

Matrix of Public Comments through June 30

Commenter	Date Received	Goal/Policy #	Comment	City Staff Response/Recommendation
Kim Travis	6/9/2020 (written)	Section 1 (Community Engagement)	<i>Thank you for the opportunity to provide comment on the Comprehensive Plan. As former Chair of the Milwaukie Planning Commission, and member of the Comprehensive Plan Advisory Committee, I am pleased with the final plan that has been handcrafted with care & attention by many volunteers and technical experts. Reflecting back on 2 years of Comp Plan policy discussions, that built on the many previous years of community meetings & town halls to create the Vision, I would like to say Thank You to all who have contributed to help us arrive at this point as a City. In addition, I want to say Thank You to leadership for your ongoing commitment to community involvement - Goal 1. Striving towards an inclusive and equitable city requires us to realize we need new strategies to engage diverse community members, and as I've said before I hope we can build authentic relationships by going to where diversity exists; not expecting people who haven't participated to show up at meetings. I really feel like this is a great time to engage with MHS students; as well as students/families and teachers at El Puente Elementary given the intentional diverse community at that particular school.</i>	Comment noted. These are great outreach strategies that can be used during the Comprehensive Plan Implementation process.
Ernesto Dominguez	6/1/2020 (Written) 6/2/2020 (Oral)	Section 1 (Community Engagement)	<i>I would like to have read the section on community participation and found it was provided in Spanish as well. In particular, I am curious to know how the City decided that it was involving a "diverse set of interested parts." What points of reference or data do they tell us? How do we know if communities of color, particularly black and brown residents, feel welcome and included? As someone who has gone to many neighborhood association meetings, I can tell you that these communities are not diverse in terms of race or ethnic origin. My brother and I are both linked in to the City's leadership academy and note many of the same concerns about the lack of diversity. The community events and postings on City-directed social media and websites do not appear to celebrate diversity or highlight the contributions of people of color in the city. I would also like to see the experiences of people of color represented in the document. If we really want Milwaukie to be a vibrant and diverse city, we need to create a city and an environment where people of color can and want to move to.</i>	Comment noted and appreciated. The city continues to improve and refine its outreach efforts, and incorporate elements of diversity, equity and inclusion in its community engagement and community events.
Ronelle Coburn	6/2/2020	Section 1 (Community Engagement)	<i>I am writing in to express my concerns specifically about our city's Community Engagement Goals & Policies. At present, the systems and structures for community engagement are grossly insufficient and outdated and I am concerned that the draft Comp Plan does not lay a strong enough framework for our city to get serious about updating its outreach, information, education, and encouragement of citizen participation. I also have deep concern that the draft Comp Plan also does not sufficiently provide for the formation of a true Diversity, Equity, and Inclusion body that will ensure our city engages in truly broad, effective, and inclusive community and citizen involvement.</i>	Comments noted. Ms. Coburn provided extensive, similar commentary during the Planning Commission public hearings, staff responses to which are included in Attachment 2 of the June 2 Council hearing packet.

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Dan Eisenbeis	6/2/2020 (Oral)	Section 1 (Community Engagement)	<i>Mr. Eisenbeis felt it was important to expand equitable opportunities to the general public and in creating a more diverse workforce, and also noted the importance of updating the land use map. He did not have a strong opinion on the need for a DEI Committee, but instead felt it was necessary to comprehensively address diversity, equity and inclusion.</i>	Comments noted.
Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	Section 1, multiple	<i>It is too early to know all of the possible long term effects of the Covid 19 pandemic, but it is clear that there will be many. I think that language should be added that addresses these uncertainties and commits the City to "nimbleness" as we go forward. That language will need to allow for a dynamic and fluid future without losing sight of the Vision. The challenge will be in crafting language that allows for needed flexibility in the face of changing circumstances while not creating an opportunity for future decision-making to scrap the intent of these policies and the community vision.</i>	Comment noted. Staff encourages Council discussion on whether new policy or updated language is needed.
