



CITY OF MILWAUKIE

AGENDA

January 28, 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 Information Items

3.0 Audience Participation — This is an opportunity for the public to comment on any item not on the agenda

4.0 Public Hearings — Public hearings will follow the procedure listed on the reverse side

4.1 Summary: Comprehensive Plan Draft Policy Document
Applicant: City of Milwaukie
Address: 10722 SE Main St
File: CPA-2019-001
Staff: David Levitan, Senior Planner

5.0 Planning Department Other Business/Updates

6.0 Planning Commission Committee Updates and Discussion Items — This is an opportunity for comment or discussion for items not on the agenda.

7.0 Forecast for Future Meetings

February 11, 2020 1. Hearing Item: Comprehensive Plan Recommendation
2. Work Session Item: PC Bylaws Amendment; Annual NDA Meeting

February 25, 2020 1. Hearing Item: S-2018-001, Railroad Ave Subdivision

March 10, 2020 No items are currently scheduled for this 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

To: Planning Commission
Through: Dennis Egner, Planning Director
From: David Levitan, Senior Planner
Date: January 21, 2020, for January 28, 2020 Public Hearing
Subject: Continued Public Hearing for Comprehensive Plan Policy Document

ACTION REQUESTED

Continue the public hearing and take oral testimony for application CPA-2019-001, which as proposed would update the Comprehensive Plan policy document, with the exception of the Transportation section. Close the public hearing and begin deliberation by discussing 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 11 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.

BACKGROUND

On January 14, 2020, Planning Commission opened the 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). Planning Commission heard a brief presentation from staff on the project and key issues, which was followed by oral testimony from nine individuals representing themselves and one individual representing the North Clackamas Watershed Council (NCWC). Commissioners had a brief discussion of several key issues at the end of the January 14 meeting, and directed staff to respond to several of them on January 28.

Several individuals who provided oral testimony on January 14 also submitted written comments at or after the public hearing, which are included in Attachment 1. The comments included in Attachment 1 do not include the comments that were included as Addenda 1 and 2 (comments received between January 2 and January 13) at the end of the [January 14 final meeting packet](#). All public comments provided through January 17 (including those provided at the January 14 public hearing) have been added to the updated matrix of comments and staff responses (Attachment 2). Public comments received after January 1 (which were not included in the January 14 meeting version of the document) have the name and date columns **shown in blue** in Attachment 2. As a reminder, general commentary in Attachment 2 is *italicized*, proposed policy additions are in **red**, and proposed policy deletions are in ~~strikethrough~~.

Staff has reviewed all written comments and oral testimony provided through January 17 and provided responses in Attachment 2 and proposed edits to the policies (in track changes) in Attachment 3. As part of Planning Commission's discussion and deliberation on January 28, staff is recommending that commissioners go through Attachment 3 and identify 1) changes that they support and 2) any additional changes to the policies that are still needed based on comments in the matrix.

Planning commissioners asked several questions to commenters and staff during the oral testimony portion of the January 14 public hearing, and asked staff to follow up on several issues and explore changes to the goal and policy language prior to the continued public hearing on January 28. Staff has addressed these issues in the matrix provided in Attachment 2 and has recommended several additional changes to the goal and policies. An updated track changes version of the goals and policies with recommended edits is included in Attachment 3.

KEY ISSUES

Many of the comments and proposed changes raised in advance of and during the January 14 public hearing have been addressed in the updated matrix and revised policies. However, several issues were not completely resolved during the January 14 discussion. Many of these items were identified as Key Issues in the January 14 staff report and are discussed in more detail below.

1. Should the Planning Commission serve as the city’s Community Involvement Advisory Committee (CIAC) for land use and transportation issues?

[Statewide Planning Goal 1](#) calls for the public involvement programs for local jurisdictions to have an officially recognized committee for citizen involvement (CCI) “broadly representative of geographic areas and interests related to land use and land-use decisions.” The city does not currently have a designated CCI, so Policy 1.3.1 calls for Planning Commission to be recognized as the city’s Community Involvement Advisory Committee (CIAC), and that they shall hold an annual meeting to review community involvement practices related to land use and transportation issues.

Planning Commission has received both written and oral testimony on Policy 1.3.1 and had an extensive discussion on January 14 regarding whether Planning Commission should serve in the CIAC role, or if it should be a separate committee. In reviewing the structure at other local cities, several cities utilize their Planning Commission in the CCI role, while others (all larger) have standalone committees.

PC serves as CCI	2019 Population	Standalone CCI	2019 Population
Lake Oswego	39,115	Oregon City	35,570
Wilsonville	25,635	West Linn	25,905
Tualatin	27,135	Beaverton	98,255
		Tigard	53,450
		Hillsboro	103,350

Several commissioners expressed initial support on January 14 for the creation of a separate CIAC, while others felt that Planning Commission should serve in that role. One suggestion mentioned on January 14 was the Planning Commission be supplemented by other community members (such as NDA land use chairs, etc.) when convening as the CIAC. Staff has not revised the language in Policy 1.3.1 but would like to discuss this issue in more detail on January 28 so that Planning Commission can make their recommendation to City Council on February 11.

2. How do other cities treat/discuss homeless shelters in their Comprehensive Plans?

Policy 7.1.8 calls for the city to “Collaborate with community partners to provide a continuum of programs that address the needs of unhoused persons and families, including temporary shelters, long-term housing, and supportive services.” On January 14, Commissioner Travis referenced an email comment (by Sara Gross Samuelson on December 13) that requested that the city specifically reference 2019 House Bill (HB) 2916 in the Comprehensive Plan. HB 2916 modified rules regarding transitional housing in Oregon communities by allowing cities to designate more than two parcels for use as transitional housing, and also expanded the types of housing units allowed for transitional housing to include structures such as tiny homes and tents.

In response to Miss Gross Samuelson’s comments, staff previously recommended that Policy 7.1.8 be revised to reference alternative shelter models that are now permitted under HB 2916, including sleeping pods and conestoga huts. In reviewing other Comprehensive Plans in the region, very few include specific policies regarding homeless shelters, and none have been updated since the passage of HB 2916. Staff believes that the proposed edits to Policy 7.1.8 (calling out alternative, non-permanent shelter types) provide adequate guidance to City Council if it decides to pursue zoning code amendments to expand permitted shelter types or streamline the permitting process for shelters.

3. Is Planning Commission comfortable with staff’s recommended edit to Policy 5.4.1?

As noted in the January 14 staff report, staff is recommending a one-word edit to Policy 5.4.1, so that it reads as follows: “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.” This item was not discussed during the January 14 meeting, so staff would like feedback from Planning Commission on the proposed change. More background on the proposed change can be found in the January 14 staff report.

4. Should the Comprehensive Plan include a policy calling for the creation of a Diversity, Equity, and Inclusion Committee?

The [2017 Community Vision](#) includes an action item (People 1.7) that calls for the city to “form a committee dedicated to equity, diversity and inclusion that evaluates City decisions and actions based on City standards and reviews programs and policies for protected classes.” As noted on January 14, there was consensus from the Comprehensive Plan Advisory Committee (CPAC) that the Comprehensive Plan include a policy referencing the DEI Committee and its role in the land use planning process. Four CPAC members provided oral testimony on January 14 reiterating their support for calling out the DEI Committee in the Comprehensive Plan.

Staff noted its belief that the Vision is the more appropriate document for this action/policy, which extends beyond the issues of land use and transportation planning, and as such has not added a new policy to Section 1 (Community Engagement). If commissioners would like to reference diversity, equity and inclusion in the Comprehensive Plan, staff believes it would be more appropriate to include policy language that describes how DEI issues should be incorporated into the land use planning process (with one option being review by the DEI Committee, should it be created), as opposed to the creation of the DEI Committee. Staff would like to further discuss Planning Commission’s thoughts on this issue, so that it can be incorporated into the commission’s February 11 recommendation.

