friendly content and invitations sent), print and radio, flyers, mail back & online surveys, presenting information at fairs and events, and direct outreach to existing organizations and community leaders .	Staff feels that a detailed list of examples is unnecessary, and does not recommend any changes to the policy language.
Milwaukie RIP	11/24/2019	1.1.5	Continuously improve engagement and dialogue with property owners, tenants, and employees in Milwaukie's commercial and employment areas through the most effective and preferred surveyed modes of communication and emerging technologies, methods and techniques.	Staff feels that a detailed list of examples is unnecessary, and does not recommend any changes to the policy language.
Milwaukie RIP	11/24/2019	1.2.1	Build engagement across Milwaukie's diverse communities by notifying and facilitating participation in all land use and Comprehensive Plan related activities using proven effective methods of outreach as defined in policy 1.1.3. and policy 1.1.4.	Staff believes it unnecessary to reference other policies from this section and as such does not recommend any changes to the policy language.

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Milwaukie RIP	11/24/2019	1.2.3	Seek public input on major land use issues through community organizations, such as faith groups, business associations, school districts, non-profits, service organizations, Neighborhood District Associations and established non-NDA citizen organizations , and other bodies to encourage broad, effective, and informed participation.	NDAs have their own section goal (1.3) and policies, so while staff is not opposed to adding them to this policy, it would be somewhat redundant. Staff is not sure what constitutes an "established non-NDA citizen organization", so would recommend a more general term if Planning Commission feels that additional groups should be referenced in the policy. Staff has no opinion on adding "effective and informed" at the end of the policy but in general recommends deferring to policy language that has been developed by the CPAC and reviewed by Council, unless it is especially substantive in nature.
Milwaukie RIP	11/24/2019	1.2.4	Reduce barriers to participation by considering language, meeting time, location, and required level of involvement, and effective two-way dialogue between citizens and the city.	Staff does not believe that the proposed addition is relevant to the policy language, which is focused on improving access to community meetings and events.
Comprehensive Plan Advisory Committee	12/16/2019	1.2.5 (new)	Proposed New Policy: Create a Diversity, Equity and Inclusion Committee.	As noted in the January 14 staff report, the CPAC has recommended a Comprehensive Plan policy that calls on establishing a Diversity, Equity and Inclusion (DEI) Committee. A similar policy was previously proposed by the CPAC but was removed prior to the community engagement policies being pinned down by City Council. Staff continues to believe that this language is more appropriate for the Community Vision (where it already exists), and as such does not recommend adding it to the Comprehensive Plan.
Celestina DiMauro	1/14/2020	1.2.5 (new)	<i>Supports a policy calling for a DEI Committee. [See Ms. DiMauro's more detailed comments in her January 15 email]</i>	Comment noted. The January 28 staff report addresses the continued call for referencing the DEI committee in the Comprehensive Plan, which staff would like to discuss on January 28..
Stephan Lashbrook	1/14/2020	1.2.5 (new)	<i>Supports a policy calling for a DEI Committee.</i>	See comment above.
Dan Eisenbeis	1/14/2020	1.2.5 (new)	<i>Supports a policy calling for a DEI Committee.</i>	See comment above.
Ben Rousseau (CPAC Member)	1/14/2020	1.2.5 (new)	<i>Supports a policy calling for a DEI Committee. Also noted that the Community Vision called for its establishment to implemented during the update to the Comprehensive Plan.</i>	See comment above.
Celestina DiMauro	1/28/2020	1.2.5 (new)	<i>Summary of 1/28 Oral Testimony: Wanted to clarify if there should be a policy for a DEI committee. The Vision called for it and the Comp Plan is an implementation tool for the Vision. Staff had acknowledged that DEI is important city-wide and had concerns about it being tied to only land use in the Comp Plan. Believes that the city can't be neutral on DEI, even in land use.</i>	Comment noted. The DEI Committee is identified as a key issue to discuss in the January 14, January 28, and February 11 staff reports.
Milwaukie RIP	11/24/2019	1.3 - Goal	Maintain Transparency and Accountability: Ensure transparency and accountability in City and land use policy decision-making by maintaining access to City leadership, timely and respectful response to citizen inquiries , and making a commitment to equitable engagement practices.	Staff is not opposed to this proposed addition, if Planning Commission believes that it improves the goal language. It would recommend using the term "public inquiries" as opposed to "citizen inquiries."

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Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Milwaukee RIP	11/24/2019	1.3.1	Recognize the Planning Commission as the City's Community Involvement Advisory Committee (CIAC) to evaluate community involvement practices related to land use and comprehensive planning. The CIAC shall meet annually to specifically review community involvement practices. Per OAR 660-015-0000(1), establish and recognize a Commission for Citizen Involvement (CCI) to formulate and execute community involvement practices related to surveyed community values and communications with citizens on land use and comprehensive planning. The Citizen Involvement Program (CIP) shall be appropriate to the scale of the planning effort. The CCI shall include members from ALL neighborhoods and commercial districts of the city with seats for 2 representatives from each district (1 of which is reserved with first-right-of-refusal for an NDA member from each district). The CCI's community involvement practices and effectiveness will be evaluated annually by the City Council. <i>Proposed New Policy</i> : The city shall establish/assign a staff member who works with the CCI to regularly provide a representative voice for the citizens and various communities' concerns on all city matters at all meetings and in all city publications (online, print, and audio), including (but not limited to) City Council Regular Meetings and Planning Meetings and any other commissions or committees whose decisions impact the city, its neighborhoods, communities, and citizens. All councils, committees, and commissions are required to take the CCI and staff member counterpart's recommendations into account in making decisions for the overall good of the city, its citizens, neighborhoods, and various communities.	Staff recommends that this policy remain unchanged. There has been significant discussion at the CPAC, Planning Commission and City Council level regarding the role of the Community Involvement Advisory Committee (CIAC), and Council has previously indicated their desire for Planning Commission to serve in that role. As the proposed new policy is contingent on the establishment of a separate CCI, staff is recommending against its addition.
Milwaukee RIP	11/24/2019	1.3.2	Establish a Comprehensive Plan Advisory Committee (CPAC) to assist in periodic review or major updates of the Plan that includes citizen representatives from ALL neighborhoods and commercial districts of the city and representation of a variety of interests from each district.	Staff is not opposed to providing more specificity in the text of this language, but would recommend some slight changes to the proposed revisions if Planning Commission agrees. Staff recommends that the description of the CPAC read as "that includes representatives from all neighborhoods, groups that have been historically underrepresented in planning efforts, and that reflect a variety of interests and perspectives."
Milwaukee RIP	11/24/2019	1.3.3	The CCI and City Staff Representative shall track and evaluate the success of community involvement activities regularly based on established effectiveness goals and metrics and make results available to the community through a monthly (or quarterly) written report on achievements posted on the city's website, social media, and printed in the Milwaukee Pilot. Quarterly evaluations will be done and adjustments made to increase effectiveness of community involvement over time.	Staff believes that the proposed additions are too prescriptive for a Comprehensive Plan policy, and more appropriate for the city's public engagement strategies. Unless Planning Commission recommends the addition of a separate CCI, the CIAC (with staff support) would be responsible for this policy.
Milwaukee RIP	11/24/2019	1.3.4	Prioritize funding in the planning budget to support inclusive effective community engagement and participation.	This policy is meant to specifically call out the concept of inclusivity, and as such staff does not recommend the proposed addition.
Douglas Edwards	12/14/2019	1.3.5 (new)	<i>Proposed New Policy</i> : Establish and maintain a reporting mechanism as part of the city's communication program on progress and metrics of the Comprehensive Plan.	Staff is not opposed to this proposed policy, but would recommend alternative language if Planning Commission is interested in adding the policy. All four housing goals include a policy related to metrics, but no other sections have similar policies.
Milwaukee RIP	11/24/2019	1.4 - Goal	Goal 1.4 - Uphold Neighborhood District Associations (NDA) and non-NDA community organizations: Continue to support, inform in a timely manner, consult, and empower community members through the Milwaukee Neighborhood District Associations (NDAs) and other easily identifiable non-NDA community organizations.	As this goal and the underlying policies are specifically focused on neighborhood district associations (NDAs), staff does not recommend adding any references to non-NDA groups. If Planning Commission would like to add a new policy related to non-NDA groups, staff believes it should be added under Goal 1.1.

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Milwaukie RIP	11/24/2019	1.4.1	Policy 1.4.1: Encourage and support NDA and non-NDA community leadership to develop and implement strategies to nurture new leaders and increase participation while intentionally reflecting the diversity in each neighborhood.	See comment above under Goal 1.4.
Milwaukie RIP	11/24/2019	1.4.2	Policy 1.4.2: Provide opportunities for NDAs and non-NDA community groups to give relevant and effective testimony to the City Council and Planning Commission on matters affecting their neighborhoods.	See comment above under Goal 1.4.
Milwaukie RIP	11/24/2019	1.4.4	Notify NDAs and non-NDA community groups in a timely manner on all relevant land use and comprehensive planning matters and solicit feedback on proposed land use actions and legislative changes as required by ordinances.	See comment above under Goal 1.4.
David Aschenbrenner	1/14/2020	2.1.7	The Milwaukie Museum is not on the historical or cultural sites map. It should be added. Unsure what the numbers mean on the Historic Resources Inventory map within the draft Comprehensive Plan document.	Updating the Historic Resources Inventory is included as part of the Comprehensive Plan implementation process. When this is done, it will look at adding the Milwaukie Museum as a historic resource along with other historically significant buildings within the city. The numbers are associated with the Historic Resources Inventory list. It will be an appendix in the final Comprehensive Plan document. The list was not in the draft Comprehensive Plan document.
North Clackamas Watershed Council	1/14/2020	3 - Section	Has concerns about uplands. They need to be regulated and more regulations needs to be in place to incorporate bioswales, pervious pavement, etc. WES is currently redoing their stormwater regulations and the City should be reviewing them to make sure they meet our goals and policies. Agree that natural areas should be maintained, but also add to them. Missing natural areas should be planned with habitat connectivity in mind.	Policies 3.3.2, 3.3.5, and 3.3.7 all reference habitat connectivity, including a policy (3.3.7) that calls for developing a habitat connectivity analysis.
David Aschenbrenner	1/14/2020	3 - Section	There needs to be a tree policy stating that trees should be replaced within one year.	Staff believes that this level of detail is more appropriate for the Development Code. Work on a tree ordinance is likely to be included in the 2020-2021 implementation work that will be led by the CPC.
David Aschenbrenner	1/14/2020	3 - Section	Minthorn Pond and Minthorn Creek needs to be included as natural resources in the Comp Plan and is on the buildable lands map and it should not be.	Minthorn Pond and Minthorn Creek are on the Natural Resources Inventory map. Due to the types of natural resources on the site, development on this land would be impossible. These properties should not be on the Buildable Lands Inventory. Staff will make required edits to the map prior to Council adoption.
North Clackamas Watershed Council	1/22/2020	3- Section (Proposed New Policy)	Improve connectivity for wildlife based on the connectivity maps developed by the Regional Habitat Connectivity Work Group, the Habitat Connectivity Toolkit, and other work that identifies critical connections between areas of natural habitat. See January 22 NWC comment letter for additional background and commentary.	As proposed, staff believes this policy is much too prescriptive/detailed in its references to current working groups and toolkits, which may not exist beyond the near term. As noted above, there are several existing policies that deal with habitat connectivity, and staff is proposing minor edits to Policy 3.3.7 to more broadly call for utilizing best practices in addressing habitat connectivity.
North Clackamas Watershed Council	12/9/2019	3 - Overarching Section Goal	We support the goal largely as written; however it should include water quantity, as well as water quality, in the goal statement.	NWC has recommended adding water quantity to both the overarching chapter goal and Goal 3.2. Staff is not opposed to this addition, but would recommend edits to the language of Goal 3.2 if Planning Commission believe that this change is needed.
North Clackamas Watershed Council	12/9/2019	3.2 - Goal	Enhance water quality, ensure water quantity and flow regimes that sustain healthy streams and water resources. Healthy water resource management must include not only water quality (the absence of pollution or excessive heat) but also the availability of water in a natural flow pattern that avoids hydromodification, reduces flood risk, allows for groundwater recharge, etc.	See above.

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North Clackamas Watershed Council	1/14/2020	3 - Overarching Section Goal and Goal 3.2	Again requested that water quantity be addressed in the overarching section goal and Goal 3.2.	Staff has revised the overarching Section goal and Goal 3.2 to reference water quantity.
North Clackamas Watershed Council	12/9/2019	3.2.1	We support as written. The acknowledgement of the importance of uplands in water resources is critical and we applaud the City for this recognition.	Comment noted.
North Clackamas Watershed Council	12/9/2019	3.2.2	Support efforts to restore Kellogg and Johnson Creeks and their tributaries and remove the restore a free-flowing Kellogg Creek at the Kellogg Dam site. We strongly support this goal. As stated earlier, options in current preliminary consideration may not require the removal of the existing structure to restore a free-flowing Kellogg Creek.	Staff is supportive of this proposed edit, which would offer alternatives to the removal of Kellogg Dam.
North Clackamas Watershed Council	1/14/2020	3.2.2	Expressed support for staff's proposed edits to this policy.	Comment noted.
North Clackamas Watershed Council	12/9/2019	3.2.3	We strongly support this goal, given the City's location at the downstream portion of Kellogg Creek, and we hope the Council can continue to facilitate these efforts.	Comment noted.
North Clackamas Watershed Council	12/9/2019	3.2.6	When considering development proposals, take into account changes in water flow, quantity, and duration of flow associated with both development and climate change, and evaluate the downstream impacts of development in upland areas." This reflects current cutting-edge standards and those currently under consideration by WES to address the duration of discharge from development as well as sheer quantity.	Staff is supportive of these proposed edits.
North Clackamas Watershed Council	12/9/2019	3.2.7	Protect water quality of streams by using best available science to help control the amount, temperature, turbidity, duration and quality of runoff that flows into them, in partnership with other regulatory agencies.	Staff is supportive of this proposed edit.
North Clackamas Watershed Council	12/9/2019	3.3.8 (new)	Proposed New Policy : Fill existing gaps in knowledge of the population, trends, and connectivity of habitat fish and wildlife populations. Many critical species lack either baseline population status to measure trends, and/or to identify key habitat or target restoration activities.	Staff does not believe that this new policy is needed, given existing language in Policy 3.1.2 about promoting public education on natural resources.
North Clackamas Watershed Council	12/9/2019	3.4 - Goal	We strongly support this goal. As stated earlier, this is a critical goal that cannot be met on public land alone. We therefore strongly support Subpoints 1-4, and encourage the City to enact steps that protect large trees on private land as well as public land.	Comment noted.
Ken Kraska	1/14/2020	3.4 - Goal	Create incentives for the preservation of large and old-growth trees.	Policy 5.4.2 includes policy language calling for the preservation of large trees as a climate change adaptation/mitigation measure. Staff is proposing edits to Policy 3.4.5 that call for incentives for the preservation of large and old-growth trees.
Stephan Lashbrook	1/14/2020	3.4.2	Supports the goal of a 40% tree canopy in Milwaukie, but is also concerned that subject should always be raised with certain caveats - first being the right type of trees at the right locations and the second, being solar access. Also it makes no sense to encourage more tree planting unless the City is willing to commit to the removal of invasive species that kill trees (i.e. English ivy)	Staff has included a minor addition to Policy 3.4.2 that calls for the city to seek to expand the tree canopy, "while also considering future solar access". Planning Commission is encouraged to discuss this potential addition and make a recommendation on whether it should be included.
North Clackamas Watershed Council	12/9/2019	3.4.5	We strongly support the focus on native and climate-adapted species. We also encourage the inclusion of explicit language for a multi-aged canopy that will be sustainable over time.	Comment noted.