Ben Rousseau	6/2/2020 (Written) 6/2/2020 (Oral)	1.2	<i>I ask you to consider adding the following draft policy statements under Goal 1.2: A. Define equity strategies and measurable outcomes to guide the City's programs, procedures, and policy development. B. Allocate resources and authority for staff member(s) to measure, report on, and effectively manage our progress toward these goals C. Allocate resources for robust Diversity, Equity and Inclusion (DEI) training for City Management, Community Development, Planning Staff, Commissioners, City Council, the Police Department and Neighborhood Association Leadership as well as other staff and committee members who interact with the community.</i>	Comment noted. Staff suggests that Council discuss Mr. Rousseau's proposed additions.
Rebecca Hayes	6/8/2020 (written)	1.2	<i>Add all ages and abilities to the support of DEI. Emphasis on age-in-place.</i>	Comments noted.
Dan Eisenbeis	6/8/2020 (written)	1.2	<i>Supports the creation of an equity committee; the scope should extend beyond the scope of the Plan - implementation is more important than it being included in the Plan. The example of the city's efforts in climate work shows that the DEI committee can succeed. The city must apply an equity lens to policies, programs, and practices and ensure that government is inclusive of BIPOC.</i>	Council is asked to decide whether a DEI Committee should be included in the Plan document.
Greg Hemer	6/9/2020 (written)	1.2	<i>The Plan is a land use document; DEI will get buried if included and extends beyond land use into hiring practices, community outreach and involvement. Instead, Mr. Hemer suggests a resolution for Council to adopt that would spell out the reason for DEI and a date that a plan can be in place or a plan to fund the plan. Perhaps create a task force to help frame what DEI should be.</i>	Council is asked to decide whether a DEI Committee should be included in the Plan document.

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Celestina DiMaura	6/9/2020 (written)	1.2	<i>Ms. DiMauro's comments on DEI and Anti-Racism are related to the lack of a specific policy to establish a DEI body in the City. She notes: it is OK if the committee is imperfect to start - this is a process of growing and learning. The Plan is not exclusively a land use document and DEI priorities are clearly related to land use. "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..." Bringing diversity and equity and inclusion into the forefront of land use is required to reverse the damage that has already been done. Ms. DiMauro provides a significant amount of information regarding the importance of generational wealth and how that is directly impacted by land use decisions, including housing affordability. Ms. DiMauro concludes by stating that the Council has a procedural, intellectual, ethical, and constituent mandate to include a policy to institutionalize the need for a DEIA (Diversity, Equity, Inclusion, and Anti-Racism) body at the City.</i>	Council is asked to decide whether a DEI Committee should be included in the Plan document.
Elvis Clark	6/9/2020 (written)	1.2	<i>Mr. Clark states that the Comprehensive Plan Implementation Committee (CPIC) is not following the goal of 1.2 and Policy 1.2.5 in the draft Comp Plan. He does not believe the CPIC is diverse enough. It does not have any Black renters or Black homeowners and believes it is mostly dominated by City employees/elected officials, retired government planners, and real estate developer/brokers.</i>	The CPIC was appointed by Council from applications submitted by Milwaukie community members before adoption of the current draft Comprehensive Plan. Those who were chosen represent a variety of interests/experience, including both renters and homeowners. At this time, Council has not indicated wanting to appoint others for more diversity onto the Commission, but it would happen outside of this Comprehensive Plan process if they do.
Ben Rousseau, Dan Eisenbeis, Celestina DiMauro, Stephan Lashbrook	6/9/2020 (written)	1.2	<i>Establish a robust and ongoing Diversity, Equity, Inclusion, and Anti-Racism (DEIA) training program as a requirement for all city staff, consultants and volunteer committee members who interact with, or whose actions impact, our community.</i>	Comment noted. Staff requests direction from Council on any changes to policy language or additional policies.
Ben Rousseau, Dan Eisenbeis, Celestina DiMauro, Stephan Lashbrook	6/9/2020 (written)	1.2	<i>Engage Milwaukie residents and stakeholders, ensuring the input from underrepresented communities and protected classes is centered, in defining equity strategies and measurable outcomes that will lead us toward realizing our 2040 Vision of being an "entirely equitable" Milwaukie in all facets of community life.</i>	Comment noted. Staff requests direction from Council on any changes to policy language or additional policies.
Ben Rousseau, Dan Eisenbeis, Celestina DiMauro, Stephan Lashbrook	6/9/2020 (written)	1.2	<i>Institute and provide adequate support and authority for a DEIA Body to effectively guide, oversee, implement, measure, and communicate the City's DEIA work, progress, and outcomes, and to review other City policies, programs, and practices from a DEIA lens.</i>	Comment noted. Staff requests direction from Council on any changes to policy language or additional policies.