5. What level of changes/additions are needed for Section 8 (Urban Design)?

As noted in the January 14 staff report, all goals and policies have been pinned down by Council resolution with the exception of the Urban Design and Land Use (Section 8) policies. Along with housing and natural resources/environmental quality, Section 8 received the largest number of public comments, which ranged from calling for the creation of a new goal (Goal 8.4) and supporting policies related to “Neighborhood Integrity”, to recurring recommendations for policy language related to new housing types to match the scale of what

has been “historically permitted”, to more closely tying potential density increases to transportation infrastructure improvements. Similar comments on measures to protect neighborhoods and address building types, traffic, density and tree protection were provided about the “livability goal” for the Housing section (Section 7).

Given the fact that the Section 8 policies were never pinned down by Council, staff believes that they warrant a robust discussion during the January 28 public hearing. Staff has provided preliminary responses in Attachment 2 to the public comments received on the Urban Design policies and may provide an addendum prior to the January 28 meeting. Staff would like direction from Planning Commission in advance of its February 11 meeting, most notably on:

- 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?
- Do commissioners believe there needs to be a policy or policies addressing neighborhood compatibility and neighborhood integrity? Staff and CPAC members have previously expressed reservations about these topics and terms, which can be extremely subjective in nature and can result in exclusionary policy language that serves to limit new housing options in established single family residential neighborhoods.

COMMISSION

1. Staff has made 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 3 includes a list of recommended edits to the policies and land use designations based on comments received by January 17, 2020. 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?

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 on/after January 14	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Updated Matrix of Public Comments and City Responses	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Track Changes Version of Recommended Policy Edits	<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-43>.

THIS PAGE LEFT INTENTIONALLY BLANK



CITY OF MILWAUKIE

To: Planning Commission
From: Dennis Egner, Planning Director and David Levitan, Senior Planner
Date: January 24, 2020, for January 28, 2020 Public Hearing
Subject: CPA-2019-001 Supplemental Staff Report - Comprehensive Plan Update

ACTION REQUESTED

On January 28, Planning Commission is scheduled to take additional testimony as part of the continued public hearing for CPA-2019-001. Upon closure of the public hearing, the Commission will begin its deliberation. In advance of the hearing, staff met with Chair Robert Massey on Wednesday, January 22 to develop an approach for deliberation. Rather than address the key issues at the outset of the deliberation process, staff recommends that the Commission use the set of policies with strike-outs and redline inserts (Attachment 3) as the framework for discussion, and address the key issues as they relate to each section of plan policies.

For example, when reviewing and deliberating on the Section 1 (Community Engagement) policies, commissioners would address the key issues related to the Community Involvement Advisory Committee (CIAC) and diversity, equity, inclusion (DEI) policies that are called out in the January 28 staff report and this supplemental staff report. Once the Commission has worked through Attachment 3 and discussed the key issues identified within the various sections, the Commission would have the opportunity to discuss any other issues, including those identified in the matrix of public comments and staff responses (Attachment 2).

In summary, the approach for deliberation is as follows:

1. Use Attachment 3 as the framework for discussion
2. Address each the key issues identified in the staff report under the appropriate section or sections of Attachment 3
3. Raise other issues or issues identified in the matrix following completion of the review of Attachment 3 and the key issues

The goal for deliberation on January 28 is to pin down as much as of the document as possible and identify a set of changes that require further discussion on February 11. February 11 continues to be the target date for making a Commission recommendation to City Council.

DISCUSSION

This supplemental staff report provides additional information and context for topics that will be discussed at the January 28 hearing. These include additional public comments received from the North Clackamas Watershed Council on January 22; Alternative policy language related to

diversity, equity and inclusion (DEI); a CIAC policy recommendation; and a brief discussion of the urban design and land use policies of Section 8. Each topic is addressed below.

North Clackamas Watershed Council Comments

On January 22, 2020, the North Clackamas Watershed Council (NCWC) submitted a new comment letter, which has been added to Attachment 1 of the revised January 28 meeting packet. NCWC proposed the addition of several new Comprehensive Plan policies, based on inquiries and feedback they received from commissioners during their oral testimony at the January 14 public hearing. Staff has reviewed NCWC's letter and added their comments to Attachment 2 of the revised meeting packet. Staff has also made edits to the proposed policies (visible as track changes in Attachment 3) that incorporate NCWC's comments, in the form of two new policies (3.4.7 and 10.4.10) and revisions to two existing policies (3.3.7 and 3.4.4).

DEI Options

At the public hearing on January 14, the Commission heard testimony from the public and members of the Comprehensive Plan Advisory Committee regarding Section 1 policies related to whether there should be a committee formed to address diversity, equity, and inclusion (DEI). DEI has been an important aspect of the work that has gone into the preparation of the comprehensive plan. In reviewing the draft policies, staff counted 44 different policies that address the topic in nine different sections of the draft plan (see Attachment 4 for a compilation of the policies).

At the January 14 hearing, testimony was offered suggesting that a comprehensive plan policy was needed to say that a DEI committee be formed to advise and monitor the land use and planning process to ensure that DEI principles are followed. In addition, there were comments suggesting that a DEI committee was needed to monitor all City outreach and involvement programs, not just the land use process. Staff has compiled the following alternative options for the Commission:

1. Prepare a separate Planning Commission resolution recommending that the City Council create a new DEI committee that would monitor and advise the City regarding the full range of City outreach and involvement programs.
2. Add a new policy to Section 1 stating that the City will consider diversity, equity, and inclusion when making land use decisions related to map or text amendments to the Comprehensive Plan and any codes or maps implementing the Comprehensive Plan. In addition, diversity, equity, and inclusion will be a consideration when forming any advisory committees for planning projects. A new policy has been drafted and included in the revised version of Attachment 3 for the Commission's consideration.

Please note that the City is in the process of forming a new Comprehensive Plan Implementation Committee (CPIC) to work on code language and map amendments related to the new Comprehensive Plan policies. The CPIC application form includes a question about DEI. In addition, the City intends to hire a consultant to assist with the code writing and the community involvement process. As well as having an overall strong proposal, experience reviewing and writing code to eliminate historic biases will be a graded criterion in the consultant selection process.

CIAC Recommendation

Testimony was received suggesting that the CIAC be either a new independent committee or, if made up of members of the Planning Commission, the CIAC include additional community members to provide a broader perspective. There was discussion about whether the CIAC should advise on involvement activity across all City programs or just focus on planning. Statewide Planning Goal 1 requires that we have a process to evaluate the public involvement program related to planning but not for other City activities. Based on a suggestion from Commissioner Burns, staff recommends that proposed Policy 1.3.1 be modified to add flexibility to the policy by not naming the Planning Commission but simply stating the City Council will appoint a CIAC responsible for complying with state requirements. This would most likely result in a Council resolution that would make the Planning Commission the default CIAC but allow the Council to either expand membership or to shift the responsibility to another independent committee if appropriate and budgeted at some point in the future. Staff has revised Policy 1.3.1 in Attachment 3 to reflect this approach.

Urban Design and Land Use Policies – Section 8

New written testimony was received calling for a new goal for Neighborhood Integrity along with a set of supporting set of policies. Given the focus of the plan on enhancing diversity, equity, and inclusion, staff has concerns that the proposed goal and suggested policies could be interpreted as being exclusionary in nature and used to discourage allowing new housing options in the community. Plan policies need to be addressed in findings when comprehensive plan amendments and zone changes are made. This set of policies are very subjective and could be used to block needed changes, and as such warrant further discussion by Planning Commission.