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Ken Kraska	1/14/2020	3.4.5	<i>We support North Clackamas Watershed Council's stance, and recommend the following edit:</i> Strengthen Enhance protections for existing native-species and climate-adapted trees that contribute to a diverse and multi-aged tree canopy. enacting steps that protect large and old-growth trees on private and public land, and the habitat they provide.	Staff agrees with changing the first word from "Enhance" to "Strengthen", but believes that the additional language proposed at the end of the policy is better suited for the implementation work related to developing an updated tree protection and replacement ordinance. As noted above, staff has proposed amending the policy to call of incentives for protecting larger trees.
North Clackamas Watershed Council	12/9/2019	3.4.6	Evaluate the stormwater and water quantity impacts associated with tree removal as part of the development review process. <i>We strongly support the assessment of the stormwater impact of tree removal, as existing trees are often the most effective and least expensive means of reducing stormwater impacts.</i>	Staff is not opposed to this proposed edit, which would be consistent with NCWC's recommended additions to policies under Goal 3.2.
North Clackamas Watershed Council	12/9/2019	3.5 - Goal	<i>We strongly support the Goal and subpoints.</i>	Comment noted.
Ken Kraska	1/14/2020	3.6.7	Create standards, fee schedules , and best practices for the demolition of buildings to reduce impacts associated with increased demolition, including creation or release of dust and air pollutants.	The City has a fee schedule that includes the demolition of buildings. Calling for an increase in the fee in the policy is unnecessary. If the Council chooses, it can increase the fees for building demolition when it adopts an updated fee schedule. The schedule is updated annually.
Ken Kraska	1/28/2020	3.6.7	<i>Staff comments that "calling for an increase in the fee in the policy is unnecessary." However, we did not advocate increasing fees in prior comments.</i>	Comment noted. Planning Commission discussed Mr. Kraska's proposed edits during their January 28 meeting, and opted not to revise the language in Policy 3.6.7.
North Clackamas Watershed Council	12/9/2019	4 - Overarching Section Goal	<i>We support the articulated goal. We also feel that access to the Willamette River for Milwaukie Residents should be maintained and enhanced beyond the access provided at Milwaukie Bay, and that the goal statement should reflect this.</i>	Comment noted. Staff is open to changes that call for additional access, if Planning Commission feels it necessary and appropriate.
North Clackamas Watershed Council	12/9/2019	4.4.1	<i>We strongly support the conservation values and protection of these overlay zones. It is vital that the City both continue them as they relate to the Willamette River and resist attempts to weaken and/or provide variances.</i>	Comment noted.
North Clackamas Watershed Council	12/9/2019	4.4.2	<i>We strongly support an increase in tree canopy in the Willamette Greenway. We believe that merely mitigating for trees lost through development will be inadequate at providing the many value of trees to the people, fish and wildlife, and property values, as Milwaukie's population grows. Given the essential roles trees play in reducing the climate-induced heat island effect, cooling stream temperatures, and providing carbon sequestration, merely replacing lost trees will not be adequate. We must ensure a net increase in tree cover, both within the Willamette Greenway, in the City as a whole, and on a neighborhood basis. It is anticipated that climate change (in addition to development) will cause increases in tree mortality independent of development as many species will be heat/drought stressed. City policy should call for a net increase and a species and age in Greenway's tree cover.</i>	Comment noted. Policies 3.4.2 and 6.4.1 call for a citywide 40% tree canopy, which would be a significant increase from the current estimate of 26%. Staff is open to additions/edits to the policy language if Planning Commission believes that additional specificity on the location and type of tree canopy is needed.

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North Clackamas Watershed Council	12/9/2019	4.4.3	Support the removal of the Kellogg Creek Dam and/or other steps to support a free-flowing the restoration of Kellogg Creek through revegetation of riparian areas with native species, increased channel complexity, pools, floodplain reconnection, large wood placement, and/or other restoration techniques. The Council strongly supports the removal of Kellogg Dam, as we are working in partnership with the City to advance this project. We support the removal not requiring greenway review, and we support the articulation of the restoration of Kellogg Creek. The language should allow flexibility in strategies for stream restoration at the Kellogg Dam/Kellogg Lake site.	Staff is supportive of the proposed changes to a "support a free-flowing" Kellogg Creek, but would advise additional edits be limited to the less prescriptive "and other restoration techniques."
Ken Kraska	1/14/2020	4.4.3	We support North Clackamas Watershed Council's suggested edits, noting that they conclude with "and/or other restoration techniques." Staff asks that the additional edits be limited to a more permissive "and other restoration techniques." However, the inclusion of 'and/or' already renders the language less prescriptive, as only one of the listed steps would have to be supported. Calling out additional options allows the city to demonstrate a commitment to environmental stewardship, and we recommend their inclusion.	Staff believes that the proposed edits in Attachment 3 capture the spirit of NCWC's edits, and that less specificity is warranted and provides for more options in the future.
North Clackamas Watershed Council	12/9/2019	4.6.4	We especially support the language of Policy 4.6.4, noting that enhancing riparian vegetation along Kellogg Creek to improve aquatic habitat conditions for native species will be a higher priority than maintaining or improving views. The current impaired water quality and high temperature of Kellogg Creek requires additional shade as well as other restoration, so this policy is essential to returning Kellogg Creek to unimpaired status.	Comment noted.
North Clackamas Watershed Council	12/9/2019	4.7.1	Providing safe pedestrian access between downtown Milwaukie and the Willamette River has thus far been focused on an alternative crossing of McLaughlin, which, if the Kellogg Dam were to be removed and/or modified, could be located next to a restored Kellogg Creek at the dam site. We support this option should it prove feasible in efforts to address Kellogg Dam. Given the complexity of this project, and the possibilities that restoration may not require full removal of the dam in order to restore a free-flowing creek, the City should acknowledge that subsequent processes addressing the dam may require some modifications to existing plans for this pedestrian connections.	Comment noted.
Linda Hedges	1/8/2020	5 - Section	The commenter noted that the green callout box describing the Community Emergency Response Team (CERT) was inaccurate, in that CERT is sponsored by Clackamas Fire District, and not the City of Milwaukie.	Comment noted. The edit clarifying the sponsorship of the CERT program will be incorporated into a revised version of the policy document in the February 11 meeting packet.
North Clackamas Watershed Council	12/9/2019	5.1 - Goal	Identifying and Reducing Hazard Potential: Identify areas with high natural hazard potential and develop policies and programs to reduce potential negative impacts, and reduce when avoidance is not possible.	Staff does not recommend changes to this goal, as it deals with reduction of negative impacts, and not avoidance.
Ken Kraska	1/14/2020	5.1 - Goal	We strongly support North Clackamas Watershed Council's stance on this issue. Notably, staff does not recommend avoiding potential negative impacts in areas with high natural hazards, rather it suggests merely reducing such impacts. Some suggested edits based on NCWC comments: IDENTIFYING, AVOIDING, AND REDUCING HAZARD POTENTIAL Identify areas with high natural hazard potential and develop policies and programs to avoid or reduce potential negative impacts, reducing impacts when avoidance is not possible.	Staff is not opposed to avoiding impacts in high natural hazard areas. Policy 3.2.4 specifically notes the city's regulatory hierarchy, which lists avoidance as the preferred option. Staff has included minor edits to Goal 5.1 to reference avoidance, but believes the proposed language calling for "reducing impacts when avoidance is not possible" is redundant to the language in Policy 3.2.4.

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Ken Kraska	1/28/2020	5.1 - Goal	We strongly support North Clackamas Watershed Council's stance on this issue, as well as staff's inclusion of minor edits to Goal 5.1 to reference avoidance.	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.1.1	We strongly support the essential role that natural hazards maps play in locating hazards and reducing risks to people, property, and natural systems. Floodplain, FEMA and many other maps are often out of date and fail to account for the changes already being experienced due to climate effects on precipitation regime and increases in impervious surface.	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.1.1 to 5.1.4	Climate change effects are accelerating faster than even recently forecast. We therefore urge the City to use and/or require a conservative standard that acknowledges the new nature of this science, and when the evidence is uncertain, to err on the side of reducing development in areas that may be prone to floods, landslides, unstable slopes and soils, drought, and sea/river level rise. This protects people, property, ecosystems, and public investment.	Comment noted.
Stephan Lashbrook	1/14/2020	5.1.2	Requiring developers to pay for the consulting services needed to accurately evaluate land use applications is a really important policy direction. Other communities in the region are already using this approach and it works. Examples include traffic studies, wetland delineations and determinations of flood elevations.	Comment noted. This is the current practice for natural resource review and for traffic studies.
Ken Kraska	1/14/2020	5.1.3	Development in areas with high risk of natural hazards that cannot be adequately mitigated clearly should be prohibited. To merely "restrict" development in such cases would be poor policy. Encourage and prioritize development in areas with low risk of natural hazards and restrict prohibit development in areas with high risk that cannot be adequately mitigated.	Staff believes that "restrict" continues to be a more appropriate word than "prohibit."
Ken Kraska	1/28/2020	5.1.3	Regarding this provision, staff appears to believe that development in areas with high risk of natural hazards that cannot be adequately mitigated should not be prohibited! Without any substantive justification, staff somehow thinks that high-risk developments for which long-term risks to human life and property cannot be adequately mitigated should be merely "restricted" (term undefined).	Comment noted. Planning Commission discussed Mr. Kraska's proposed edits during their January 28 meeting, and opted not to revise the language in Policy 5.1.3.
North Clackamas Watershed Council	12/9/2019	5.2 - Goal 5.2.3 and 5.2.4	We support the Goal and Policies are largely as written.	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.3 - Goal 5.3.3 and 5.3.4	We support the Goal and Policies are largely as written to the extent that they apply to watershed health.	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.4 - Goal	We strongly support the City's response to this critical topic. We urge the City to develop strong codes and ordinances to implement these policies.	Comment noted.
City of Milwaukie	12/9/2019	5.4.1	In areas where there is a high risk of flooding or other natural hazards, support efforts by the City and other public and private entities to acquire properties for conservation purposes. Restrict development to uses that have a demonstrated community benefit and or for which the natural hazard risks and environmental impacts can be adequately mitigated.	As noted in the January 14 staff report, staff is recommending this minor edit to avoid any confusion on whether development in areas with natural hazard risks should be limited to public projects. During the January 28 public hearing, commissioners indicated their preference keeping "and" in place of "or".

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North Clackamas Watershed Council	12/9/2019	5.4.1	As has already been seen on both FEMA buyouts on Mt. Scott Creek and work by the City of Portland along Johnson Creek, active steps must be taken to restore historic floodplain function. This often includes acquiring properties to create an area that can absorb floodwaters and therefore reduce flood risk to people property downstream. On Johnson Creek this has also provided water quality, habitat, and outdoor recreation benefits. This is often the only alternative to repeated risk to people and property, at public expense, from continuing to rebuild in the floodplain. Given Milwaukie's location in the lower reach of the Kellogg and Mt. Scott watershed, this is a critical policy and program.	Comment noted. Policy 5.4.1 currently includes a reference to acquiring properties for conservation purposes.
Ken Kraska	1/14/2020	5.4.1	Staff characterizes as a "minor edit" a proposal to delete the word "and", replacing it with "or" in this provision. It is unclear where "uses that have a demonstrated community benefit" are limited to or defined as "public projects." We believe however that development, if any, in areas with natural hazards should be limited to public projects, subject to the provisions in Section 5.1. Regarding "support[ing] efforts by the City... to acquire properties for conservation purposes", the use of eminent domain should be limited, and restricted to public projects only, and should be clarified.	Staff believes that the proposed edits to Policy 5.4.1 are an appropriate edit. There is not any discussion of eminent domain in the Comprehensive Plan, and staff does not believe it is appropriate to speculate on its use for acquiring areas with high hazard potential.
Ken Kraska	1/28/2020	5.4.1	Staff characterizes as a "minor edit" a proposal to delete the word "and", replacing it with "or" in this provision, which currently reads: (STAFF NOTE: SEE ATTACHMENT 1). NOTE: Staff believes changing 'and' to 'or' is an "appropriate edit", however they do not address the following public comments submitted 1/14/20 that were omitted from the Public Comments matrix: Under staff's suggested placement of "or", if an applicant simply "demonstrates community benefit" (undefined), they would then be presumably allowed to develop in areas with high risk of flooding or other natural hazards. With this language, it appears there would be the choice to either permissively allow a development in hazard areas (if it has an undefined "demonstrated community benefit") or to prescriptively allow it (when "natural hazard risks and environmental impacts can be adequately mitigated.") Would, for instance, uses that demonstrate benefit to the "development community" be allowed under this provision? [Is also inconsistent with existing language in Policy 3.2.4]	Comment noted. Mr. Kraska's January 14 comments were provided to Planning Commission, but some of his extensive commentary was edited for brevity in the matrix of comments. Commissioners discussed this policy on January 28, and opted not to make staff's recommend edit. Staff is meeting with City Council on February 4 to discuss this policy and will report back to commissioners on February 11.
North Clackamas Watershed Council	12/9/2019	5.4.4	We strongly support the future requirement (rather than simply encouraging) green infrastructure and development practices. This will be essential in modernizing our built environment. We commend the City for taking this step.	Comment noted.