Ronelle Coburn	6/2/2020	1.1.3	<i>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.</i>	Council is asked to decide whether Policy 1.1.3 should be truncated so as to remove any references to specific outreach.
Cole Merkel	6/9/2020 (written)	1.2.5	<i>While I am glad to see that Policy Goal 1.2.5 asks policy makers to "consider diversity, equity, and inclusion when making land use decisions," there can no longer be an excuse to ignore the racism of our region's past while we take bold steps to plan for a more equitable future. Diverse neighborhoods create livable communities, and a range of affordable housing options - from income-contingent apartments to home ownership programs - are major steps toward creating intergenerational wealth. I would strongly encourage the council to change this language from "consider" to "require."</i>	Staff would like direction from Council in regard to the proposed change to the policy language. This draft policy is intended to result in a code change that would add consideration of DEI issues as a plan amendment criterion. The policy could be strengthened by stating "Require consideration of....."

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Cole Merkel	6/9/2020 (written)	1.2.5	<i>I also implore you to take the step of requiring the city to, in conjunction with residents of color, develop a strong racial equity lens that centers race and prioritizes equitable outcomes in all planning decisions processes. Taking this step will ensure decisions are made with input from marginalized communities, while also holding us as white leaders accountable to those who are often silenced in decision-making processes.</i>	Staff would like direction from Council for any additional policies or language around a racial equity lens. It should be noted that applying a racial equity lens often requires some discretion and many of the City's planning decisions are guided by clear and objective criteria. As noted above and in draft Policy 1.2.5, the intent is to consider DEI issues when amending the plan or code requirements rather than with individual development decisions.
Councilor Wilda Parks	6/5/2020 (written)	1.2.5	<i>How can we ensure, without a committee called out in the Comp Plan, that the concepts of Diversity, Equity and Inclusion will be applied? I believe that is noted in policy 1.2.5 and also on page 44 where the purpose of DEI is noted. The concepts of diversity and equality go beyond land use and should encompass considerations for all Milwaukians, including planning for an age friendly community. A completely leviabile community offers opportunities for all ages, and all mobilities, as well as other diversities. As noted in the document, all citizens should feel included in their community. If a Diversity, Equality and Inclusion committee is formed, I would not have it listed in the Comp Plan and I would ensure it has a broader perspective. (BTW – there are 16 references to DEI in the materials we reviewed)</i>	These are key questions for the Council. Do we create a City-wide DEI committee? Is it referenced in the Comp Plan? Is it combined with the Community Involvement Advisory Committee (CIAC)? The draft plan was prepared with the assumption that DEI work is a separate City-wide effort that is not under the umbrella of the Comp Plan. The draft plan includes a policy calling for new plan amendment criteria stating that DEI should be considered in Type V decisions. The draft policies also give the Council flexibility to appoint the Planning Commission as the CIAC or to create a separate independent group.
Ronelle Coburn	6/2/2020	1.3.1	<i>I urge you to consider revising the draft Comp Plan to require a committee or commission whose charge is to be our city's CIAC AND DEI that will be held accountable for forming and carrying out broad, effective, and inclusive outreach for every resident and interested member of our city and that all city bodies can turn to, and must abide by, in carrying out its tasks across all areas.</i>	Staff will need direction from Council on any potential amendments to Policy 1.3.1
Councilor Kathy Hyzy	5/26/2020 (written)	1.4.2	<i>I'm not sure this is the right place for this comment, but I'll leave it here anyway! As we learned from our most recent community-wide survey, residents are not currently relying on their NDAs much at all for information about what's happening in the city. I know that as part of the community engagement goal, Jason (Wachs) has stepped up some training efforts with the NDAs (interrupted to some degree by COVID), and I'm curious if Planning has given thought to how they can support the NDAs in becoming more effective at providing testimony—in particular, how they might be able to provide testimony that represents more of their neighbors. All of which is to ask if that should be, "Provide opportunities and training".</i>	Adding "and training" to Policy 1.4.2 would strengthen the policy without changing its intent. Discussed by the Council on 6-2-20.