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. Public Comments Received on/after January 14 (Revised)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2. Matrix of Public Comments and City Responses (Revised)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3. Track Changes Version of Policy Edits (Revised)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
4. Policies related to Diversity, Equity and Inclusion (New)	<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-43>.

THIS PAGE LEFT INTENTIONALLY BLANK

January 14, 2020
Comprehensive Plan Public Hearing

Testimony of Stephan Lashbrook.

My name is Stephan Lashbrook; address 4342 SE Rockwood Street, Milwaukie.

I am not here to represent either the Comp Plan Advisory Committee (CPAC) or the Lewelling Neighborhood Association, although I have been very involved with both. My testimony is mine alone.

I'll start by thanking my cohorts from the CPAC for all of their work and for some really well-thought-out debates on a number of topics. I would also like to thank the staff and consultant team who have done some really fine work to get us where we are tonight. Finally, I'll thank the Planning Commission in advance for the time and effort you have ahead of you to finish this process with a document for City Council adoption.

Most of what I have to say is positive and I want to emphasize that because I am well-aware that the Planning Commission often hears more than enough negative testimony. This set of Comp Plan policies is simply a really good document. Having written numerous planning documents myself through the years, I think I'm qualified to say that this is a really good Comprehensive Plan.

I will limit my comments in the interest of brevity. First, on the positive side:

* 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 certainly is worth striving for and this document will help the community move towards its Vision.

* 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 that conversation to the next step and the proposed language does that.

* Similarly, 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 the 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 Milwaukie 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 Milwaukie.

* Requiring developers to pay for the consulting services needed to accurately evaluate land use applications (page 86, Policy 5.1.2) is a really important policy direction. Other communities in the region are already using this approach and it works. Examples could include traffic studies, wetland delineations and determinations of flood elevations.

On the less positive side:

* I believe Milwaukie will eventually need to expand its use of urban renewal as a means of supporting more public/private partnerships and generating more funding for infrastructure improvements. 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 toward reducing parking requirements for new developments, urban renewal funds may be needed to pay for parking structures in the downtown of other employment areas. Lake Oswego can provide a model.

* While I support the goal of a 40% tree canopy in Milwaukie, and I believe it can be achieved, I am concerned that the subject should always be raised with certain caveats — first, being the right types of trees at the right locations and the second, being the need to protect solar access. Also, it makes no sense to me to encourage more tree planting unless the City is willing to commit to the removal of invasive species that kill trees (e.g., English ivy).

* It is time for Milwaukie to be more aggressive about transit improvements. The Oregon Transit Tax has been in effect since mid 2018. Milwaukie 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 whatsoever. Whether it is via a community shuttle service, contracting with a third party or improved service from TriMet, better access to transit is an essential component of Milwaukie's vision.

* There are numerous provisions in the proposed Plan that imply we will have a future with less vehicle parking. While I totally buy the concept and I am a supporter of transit use, it is safe to say that this will be one of the most contentious parts of the Code work ahead. I urge the members of the Planning Commission to check out the nearly hidden parking structure surrounded by

businesses inside Lake Oswego's commercial development on State Street. We should be able to accomplish something similar in Milwaukie's downtown, without assuming that public parking will not be needed.

Thank you again for your consideration of my comments and for all the work you do for this community.

Stephan A. Lashbrook, AICP retired

My neighbors and I would like to start by thanking the Planning Department staff, the CPAC, and the Planning Commission for their hard work thus far on this major overhaul. It is an honor to be able to weigh in on such a great effort up to this point.

In the Public Comments matrix in your packets, which staff meticulously compiled, there is support for some of the comments received, which is much appreciated. However, unfortunately many of the public comments received were dismissed by staff, often with little to no substantive explanation or justification for these characterizations.

We believe it important to consider that interpretation of the intent, meaning and/or quality of current and proposed policy language is not the sole province of staff, indeed it is specifically the Planning Commission’s charge, in collaboration with the public, to ensure that the intent and goals of policy are effectively adjusted, expanded, and clarified to facilitate effective implementation.

We ask and trust that you will be comprehensive in your consideration and representation as you deliberate on the existing language as well as on incorporation of public comments into the plan.

Summary of Suggestions for Consideration

1. Create incentives for the preservation of large and old-growth trees.
2. Create fees schedules for the demolition of buildings.
3. Avoid natural hazard potentials when cannot be reduced.
4. Prohibit development in areas with high risk that cannot be adequately mitigated.
5. Development, if any, in areas with natural hazards should be limited to public projects.
6. In acquiring properties for conservation purposes, the use of eminent domain should be limited, and restricted to public projects only.
7. Suggest establishing/publishing a workplan and timeline for implementation of the pre-app online portal.
8. Require, rather than merely encourage, the use of energy efficient design and building materials that reflect industry best practices and community priorities.
9. Attain a 40% citywide tree canopy by addressing preservation of large trees on private property as well as in public areas.
10. Include adaptive reuse of existing housing in creating a more energy efficient land use pattern.
11. Establish incremental development standards that focus equally on form and density in residential neighborhoods.
12. Enhance livability by maintaining or exceeding current standards for style and quality of building materials, ensuring that housing construction continues to be of good quality, especially in residential neighborhoods.
13. Ensure that standards for residential housing style are compatible with existing styles.
14. Allow manufactured home on individual lots in limited specified areas.
15. Allow for specified reductions in required off-street parking in proportion to allowable density.
16. Specifically define (in fractions of a mile) “close proximity” and “walking distance” in the Comp Plan.
17. Allow increased residential density only with concomitant support for increases in nearby amenities.

18. Specify sidewalks and bike paths when referencing infrastructure and connections in the Plan.
19. Administer development code that both provides for and defines appropriate setback and lot coverage standards.
20. Implement development and design standards that require transitions between lower and higher density residential development areas.
21. Ensure that new development in each residential neighborhood is 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.
22. Utilize “form-based” approaches to zoning judiciously and in balanced consideration of other factors such as density, parking, sidewalks and quality streets.
23. Provide opportunities for higher intensity development contingent upon provision of accessible sidewalks to nearby existing transit stops, and provision of funding for repair and widening of streets to create a quality environment for pedestrians and bicyclists.
24. Recognize that the most affordable, in-demand, and environmentally friendly homes are those that are already built.
25. Maintain and enhance the quality and functionality of residential neighborhoods by retaining and properly referencing density, style and building materials standards in the Comprehensive Plan.
26. Recognize the Comp Plan as the guiding legal document for implementing city development code and employ reasonable specificity to avoid ambiguity or unintended consequences.
27. Explore reductions in off-street parking requirements when parking demand decreases. Establish parking standards based upon periodically measured levels of active transportation and use levels of transportation demand management programs to achieve community design patterns that are both environmentally and functionally sustainable.
28. Establish policies to promote community character, including encouraging green buildings through a program that allows extra building height, specified in City Code, with the development of a green building.
29. Establish policies to promote community character, including ensuring that policies and codes related to urban design and vehicular and human density are consistently and regularly enforced.
30. Prohibit or severely limit “discretionary design review” approaches in residential zones, which often result in uncertain, arbitrary, and/or inconsistent decision-making, with potential for conflict over more subjective sets of design guidelines.

31. Expand incentives and refine development standards that help to encourage locally or regionally owned and operated developers and builders to invest in Milwaukie, and that encourage construction of owner-occupied housing units, thereby attracting and fostering businesses that hire local residents and provide local jobs and home ownership. Profit potential must be tied to local policy that reflects the citizens who live and vote here. Locally or regionally owned and operated developers and builders are more likely to be accountable and responsive to the needs of the local community than out of state or foreign corporations.

32. Require that comprehensive plan amendment applications to low, medium, high, and mixed-use Density residential 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.

33. Ensure that existing residents and taxpayers do not pay for services that don’t directly benefit existing Milwaukie residents or future annexed residents.