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Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
North Clackamas Watershed Council	12/9/2019	5.4.7 (new)	Proposed New Policy: Create a mechanism that ensures proposed development receive cutting-edge consultation on green infrastructure and development processes early in the development process. <i>Under current practice, proposed development has typically already undergone a significant portion of design before the Council and/or other organizations with the interest and expertise in green infrastructure are notified. This is a significant barrier to instituting green infrastructure since it require re-design work at considerable cost and time. We urge the City to provide notification at the earliest possible pre-design and conference stages, to provide experts and/or expertise regarding cutting edge approaches to developers early, and/or to require these consultations before a preliminary design is created, rather than after the fact.</i>	Staff is not opposed to this policy addition, but is unsure how feasibly it could be implemented given that Milwaukie is a small city with limited resources. Staff has created an online portal and notification process to make pre-application conferences available for public review, which could achieve much of the desired intent of this policy by allowing public comments on development proposals earlier in the process.
Ken Kraska	1/14/2020	5.4.7 (new)	<i>Staff notes that they are "currently in the process of creating an online portal and notification process to make pre-application conferences available for public review.." This is a commendable step! Suggest establishing/publishing a workplan and timeline for implementation.</i>	Comment noted.
Ken Kraska	1/28/2020	5.4.7 (new)	Staff notes that they are "currently in the process of creating an online portal and notification process to make pre-application conferences available for public review." Where should this improvement be referenced in the Comp Plan?	Attachment 2 in the February 11 meeting packet includes a new policy 1.3.4 discussing the online pre-application portal, which was requested by commissioners on January 28.
North Clackamas Watershed Council	12/9/2019	6- Overarching Section Goal	<i>As stated earlier, we applauded the City for taking steps to anticipate and respond to likely climate impacts, and for leading north Clackamas County in this regard.</i>	Comment noted.
North Clackamas Watershed Council	1/14/2020	6 - Section	<i>Support climate policies, but also concerned about keeping water in creeks. Supports the 40% tree canopy goal. Also mentioned that in relation to equity goals, you can see a lot of inequity of trees. Typically upscale neighborhoods have more trees than lower income neighborhoods.</i>	Policy 3.4.4 currently calls for a more "equitable distribution of trees in the city", which staff believes addresses this comment.
North Clackamas Watershed Council	1/22/2020	6- Section (Proposed New Policies)	1. Prioritize low-canopy areas, neighborhoods and census tracts most vulnerable to urban heat islands, low air quality, and low access to nature when locating tree plantings, tree protections and maintenance, and green infrastructure projects. 2. Explore options for public-private partnerships to help reduce or share the cost of tree planting and maintenance in low-income neighborhoods. See January 22 NWC letter for more background/commentary.	Staff has proposed additional edits to Policy 3.4.4 to address the suggestions raised in NWC's first proposed policy addition. Staff concurs with NWC's second proposed policy addition, which is now included (with minor edits) as Policy 3.4.7.
North Clackamas Watershed Council	12/9/2019	6.1.1	<i>Encourage, and eventually require, the use of innovative design and building materials that increase energy efficiency and natural resource conservation, and minimize negative environmental impacts of building development and operation.</i>	Staff recommends against this proposed addition, as "eventually" requiring something does not add anything substantive to the policy language. As time progresses, the city's development code will continue to be modified to reflect industry best practices and community priorities.

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Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/14/2020	6.1.1	NCWC's proposed edit leaves the door open for eventually requiring the use of energy efficient building materials, which is likely more substantive than merely encouraging it. Also aligns language in this provision for consistency with current Policy 5.4.4 "Encourage, and eventually require, green infrastructure and development practices.". Alternatively, suggest the following, based on staff input: Encourage the use of innovative design and building materials that increase energy efficiency and natural resource conservation, and minimize negative environmental impacts of building development and operation. Require the use of energy efficient design and building materials that reflect industry best practices and community priorities.	Policy 6.1.2 mentions providing flexibility in development standards for projects that address climate change and energy conservation based on strategies identified in the Climate Action Plan and/or best available science. Community priorities would be addressed during the land use code updates where the community would provide input on these changes. The wording is too subjective to include in a Comprehensive Plan policy. Staff does not recommend this addition as it is already met with Policy 6.1.2.
Ken Kraska	1/28/2020	6.1.1	Encourage, and eventually require, the use of innovative design and building materials that increase energy efficiency and natural resource conservation, and minimize negative environmental impacts of building development and operation, and reflect industry best practices and community priorities. <i>Staff seems to believe that eventually requiring something "does not add anything substantive." However, the proposed edit leaves the door open for both encouraging and eventually requiring the use of energy efficient building materials; strategies which, in combination, are more substantive than mere "encouragement" (undefined term). And a combined strategy is consistent with that in current Policy 5.4.4 to "Encourage, and eventually require, green infrastructure and development practices." Staff also states that "the city's development code will continue to be modified to reflect industry best practices and community priorities", yet without explanation recommends against including this laudable goal in the Comp Plan.</i>	Commissioners discussed this policy (as well as Policy 5.4.4) on January 28, and opted not to include the "and eventually require" in either policy.
North Clackamas Watershed Council	12/9/2019	6.1.4	We strongly support this statement, and believe this is a critical step to yield multiple benefits, including preserving human health from poor air quality and excessive heat, reducing the urban heat island effect, and to maximize the beneficial effects of tree canopy on property values, community livability, enjoyment, and health. Specifically, tree standards and ordinances must address preservation of large trees on private property as well as in public areas; there is simply not enough public land to reach a 40% canopy goal without preserving trees on private property. These trees deliver public benefits, and their removal imposes public costs of reduced air and water quality benefits, lower neighbors' property values, etc. Furthermore, large trees cannot be replaced by planted trees in any time frame less than multiple generations. While there should be exceptions for hazards and for watershed restoration activities (such as thinning to allow rare Oak habitat to grow) the retention of existing large trees on both public and private land is critical.	Comment noted.
Ken Kraska	1/14/2020	6.1.4	We support the views of North Clackamas Watershed Council, and suggest the following edits: Develop standards and guidelines that contribute to result in attainment of a 40% citywide tree canopy by addressing preservation of large trees on private property as well as in public areas.	This will be looked at during the tree code discussion for the Comprehensive Plan implementation process. This may not be the only way to address tree canopy, which is why Policy 6.1.4 was not specific.

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Ken Kraska	1/14/2020	6.1.5	Create a more energy efficient land use pattern that includes but is not limited to infill and cluster development, neighborhood hubs and increased density, in areas where adaptive reuse of existing housing is not feasible . (Tie to metrics and triggers referenced in 6.3.10).	Adaptive reuse is already mentioned in Policy 6.1.7, which is part of a goal that states prioritization of energy efficiency and climate resiliency for the built environment. Staff does not recommend this addition.
Elvis Clark	1/14/2020	6.1.5	Heat island effects are likely exacerbated by this policy which seeks to increase population density. The research I have seen indicates temperature increases caused by increased local population substantially exceed the temperature increases, locally, due to global climate change.	Policy 6.3.11 encourages the use of materials and site development techniques that can mitigate for climate-change induced impacts such as heat island effect and increased flooding. Policy 6.1.4 states that the city develop standards and guidelines that contribute to a 40% citywide tree canopy. Tree canopy is another way to reduce the heat island effect. Policies under Goal 3.4 Healthy Urban Forest also address adding more trees that provide shade, especially in areas that are canopy-deficient. Staff believes the draft Comp Plan adequately addresses mitigating and minimizing heat island effects within the city. Further details and specifics to address heat island effects will be looked at further during the Comprehensive Plan Implementation process.
Ken Kraska	1/28/2020	6.1.5	Elvis Clark's testimony of 1-14-20 referenced research indicating that heat island effects are exacerbated by increased population density, and that temperature increases cause by increased local population substantially exceed those induced by climate change. Staff in their response deems the use of green building materials and techniques and adding trees as adequately addressing heat island effects in Milwaukee, but is silent on the issue of density. Density is a key contributing factor that should be included somewhere in a Comprehensive Plan.	Comment noted. Commissioners discussed Mr. Clark's comments during their January 28 meeting, and opted not to make any edits to Policy 6.1.5.
North Clackamas Watershed Council	12/9/2019	6.3.12 (new)	Proposed New Policy: Ensure late season instream water availability using a variety of methods including but not limited to stormwater detention, standards for both discharge amount and duration of discharge in stormwater standards, acquisition, lease, and/or transfer of location and purpose of water rights, increased standards for infiltration, reduced impervious surface, and/or other techniques.	Staff believes that this level of detail is more appropriate for the Development Code, and as such recommends against its addition.
Ben Rousseau (CPAC Member)	1/7/2020	7 - Section	The commenter noted that the narrative at the beginning of Section 7 describing the "Key Issue of Equity" does not have any discussion of the role that racial segregation or redlining had in creating the land use and housing framework in the city, region, and nationwide. He felt that leaving out this important context does not provide the context or rationale for why the city is seeking to expand permitted housing types in the city in the interest of improved equity. Like most jurisdictions in the region and the country, institutional racism through a variety of policies, practices and programs, was established to the benefit of white people and the detriment of people of color. This includes the permitted housing types and development standards in Milwaukee's residential zones have resulted in neighborhoods dominated by single housing types (detached single family residences, apartment units, etc.). The Community Vision called for Milwaukee to be an entirely equitable community, and specifically for expanding housing options in all of Milwaukee's neighborhoods to offer opportunities for Milwaukee households across a range of incomes and household sizes.	Staff agrees that additional context on the history of exclusionary zoning and redlining is important when discussing why the city is seeking to expand housing options in the city. Staff is recommending the following edits: Like most jurisdictions in the region and the country, permitted housing types and development standards in Milwaukee's residential zones have resulted in neighborhoods dominated by single housing types (detached single family residences, apartment units, etc.). It is important to recognize that this framework was heavily influenced by institutional racism, with policies, practices and programs such as exclusionary zoning and redlining benefiting white people while specifically targeting people of color. The Community Vision called for Milwaukee to be an entirely equitable community, and specifically for expanding housing options in all of Milwaukee's neighborhoods to offer opportunities for Milwaukee households across a range of incomes and household sizes.

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Ken Kraska	1/14/2020	7 - Section	The City identifies Livability as one of the lenses it utilized in developing the proposed housing goals and policies. However, existing residents' concerns about traffic resulting from increased density, tree protection, and quality design are not currently adequately addressed in this section's policies.	Staff has raised this issue under Key Issue 4 of the January 28 staff report. There are numerous public comments on Sections 7 and 8 related to "livability" concerns such as density, traffic, and neighborhood compatibility. Staff recommends a more detailed discussion of these topics at the January 28 public hearing.
Stephan Lashbrook	1/14/2020	7 - Section	The new Plan includes a focus on missing middle housing and on increasing density in general. I support both of those efforts in concept, understanding full well that significant community debates will be held before details are known. As far as that goes, we can also expect mandates from the State on housing density when the current rule-making process is completed for HB 2001 and HB 2003. For now, I believe Milwaukee should move forward with policy commitments to work through all of that in the interest of expanding housing options. The proposed language on missing middle housing and on density will help to expand housing opportunities for some people who are currently unable to afford housing in Milwaukee.	Comment noted.
David Aschenbrenner	1/14/2020	7 - Section	Do you anticipate any changes to setbacks in Low and Moderate density zones in the future? I would recommend no changes to setbacks.	This will be looked at during the housing portion of the Comprehensive Plan Implementation process. As of now, no changes have been recommended.
Ken Kraska	1/14/2020	7 - Section	Ensure that standards for residential housing style are compatible with existing styles.	The CPAC, Planning Commission and City Council had extensive discussions on how language related to design compatibility can result in policies that are exclusionary and inequitable. Staff would like to discuss this topic as part of the January 28 discussion of Sections 7 and 8.
Ken Kraska	1/28/2020	7 - Section	The City identifies Livability as one of the lenses it utilized in developing the proposed housing goals and policies. However, existing residents' concerns about traffic resulting from increased density, tree protection, and quality design are not currently adequately addressed in this section's policies. Staff commendably recommends a more detailed discussion in this evening of livability concerns such as density, traffic, and neighborhood compatibility.	Comment noted. Planning Commission will be discussing livability as part of their discussion of Section 7 and 8 policies on February 11.
Eugene Trapp	1/28/2020	7 - Section	Summary of 1/28 Oral Testimony: This is Milwaukee not Portland. King Rd and Johnson Creek Blvd are already getting backed up by traffic. Any changes that bring in new housing are likely to result in additional shootings and rapists.	Comment noted. Staff does not agree with Mr. Trapp's commentary on the relationship between additional density and increases in crime. The city values public input, but in the interest of respect and civility, would encourage members of the public to avoid language that might be construed as racist, classist, or otherwise discriminatory.
Barrett Kenney	1/28/2020	7 - Section	Summary of 1/28 Oral Testimony: Not opposed to infill, but agrees that it needs to happen incrementally. There are no sidewalks. Where are people going to park if we bring in all of this density? How are we going to keep kids safe? Perceives that the plan favors developers and pushes more taxes on residents. Transportation needs to be better. Moved to Milwaukee and cannot use the MAX because there is no parking available.	Comment noted. Planning Commission will be discussing the Section 7 policies on February 11.
Clackamas Housing Team	11/21/2019	7.1 - Goal	Proposed New Policy: Promote zoning and code requirements that provide flexibility and remove or prevent potential barriers to temporary shelter/safe overnight shelter development.	Staff believes that existing Policy 7.2.8 largely addresses this comment, but is supportive of additional edits if so directed by Planning Commission.
Ken Kraska	12/10/2019	7.1.2	POLICY 7.1.2 Establish development standards that focus more equally on regulating size, shape, and form and less on the number of housing units.	This policy has been discussed in depth by the CPAC, and as such staff recommends against the proposed edits.