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Courtney Johnson	5/31/2020	Section 3 (Natural Resources)	<i>I appreciate the lengthy discussion of environmental justice identified as a "key issue" in this section. However, the final sentence states, "Ideally, the policies adopted within in [sic] this plan will work towards alleviating the real impacts of environmental injustice in our built environment." Not only does the sentence contain a typo, the use of the word "ideally" distances the City from any real responsibility to work for environmental justice. The fact that this section immediately follows the "Balancing natural resources protection and development " issue, which implies that in some cases environmental protections will have to be sacrificed in the name of development , leaves the reader with the sense that this section pays mere lip service to environmental justice without actually accepting responsibility for dismantling the acknowledged injustice.</i>	Comment noted. Staff will work to revise this section to clarify the city's commitment to environmental justice, and would appreciate any direction provided by Council.
Councilor Lisa Batey	6/4/2020 (written)	Section 3 (Natural Resources), Section 6 (Climate Change)	<i>There was also a NCWC suggestion about setting a cap on impervious surfaces. Can you please point me to the relevant sections on that?</i>	Section 3, in particular Goals 3.2, 3.5. Section 6, in particular Goal 6.1
Courtney Johnson	5/31/2020	3.2.4	<i>Policy 3.2.4 requires an analysis of how development will avoid, minimize and mitigate for impacts to natural resources. This requirement should be strengthened to clarify that development must first avoid, and only if avoidance is not possible, then minimize and mitigate adverse impacts. Further, it is not clear whether all development proposals will have to meet this requirement, or only certain proposals. Whether in this Plan or the development code, the City should ensure that it is clear to what types of development this policy will apply.</i>	Comment noted. The development code's existing natural resource regulations clarify that projects must first try to avoid, then minimize, and finally mitigate impacts to natural resource areas. The development code also includes types of development that are exempt from natural resource regulations, and the level of review varies depending on the scope of the project and the projected impacts to natural resource areas.
Councilor Kathy Hyzy	5/26/2020 (written)	3.3	<i>Just a question—is there a reason we talk about indigenous fish and wildlife vs just all native species? I'm thinking about the countywide initiative around pollinators, for example, or native plants, and the ways this language excludes them.</i>	Goal 3.3 and the underlying Policy 3.3.1 are focused on fish and other animals (birds, mammals), and was developed by the CPAC. The document did not intend to exclude a more robust discussion of pollinators or native plants, and staff is open to adding better references to both.
Councilor Kathy Hyzy	5/26/2020 (written)	3.3.6	<i>Not sure what "on its stormwater management" is supposed to mean—guessing that's a typo</i>	Correct. It should read "on-site stormwater management". This will be revised.
Courtney Johnson	5/31/2020	3.6	<i>Goal 3.6 should include an explicit policy to evaluate the potential for new industrial development to create disparate pollution impacts on communities of color, and a requirement to avoid any disparate impacts. This could be accomplished through the use of environmental justice mapping tools, for example the U.S. EPA EJSCREEN Tool.</i>	Comment noted. Staff would encourage Council to discuss whether such a new policy is needed.
Councilor Kathy Hyzy	5/26/2020 (written)	3.6.3	<i>Should we include "odor" in there? I ask because we've got the Kellogg Good Neighbor Committee, which works in part to address odor issues with the plant. We talk about the plant pretty extensively later on, but in the interests of completeness...</i>	Staff will add odor to Policy 3.6.3. Council discussed this on 6-9-20. Odor at the plant is also addressed in Policy 10.3.5.
Councilor Lisa Batey	6/4/2020 (written)	Section 4 (Willamette Greenway)	<i>The Greenway chapter mentions trails in several places, but I take this to be trails on land. I didn't see a reference to the Willamette Water Trail, but I am wondering if we shouldn't have one.</i>	Staff would appreciate direction from Council on whether changes to Section 4 are needed. Typically, the City does not have jurisdiction over areas in the water.