34. 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.

35. Ensure 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.

36. 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.

37. Align with American Planning Association best practices by connecting the Comp Plan to the City’s capital planning and annual budgeting processes.

38. 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. Other progressive U.S. cities have concurrently integrated transportation planning into their comprehensive plans. Milwaukie can be a leader in this regard by extending current timelines and revising the current work plan to include a concurrent update to the TSP, a vital aspect of truly comprehensive land use planning.

Suggested Edits

Matrix labels and headings: Suggest changing the word “City” to “Staff”.

Matrix headings are labeled “City Responses/Recommendations”, we suggest clarifying that these are City *staff* responses & recommendations. Staff are *one* important part of the voice of the City, along with the Planning Commission, City Council, and members of the public.

3.4.5 We support North Clackamas Watershed Council’s stance, and recommend the following edit:

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.

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.

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.

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:

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, reducing impacts when avoidance is not possible. [Might want to check consistency 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.]

5.1.3 Related 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.

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.

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.

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.

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?

[Consistency 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.]

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.

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..” This is a commendable step! Suggest establishing/publishing a workplan and timeline for implementation.

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.

The 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:

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. Require the use of energy efficient design and building materials that reflect industry best practices and community priorities.

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.

6.1.5 Suggested edit to address energy-efficient and sustainable growth in land use:

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].

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:

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.

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.

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.

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.

7.3.8 [revised edit]

Allow for a specified reduction in required off-street parking, in proportion to allowable density, for new development within ~~close proximity~~ 1/8 mile of light rail stations and 1/16 mile of frequent bus service corridors that run through existing residential areas.

Use of vague and insubstantive terms such as “close proximity” for such a crucial aspect of urban planning is ill advised. In fact, Milwaukie’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.

Staff states that specifying distances “is more appropriate for the Zoning Code.” However, compared to a comprehensive plan, zoning code can be changed relatively easily at any time with little public oversight or input. As the guiding document for implementing code, we believe the Comp Plan is as or more important than the code itself.

7.4.1 [revised edit]

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.

The proposed edit is consistent with the intent of its section goal, Livability, in that it enhances the ability of Milwaukie’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 that improve the quality and connectivity of active transportation modes.

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” setback and lot coverage standards would be ambiguous and would create significant costs, uncertainty and unintended consequences.

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.

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.

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.

Section 8 Overarching Goal emphasizes fostering high quality design that enhances community livability; under best practices this would include architectural style and quality of building materials:

8.1.2 d) Manage the height, bulk, style, quality 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.

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.

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

“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.

8.1.8 a)

Provide opportunities for higher intensity development, as defined in City Code, in areas within walking distance 1/16 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. [see policies 10.1.1 & 10.6.5]

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. Milwaukie’s Planning Director has indicated concern along these lines. During a Planning Commission meeting, Mr. Egner 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.

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.

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.]

8.1.8 c)

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.

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 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.

8.2.6 Develop, monitor and periodically update metrics that evaluate the City’s success in achieving Goal ~~7-3~~ 8.2. [fixes typo]

8.2.5 Policies to promote community character include:

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.

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.

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.

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.

Bravo! We support the above policy and suggest more specificity in how this will be accomplished.

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
g) encourage construction of owner-occupied housing units

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 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 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. We encourage the Planning Commission to take a look at the policy language in this section.

10.1.1 [new edit]

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.

10.1.2 [revised edit]

Ensure that existing residents and taxpayers do not pay for services that don’t directly benefit existing Milwaukie residents or future annexed residents.

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.

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.

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.

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>

Dear Planning Commission & Planning Staff,

I appreciated participating in the January 14, 2020 Public Hearing - thank you also for your participation and your work on this very large undertaking for our city. Based on the comments that ensued on the topic of the Diversity, Equity, and Inclusion Committee at the public hearing on Agenda Item #5.1, I don't believe I, perhaps nor staff's Key Issue presented, were entirely understood by the Planning Commission. I would like to offer clarification at this time.

The Key Issue presented by staff was whether or not a policy in the Comprehensive Plan should call for a Diversity, Equity, and Inclusion Committee at the City.

It appeared that some or all members of the Planning Commission interpreted that question to either ask, a) whether or not the Planning Commission should serve as the DEI Committee, or b) whether or not the DEI Committee's sole purpose would be to deal with land use matters. It is my understanding that neither question (a) nor question (b) are the matter at hand, nor is the conversation about the Comprehensive Plan Policies truly the time to discuss either of those questions. As is the case for all policies in the Comprehensive Plan, they necessitate future implementation and codification.

I would now like to reiterate and elaborate on my response to the question at hand that I attempted to speak to at the Public Hearing - whether or not there should be a policy in the Comprehensive Plan that calls for the establishment of a Diversity, Equity, and Inclusion Committee.

There should unequivocally be a direct and compulsory policy in the City of Milwaukie's Comprehensive Plan that calls for the establishment of a Diversity, Equity, and Inclusion Committee.

The Comprehensive Plan cannot be implemented into code, or in any capacity, in complete and earnest intention without the input of specific attention and expertise in the topics of diversity, equity, and inclusion. The Vision charges the Comprehensive Plan and the City itself with unmistakable responsibility to deliver a diverse, equitable, and inclusive city. As a result, it is imperative that a policy in the Comprehensive Plan identifies and calls for the establishment of the DEI Committee, knowing that no other even remotely relevant implementation body exists, and that no implementation of this Comprehensive Plan without such very explicit, direct, and focused input on DEI topics would be acceptable nor sufficient.

Should this policy not be included in the Comprehensive Plan, the City would be doing a complete disservice to the Milwaukie community and would fail to execute its duties at this stage in the Comprehensive Plan update as informed by the already-adopted City Vision. The City's Vision is not a footnote to Planning Commission meetings and it is not to be disregarded in moments of logistical challenge. It would be insulting to all community members and the entire

visioning process to have the first line of the City's Vision be, "In 2040, Milwaukie is a flourishing city that is entirely equitable, delightfully livable, and completely sustainable.," and to not have anything in our following Comprehensive Plan provide policy to enable adequate execution of that vision by a dedicated body. It seems, yet again, as history has shown us is so prone to happen, that issues of diversity, equity, and inclusion are sidelined by those whom the issues do not appear to directly negatively impact, while the issues that are understood to directly impact those in powerful and decision-making positions are given higher priority.

There are many items in the Comprehensive Plan that are unequivocal in demanding attention and change. One simple and illustrative example is the issue of climate change. Because the planet's temperature and its resulting effects are indiscriminate to the backgrounds and privileges of any individual human, the direct and personal impacts are obvious to many people of privilege (please note that in fact negative climate change impacts do categorically disproportionately affect historically marginalized populations and less-privileged individuals, but that climate change also negatively impacts even more-privileged populations). It seems that climate-related policies in the Comprehensive Plan that call for extremely direct and logistically challenging outcomes, such as a 40% tree canopy cover by 2040, are still deliberated but ultimately adopted with far less resistance than those issues regarding diversity, equity, inclusion. I do understand that the 40% tree canopy cover by 2040 goal was determined by a separate document, the Urban Forest Management Plan, and thus need to be pulled into the Comprehensive Plan for consistency. My position is that the issues of diversity, equity, and inclusion be treated equally, seeing as they have already been definitively called out in a separate document, the City's Vision.

I am struck by how tiring it feels to have to repeatedly have this conversation in our community right now for me, someone who is largely of privilege; I can only imagine and will never understand the burdens of our community members of less privilege than I in trying to be heard on these issues.