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Ken Kraska	1/14/2020	7.1.2	Establish incremental development standards that focus more on regulating size, shape, style, quality , and form, and less on the number of housing units as well as on density in residential neighborhoods . Staff indicates in its comments [above] that "this policy has been discussed in depth by the CPAC, and as such (it) recommends against the proposed edits." However, in Attachment 5 of your packet there is a letter from the CPAC indicating that decisions were often made "with dissent" and that members of the CPAC believe that "changes...[to the Comp Plan] are still needed." Density and style are key issues for the community, and we believe merit additional discussion and examination by the Planning Commission.	This policy is not one that was subject to significant CPAC dissent. In fact, there was near consensus on the language. Staff would like to discuss this comment in greater detail on January 28 as part of the larger discussion on how to address concerns about neighborhood compatibility.
Ken Kraska	1/28/2020	7.1.2	STAFF NOTE: Mr. Kraska submitted comments that duplicate those that he provided on 1/14/20, with the following additions: "Density and style are key issues for the community, and we believe merit addition discussion and examination by the Planning Commission." "In any case, there is significant dissent and lack of consensus by the public on these issues." "Form-based" zoning code is a current trend favored by developers to maximize profit at the expense of quality, style and space. It is not required by law and should be utilized sparingly and in balanced consideration of other factors such as density, parking, sidewalks and quality streets.	Comment noted. Planning Commission is scheduled to discuss these issues on February 11.
Sara Gross Samuelson	12/13/2019	7.1.8	Please consider local faith communities and non-profits in the list of collaborators. You also have the power as a municipality under HB 2916 passed in the Oregon House to simply state that it is your policy to "allow" non-profit entities and faith communities to utilize their land for temporary housing solutions such as car camping, conestoga huts and other temporary shelter options. Our crisis is big, and complex. Our economy has changed rapidly. And our neighbors have not had the information, education and messaging to be able to grapple with the complexities of WHY the housing crisis exists and WHO our houseless neighbors are. Just as you include language from HB 2001 into the comprehensive plan, I strongly encourage you in this particular policy language and in others like it, to take a look at HB 2916 and consider ways to include those provisions into City of Milwaukie Comp Plan policy.	Staff does not believe that calling out specific partners/collaborators in the policy is necessary, and as such recommends against the proposed changes. The city looks forward to engaging with all stakeholders as it seeks to address housing affordability and houselessness.
Clackamas Housing Team	11/21/2019	7.2 - Goal	Proposed New Policy: Support alternative shelter models such as conestoga hut shelters and/or sleeping pod structures (8' X 12' insulated wooden structures).	Staff recommends that language about temporary shelters be added to existing Policy 7.1.8, in lieu of creating a new policy.
Ken Kraska	12/10/2019	7.2.2	Allow and encourage development of housing types with lower construction costs, provided materials are of good quality and style is specified such that community character is preserved.	Staff recommends against the addition of language that refers to "community character", which can be difficult to define. This policy is specifically related to housing affordability, so any discussion of quality or character should be included in another section, if so desired.

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Ken Kraska	1/14/2020	7.2.2	Allow and encourage development of housing types with lower construction costs. provided materials are of good quality and style is specified such that community character and livability are maintained. <i>Staff comments that community character "can be difficult to define", yet in Policy 8.2.5 there are very clearly defined "policies to promote community character." Staff suggests that quality and character be addressed "in another section, if so desired." We believe style and quality of building materials are important factors that directly relate to Milwaukee's livability and community character, especially in residential areas, and agree they should be included somewhere in the Comp Plan.</i>	Staff would like to discuss potential edits to this policy in the larger discussion of neighborhood compatibility, community character, and livability at the January 28 public hearing.
Ken Kraska	1/28/2020	7.2.2	STAFF NOTE: Mr. Kraska submitted comments that duplicate those that he provided on 1/14/20, with the following additions: <i>"We believe style and quality of building materials are important factors that directly relate to Milwaukee livability and community character, especially in residential areas, and agree they should be included somewhere in the Comp Plan."</i>	Comment noted.
David Aschenbrenner	1/14/2020	7.2.3	<i>If you waive System Development Charges (SDCs) how will you fund infrastructure?</i>	There are several mechanisms to "backfill" waived SDC's, including the use of construction excise tax (CET) funds (for affordable development) and the use of general funds (if authorized by Council). These topics will be discussed in more detail as part of the implementation work in 2020-2021.
Ken Kraska	12/10/2019	7.2.6	Support the continued use and preservation of manufactured homes, both on individual lots in limited specified areas and within manufactured home parks as an affordable housing choice.	As manufactured homes are allowed by state law anywhere that a single family home is allowed, staff recommends against this addition.
Ken Kraska	1/14/2020	7.2.6	<i>Staff in their comment states that "manufactured homes are allowed by state law anywhere that a single family home is allowed." What the law [ORS 197.312(1), as amended] actually says is that cities may not prohibit them "from all residential zones." Under state law, manufactured homes can therefore be limited to specified areas and we believe this should be considered, as increased and random placement of manufactured homes in every single-family neighborhood would adversely affect community character, livability and property values.</i>	ORS 197.314 (Required siting of manufactured homes) states that (1) "within urban growth boundaries each city and county shall amend its comprehensive plan and land use regulations for all land zoned for single-family residential uses to allow for siting of manufactured homes", and that "a local government may only subject the siting of a manufactured home allowed under this section to regulation as set forth in ORS 197.307." ORS 197.307(8) lists the placement standards cities may implement for manufactured homes. It does not say that they can be prohibited in areas that allow for single-family residential units.
Ken Kraska	1/28/2020	7.2.6	<i>Staff's clarifying response is appreciated. We suggest the following edit in congruence with ORS 197.307(8)(g) which allows cities to "subject a manufactured home and the lot upon which it is sited to any development standard, architectural requirement and minimum size requirement to which a conventional single-family residential dwelling on the same lot would be subject." Suggested edit:</i> Support the continued use and preservation of manufactured homes as an affordable housing choice, both on individual lots and within manufactured home parks as an affordable housing choice, and on individual lots subject to single-family developmental standards, architectural and minimum size requirements.	Comment noted. Section 19.506 of the Milwaukee Municipal Code already notes that manufactured homes on individual lots are subject to a minimum floor area of 1,000 sf and must meet the single family design standards in Section 19.505.1. As such, staff does not believe it necessary for the policy to call this out, as it only serves to further the stigma that manufactured homes are by default a significantly inferior and poorly-designed alternative to site-built homes.

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Ken Kraska	12/10/2019	7.3.8	Allow for a specified reduction in required off-street parking, proportionate to allowable density , for new development within these proximity 1/4 mile of light rail stations and ½ mile of frequent bus service corridors that run through existing residential areas . Frequent bus service corridors are those which are traversed by multiple different bus lines. [see also 8.1.8 a)]	Staff recommends against these additions, and believes that this level of detail is more appropriate for the Zoning Code.
Ken Kraska	1/14/2020	7.3.8	Allow for a specified reduction in required off-street parking, in proportion to allowable density , for new development within these proximity 1/8 mile of light rail stations and 1/16 mile of frequent bus service corridors that run through existing residential areas . <i>Use of vague and insubstantive terms such as “close proximity” for such a crucial aspect of urban planning is ill advised. In fact, Milwaukee’s Planning Director has indicated that it could be problematic. Lowering or removing off-street parking requirements will lead to the kind of conditions occurring in Sellwood and other nearby areas of Southeast Portland. Several other members of the public have expressed concerns about traffic congestion, and while a goal of reducing use of private automobiles is laudable, “cars are not going away” as one public commenter stated, and the quality and functionality of residential neighborhoods would be adversely affected were parking requirements not to be properly regulated.</i>	Zoning code amendments are a Type V legislative amendment. This work is also likely to be done as part of the implementation work in 2020/2021, which will include a major public outreach component. Staff continues to believe that including specific distances is more appropriate for the Zoning Code.
Dan Eisenbeis	1/14/2020	7.3.8	<i>The policy should not just consider reduction in parking requirement, but should also consider total elimination of parking as this is a 20-year document and could be a reality within that timeframe.</i>	Comment noted.
<i>Ken Kraska</i>	<i>1/28/2020</i>	<i>7.3.8</i>	<i>Staff states that specifying distances “is more appropriate for the zoning code.” Since a commonly cited standard for “walking distance” is within ¼ mile and “close” proximity (as opposed to reasonable proximity) already is articulating a standard, we agree that both considerations are more appropriate for the zoning code. We propose the following revised edit: Allow for a incremental, specified reductions in required off-street parking, in proportion to allowable density, for new development within these proximity specified distance of light rail stations and frequent bus service corridors running through existing residential areas.</i>	Staff continues to believe that this level of detail is more appropriate for the Zoning Code. However, it encourages Planning Commission to discuss this issue on February 11.
Milwaukee Resident	1/1/2020	7.3.8	<i>While I'm sure this fits the plan for forcing people into using mass transit, I encourage you to look at the mess that is happening throughout Portland and most closely in the Sellwood area. The lack of off street parking is creating a toxic environment within the neighborhood. Not to mention the ridiculous traffic congestion for residents. This is exceptionally a concern when so many mixed used developments are being discussed and planned in our city. I would hope that Milwaukee does not choose to create such an environment for it's residents.</i>	Comment noted.

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Ken Kraska	12/10/2019	7.4.1	Implement land use and public investment decisions and standards that foster creation of denser development in centers, corridors, and neighborhood hubs to support commensurate with development of community gathering places, commercial uses, and other amenities that give people opportunities to socialize, shop, and recreate together.	Staff does not recommend the proposed edit, as it believes it changes the intent of the policy.
Ken Kraska	1/14/2020	7.4.1	Implement land use and public investment decisions and standards that foster creation of denser development in centers, along corridors, and in neighborhood hubs to support and that foster development of accessible community gathering places, commercial uses, and other amenities that give to support people's opportunities to socialize, shop, and recreate together. <i>The proposed edit is consistent with the intent of its section goal, Livability, in that it enhances the ability of Milwaukee's neighborhoods to meet community members' economic, social, and cultural needs and promote their health and well-being. Community members do not desire increased residential density without concomitant support for increases in accessible nearby amenities (like provided for in Neighborhood Hubs- 8.1.4 a)</i>	Staff believes that the proposed edits help to clarify the intent of the policy, and recommend their inclusion (with minor amendments for sentence structure).
Ken Kraska	1/28/2020	7.4.1	<i>We concur with staff's edit of this policy and agree it helps clarify its intent. The proposed edit is also consistent with the intent of its section goal, Livability, in that it enhances the ability of Milwaukee's neighborhoods to meet community members' economic, social, and cultural needs and promote their health and well-being. Community members do not desire increased residential density without concomitant support for increases in accessible nearby amenities (like provided for in Neighborhood Hubs- 8.1.4 a)</i>	Comment noted.
Ken Kraska	12/10/2019	7.4.2	Require that new housing projects improve the quality and connectivity of active transportation modes by providing infrastructure and connections such as sidewalks and bike paths that make it easier and more direct for people to walk or bike to destinations such as parks, schools, commercial services, and neighborhood gathering places, and improve the quality and connectivity of active transportation modes. [see also 8.3.5]	Staff does not believe that the proposed edits improve the policy, and recommends leaving it as is.
Ken Kraska	1/14/2020	7.4.2	Require that new housing projects improve the quality and connectivity of active transportation modes by providing infrastructure and connections such as sidewalks and bike paths that make it easier and more direct for people to walk or bike to destinations such as parks, schools, commercial services, and neighborhood gathering places. <i>We believe that calling out sidewalks and bike paths improves the policy by providing illustrative examples of connections and infrastructure that improve the quality and connectivity of active transportation modes.</i>	Staff continues to believe that the specific reference to sidewalks and bike paths is unnecessary, but will defer to Planning Commission's recommendation.
Ken Kraska	1/28/2020	7.4.2	<i>We believe that calling out sidewalks and bike paths improves the policy by providing illustrative examples of connections and infrastructure (beyond vehicular lane improvements) that improve the quality and connectivity of active transportation modes. Staff states they do not feel this is necessary, however indicate they will defer to the Planning Commission's recommendation on this provision.</i>	Comment noted. Planning Commission is schedule to discuss this topic on February 11.

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Ken Kraska	12/10/2019	7.4.3	Administer development code standards that require new housing to engage with the public realm and provide for and define appropriate setback and lot coverage standards.	Staff does not believe that the proposed edits improve the policy, and recommends leaving it as is.
Ken Kraska	1/14/2020	7.4.3	<i>We recommend improving the policy language with the above edit, as allowing development code that provides for undefined "appropriate" setback and lot coverage standards would be ambiguous and would create significant costs, uncertainty and unintended consequences.</i>	By nature, a Zoning Code includes specific setback and lot coverage standards. A Comprehensive Plan policy is not needed to call for the Zoning Code to define these development standards.
Ken Kraska	1/28/2020	7.4.3	<i>We recommend improving the policy language with the above (STAFF NOTE: 12/10/19) edit, as allowing development code that provides for undefined "appropriate" ad hoc setback and lot coverage standards would be ambiguous and could create significant costs, uncertainty and unintended consequences. NOTE: The following suggested edits are to provide consistent policy regarding scale for residents living in "neighborhood hubs" (8.1.4b), residents living in "transition areas" between lower & higher density residential (7.4.5), and residents living in low density areas near "corridors" (8.1.8e):</i>	Comment noted.
Ken Kraska	12/10/2019	7.4.4	Require that multi-family housing units have access to usable and adequate open space, as defined by City Code , either on-site or adjacent to the site.	Staff is not opposed to the addition of "adequate," but does not believe that referencing City Code is necessary.
Ken Kraska	1/14/2020	7.4.4	Require that multi-family housing units have access to usable and adequate open space, either on-site or adjacent to the site.	Staff has already made this edit in Attachment 3.
Ken Kraska	12/10/2019	7.4.5	Implement development or and design requirements to help create standards that require transitions between lower and higher density residential development areas where the mass, size or scale of the developments differ substantially, as specified in City Code . Requirements could include including massing, buffering, screening, height, form, style and or setback provisions at a scale that fits with what has been historically permitted in the neighborhood . <i>Do we want requirements to "help create" transitions, or standards that require them? The phrase "help create" is undefined and ambiguous. The term "substantially" should be defined in Code.</i>	Staff does not believe that the proposed edits improve the policy, and recommends leaving it as is.
Ken Kraska	1/14/2020	7.4.5	Implement development or and design requirements to help create standards that require transitions between lower and higher density residential development areas where the mass, size or scale of the developments differ substantially, as specified in City Code . Requirements could include including massing, buffering, screening, height, form, style and or setback provisions at a scale that fits with what has been historically permitted in the neighborhood . <i>Staff indicates they would like to include this policy in the discussion on neighborhood compatibility this evening.</i>	This policy is intended to address size and massing, and not style. Staff would like to include it in the larger discussion of neighborhood compatibility on January 28.
Ken Kraska	1/28/2020	7.4.5	Implement development or and design requirements to help create standards that require transitions between lower and higher density residential development areas where the mass, size quality or scale of the developments differ substantially, Requirements could include including massing, buffering, screening, height, form, style and or setback provisions at a scale that fits with what has been historically permitted in the neighborhood . <i>Staff indicates they would like to include this policy in the discussion on neighborhood compatibility this evening.</i>	Mr. Kraska has submitted a slightly revised version of his proposed edits from January 14, which were revised from the version he originally submitted on December 9. Planning Commission is scheduled to discuss these issues on February 11.
Yvonne McVay	1/8/2020	8 - Section	<i>The commenter noted that while they support encouraging public transportation, walking and biking, cars are not going away, especially in poor weather.</i>	Comment noted.