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Councilor Lisa Batey	6/4/2020 (written)	4.2	<i>I thought in the PC hearings it was said that we don't have, and we don't necessarily have to have, a Willamette Greenway Design Plan, but there are still references to that. Should we be removing those?</i>	Staff response: The Greenway Design Plan provides for an optional review process without a public hearing. It is allowed under Section F.3.f. of Statewide Planning Goal 15. It is not required. Sec 4 of the Comp Plan leaves the option open to adopt a greenway plan and recognizes the existing adopted park plans as the Greenway Design Plans for those properties. Based on Council discussion on 6-9-20, staff will check to determine if another process is required to recognize park plans as part of a Greenway Design Plan.
Councilor Lisa Batey	6/4/2020 (written)	4.5	<i>Do you see a place to insert some general language about enhancing safety for all river users -- I am starting to talk to people about working toward a No Wake Zone for Milwaukie Bay. Saying that specifically is premature, but I would like to put in something about safety for non-motorized users.</i>	Goal 4.5 could include some language around recreation with public safety in mind. Staff encourages direction and discussion from Council on this.
Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	4.7.2	<i>Policy 4.7.2 consists of language that leaves open the possibility that the Kellogg Creek Wastewater Plant may someday be shut down and Milwaukie sewage sent elsewhere for treatment. I believe a real commitment towards capping the current plant and capturing the methane from it for use as a fuel at the plant would be a much more sustainable solution.</i>	Comment noted. Staff would encourage Council to discuss whether updated policy language is needed.
Courtney Johnson	5/31/2020	Section 5 (Natural Hazards)	<i>The "key issues" point out the problem that the viewshed protection requirements are not inventoried and have not been clarified to protect public viewpoints. However, it does not appear that the policies or goals attempt to resolve this issue by either requiring an inventory or clarifying that public views are to be protected.</i>	Comment noted. Staff believes that additional policy language regarding viewshed protection is warranted, if so directed by Council.
Councilor Lisa Batey	6/4/2020 (written)	5.1	<i>I listened with great attention to this discussion and the takings issue in the PC hearings. I still say, as I said in the Elk Rock Estates hearings, that I think there is an option, short of outright prohibiting development, that can be helpful, and that is changing our minimum density calculations to take all HCA and WQR lands out of the calculation. I'd like to see some language here that gives a nod to that, so that we keep it in mind in the code work.</i>	Staff response: Policies 5.1.3 and 5.1.4 direct the City to restrict development in the floodplain. Policies 3.2.4 and 3.3.4 require that the City works to avoid, minimize, and mitigate impacts to NR areas and that riparian areas be protected. The policies don't go into detail in regard to how to calculate minimum densities. Minimum density requirements are set in the Zoning Ordinance and are appropriately addressed as part of Comp Plan implementation.
Courtney Johnson	5/31/2020	5.1.2	<i>Policy 5.1.2 requires the submittal and neutral third-party review of technical reports for development within high risk flood, liquefaction and landslide hazard areas. Technical analyses often reach the conclusion that impacts or risks do not exist or can be mitigated. If the City lacks the technical expertise on staff to be able to rigorously review these reports then review by a neutral third party is a positive requirement. Consider clarifying that the project proponent shall bear the cost of third-party review.</i>	Staff believes that this level of detail is more appropriate for the Development Code.
Councilor Lisa Batey	6/4/2020 (written)	5.1.2	<i>Someone commented that we should specify that these plans are paid for by applicants. I think that's sort of implicit, but wondered if you thought we needed to be more specific on that.</i>	Staff also believes this is not needed, but welcomes further discussion from Council.
Courtney Johnson	5/31/2020	5.3.5	<i>Consider adding "essential public services" to the glossary.</i>	Comment noted.
Courtney Johnson	5/31/2020	5.4	<i>Consider adding a policy that would require periodic re-evaluation of setbacks and other regulatory provisions that could shift over time.</i>	Comment noted. Staff can draft an additional policy, if directed by Council.

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Councilor Kathy Hyzy	5/26/2020 (written)	Section 6 (Climate Change and Energy) (pg 92)	<i>We should update that first paragraph to include the climate emergency declaration and the acceleration of each of those goals by five years.</i>	Staff agrees with this recommended addition.
Councilor Kathy Hyzy	5/26/2020 (written)	Section 6 (Climate Change and Energy) (pg 93)	<i>Cost and Capacity: In our discussion of goals this year, Council dropped the language from the Climate Action Goal around cost concerns. That second sentence is a little clunky as it is anyway; maybe "The city will need to consider economic concerns and longer-range budgeting for climate change." (Not tied to that language either.)</i>	This section was reviewed by the city's Public Works Director and Climate Change and Sustainability Coordinator, but staff is open to additional revisions requested by Council.