I reiterate that it is simply not the topic of discussion at this time, nor the responsibility of the Planning Commission alone, to determine who will be a part of the Diversity, Equity, and Inclusion Committee or other finalized implementation measures, just as we also are not outlining exactly the codes and programs that must be determined to implement the rest of the Comprehensive Plan right now, either. For what it is worth, I am certain there are solutions and that with all of the wonderful minds we have on this issue, a workable outcome is well within reach. Anecdotally, I am happy to report that in a 1-hour brainstorming session with six (6) individuals who attended the public hearing, multiple formats were brainstormed, some involving the Planning Commission, some not, some requiring one Planning Commission representative, and so on.

Because I know the topic of funding is repeatedly used as an all-stop for this conversation, I'd like to highlight one more discrepancy in the attention and gravity that the city is treating climate change impacts with as compared to diversity, equity, and inclusion issues. We currently have at least three coordinator staff positions devoted to climate change and environmental services (Climate Action & Sustainability, Environmental Services, and Natural Resources), and we do not yet have a Diversity, Equity, and Inclusion Coordinator. Whether or not and in what timeline that exact role will be filled is again not our problem to solve in this moment, but it seemed starkly evident that there is a discrepancy in City attention and resources between two of the three items listed in the first sentence of our vision (equitable, livable, and sustainable) with no apparent explanation as to why. I sincerely understand the challenges of financial constraints. I also have seen systematic de-prioritization of diversity, equity, and inclusion time and time again and there is no place for it in our City.

While I don't think the question pertains to the matters currently being deliberated at this stage in the Comprehensive Plan adoption process seeing as the Vision provides a clear path to understanding why we need a policy calling for a DEI Committee, I am willing and able to speak to Commissioner Hemer's follow-up question to me generally regarding whether or not, and how, the issues of Diversity, Equity, and Inclusion are related to land use planning. Additionally, because of the gravity of the answer, I feel I am obligated to speak to it.

My first piece of business here is to point out that there is an entire literature already developed and still developing on this topic, and in no way can I illustrate or summarize the breadth nor the depth of the inextricable relationship between land use and equity. I will speak to it in brevity and I hope anyone reading this comments will pursue additional information and reading on the topic: an often-referenced book is *The Color of Law* by Richard Rothstein. In fact, if I recall correctly, the City of Milwaukee hosted an event specific to the Housing portion of this Comprehensive Plan Update wherein Mr. Rothstein was projected onto a screen in front of an entire event hall to discuss this exact topic with a panel of regional experts. I encourage anyone who is contributing to this conversation to watch or re-watch the recording of that event.

My second piece of business here is to do my best to give you the cliff-notes on this relationship between land use and diversity, equity, and inclusion, which I can't help but emphasize ad nauseam cannot be is not exhaustive - this is simply the tip of the iceberg (and this metaphorical iceberg is unfortunately not melting anywhere close to as fast as our geological ones). I also do not currently have the time in this volunteer capacity to write a full analysis of the literature with citations to reference for you, but this is my best summary attempt.

In our current societal structure, land use has been and still is one of the most direct ways, if not the most paramount way, that access to socioeconomic wealth and resources is regulated, and most often, granted by those in power in a community in any given time. These impacts manifest from two different inputs that you may recall from research or reading on civil rights and segregation in our country: "de jure" and "de facto." De jure impacts are those precipitated

by institutional structures, while de facto impacts are those precipitated by social structures. While there is a larger discussion to be had about the City's implicit participation in de facto oppression of historically marginalized communities, land use has been an enormous de jure contributor to oppression of historically marginalized communities. It is our explicit charge to not only neutralize but reverse that oppression to the best of our ability; thus, bringing diversity, equity, and inclusion into the forefront of each and every land use is required to reverse the damage it has already done.

Unfortunately I have not been able to find the citation for this concept, but I imagine that you can conceptually understand the sentiment (I also ask that if anyone recognizes it that they let me know): it is my understanding that the number one economic indicator of socioeconomic status is how far back in someone's lineage the somebody owned property. Generational wealth combined with dramatically increased cost of living in real dollars means our wealth gap is rapidly growing and that wealth gap still strikingly and frighteningly splits on lines of privilege.

Just some of the ways that land use decisions have direct impact on diversity, equity, and inclusion in our City:

- How we regulate what people are allowed to build on their property in a way that either includes or excludes family sizes or multi-generational living, which historically has been largely divided along racial lines and de jure discrimination is coded in things like "matching the style of a neighborhood"
- How and where land use decisions are directly or indirectly facilitating property value shifts and impacting wealth, whether increasing or decreasing
- How our regulations around buildability change property values and immediate affordability of resources in such a dramatic way that shifts in property taxes could burden local residents and cause displacement (often understood as "gentrification" - along with gentrification is a related group behavior called "white flight" that is de facto oppression in the opposite direction as gentrification)
- How we support and incentivize housing affordability across the board to be equitable and available to our diverse and inclusive community so that all people can save as renters and buy as homeowners with the same access to resources
- Where we support affordability to ensure that locations where affordable housing is available to ensure that the locations are not disproportionately isolated from more commercial areas with basic resources, including but not limited to transportation, fresh foods, parks, childcare providers, and healthcare providers
- How and where we facilitate affordable housing in a way that we create income-diverse communities and do not isolate affordable housing to particular areas in the first place
- How we might choose to grapple with our school funding structure that relies on property taxes and so painfully perpetuates wealth inequality and perhaps try to mitigate those effects if not ultimately change our systemic land use and funding regulation around access to schools
- And more.

This is an aside to the Comprehensive Plan Public Hearings, but given the fact that we have to be having this discussion in the rooms of a Planning Commission Public Hearing, I respectfully request that a requirement of the Planning Commission seats be a small reading list and/or a training or course on the history and current status of diversity, equity, and inclusion and its relationship to land use, from the city to the national level. The reality is that land use and its cascading impacts are not only related to, but have been a direct cause (if not the single largest de jure cause) of systematic prejudice and oppression (often in the form of racism, but also across a number of identities). Thus, it is now the absolute obligation of present and future land use decisions to actively implement and uphold systematic diversity, equity, and inclusion. This is simply not an issue that can be left only up to volunteers of the public like myself to raise in public comment. I encourage the City to identify the necessary consultants, reading lists, or coursework to ensure that Planning Commissioners are empowered with the background and contextual knowledge to execute the task at hand given their land use tools - to build Milwaukie into a flourishing city that is entirely equitable, delightfully livable, and completely sustainable.

I want to recognize our Community & Economic Development Departments who appears to be consistently and without hesitation upholding their responsibility to work toward the City's Vision. They have facilitated incredibly important community discussions regarding these issues specifically during the Comprehensive Plan update process and more specifically for the Housing- and Economic Development-related components. I imagine some of the resources the Department already has put together may be helpful to revisit.

I will address one final point brought up at the Public Hearing: the relationship of the state-mandated CIAC and the DEI. This point does not appear to be under the current scope of finalizing the Comprehensive Plan. To the extent that the CIAC needs to be allocated to a particular executionary body should not come at the hamstringing or detriment to the necessity of the DEI. Should, in implementation of the DEI, it be determined that the CIAC responsibilities are best included as part of their task, then so be it. At this time, however, linking the DEI's place in the plan to a state-mandated CIAC is not warranted and it does not adequately address the unique and absolutely critical role of a Diversity, Equity, and Inclusion Committee, which it is plainly evident by the existence of this letter (although otherwise already called for in our Vision) that the City desperately needs.

Thank you for your time and all of your work for our City.

Sincerely,
Celestina DiMauro

Chris Ortolano
11088 SE 40th Ave
Milwaukie, Oregon 97222
(503) 353-3000

David Levitan
Senior Planner, City of Milwaukie
6101 SE Johnson Creek Blvd
Portland, Oregon, 97206

BY EMAIL - January 17, 2020

Dear Mr. Levitan,

I appreciate the opportunity to submit public comments in response to the proposed City of Milwaukie Comp Plan update prior to the Planning Commission public hearing on January 28th.