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David Aschenbrenner	1/14/2020	8 - Section	<i>Parking needs to be examined more.</i>	Comment noted.
Ken Kraska	1/14/2020	8 - Section	<i>Overarching Goal emphasizes fostering high quality design that enhances community livability; under best practices this would include architectural style and quality of building materials.</i>	Comment noted.
Elvis Clark	1/14/2020	8 - Section	<i>The Comp Plan should have a policy to prevent increases in density (via re-zoning) to a neighborhood area if its streets lack a sidewalk and are potted and rutted. A policy should incentivize the city to first improve a neighborhood street in poor condition before permitting more people and cars/traffic into and onto it.</i>	This comment is referenced in the January 28 staff report, and staff would like further guidance from Planning Commission on whether a policy needs to be developed regarding this issue.
<i>Elvis Clark</i>	<i>1/26/2020</i>	8 - Section	<i>Staff note: Mr. Clark submitted a follow-up comment letter to his January 14 proposal to tie increased density to infrastructure improvements. His full comments are included in Attachment 1.</i>	Comment noted. Planning Commission is anticipated to discuss this proposal during their February 11 deliberation.
Dan Eisenbeis	1/14/2020	8 - Section	<i>Has concerns about adding language that addresses "community character" in the Comprehensive Plan. Feels that this is subjective language.</i>	Comment noted.
Stephan Lashbrook	1/14/2020	8 - Section	<i>Milwaukee needs to be more aggressive about transit improvements. The Oregon Transit Tax has been in effect since mid-2018. Milwaukee continues to have major employment areas (which are contributing to that tax as well as Trimet's payroll tax) that still receive no transit service. Whether it is via community shuttle service, contracting with a third party or improved service from Trimet, better access to transit is an essential component of Milwaukee's Vision.</i>	Comment noted. This issue will be more directly addressed when Section 13 (Transportation) is updated, but staff is open to any suggested edits to policy language in Section 8 (Urban Design) or other sections.
Stephan Lashbrook	1/14/2020	8 - Section	<i>In several places the proposed Comp Plan policies support the creation of neighborhood hubs. No one is exactly sure how that will all play out but there has been substantial public support for the concept. We may end up with 10 different kinds of neighborhood hubs when all of the implementation work is done. The important part now is that the new Comp Plan policies support moving the conversation to the next step and the proposed language does that.</i>	Comment noted.
Chris Ortolano	1/17/2020	8 - Section	<i>Whereas the citizens of Milwaukee have stated their preference for Neighborhood Hubs as part of the Community Vision, and "some" residential infill with regards to middle housing types, and the Comp Plan update Section 8 proposes to modify the design review process and building standards, it must also be noted that Section 8 Urban Design & Land Use section is lacking any policies to protect the unique form, function, and integrity, of all Milwaukee neighborhoods. Therefore, in order to support the unique form and function of all Milwaukee neighborhoods, I strongly recommend adding a new goal, 8.4 - Neighborhood Integrity and supporting policies, to Section 8 Urban Design and Land Use to support the overarching goal. To support the unique form and function of all Milwaukee neighborhoods, please append the following Goal 8.4 to the Comp Plan Section 8, in addition to the goals already stated.</i>	Comment noted. Staff would like to discuss the commenter's proposed new goal (Goal 8.4) during the January 28 public hearing.
<i>Chris Ortolano</i>	<i>1/28/2020</i>	8 - Section	<i>Summary of 1/28 Oral Testimony: Asked to have the CPAC hold a meeting with leaders of the NDAs to review the Section 8 Urban Design policies. Does not feel that it was discussed well.</i>	Comment noted. Planning Commission is scheduled to discuss Mr. Ortolano's proposed additions to Section 8 on February 11, at which point any additional review of the Section 8 policies can be discussed.

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Ken Kraska	1/28/2020	8 - Section	At the January 14th Planning Commission meeting, Commissioners and members of the public proposed provisional increases in density based on infrastructure improvements, through tying CIP funds to density levels and/or through incentivizing developers who make infrastructure improvements (such as adding sidewalks) with density bonuses (e.g. "triggers" to "unlock density"). We tentatively support such measures.	Comment noted.
Ken Kraska	12/10/2019	8.1.2	Central Milwaukie d) Manage the bulk, style, and form of buildings to provide a transition between Central Milwaukie and adjacent areas with a lower density residential comprehensive plan designation.	The intent of the policy is related to bulk/mass/form and not style, so staff does not recommend the proposed addition.
Ken Kraska	1/14/2020	8.1.2	d) Manage the height, bulk, quality, style and form of buildings and setbacks at a scale that fits with what has been historically permitted in the neighborhood to provide a transition between Central Milwaukie and adjacent areas with a lower density residential comprehensive plan designation.	Staff would like guidance from Planning Commission on January 28 on whether it believes the level of detail proposed in these edits are appropriate for a Comprehensive Plan.
Ken Kraska	1/14/2020	8.1.3	e) Ensure that new development is designed to create a transition to adjoining residentially zoned properties that are at a scale that fits in terms of height, massing, setbacks, and building form, style and quality with what has been historically permitted in the neighborhood. <i>"Form-based" zoning code is a current trend favored by developers to maximize profit at the expense of quality, style and space. It is not required by law and should be utilized sparingly and in balanced consideration of other factors such as density, parking, sidewalks and quality streets.</i>	Staff would like guidance from Planning Commission on January 28 on whether it believes such edits are needed.
Ken Kraska	1/14/2020	8.1.4	b) Ensure that new development projects are at a scale that fits with the height, bulk, building height, bulk, setbacks, style, quality and form of development that has been historically permitted in the neighborhood.	Staff would like guidance from Planning Commission on January 28 on whether it believes such edits are needed.
Ken Kraska	1/28/2020	8.1.4	b) Ensure that new development projects are at a scale that fits with the height, bulk, setbacks, style, quality and form of development that has been historically permitted in the neighborhood.	Mr. Kraska has made minor revisions to his proposed edits from January 14. Staff would like guidance from Planning Commission on February 11 on whether it believes such edits are needed.
Ken Kraska	12/10/2019	8.1.8	Corridors a) Provide opportunities for higher intensity development, as defined in City Code, in areas within walking distance ½ mile of existing or planned frequent transit service, as defined in 7.3.8. b) Ensure that design standards require direct pedestrian connections to the closest transit line in the form of sidewalks. e) Maintain development and design standards that provide for a transition in development intensity between the development site and adjoining areas designated or planned for lower density residential uses, as specified in City Code.	Planning Commission previously discussed whether to include specific distances in the urban design policies, and opted for more general terms such as "within walking distance." As such, staff does not recommend the proposed edit to call out a 1/2 mile radius. Staff also does not believe that the additional proposed edits are necessary.

Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/28/2020	8.1.8	<p>e) Provide opportunities for incremental medium or higher intensity development in areas within specified walking distance of existing or planned or future established frequent transit service, contingent upon provision of accessible sidewalks to nearby transit stops, and provision of funding for repair and widening of streets to create a quality environment for pedestrians and bicycles.</p> <p><i>Staff states that specifying distances "is more appropriate for the zoning code." "Since a commonly cited standard for "walking distance" is within ¼ mile and "close" proximity (as opposed to reasonable proximity) already is articulating a standard, both considerations are more appropriate for the zoning code.</i></p> <p><i>Otherwise, as currently written transit service could be "planned" years in advance, yet never built, meanwhile allowing this provision to apply nearly everywhere. "Higher" as well as other levels of "intensity" need to be defined to be meaningful and avoid unwanted consequences. As others have commented, safe and accessible sidewalks are essential to effectively utilize bus transit. Use of vague and insubstantive terms such as "within walking distance" for such a crucial aspect of urban planning is ill advised.</i></p> <p><i>Miwaukie's Planning Director has indicated concern along these lines.</i></p> <p><i>NOTE: The following text was not included in the last Matrix of Public Comments, as staff indicated they were "too long to fit within the spreadsheet."</i></p> <p><i>During a Planning Commission meeting, Mr. Egner stated:</i></p> <p><i>"We need to have more discussion about how do the corridors overlap around 32nd. 32nd is a frequent transit corridor, and if we talk about a quarter-mile off of that, that's a really big swath that you could potentially have more intense development.</i></p> <p><i>STAFF NOTE: Excel limits the size of rows. Please see Mr. Kraska's January 14/28 public comments for the remainder of his extensive commentary.</i></p>	<p>Comment noted. Planning Commission is requested to discuss this concept on February 11.</p>
Ken Kraska	1/28/2020	8.1.8	<p>Corridors</p> <p>e) Maintain development and design standards that provide for a transition in development intensity between the development site and adjoining areas designated or planned for lower density residential uses, that are at a scale that fits in terms of height, massing, setbacks and building forming, style and quality with what has been historically permitted in the neighborhood.</p>	<p>Mr. Kraska has revised his proposed edits to Policy 8.1.8(e), but appears to have duplicated multiple terms in his proposed track changes that make the intended changes difficult to decipher (see Attachment . Staff would like to discuss any required edits to this policy on February 11.</p>

Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/14/2020	8.1.8	a) Provide opportunities for higher intensity development, as defined in City Code , in areas within walking distance 1/16th of a mile of existing or planned frequent transit service, contingent upon provision of accessible sidewalks to nearby transit stops, and provision of funding for repair and widening of streets to create a quality environment for pedestrians and bicycles. Staff Note: See Mr. Kraska's January 14 letter for his extensive commentary on this topic, which was too long to fit within the spreadsheet. His first and last paragraphs are included below. <i>Transit service could be "planned" years in advance, yet never built, meanwhile allowing this provision to apply nearly everywhere. 'Higher intensity' needs to be defined to be meaningful. As others have commented, safe and accessible sidewalks are essential to effectively utilize bus transit. Use of vague and insubstantive terms such as "within walking distance" for such a crucial aspect of urban planning is ill advised. Milwaukee's Planning Director has indicated concern along these lines. Staff states that Commissioners previously "opted for more general terms", however we request further consideration of this very important policy. Compared to a comprehensive plan, zoning code can be changed relatively easily at any time with little public oversight or input. Although its importance has been downplayed by some, as the guiding document for implementing code, we believe the Comp Plan is as or more important than the code itself.</i>	As noted earlier, staff believes that this level of detail and specificity regarding distances are more appropriate for the Zoning Code. Staff would like guidance from Planning Commission on January 28.
Dan Eisenbeis	1/14/2020	8.1.8	<i>Walking distances should be addressed in the land use code, not the Comprehensive Plan.</i>	Comment noted.
Ken Kraska	1/14/2020	8.1.8	b) Ensure that design standards require direct pedestrian connections to the closest transit line in the form of sidewalks. <i>Busy, rundown streets could constitute direct pedestrian connections without this specificity.</i> e) Maintain development and design standards that provide for a transition in development intensity between the development site and adjoining areas designated or planned for lower density residential uses, that are at a scale that fits in terms of height, massing, setbacks, and building form, style and quality with what has been historically permitted in the neighborhood.	Comment noted. As previously mentioned, staff would like guidance from Planning Commission on January 28 regarding the level of specificity desired in policy language.
Ken Kraska	1/28/2020	8.1.8	b) Ensure that design standards require direct pedestrian connections to the closest transit line in the form of sidewalks. <i>Busy, rundown streets could constitute direct pedestrian connections with this specificity.</i>	Comment noted. Mr. Kraska provided the identical comment on January 14, and staff would like Planning Commissioners to discuss this on February 11.
Ken Kraska	1/14/2020	8.2 - Goal	Enhance livability by establishing urban design concepts and standards that help improve the form and function of the built environment, while maintaining current standards for style and quality of materials.	Mr. Kraska has called for references to style and quality of materials in other sections as well, and staff would like guidance from Planning Commission on any desired edits.
Ken Kraska	1/28/2020	8.2 - Goal	Enhance livability by establishing urban design concepts and standards that help improve the form and function of the built environment, while maintaining current standards for style and quality of materials.	Comment noted. Mr. Kraska provided identical comments in his January 14 letter.

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Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	12/10/2019	8.2.2	Policies related to parking design include: a) Establish parking standards that rely on higher based upon periodically measured levels of active transportation and increased use levels of transportation demand management programs to achieve community design patterns that are more both environmentally and functionally sustainable.	Staff believes that the proposed edits change the intent of the policy, and as such does not recommend their inclusion.
Ken Kraska	1/14/2020	8.2.2	Policies related to parking design include: a) Establish parking standards that rely on higher based upon periodically measured levels of active transportation and increased use levels of transportation demand management programs to achieve community design patterns that are more both environmentally and functionally sustainable. <i>The above would base parking standards on a speculative untested assumption about modes and usage levels of future transportation. A more empirical approach would more accurately and effectively meet the goals of Section 8.2 and assist in meeting the goals of 8.2.6 to properly measure the City's success in enhancing livability. Recommend consideration of a contingent approach like that in Section 9.2.6: Explore conversion of parking lots to parks and recreation opportunities when parking demand decreases.</i>	Comment noted. Staff continues to believe that the proposed edits are more appropriate as Zoning Code development standards, but would like guidance from Planning Commission.
<i>Ken Kraska</i>	<i>1/28/2020</i>	8.2.2	Policies related to parking design include: a) Establish parking standards that rely on higher based upon periodically measured levels of active transportation and increased use levels of transportation demand management programs to achieve community design patterns that are more both environmentally and functionally sustainable. <i>The current language of 8.2.2 would base parking standards on a speculative untested assumption about modes and usage levels of future transportation. A more empirical approach would more accurately and effectively meet the goals of Section 8.2 and assist in meeting the goals of 8.2.6 to properly measure the City's success in enhancing livability. Recommend consideration of a contingent approach like that in Section 9.2.6: Explore conversion of parking lots to parks and recreation opportunities when parking demand decreases.</i>	Comment noted. Mr. Kraska provided identical comments in his January 14 letter. Planning Commission is scheduled to discuss Section 8 policies on February 11.
Ken Kraska	12/10/2019	8.2.5	Policies to promote community character include: c) Encourage green buildings through a program that allows extra building height, as specified in City Code , with the development of a green building. d) Ensure that policies and codes related to urban design and vehicular and human density are consistently and regularly enforced.	Staff does not believe that the proposed edits improve the policy, and recommends leaving it as is.
Ken Kraska	1/14/2020	8.2.5	c) Encourage green buildings through a program that allows extra building height, specified in City Code , with the development of a green building. d) Ensure that policies and codes related to urban design and vehicular and human density are consistently and regularly enforced. <i>The proposed edits improve the policy by assuring that green building height variance limits are properly specified in city code, rather than left vague and undefined. It is important to ensure that codes and policies related to vehicular density and human density are, along with urban design generally, consistently and regularly enforced.</i>	The city does not regulate vehicular and human density as it relates to households, outside of required parking standards and maximum occupancy (via the Building Code). As such, staff continues to recommend against the proposed edits.

Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/28/2020	8.2.5	c) Encourage green buildings through a program that allows specified extra building height with the development of a green building. d) Ensure that policies and codes related to urban design, parking standards and residential density are consistently and regularly enforced. <i>The proposed edits improve the policy by assuring that green building height variance limits are properly specified, rather than left vague and undefined. As an integral component of livability, it is important to ensure that codes and policies related to parking and housing density are, along with urban design generally, consistently and regularly enforced.</i>	Mr. Kraska has proposed slight edits to those he submitted on January 14. Planning Commission is asked to discuss the necessary level of specificity in Policy 8.2.5 at their February 11 meeting.
Ken Kraska	1/14/2020	8.2.6	Develop, monitor and periodically update metrics that evaluate the City's success in achieving Goal 7-3 8.2 . <i>[fixes typo]</i>	There is no Policy 8.2.6. Its inclusion in the draft policy document was the product of cutting and pasting a policy from Section 7 in the wrong place. It will be removed in final version.
Ken Kraska	1/14/2020	8.3.2	Ensure that a clear and objective process is available for all housing types that meet design standards, provide adequate open space, and fit into the community, while offering an alternative discretionary path for non-residential projects that cannot meet these standards. <i>Discretionary design review approaches often result in uncertain, arbitrary, and/or inconsistent decision-making, with potential for conflict over a "more subjective set of design guidelines," and are inappropriate for residential neighborhoods. Staff indicates that if the Planning Commission has similar concerns, they should deleted the second half of the policy ("while offering an alternative...").</i>	The alternative discretionary process is intended to provide a degree of flexibility to residential projects that can't otherwise meet the clear and objective standards. Projects would still be required to meet a set of design guidelines, such as the multifamily design guidelines included in MMC Table 19.505.3.D. Staff does not believe that the alternative discretionary process has resulted in poor or arbitrary design decisions for multifamily development, and that a similar process would be effective for low and medium density residential development. If Planning Commission does not agree, staff would recommend that the second half of the policy ("while offering an alternative...") be deleted, as this policy specifically refers to residential development.
Ken Kraska	1/28/2020	8.3.2	Ensure that a clear and objective process is available for all housing types that meet design standards, provide adequate open space, and fit into the community, while offering an alternative discretionary path for non-residential projects that cannot meet these standards. <i>Discretionary design review approaches often result in uncertain, arbitrary, and/or inconsistent decision-making, with potential for conflict over a "more subjective set of design guidelines," and are inappropriate for residential neighborhoods. Staff indicates that if the Planning Commission has similar concerns, they should deleted the second half of the policy ("while offering an alternative...").</i>	Comment noted. Mr. Kraska submitted the same proposed edits on January 14. Staff continues to recommend that an alternative discretionary path, with well thought out and development design guidelines, be offered for residential development. Planning Commission is scheduled to discuss this issue on February 11.
Ken Kraska	1/14/2020	8.3.3	<i>Bravo! We support the above policy and suggest more specificity in how this will be accomplished.</i>	Staff appreciates the support for this policy. The Planning Department has begun making pre-application notes (required for Type II and Type III land use applications) available on the city website, and will continue to discuss additional ways to foster early public involvement in the land use process.
Ken Kraska	1/28/2020	8.3.3	Expand opportunities for neighborhood district associations (NDAs), and other stakeholders and the public to review information such as pre-application conference notes and provide feedback early in the development process and respond to community concerns with clear, concise, objective information. <i>We support the above policy and suggest more specificity in how this will be accomplished. The Planning Department indicates in their response that they have begun making pre-application notes available on the city website and will continue to discuss additional ways to foster early public involvement in the land use process. This is excellent! [Minor suggested edit added above.]</i>	Staff is not opposed to Mr. Kraska's proposed addition of "and the public", but does not feel that specifically referencing pre-application conference notes is needed in this policy, as a new policy (Policy 1.3.4) has been proposed that specifically discusses the pre-application conference online portal.

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Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/14/2020	8.3.4 (proposed additions)	Expand incentives and refine development standards that help to: f) encourage locally owned and operated developers and builders to invest in Milwaukie g) encourage construction of owner-occupied housing units <i>Above aligns with Policy 11.3.3.</i>	Staff would advise against specifically encouraging more owner-occupied housing, as it is exclusionary in nature and provides a negative connotation of renter-occupied housing, which the HNA shows as needed housing in Milwaukie. Staff is not opposed to proposed edition f), but believes it might be more appropriate as part of the city's housing productions strategy or HNA.
Ken Kraska	1/28/2020	8.3.4 (proposed additions)	Expand incentives and refine development standards that help to: f) encourage locally owned and operated developers and builders to invest in Milwaukie (Staff is not opposed to the above edit.) g) encourage construction of owner-occupied housing units <i>Staff indicates in their response an unsubstantiated belief that owner-occupied housing... is exclusionary in nature and provides a negative connotation [in staff's minds?] of renter-occupied housing. " This is illogical and defies reality. Many of my low-income students are people of color who are striving to own their own home for the stability and economic gains home ownership can provide. There are advantages and disadvantages to both owning and renting one's home. This need not be a zero-sum game. We need to be careful not to conflate the terms "affordable" and "inclusive" with the developer-investor terms "profit margin" and "return on investment." ROI is not the same as DEI. (f) above aligns with Policy 11.3.3: Attract and foster businesses that hire local residents and provide... jobs for employees.</i>	Comment noted. Staff did not mean to suggest that owner-occupied housing on its own is exclusionary in nature, but that explicitly stating a desire and preference for it could be construed as being exclusionary in nature. It recognizes how the phrasing in its original response to Mr. Kraska's comments could be interpreted, and believes this explanation is better rooted in logic and reality. Staff continues to believe that policy language calling for owner-occupied housing, but not renter-occupied housing or all housing, suggests the city's preference for homeowners over renters, and does not recommend the addition of Policy 8.3.4(g).
Ken Kraska	12/10/2019	8.3.5	Require that comprehensive plan amendment applications to low density residential , medium density residential, high density residential, and mixed-use residential consider adequately address walkability, access to frequent transit service, and proximity to parks, schools and commercial services, through the provision of infrastructure and connections described in 7.4.2.	As the low density residential land use designation is the lowest density Comprehensive Plan designation, staff believe it is unnecessary to include it when discussing comprehensive plan amendments. Staff also does not believe that the other proposed edits are necessary.
Ken Kraska	1/14/2020	8.3.5	Require that comprehensive plan amendment applications to low density residential , medium density residential, high density residential, and mixed-use residential consider adequately address walkability, access to frequent transit service, and proximity to parks, schools and commercial services, through the provision of infrastructure and connections such as sidewalks and bike paths. <i>Staff states that "the low density residential land use designation is the lowest density Comp Plan designation", and that comp plan amendment applicants to low density residential need not consider walkability, access to frequent transit service, and proximity to parks, schools and commercial services.</i>	Comment noted. Staff has made its recommendation, and would like guidance from Planning Commission on the level of detail they feel is necessary for this policy.
			<i>Staff apparently believe it is not necessary for comprehensive plan amendment applicants to adequately address walkability, access to frequent transit, and proximity to parks, schools and commercial services, rather, it is enough for applicants to simply "consider" these issues.</i> <i>Staff apparently also believe that it is unnecessary for applicants to address walkability and access to transit through the provision of infrastructure such as sidewalks and bike paths. We encourage the Planning Commission to take a look at the policy language in this section.</i>	

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Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/28/2020	8.3.5	Require that comprehensive plan amendment applications to low density residential , medium density residential, high density residential, and mixed-use residential consider adequately address walkability, access to frequent transit service, and proximity to parks, schools and commercial services, through the provision of infrastructure and connections such as sidewalks and bike paths . <i>Staff states that “the low density residential land use designation is the lowest density Comp Plan designation”, and apparently feel that comp plan amendment applicants to low density residential need not consider walkability, access to frequent transit service, and proximity to parks, schools and commercial services.</i>	Comment noted. Mr. Kraska proposed identical edits and nearly identical commentary in his January 14 letter, which staff has responded to above.
			<i>Staff apparently believe it is not necessary for comprehensive plan amendment applicants to adequately address walkability, access to frequent transit, and proximity to parks, schools and commercial services, rather, it is enough for applicants to simply “consider” these issues.</i>	
			<i>Staff apparently also believe that it is unnecessary for applicants to address walkability and access to transit through the provision of infrastructure such as sidewalks and bike paths. We encourage the Planning Commission to take a look at the policy language in this section.</i>	
Ken Kraska	1/28/2020	8.3.6 (New)	Develop, monitor and periodically update metrics that evaluate the City’s success in achieving Goal 8.2.	Each of the four Section 7 (housing) goals currently include a policy with similar language calling for metrics to evaluate the success of the goal. One of those policies was accidentally cut and pasted into Section 8.3 of the January 14 Comprehensive Plan policy document, but it was not intended to be included. As such, staff would not recommend this addition.
Chris Ortolano	1/17/2020	Goal 8.4 (New)	Goal 8.4: Neighborhood Integrity Increase overall residential density in the Milwaukee area by creating more opportunities for effectively-designed in-fill, redevelopment, and mixed use while considering the impacts of increased residential density on historic, existing, and future neighborhoods.	Staff is generally opposed to terms such as “neighborhood integrity”, as it seems to suggest that increasing density will by nature have and adverse impact on existing neighborhoods. Staff would like to discuss this concept in detail on January 28.
Ken Kraska	1/28/2020	Goal 8.4 (New)	<i>Staff feels that terms such as neighborhood integrity “seem to suggest increasing density will by nature have an adverse effect on existing neighborhoods” However, the proposed new goal actually encourages increasing overall density that is effectively designed.</i>	Comment noted. Planning Commission is scheduled to discuss these issues on February 11.

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Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Chris Ortolano	1/17/2020	Policy 8.4.1 (New)	Develop a design review process that supports residential neighborhoods. Create and adopt design review processes and building standards that: a) Prevents residential infill that would significantly threaten or diminish the stability, quality, positive character, livability or natural resources of residential neighborhoods; and b) Encourages residential infill that would enhance the stability, quality, positive character, livability or natural resources of residential neighborhoods; and c) So long as the goal stated in (a) is met, allow for increased density, a variety of housing types, affordable housing, and mixed-use development; and d) Improves the appearance of buildings and landscapes	City Staff Response/Recommendation Again, staff has concerns about the assertion that density is likely to "threaten or diminish" the stability, quality, and positive character of established neighborhoods.
<i>Ken Kraska</i>	<i>1/28/2020</i>	<i>Policy 8.4.1 (New)</i>	<i>Staff claims that this policy "asserts that density is likely to threaten or diminish... established neighborhoods." However, it doesn't say this is likely across the board. Instead, it actually addresses the fact that some forms of residential infill do threaten and diminish, while other forms of infill enhance, the stability, quality, and positive character of neighborhoods.</i>	Comment noted. Planning Commission is scheduled to discuss these issues on February 11.
Chris Ortolano	1/17/2020	Policy 8.4.2 (New)	Support revitalization of existing housing in residential neighborhoods Conserve the City of Milwaukee's supply of existing affordable housing and increase the stability and quality of older residential neighborhoods, through measures including but not limited to: a) Revitalization b) Code enforcement c) Appropriate zoning d) Rehabilitation programs e) Relocation of existing structures f) Traffic calming g) Parking requirements h) Public safety considerations	The components of this recommended policy seem more appropriate for Section 7 (Housing), if Planning Commission is interested in incorporating any of the language.
<i>Ken Kraska</i>	<i>1/28/2020</i>	<i>Policy 8.4.2 (New)</i>	<i>Staff states that the "components of this recommend policy seem more appropriate for Section 7 (Housing, if Planning Commission is interested in incorporating [it.]" We strongly support the incorporation of this language into Section 7.</i>	Comment noted. Planning Commission is scheduled to discuss both Section 7 and Section 8 goals and policies on February 11.
Chris Ortolano	1/17/2020	Policy 8.4.3 (New)	Mitigate impacts of density in residential neighborhoods Increase overall residential density in the City of Milwaukee by creating more opportunities for effectively-designed in-fill, redevelopment, and mixed use while mitigating the impacts of increased residential density on historic, existing, and future neighborhoods including but not limited to: a) Impacts related to tree canopy in the right of way and on private property b) Impacts related to on-street parking, especially on narrow streets, and intersections where it is difficult to see around corners, especially at grade c) Impacts related to cut-through traffic in neighborhoods where little or no sidewalks exist, and there is no near term plan for adding new sidewalks via SAFE or other programs.	See comments above under Policy 8.4.1.
<i>Ken Kraska</i>	<i>1/28/2020</i>	<i>Policy 8.4.3 (New)</i>	<i>We strongly support this provision.</i>	Comment noted.

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Chris Ortolano	1/17/2020	Policy 8.4.4 (New)	Protect and maintain healthy residential neighborhoods Protect and maintain these healthy, established, residential areas by ensuring compatible design for residential infill development including but not limited to: a) Lot patterns and uses b) Development intensity c) Building mass, scale, orientation and setbacks d) Open space and access to open space e) Impact of vehicle ownership and use	Staff does not recommend the use of the verbs "protect" or maintain when referring to established residential neighborhoods experiencing infill development, as it connotes a history of exclusionary zoning and the need to protect detached single family residences from other housing options, even though many of these housing types were permitted in most residential neighborhoods through the first half of the 20th century. Calling for infill development to be similar in lot pattern, use, development intensity, mass, scale, orientation, setbacks, and vehicle ownership would seemingly limit infill development to only existing (detached single family residential) uses.
Ken Kraska	1/28/2020	Policy 8.4.4 (New)	<i>Staff stipulates they do not recommend the use of some verbs in the Comp Plan. Staff says that to 'protect' or 'maintain' an established residential neighborhood "connotes a history of exclusionary zoning and the need to protect detached single-family residences from other housing options", as though a triplex would in itself cause damage to a single-family residence. Does this mean that to "neglect" or "abandon" existing neighborhoods connotes a commitment to inclusionary zoning? Staff and/or consultants seem to believe that calling for compatible design (including but not limited to several options) would somehow "limit infill development to only existing uses." We believe this is a misleading approach: with some creative thinking we can have inclusionary, mixed income, and racially and ethnically diverse neighborhoods that allow for affordable rental and home ownership opportunities, that are compatible in terms of style, building materials, size and proportion. The real question is how much of an initial and/or ongoing profit margin are we willing to cede to regional but also out of state and foreign developer-landlords, who are now coveting this area? The idle threat that's often bandied about is that developers will 'go elsewhere' if conditions are not up to their liking, but the fact is this is a 'hot' area due to mild climate, nearby mountains and ocean, and good employment market. DEL for POC, low-income and elderly people is not the same as ROI for the "development community." Does a policy of "demolish, pack and stack" connote a commitment to inclusionary zoning, or does it point to an interest in increasing profits and tax revenues?</i>	Comment noted. Planning Commission is scheduled to discuss this proposed policy addition on February 11.
Ken Kraska	1/28/2020	8.4.5 (New)	Explore programs such as density bonuses in exchange for specified percentage of below market rate units for individuals between 30% and 60% AML, based on building capacity or other similar measures.	Staff would like Planning Commission to discuss this proposed addition on February 11. If such policy language is desired by commissioners, staff would recommend that it be added under Goal 7.2 (Housing Affordability), as opposed to this section.
North Clackamas Watershed Council	12/9/2019	9 - Overarching Chapter Goal	To provide for the recreational needs of present and future City residents, while also preserving natural areas. The City will maximize the use of existing public facilities, encourage development of indoor public or private recreational facilities and trails, support dedication and acquisition of land for recreational use and/or habitat conservation, and maintain, expand, and establish/acquire new natural areas for existing natural areas for conservation.	Staff agrees with the proposed edits to this goal.