Please see my recommendations for changes to Section 8 Urban Design and Land Use below.

Sincerely,

Chris Ortolano

The Section 8 Overarching Section Goal is:

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.

Whereas the citizens of Milwaukie 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 Milwaukie neighborhoods. Therefore, in order to support the unique form and function of all Milwaukie 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 Milwaukie neighborhoods, please append the following Goal 8.4 to the Comp Plan Section 8, in addition to the goals already stated:

Goal 8. 1 Design

Goal 8.2 Livability

Goal 8.3 Process

Goal 8.4 - Neighborhood Integrity

Increase overall residential density in the Milwaukie 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.

Policy 8.4.1 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

Policy 8.4.2 Support revitalization of existing housing in residential neighborhoods

Conserve the City of Milwaukie'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

Policy 8.4.3 Mitigate impacts of density in residential neighborhoods

Increase overall residential density in the City of Milwaukie 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.

Policy 8.4.4 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



2416 SE Lake Road, Milwaukie, OR 97222 - 503-550-9282 -
northclackamaswatersheds.org

1/22/20

To: David Levitan, Senior Planner
From: Neil Schulman, Executive Director
cc: Denny Egner, Planning Director, City of Milwaukie
Mark Gamba, Mayor
Lisa Batey, City Councilor
Natalie Rogers, Climate Action Plan Manager

RE: Requested Proposed Policy Language

Thank you for the continued opportunity for the North Clackamas Watersheds Council to participate in the development of the Milwaukie Comprehensive Plan, and to integrate the healthy functioning of watersheds, floodplains, clean water, and adequate water quantity into our city's future. This letter is to provide a response to the requests for some proposed policy language conveyed by the Planning Commission on July 14, and by you in your email and our phone conversation of Jan. 16-17. Here are the requested proposed policies with some appropriate background and source information that may be useful.

Reducing Impervious Surface in the Kellogg-Mt. Scott Watershed

Proposed 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, and water quality, and water quantity.
3. Participate in and/or initiate collaborative interagency planning on watershed issues.

Background:

While a 35% impervious surface area goal is ambitious, it is also essential to a healthy watershed for people as well as fish and wildlife. Impervious surface in the uplands of a watershed significantly decreases that watershed's function. Higher Total Impervious Area (TIA) results in:

1. Increased flashiness (higher peak flows and lower low flows)
2. Reduced groundwater recharge and infiltration
3. Increased hydromodification, where changes in flows alter the shape and function of the stream channel, often resulting in downcutting, loss of floodplain access
4. Impaired water quality from warm water from pavement runoff, which holds less dissolved oxygen needed to support salmon, steelhead, trout and lamprey populations
5. Lower water in the late summer/fall which heats up quickly, and that has insufficient quantity to dilute pollutants
6. Increases in both the area subject to flood risk and the likelihood of high water events. This incentivizes property owners to armor and/or channelize streambanks, which then increases the flood risk for those downstream. Downstream residents then may then do the same, creating a vicious cycle.

TIA of <5% within a watershed results in few changes. Erosion accelerates at a TIA of 8-12%; between 25-35% TIA watersheds typically have a mix of impaired conditions and areas of good habitat and water quality; care must be taken to preserve and link intact areas. Above 45% TIA, changes can become very difficult to reverse. The Kellogg-Mt. Scott Watershed with a 47% TIA (within the likely margin of error of 45%) is at this critical juncture. This makes rapid measures to limit new and remove existing impervious surfaces critical. Because the watershed is partially in the City of Milwaukie, with upstream areas in unincorporated Clackamas County and the City of Happy Valley, interjurisdictional coordination and strong policies in Milwaukie, are both essential.

Methods of addressing impervious surface and its impacts include:

- Limiting construction of new impervious surfaces (roads, buildings, parking lots, etc.) and/or requiring removal of equal or greater impervious surface, or requiring that these surfaces do not flow directly into pipes, streams, and/or stormwater systems
- Incentives and/or requirements for retrofits of existing impervious surface so that it does not drain into streams, reducing Effective Total Impervious Area (ETIA). For example, a parking lot could be retrofitted so its runoff infiltrates

into soil or flows into a constructed wetland instead of the creek or stormwater system.

- Enhancement and/or construction of wetlands, especially in the mid/upper watershed, to absorb high water and slowly release it downstream
- Infiltration credits to create financial incentives for effective impervious surface reduction and allow properties where infiltration is not possible to contribute to the reduction in impervious surfaces
- Retention/increase of tree cover to increase infiltration
- Adequate hydrologic monitoring to assess current conditions and trends and anticipate impacts of zoning

Sources: Clackamas Partnership, 2018; Hawley, et al, 2012, Schuster, et al, 2007, Center for Watershed Protection, 1998; National Marine Fisheries Service, 2016, May, et al, 1997, Wang, et al, 2001, Booth & Jackson, 1997, ESA Recovery Plan for Lower Columbia River Coho Salmon, Lower Columbia River Chinook Salmon, Columbia River Chum Salmon, and Lower Columbia River Steelhead, (National Marine Fisheries Service, 2013).

Habitat Connectivity

Proposed 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.

Background

Habitat parcels must be linked to other habitat parcels to sustain wildlife populations. Larger anchor habitats must be connected to other habitat areas via migration corridors. This allows wildlife and fish to find sufficient food and shelter and move between areas within the urban and suburban landscape. The Habitat Connectivity Work Group, formed to implement the Regional Conservation Strategy for the Greater Portland-Vancouver Region, is mapping habitat corridors, identifying barriers, and refining a toolkit for wildlife passage through developed areas. Key tools for establishing and maintaining corridors are land-use planning, zoning, transportation corridors, trails, parks and natural areas acquisition, easements, natural areas restoration, tree ordinances, and site design criteria for the built landscape, and planting species choices to provide corridors of native plants between natural areas.

Sources: Intertwine Alliance, 2012; Metro, 2020; Carr, et al, 2003; Bliss-Ketchum, 2019

Equity in Tree Canopy Targets

Proposed Policies:

- 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.
- Explore options for public-private partnerships to help reduce or share the cost of tree planting and maintenance in low-income neighborhoods

Background

Low-income communities and communities of color typically have fewer trees in their communities, which results in a range of negative effects, from increased urban heat island effect, higher asthma rates, reduced property value, and reduced access to nature. Jurisdictions in the region are increasingly seeking to offset this longstanding inequity with planning of urban forestry programs, and in the location of future natural areas, parks, trails, and other environmental amenities.

Sources: City of Portland Climate Change Preparation Strategy, 2014; Climate Action Plan, 2015

Thank you for incorporating these elements into the final policies. Please contact us if you have any questions about these comments or wish to discuss them further. We look forward to working with the City to make Milwaukie a thriving, healthy community at the forefront of incorporating nature into all aspects of nature into the city.

Sincerely,



Neil Schulman
Executive Director

THIS PAGE LEFT INTENTIONALLY BLANK

Matrix of Public Comments through January 22, 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	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.	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.
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.
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: 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 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	Enhance and extend community involvement by using emerging technologies, methods and techniques, including the online portal, proper classification of documents, and effective email newsletter and notification management as described in the preamble.	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. New Comment

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.
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.	NDA's 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.
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."

Italics = Commentary ~~Strikethrough~~ = Deletions
Red = Proposed new policy language **Blue = Comment received since January 1**

Matrix of Public Comments through January 22, 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.	Based on feedback provided by commissioners, staff is proposing that the policy be simplified to call for the appointment of a CIAC that meets the requirements of Statewide Planning Goal 1. The revised policy language is included in Attachment 3 of the January 28 meeting packet.
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.

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.
North Clackamas Watershed Council	1/22/2010	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.
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	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.	NCWC 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.

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/14/2020	3.4.5	<i>We support North Clackamas Watershed Council's stance, and recommend the following edit: 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.</i>	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	<i>Evaluate the stormwater and water quantity impacts associated with tree removal as part of the development review process. 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	<i>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.</i>	The City already has fee schedules for the demolition of buildings. As such, it does not believe the proposed edits are necessary.
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.
North Clackamas Watershed Council	12/9/2019	4.4.3	<i>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.</i>	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."

Italics = Commentary
Strikethrough = Deletions
Red = Proposed new policy language **Blue = Comment received since January 1**

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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 McLoughlin, 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.
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.

Italics = Commentary
~~Strikethrough~~ = Deletions
Red = Proposed new policy language
Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
North Clackamas Watershed Council	12/9/2019	5.1.1 to 5.1.4	<i>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.</i>	Comment noted.
Stephan Lashbrook	1/14/2020	5.1.2	<i>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.</i>	Comment noted.
Ken Kraska	1/14/2020	5.1.3	<i>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.</i>	Staff believes that "restrict" continues to be a more appropriate word than "prohibit."
North Clackamas Watershed Council	12/9/2019	5.2 - Goal 5.2.3 and 5.2.4	<i>We support the Goal and Policies are largely as written.</i>	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.3 - Goal 5.3.3 and 5.3.4	<i>We support the Goal and Policies are largely as written to the extent that they apply to watershed health.</i>	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.4 - Goal	<i>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.</i>	Comment noted.
City of Milwaukie	12/9/2019	5.4.1	<i>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.</i>	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.
North Clackamas Watershed Council	12/9/2019	5.4.1	<i>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.</i>	Comment noted. Policy 5.4.1 currently includes a reference to acquiring properties for conservation purposes.

Italics = Commentary
~~Strikethrough~~ = Deletions
Red = Proposed new policy language
Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.	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.
North Clackamas Watershed Council	12/9/2019	5.4.4	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.	Comment noted.
North Clackamas Watershed Council	12/9/2019	5.4.7 (new)	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.	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>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> <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>	Comment noted.
North Clackamas Watershed Council	12/9/2019	6- Overarching Section Goal	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.	Comment noted.
North Clackamas Watershed Council	1/14/2020	6 - Section	As stated earlier, we applaud the City for taking steps to anticipate and respond to likely climate impacts, and for leading north Clackamas County in this regard.	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)	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.	Staff has proposed additional edits to Policy 3.4.4 to address the suggestions raised in NCWC's first proposed policy addition. Staff concurs with NCWC's second proposed policy addition, which is now included (with minor edits) as Policy 3.4.7.
			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 NCWC letter for more background/commentary.	

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
North Clackamas Watershed Council	12/9/2019	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.	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.
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.
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 entirely 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.
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).	This is mentioned in Policy 6.1.7 already, 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.

Italics = Commentary
Strikethrough = Deletions
Red = Proposed new policy language
Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Elvis Clark	1/14/2020	6.1.5	<i>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.</i>	Policy 6.3.1.1 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.
North Clackamas Watershed Council	12/9/2019	6.3.12 (new)	<i>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.</i>	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	<i>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.</i>	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.
Ken Kraska	1/14/2020	7 - Section	<i>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.</i>	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.

Italics = Commentary
Red = Proposed new policy language
Blue = Comment received since January 1
~~Strikethrough = Deletions~~

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.	City Staff Response/Recommendation 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.
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.
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.
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 Milwaukee 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.

Italics = Commentary
~~Strikethrough~~ = Deletions
Red = Proposed new policy language
Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.
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 Milwaukie'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.
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	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.

Italics = Commentary
Red = Proposed new policy language
Blue = Comment received since January 1
~~Strike through~~ = Deletions

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/14/2020	7.3.8	<p>Allow for a specified reduction in required off-street parking, in proportion to allowable density, for new development within elsewhere 1/8 mile of light rail stations and 1/16 mile of frequent bus service corridors that run through existing residential areas.</p> <p><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.</i></p> <p><i>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></p> <p><i>Staff states that specifying distances “is more appropriate for the Zoning Code.” However, compared to a comprehensive plan, zoning code can be changed relatively easily at any time with little public oversight or input. As the guiding document for implementing code, we believe the Comp Plan is as or more important than the code itself.</i></p>	<p>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.</p>
Dan Eisenbeis	1/14/2020	7.3.8	<p><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></p>	
Milwaukee Resident	1/1/2020	7.3.8	<p><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></p>	<p>Comment noted.</p>
Ken Kraska	12/10/2019	7.4.1	<p>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.</p>	<p>Staff does not recommend the proposed edit, as it believes it changes the intent of the policy.</p>

Italics = Commentary
Red = Proposed new policy language
Blue = Comment received since January 1
~~Strikethrough~~ = Deletions

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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	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	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 need to call for the Zoning Code to define these development standards.
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 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 massing, buffering, screening, height, or setback provisions.	Staff does not believe that the proposed edits improve the policy, and recommends leaving it as is.

Italics = Commentary
Strikethrough = Deletions
Red = Proposed new policy language **Blue = Comment received since January 1**

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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 setback provisions at a scale that fits with what has been historically permitted in the neighborhood . 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.	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.
Yvonne McVay	1/8/2020	8 - Section	The commenter noted that while they support encouraging public transportation, walking and biking, cars are not going away, especially in poor weather.	Comment noted.
David Aschenbrenner	1/14/2020	8 - Section	Parking needs to be examined more.	Comment noted.
Ken Kraska	1/14/2020	8 - Section	Overarching Goal emphasizes fostering high quality design that enhances community livability; under best practices this would include architectural style and quality of building materials.	Comment noted.
Elvis Clark	1/14/2020	8 - Section	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.	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.
Dan Eisenbeis	1/14/2020	8 - Section	Has concerns about adding language that addresses "community character" in the Comprehensive Plan. Feels that this is subjective language.	Comment noted.
Stephan Lashbrook	1/14/2020	8 - Section	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.	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	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.	Comment noted.

Italics = Commentary
Strikethrough = Deletions
Red = Proposed new policy language **Blue = Comment received since January 1**

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Chris Ortolano	1/17/2020	8 - Section	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.	Comment noted. Staff would like to discuss the call of a new goal (Goal 8.4) during the January 28 public hearing.
Ken Kraska	12/10/2019	8.1.2	Central Milwaukee d) Manage the bulk, style, and form of buildings to provide a transition between Central Milwaukee 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 Milwaukee 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 in terms of 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.

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	12/10/2019	8.1.8	<p>Corridors</p> <p>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.</p> <p>b) Ensure that design standards require direct pedestrian connections to the closest transit line in the form of sidewalks.</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, as specified in City Code.</p>	<p>Planning Commission previously discussed whether to include specific distances in the urban design policies, and opted for more general terms such as "withing 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.</p>
Ken Kraska	1/14/2020	8.1.8	<p>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.</p> <p>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.</p> <p align="center"><i>Transit service</i></p> <p>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.</p> <p>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.</p>	<p>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.</p>
Dan Eisenbeis	1/14/2020	8.1.8	<p><i>Walking distances should be addressed in the land use code, not the Comprehensive Plan.</i></p>	
Ken Kraska	1/14/2020	8.1.8	<p>b) Ensure that design standards require direct pedestrian connections to the closest transit line in the form of sidewalks.</p> <p align="center"><i>Busy, rundown streets could constitute direct pedestrian connections without this specificity.</i></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 form, style and quality with what has been historically permitted in the neighborhood.</p>	

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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 edit.
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 measured 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 measured 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.
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.
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>	Staff has revised the policy to property reference Goal 8.2.