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North Clackamas Watershed Council	12/9/2019	9.2.7	Given that this site is adjacent to Kellogg Dam, Milwaukie Bay, and the planned trail undercrossing, and that future priorities the City and the Council include the removal of Kellogg Dam and/or fish passage into Kellogg Creek, any plans for this site must be compatible with dam removal and/or restoration of Kellogg Creek to its free-flowing state.	Comment noted.
North Clackamas Watershed Council	12/9/2019	9.3.1 to 9.3.4	We strongly support these policies as articulated. Active transportation networks have valuable ability to combine transportation, human health, and natural area goals, and economic development. Rather than thinking of "nature" and "developed landscapes" as separate, these policies reflect that they can and should be integrated into the community fabric.	Comment noted.
North Clackamas Watershed Council	12/9/2019	9.4 - Goal 9.4.6 and 9.4.7	We support the policies as written. We particularly support and urge strong implementation of 9.4.6 and 9.4.7, as they provide mechanisms for increasing greenspace and public space where there are deficiencies and natural area connections, and providing valuable incentives to developers.	Comment noted.
Ken Kraska	1/14/2020	10.1.1	Maintain and enhance levels of public facilities and services to City residents, businesses, and vulnerable populations as urban development or growth occurs, including but not limited to the provision of sidewalks and repair of streets and roads.	The commenter has made similar suggestions to other policies (calling for sidewalks and street repairs to specifically called out). Staff believes that the policies should be consistent in their level of detail, so recommends that Planning Commission advise on how prescriptive the language should be throughout the document.
<i>Ken Kraska</i>	<i>1/28/2020</i>	10.1.1	Maintain and enhance levels of public facilities and services to City residents, businesses, and vulnerable populations as urban development or growth occurs, including but not limited to the provision of sidewalks and repair of streets and roads. <i>Staff asks for advice on how permissive the language should be.</i>	Comment noted. Mr. Kraska submitted the same proposed edits on January 14.
Ken Kraska	12/10/2019	10.1.2	Ensure that existing residents and taxpayers do not pay for services that don't directly benefit existing Milwaukie residents.	Staff recommends against specifically referencing "existing" residents, as the city may want to pursue programs to encourage annexation (of future residents).
Ken Kraska	1/14/2020	10.1.2	Ensure that existing residents and taxpayers do not pay for services that don't directly benefit existing Milwaukie residents or future annexed residents.	Staff believes that the commenter's revised edit - to reference both "existing" and "future annexed" residents - is redundant, as together they comprise "Milwaukie residents".
<i>Ken Kraska</i>	<i>1/28/2020</i>	10.1.2	Ensure that existing Milwaukie residents and taxpayers do not pay for services that don't directly benefit Milwaukie residents them .	Staff is not opposed to this proposed edits, if Planning Commission believes that it improves the existing draft policy language.
Ken Kraska	12/10/2019	10.1.6	Require developers to pay their proportionate share of the cost of utilities and facilities needed to support their developments, except in such cases where the City may provide incentives to achieve priorities outlined in the City's vision, and as specified in City Development Code.	Staff does not believe referring to existing city code is necessary and as such recommends against the proposed addition.
Ken Kraska	1/14/2020	10.1.6	Require developers to pay their proportionate share of the cost of utilities and facilities needed to support their developments, except in such cases where the City may provide specified incentives to achieve priorities outlined in the City's vision. Clearly delineate developer incentives, so that uses of tax dollars in the form of developer subsidies are transparent to the public. <i>Better integrating the built environment, for example, is a laudable goal. However, developer incentives need to be clearly delineated somewhere, so that uses of tax dollars in the form of developer subsidies are transparent to the public.</i>	Staff supports the use of the term "specified", but does not feel that the second sentence is needed in the Comprehensive Plan.

Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/28/2020	10.1.6	Require developers to pay their proportionate share of the cost of utilities and facilities needed to support their developments, except in such cases where the City may provide specified incentives to achieve priorities outlined in the City's vision. <i>Better integrating the built environment, for example, is a laudable goal. However, developer incentives need to be clearly delineated somewhere, so that uses of tax dollars in the form of developer subsidies are transparent to the public. Staff supports the use of the term "specified" above, but apparently does not feel transparency in city use of tax dollars and developer incentive offers is needed. We urge Commission to examine this issue more closely.</i>	Comment noted. Mr. Kraska has revised his proposed edits from January 14, but appears to still want Planning Commission to consider the proposed second sentence that he included in his January 14 comments. Staff would also note that Goal 1.3 specifically addresses "Maintain[ing] Transparency and Accountability," so commissioners also have the option of recommending discussion of incentives be added under Goal 1.3.
North Clackamas Watershed Council	12/9/2019	10.4.1	<i>We strongly support this acknowledgement of the importance of overall watershed function, floodplain restoration, and the connection between the uplands and flood risk, watershed function, water quality and climate change is a critical recognition; this connection should inform all land-use, stormwater, and natural resources planning.</i>	Comment noted.
North Clackamas Watershed Council	1/14/2020	10.4.9	<i>Noted the need to not only limit impervious surfaces for new development, but to begin removing existing impervious surfaces. Vice Chair Burns asked speaker to work with staff to work on language regarding targets for impervious surface reduction.</i>	Staff believes that the proposed edits to Policy 10.4.9 provide the policy basis for the city to develop specific targets for reducing impervious surfaces in the city. Development of these targets would happen as part of the implementation work for the Comprehensive Plan.
North Clackamas Watershed Council	1/22/2020	10.4.10-12 (Proposed New Policies)	1. Reduce the total Effective Impervious Area in the Kellogg-Mt Scott watershed to 35% throughout the entire watershed by 2040, using a combination of land use, regulatory, incentive, and programmatic tools. 2. Work with jurisdictions upstream in the Kellogg-Mt Scott, Johnson Creek, and Willamette watersheds to advance watershed protections related to land use, impervious surface, stormwater, water quality, and water quantity. 3. Participate in and/or initiate collaborative interagency planning on watershed issues. See NCWC's January 22 comment letter for additional commentary.	Staff believes that the level of detail proposed in the impervious surface target policy (a 35% reduction by 2040) requires additional discussion and consideration by the city's Engineering and Public Works department, and is more appropriate for the Municipal Code or the city's stormwater master plan. The proposed edits to Policy 10.4.9 calls for the city to establish targets. The city agrees with the recommendation to include a policy calling for interagency collaboration with upstream jurisdictions, and has included a new Policy 10.4.10 for Planning Commission to consider.
Ken Kraska	12/10/2019	10.6.5	Work with partners to require streets be designed and maintained to meet the minimum needs of emergency services providers while also ensuring that street widths are appropriate and create a quality safe and usable environment for pedestrians and bicycles.	Staff is not opposed to this proposed addition.
Ken Kraska	1/14/2020	10.6.5	Work with partners to require streets be designed and maintained to meet the minimum needs of emergency services providers while also ensuring that street widths are appropriate and create a quality safe and usable environment for pedestrians and bicycles, making needed improvements as urban development or growth occurs.	Attachment 3 incorporates Mr. Kraska's proposed edits that he submitted on December 10. Staff would like commissioners to discuss his additional edits (calling for improvements as development occurs) on February 11.
Ken Kraska	1/28/2020	10.6.5	Work with partners to require streets be designed and maintained to meet the minimum needs of emergency services providers while also ensuring that street widths are appropriate and create a quality safe and usable environment for pedestrians and bicycles, making needed improvements as urban development or growth occurs. <i>Staff was not opposed to a previous iteration; however, no staff response or recommendation was included for the above revised edit.</i>	A response to Mr. Kraska's January 14 proposed edits was mistakenly left off of the matrix provided in the January 28 meeting packet. As noted in the row immediately above this one, commissioners are asked to discuss the concept of "making needed improvements as urban development or growth occurs" at their February 11 meeting.

Blue = New comments since January 23 *Red = Proposed policy additions*
Italics = General commentary ~~Strikethrough~~ = proposed policy deletions

Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	12/10/2019	10.8.3	PUBLIC SAFETY a) Maintain a public safety building which houses City police services. b) <i>Proposed New Policy</i> : Maintain safe and secure neighborhoods by allocating increased tax revenues resulting from, and commensurate with, increases in density to maintain or exceed present police officer-to-resident ratios in the City.	Staff believes that the proposed policy addition is a finance and budget issue that is more appropriate for the Community Vision. As such, it recommends against its inclusion in the Comprehensive Plan.
Ken Kraska	12/10/2019	10.8.3	Staff comments that "the proposed policy addition is a finance and budget issue that is more appropriate for the Community Vision." However, the American Planning Association's Best Practices for Comprehensive Plans recommends connecting Comp Plans to capital planning and annual budgeting processes.	The City has chosen not to have specified levels of service for police services (as well as parks and recreation and other city services), and as such continues to advise against policy language that calls for maintaining the officer-resident ratio.
Ken Kraska	1/28/2020	10.8.3	STAFF NOTE: Mr. Kraska submitted a duplicate request to add a new Policy 10.8.3(b), which is included above. He also provided the below commentary. "Staff comments that "the proposed policy addition is a finance and budget issue that is more appropriate for the Community Vision." However, the American Planning Association's Best Practices for Comprehensive Plans recommends connecting Comp Plans to capital planning and annual budgeting processes. However, staff's follow-up response on 1/17 does not address the recommendation of the American Planning Association to connect Comp Plans to capital planning and annual budgeting processes. Staff does indicate that "the City has chosen not to have specified levels of service for police" and advises against language maintaining the officer-resident ratio as population density increases! We suggest this be reconsidered, perhaps the City can look at changing its policy to have specified levels of police service based on increased population. "	Comment noted. While the APA recommends connecting capital planning and budgeting to comprehensive planning, it does specifically recommend policies calling for a designated level of service for public safety, or any other public services. The Milwaukee Police Department will continue to work to provide quality police services in the city. If commissioners believe that levels of service should be included in the Comprehensive Plan, policy language should do so consistently for fire protection, police services, library services, parks and recreation services, and other public services, instead of solely calling out a need for increased police services, which could be interpreted as suggesting that more density, on its own, will lead to more crime. Planning Commission will be discussing Section 10 policies on February 11.
Yvonne McVay	1/8/2020	11 - Section	The commenter noted that there is no discussion that Milwaukee is served by only one grocery store, and that the city needs another major grocery store.	Comment noted. Staff believes that the pursuit of additional grocery store options is better suited to economic development programs, as opposed to the Comprehensive Plan. The city's Economic Development Division continues to actively recruit both small and large grocers.
Stephan Lashbrook	1/14/2020	11 - Section	Believes that Milwaukee needs to expand it's use of urban renewal. I think the Comp Plan should contain policy language supporting such urban renewal expansion - even if it may not occur for some years. If the City moves forward toward reducing parking requirements for new developments, urban renewal funds may be needed to pay for parking structures in the downtown and other employment areas. Lake Oswego can provide a model, like the nearly hidden parking structure surrounded by businesses on State Street.	Comment noted. Staff can explore development of a policy related to the expanded use of urban renewal in Section 11, if so directed.

Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Milwaukie Resident	1/1/2020	11.2 - Goal	Milwaukie is a wonderful small town. We should absolutely strive to be self sustainable. We applaud any efforts that are made to make it that way and would encourage more of a focus on the Goal 11.2 - Economic Land Supply. Ensure the City has an adequate supply of land with access to reliable public services that meets the City's economic and employment needs. Policies in which we can encourage business development and give existing residents much needed grocery and other shopping options as well as more employment opportunities should be a top priority. We feel very strongly that bringing more residents into the city with infill projects should be of a lessor priority until they have somewhere to work and buy their basic needs. We also very much appreciate all the efforts to keep our natural areas healthy and hope this continues.	Comment noted.
Ken Kraska	12/10/2019	13 - Section (Transportation)	The City's Transportation Systems Plan (TSP) and the Comprehensive Plan transportation goals and policies were not will be updated as part of the 2019 plan adoption, to ensure congruence between increased density and traffic capacity planning, exercise due diligence, and avoid costly and foreseeable mistakes and potential litigation. Work on the updated TSP is expected to commence in 2020, at which point this chapter will incorporate the updated transportation goals and policies.	The current work plan does not include an update to the TSP. As such, staff does not recommend the proposed edits and additions. Staff has addressed the language regarding land use designations and density ranges in a separate response.
Ken Kraska	1/14/2020	13 - Section (Transportation)	The City's Transportation Systems Plan (TSP) and the Comprehensive Plan transportation goals and policies were not will be updated as part of the 2019 2020 plan adoption, to ensure congruence between increased density and traffic capacity planning, exercise due diligence, and avoid costly and foreseeable mistakes and potential litigation. Work on the updated TSP is expected to commence in 2020, at which point this chapter will incorporate the updated transportation goals and policies.	Staff will need direction from Planning Commission, City Council, and the City Manager if it is to commit to amending the TSP and transportation section of the Comprehensive Plan as part of this Type V land use application to update the Comprehensive Plan policy document. City Council has previously indicated their support for amending the TSP and Section 13 of the Comprehensive Plan as part of a separate Type V legislative amendment.