Italics = Commentary
Red = Proposed new policy language
Blue = Comment received since January 1

~~Strikethrough~~ = Deletions

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ken Kraska	1/14/2020	8.2.6	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.</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	1/14/2020	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	1/14/2020	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 Milwaukee g) encourage construction of owner-occupied housing units <i>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 Milwaukee. 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	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 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>	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> <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>	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.

Italics = Commentary
~~Strikethrough~~ = Deletions
Red = Proposed new policy language
Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.
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	Again, staff has concerns about the assertion that density is likely to "threaten or diminish" the stability, quality, and positive character of established neighborhoods.
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.
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.
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 Building mass, scale, orientation and setbacks Open space and access to open space 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.

Italics = Commentary
Red = Proposed new policy language
Blue = Comment received since January 1

~~Strike through~~ = Deletions

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.
North Clackamas Watershed Council	12/9/2019	9.2.7	<i>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.</i>	Comment noted.
North Clackamas Watershed Council	12/9/2019	9.3.1 to 9.3.4	<i>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.</i>	Comment noted.
North Clackamas Watershed Council	12/9/2019	9.4 - Goal 9.4.6 and 9.4.7	<i>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.</i>	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.
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".
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. 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", but does not feel that the second sentence is needed in the Comprehensive Plan.

Italics = Commentary ~~Strikethrough~~ = Deletions
Red = Proposed new policy language **Blue** = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
North Clackamas Watershed Council	12/9/2019	10.4.1	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.	Comment noted.
North Clackamas Watershed Council	1/14/2020	10.4.9	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.	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.	
Ken Kraska	12/10/2019	10.8.3	PUBLIC SAFETY a) Maintain a public safety building which houses City police services. b) Proposed New Policy : 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.
Yvonne McVay	1/8/2020	11 - Section	The commenter noted that there is no discussion that Milwaukie 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.

Italics = Commentary

~~Strikethrough~~ = Deletions

Red = Proposed new policy language

Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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.	City Staff Response/Recommendation Comment noted. Staff can explore development of a policy related to the expanded use of urban renewal in Section 11, if so directed.
Milwaukee Resident	1/1/2020	11.2 - Goal	Milwaukee 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 lesser 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.
			In the interim period, the City is carrying forward policies of the existing TSP and Comprehensive Plan policies, which saw its last major update in 2007. All existing zoning code land use designations, including current maximum residential densities, will be retained during this period. Minor updates to be carried forward shall not include any changes to existing zoning code density levels.	

Italics = Commentary
Strikethrough = Deletions
Red = Proposed new policy language
Blue = Comment received since January 1

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
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 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. Other progressive U.S. cities have concurrently integrated transportation planning into their comprehensive plans. Milwaukee can be a leader in this regard by extending current timelines and revising the current work plan to include a concurrent update to the TSP, a vital aspect of truly comprehensive land use planning.	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.
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 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.

Italics = Commentary
Red = Proposed new policy language
Blue = Comment received since January 1
Strikethrough = Deletions

Matrix of Public Comments through January 22, 2020

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Ben Rousseau (CPAC Member)	1/7/2020	Glossary	<i>The commenter felt that the current definition of "equity/equitable" was too weak, and suggested that it be revised as follows:</i> <i>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.</i>	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	<i>The commenter requested that his properties be rezoned to the Downtown Mixed Use (DMU) zone.</i>	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.

Italics = Commentary
~~Strikethrough~~ = Deletions
 Red = Proposed new policy language
 Blue = Comment received since January 1

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.

Policy 1.2.5: Consider diversity, equity, and inclusion when making land use decisions related to map or text amendments to the Comprehensive Plan and any codes or maps implementing the Comprehensive

Plan.

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: 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 Milwaukie 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 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~~ therestore 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 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. 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 3.2.9: 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 3.2.10: 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 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, subject to urban heat islands and low air quality, and can help provide a more equitable distribution of trees in the city, including street trees.

Policy 3.4.5: Enhance-Strengthen 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 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.

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: 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: The adopted park master plans for Kronberg Park and Spring Park, the downtown design review approval for Milwaukie Bay Park, and the Elk Rock Island management plan will serve the same purpose as a Greenway Design Plan for each of the parks. All future park master plans or amendments to plans will be adopted through the community service use process.

Policy 4.2.2: 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: Two 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, 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, 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. Development standards for these uses will be used to allow certain forms of development as a use by right.

The review process will require consistency with the following plans: 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: Setbacks 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, protect and conserve natural resources 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 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: 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 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 that the public has the right to recreate on land and water below the ordinary high-water line of the Willamette River.

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, 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 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 ~~or~~ 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 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.

Section 6: Climate Change and Energy

Overarching Section Goal: Conserve energy and be prepared for the anticipated impacts of climate change in Milwaukee through efficient land use patterns, multimodal transportation options, wise infrastructure investments, increased community education 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.

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

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

Policy 6.2.2: Work with local businesses and regional partners to increase transit usage and develop last mile solutions to Milwaukee 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 energy projects.

Policy 6.2.5: Aim to increase the use of renewable 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 energy production.

Policy 6.3.8: Explore opportunities for increasing distributed 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 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

- 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

- 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)

- 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)

- 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

- 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

- 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

- 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

- 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

- 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 pedestrian and bicycle environment for all include:

- 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:

- 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:

- 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:

- 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:

- 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 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 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 – Expansion 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 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 – 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 work with the parks district to acquire land for parks, trails, recreational uses, and habitat conservation.

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

Policy 9.4.6 – New 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 density on the remaining lands may be increased, so that the overall parcel density remains the same. 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 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 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 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: The UGMA shall clearly acknowledge 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.

Policy 12.5.3: Unless established through an intergovernmental agreement, oppose efforts by another City to provide urban services within the MPA.

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.

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 Milwaukie 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.

THIS PAGE LEFT INTENTIONALLY BLANK

Comprehensive Plan Policies related to Diversity, Equity, and Inclusion (DEI)

Section 1 Community Engagement:

Policy 1.1.1: Generate interest and encourage diverse participation in City 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 dialogue between policy-makers and the community.

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.

Policy 1.3.4: Prioritize funding in the planning budget to support inclusive community engagement and participation.

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.

Section 2 History, Arts, and Culture:

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

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

Section 3 Natural Resources and Environmental Quality:

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 3.3.1: 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 Milwaukee.

Policy 3.4.3: Prioritize increased tree canopy in areas that are currently canopy-deficient and can help provide a more equitable distribution of trees in the city, including street trees.

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 3.6.3: 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.

Section 5 Natural Hazards:

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.

Section 6 Climate Change and Energy:

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 6.3.6: 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 6.3.9: 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.

Section 7 Housing:

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

Policy 7.1.7: Collaborate with community partners to provide a continuum of programs that address the needs of unhoused persons and families, including temporary shelters, long-term housing, and supportive services.

Policy 7.1.8: Reduce the displacement of renters through tenant protection policies.

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 7.2.5: 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 7.4.1: Reduce development code barriers to cohousing and other types of intentional communities that help foster a sense of community.

Section 8 Urban Design:

Policy 8.2.1.b: Ensure that improvements are inclusive and provide access for people of all ages and abilities

Policy 8.2.1.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.

Policy 8.2.4.b: Design streets to provide for the equitable allocation of space for different modes including pedestrians, bicycles, and transit.

Policy 8.3.4.e: Incorporate universal design standards that improve access for people of all ages and abilities and expand opportunities for aging in place.

Section 9 Parks and Recreation:

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

Policy 9.2.1 – Expansion and/or redevelopment of parks and new recreation opportunities shall be tailored towards the needs and abilities of diverse communities.

Section 10 Public Facilities and Services:

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 10.5.6: 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.