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Matrix of Public Comments through January 28, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/28/2020	13 - Section (Transportation)	STAFF NOTE: Mr. Kraska submitted duplicate comments to those that he provided on 1/14/20, which are included above and can also be found in Attachment 1 of the February 11 meeting packet.	Comment noted.
Ken Kraska	12/10/2019	Land Use Designations	Summary of Email Exchange with Commenter: List density ranges for each and every implementing zoning district, as opposed to the density ranges for each Comp Plan land use designations (which cover multiple zoning districts, with the exception of moderate density). Also, city notes that this is a minor update, but the update will raise the listed density range for High Density Residential from 21-24 units to 25-32 units per acre.	Staff does not believe that the density ranges for each implementing zoning district need to be listed separately, as they were already adopted into the Zoning Code by ordinance and there are no proposals to change the Zoning Code at this time. However, in the interest of improving the clarity of the document, staff is not opposed to listing them separately, which is how they are listed in the existing Comprehensive Plan policies. In regards to the difference in density ranges for land use designation (HDR) and implementing zoning districts (R-1 and R-1-B), the existing Comprehensive Plan density range of 21-24 units is inconsistent with the R-1 and R-1-B's listed density range of 25-32 units. As state law requires Comprehensive Plans and their implementing ordinances to be consistent, staff is proposing for the Comprehensive Plan land use designations to match the density ranges in the Zoning Code. This section of the Comprehensive Plan will be revisited later in 2020 or 2021 when the city updates its Zoning Code to expand middle housing options in the city.
Elvis Clark	1/14/2020	Land Use Designations	The term "walking distance" is inadequate for the City of Milwaukee. The policy document should revise this term and metric to a concept that is revised to, "safe and accessible walking distance." Does not feel that the neighborhood local streets within a couple of blocks, or less than a quarter mile, from a transit stop, are unsafe for walking and therefore not accessible to transit.	Staff has provided previous guidance advising against the use of specific walking distances, both for the land use designations and several policies in Section 8 (Urban Design). If Planning Commission chooses to provide more specificity in the policies and land use designations, it should be addressed during the January 28 public hearing.
David Aschenbrenner	1/14/2020	Land Use Designations	Has the Units per Acre changed for Low Density 6.3 and Moderate Density 7 to 8.7?	No. The minimum and maximum densities have not changed.
David Aschenbrenner	1/14/2020	Buildable Lands Map	Triangle Park at 37th and Monroe should not be included on the Buildable Lands map.	Staff will review and make necessary edits to the BLI map prior to Council adoption.
Ben Rousseau (CPAC Member)	1/7/2020	Glossary	The commenter felt that the current definition of "equity/equitable" was too weak, and suggested that it be revised as follows: When everyone - regardless of race, ethnicity, age, gender, sexual orientation, religion, zip code, health and ability status, or any other consideration - have equal and inviolable dignity, value, and opportunity to participate justly, fairly, and fully in all dimensions of civic and economic life and to advance their wellbeing, and achieve their full potential.	Staff agrees with this proposed change, which was supported by several additional members in an email thread that was included in Addendum 1 of the January 14 meeting packet. The change will be incorporated into a revised version of the policy document in the February 11 meeting packet.
William Corti	1/3/2020	Non-Policy	The commenter requested that his properties be rezoned to the Downtown Mixed Use (DMU) zone.	Comment noted. The commenter also provided oral testimony at the January 14 public hearing. Any amendments to the Zoning Map will occur during the next (implementation) phase of the project.

Title	Current Draft	Applicable Vision Statement language	Proposed	Goals/Objectives
1 Community Engagement	Engage community members in city decision-making processes in an inclusive, collaborative, transparent, accountable, and equitable manner through a broad range of strategies that inform and involve a full spectrum of community members, including established neighborhood organizations and other groups, as well as people and groups who have been traditionally left out of the planning process.	Milwaukie's government is transparent and accessible, and is committed to promoting tolerance and inclusion and eliminating disparities. It strongly encourages engagement and participation by all and nurtures a deep sense of community through celebrations and collective action. Residents have the resources necessary to access the help they need.		Foster Broad, Effective and Collaborative Community Participation: Implement and encourage practices that increase community participation by providing thorough information, consulting with the community, and fostering collaborative partnerships. Promote Inclusion and Diversity: Involve a diverse cross-section of the community in community events and decision making related to land use and comprehensive planning, including people from a variety of geographic areas, interest areas, income, races, ethnicities, genders, sexual orientations, and all ages and abilities. Maintain Transparency and Accountability: Ensure transparency and accountability in City and land use policy decision-making by maintaining access to City leadership, providing timely and respectful responses to public inquiries, and making a commitment to equitable engagement practices. Uphold Neighborhood District Associations (NDA): Continue to support, inform, consult, and empower community members through the Milwaukie Neighborhood District Associations (NDAs).
2 History, Arts and Culture	Encourage and implement arts, cultural and history-based programs, projects, and spaces that celebrate Milwaukie's diversity and its unique historic, archaeological, and cultural heritage.	Art and creativity are woven into the fabric of the city. In this great city, we strive to reach our full potential in the areas of education, environmental stewardship, commerce, culture, and recreation; and are proud to call it home.		Milwaukie's Heritage: Research, celebrate, document, and protect Milwaukie's unique and diverse historic, archaeological, and cultural heritage Art that Reflects the Community: Collaborate with community partners to create art and programs that reflect Milwaukie's diversity. Fostering Creative Spaces: Encourage the development of creative spaces throughout Milwaukie.
3 Natural Resources and Environmental Quality	Protect, conserve and enhance the quality, diversity, quantity and resiliency of Milwaukie's natural resources and ecosystems, and maintain the quality of its air, land and water. Utilize a combination of development regulations, incentives, education and outreach programs, and partnerships with other public agencies and community stakeholders.	The Willamette River, Johnson Creek, and Kellogg Creek are free flowing, and accessible. Their ecosystems are protected by a robust stormwater treatment system and enhanced by appropriate riparian vegetation.		Prioritize the protection of Milwaukie's natural resources and environmental quality through the use of best available science and increased community awareness and education. Enhance water the quality and of Milwaukie's water resources and ensure they have adequate flows and quantity to support their long-term health. Protect and conserve fish and wildlife habitat. Develop a healthy urban forest in Milwaukie. Encourage and incentivize sustainable design and development practices. Maintain a safe and healthy level of air quality and monitor, reduce, and mitigate noise and light pollution.
4 Willamette Greenway	Protect, conserve, enhance, and maintain the lands and water that comprise the City's portion of the Willamette River Greenway in a manner that recognizes the unique natural, scenic, historical, economic, and recreational qualities that exist along the Willamette River.	The Willamette River, Johnson Creek, and Kellogg Creek are free flowing, and accessible. Their ecosystems are protected by a robust stormwater treatment system and enhanced by appropriate riparian vegetation.		Willamette Greenway Boundary: Maintain the Willamette Greenway Boundary and utilize a Greenway Compatibility Review Boundary to implement Statewide Planning Goal 15. Greenway Design Plan: Allow preparation of a Greenway Design Plan within the Willamette Greenway Boundary. Land Use Review Process: Coordinate public and private land uses and ensure compatibility of uses within the Willamette Greenway. Natural Resource Protection: Protect and conserve the natural resources within the Willamette River Greenway while recognizing recreation needs.

					Recreation: Enhance the recreational use of lands within the Willamette Greenway boundaries while protecting and conserving natural resources. Public Access and View Protection: Provide, improve, and maintain public access and visual access to the lands and water that make up the Willamette River Greenway. Downtown: Maintain Milwaukie Bay Park, Dogwood Park, and Kronberg Park as the key public amenities in the downtown that attract people to the area to enjoy the open space, public trails, riverfront access, and riverfront related development, consistent with the Downtown and Riverfront Land Use Framework Plan and park master plans.
5	Natural Hazards	Protect the Milwaukie community from the threats of natural hazards, including those induced by climate change, through risk minimization, education, and adaptation.	Milwaukie is a resilient community, adaptive to the realities of a changing climate, and prepared for emergencies, such as the Cascadia Event.		Identifying, Avoiding and Reducing Hazard Potential: Identify areas with high natural hazard potential and develop policies and programs to avoid or reduce potential negative impacts. Partnerships and Education: Continue and expand partnerships with government agencies, utilities, and other groups that can help Milwaukie residents prepare for natural hazards. Infrastructure and Building Resiliency: Ensure that the City's built environment and infrastructure are adequately prepared for natural disasters. Adaptation and Mitigation: Develop programs that inform the public about the increased risks from natural hazards and create strategies for how to deal with them.
6	Climate Change and Energy	Conserve energy and be prepared for the anticipated impacts of climate change in Milwaukie through efficient land use patterns, multimodal transportation options, wise infrastructure investments, increased community education and incorporating strategies from the City's Climate Action Plan.	Milwaukie nurtures a verdant canopy of beneficial trees, promotes sustainable development, and is a net-zero energy city.		Built Environment: Create a built environment that prioritizes energy efficiency and climate resiliency and seamlessly integrates the natural environment. Transportation and Utility Infrastructure: Maintain and expand Milwaukie's transportation and utility infrastructure in a manner that facilitates greater redundancy, energy conservation, and emissions reductions. Adaptation and Mitigation: Ensure that the Milwaukie community is informed and prepared to address a changing climate and the need to modify historic norms and behavior.
7	Housing	To provide opportunities for development of housing of a variety of types and at a range of price levels that enhances the community's livability and meets the needs of a full spectrum of Milwaukie residents in an environmentally sustainable and equitable manner.	is entirely equitable, delightfully livable, and completely sustainable. It is a safe and welcoming community whose residents enjoy secure and meaningful work, a comprehensive educational system, and affordable housing.	<i>To achieve housing security for Milwaukie residents of every socioeconomic status and physical ability within dwellings and neighborhoods that are entirely equitable, delightfully livable, and completely sustainable.</i>	Equity: Provide housing options and reduce housing barriers for people of all ages and abilities, with a special focus on people of color, aging populations, and people with low incomes. Affordability: Provide opportunities to develop housing that is affordable at a range of income levels. Sustainability: Promote environmentally and socially sustainable practices associated with housing development and construction. Livability: Enhance the ability of Milwaukie's neighborhoods to meet community members' economic, social, and cultural needs, and promote their contributions to health, well-being, and universal access and design.
8	Urban Design and Land Use	To foster the design of private development and public spaces and facilities in a way that enhances community livability, environmental sustainability, social interaction,	Milwaukie's neighborhoods are the centers of daily life, with each containing amenities and community-minded local businesses that meet residents' needs. Our industrial areas are magnets for innovation, and models for		Design: Use a design framework that considers location and development typology to guide urban design standards and procedures that are customized by zoning district.

		connectivity for all modes of travel, and high-quality landscape and architectural design, and supports the unique form and function of all Milwaukee neighborhoods.	environmentally-sensitive manufacturing and high wage jobs.		Livability: Enhance livability by establishing urban design concepts and standards that help improve the form and function of the built environment. Process: Provide a clear and straight forward design review process for development in Milwaukee along with incentives to achieve desired outcomes.
9	Parks and Recreation	To provide for the recreational needs of present and future City residents, while also preserving natural areas. The City will maximize the use of existing public facilities, encourage development of indoor public or private recreational facilities and trails, support dedication and acquisition of land for recreational use and/or habitat conservation, and maintain, expand, and establish new natural areas for conservation. Future expansion and development of recreational uses and natural areas should be encouraged and focused in existing underserved areas of the Milwaukee community and accessible for all ages and abilities.	In this great city, we strive to reach our full potential in the areas of education, environmental stewardship, commerce, culture, and recreation; and are proud to call it home.		Partnerships and Funding: Continue to work with the City's parks and recreation provider, other public and governmental agencies, and private organizations in providing park and recreational facilities and services, and habitat conservation. Planning and Design: Plan, develop, and enhance natural areas, parks, and recreation opportunities that meet the needs of community members of all ages, abilities, cultures, and incomes while creating solutions that are environmentally sustainable. Transportation and Connectivity: Increase safe and convenient access to and between natural areas, parks, and recreation opportunities for community members of all ages and abilities through a variety of transportation options. Park Development and Maintenance: Maintain, develop, and expand a City-wide park and recreation system which meets the needs and delivers services for all neighborhoods and members of the City as a whole.
10	Public Facilities and Services	Plan, develop and maintain an orderly and efficient system of public facilities and services to serve urban development.	A complete network of sidewalks, bike lanes, and paths along with well-maintained streets and a robust transit system connect our neighborhood centers. Their ecosystems are protected by a robust stormwater treatment system and enhanced by appropriate riparian vegetation. Milwaukee is a resilient community, adaptive to the realities of a changing climate, and prepared for emergencies, such as the Cascadia Event.		Provide high quality public services to current and future Milwaukee residents. Provide an adequate supply and efficient delivery of water services. Continue to provide adequate wastewater collection and treatment services to all Milwaukee residents. Maintain and improve the City's stormwater management system to ensure that waterways are clean and free flowing. Improve and expand solid waste services available to City residents. Maintain facilities and personnel to respond to public safety needs quickly and efficiently. Coordinate with local partners in planning for schools, medical facilities, and other institutional uses. Provide high quality administrative services to the people of Milwaukee while maintaining cost-effectiveness and convenience. Ensure that energy and communications services are adequate to meet residential and business needs.
11	Economic Development	To support a vibrant, resilient, and inclusive local economy that enhances the prosperity and economic well-being of Milwaukee businesses, workers and residents.	Milwaukee's neighborhoods are the centers of daily life, with each containing amenities and community-minded local businesses that meet residents' needs. Our industrial areas are magnets for innovation, and models for environmentally-sensitive manufacturing and high wage jobs.		Current and Future Economic Land Use: Provide a diverse range of uses, services and amenities that contribute to a sustainable, equitable and resilient economy and are adaptable to changing land uses and technology. Economic Land Supply: Ensure the City has an adequate supply of land with access to reliable public services that meets the City's economic and employment needs. Workforce, Training, and Collaboration: Help local businesses attract and develop a skilled workforce that positions Milwaukee to be one of the strongest economies in the region.

12	Urban Growth Management	To coordinate future urban growth, development and provision of city services in a logical, cost-effective, and livable manner, in cooperation with other local, regional and state government agencies and service providers.	Milwaukee's government is transparent and accessible, and is committed to promoting tolerance and inclusion and eliminating disparities. In this great city, we strive to reach our full potential in the areas of education, environmental stewardship, commerce, culture, and recreation; and are proud to call it home.	Regional Coordination: Coordinate with Metro, Clackamas County, Happy Valley, Portland, and other governmental agencies to plan for and manage growth and development in Milwaukee and the surrounding area. Milwaukee Planning Area: Identify the future urban service area and jurisdictional boundary for the City of Milwaukee in order to better coordinate planning actions. Urban Growth Management Agreement with Clackamas County: Use the Urban Growth Management Agreement (UGMA) with Clackamas County to enable the City to work toward annexation of areas within the MPA and to better coordinate regarding County land use and transportation decisions in the area surrounding the City. Annexation: Annex lands within the Milwaukee Planning Area. Urban Services: The City of Milwaukee will coordinate the provision of urban services for land within the MPA. Urban Form: Ensure that the City of Milwaukee (City) maintains an urban form that supports a highly livable community and the efficient use of land and resources.
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