Courtney Johnson	5/31/2020	6.1	<i>Consider adding a policy that encourages development of home and community gardens.</i>	Comment noted. Staff can draft an additional policy, if directed by Council.
Russ Stoll	6/19/2020 (written)	6.2, Section 13 (Transportation)	<i>I've asked a few people I know in local government where the bypass will be when the Union Pacific double-tracks the railroad through town. What is the plan for public safety units to cross the UP when freight trains are going in both directions, possibly having blocked crossings for 8 to 10 minutes on the current grade crossings from Harrison to 37th? I'm not seeing that. Where is this double-tracked rail in your so-called comprehensive plan? [More of Mr. Stoll's comment is in Attachment 3]</i>	For the most part city staff didn't address transportation issues in the draft Comp Plan, knowing that we were going to follow the effort with an update to the Transportation System Plan (TSP). Staff could add a policy in section 6.2 of the draft comp plan if Council thinks that is appropriate. That section addresses the climate/energy related transportation issues. The appropriate policy might say something like: "Support state efforts to develop a high speed rail system and enhanced freight rail while ensuring that Milwaukee maintains safe and adequate emergency response times."
Councilor Kathy Hyzy	5/26/2020 (written)	6.3.2	<i>"how small cities can mitigate and adapt".</i>	Staff will add "mitigate and" as requested by Council on 6-9-20.
Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	Section 7 (Housing)	<i>I believe that the new Plan should clearly state that the housing projections of the Housing Needs Analysis (HNA) are minimalistic and the community is committed to accomodating substantially more growth than the HNA anticipated.</i>	Comment noted. Staff will work to revise this section to clarify the projects of the HNA, and would appreciate any direction provided by Council.
Mary Zellharie	6/1/2020	Section 7 (Housing)	<i>I encourage the development of avenues for conversation between and among residents to help all accept the need for mixed housing construction within single family residential areas. Many people wanting to live in Milwaukee cannot afford a low/moderately priced house. Neighborhoods can no longer stay areas for large expensive homes. Milwaukee residents need to learn how to talk about this issue and to be accepting of different types of housing within single family housing areas.</i>	Comment noted.

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Mary Zellharie	6/1/2020	Section 7 (Housing)	<p><i>I would also hope that the City of Milwaukie would encourage, promote and even reward property owners & builders who would build smaller single family units, duplexes, triplexes or community clusters. All of these types of housing will provide for more diversity in our community — an aspect of our community that is needed.</i></p> <p><i>When studying the maps and diagrams about land use designations, I cannot see just how much the zoning has changed to permit these types of housing opportunities with neighborhood areas. In the Hector Campbell neighborhood area for example, how much has the density increased over what it was prior to this plan? Looking at map #2 Land Use — it still looks like LOW DENSITY prevails. And where there is medium or high density it is kept in one area and not dispersed throughout the city.</i></p> <p><i>It seems to me, if Milwaukie is to welcome diversity we need to provide spaces for that diversity within each neighborhood. I am not sure that is built into this plan.</i></p>	Comment noted. The land use map and designations have not been amended as part of this project. The implementation project to expand housing options throughout Milwaukie and explore any potential zoning amendments is now underway.
Jennifer Bragar (HLA)	6/8/2020 (written)	Section 7 (Housing)	<p><i>Supports the clear commitment to equity and housing. However, the Plan falls short in crafting policies that address exclusionary zoning specifically. The Plan does not offer policies that address the imbalance of residential land (low density vs. higher density). Without more specific goals that address this issue there is a risk that the status quo will continue. The city should expressly analyze the use of underutilized or vacant public property for affordable housing.</i></p>	In regard to vacant public property, Plan Policy 7.2.1 calls for continued implementation of housing affordability strategies. The Milwaukie Housing Affordability Strategy addressed the concept of making public land available for affordable housing. Staff believes that if the Council wants to add a plan policy about public land and affordability, it should be to "consider" the use of public land for this purpose. In regard to the imbalance of land for higher density and lower density, the issue should not be one of balancing acreage but rather ensuring there is planned capacity for higher density development. The draft buildable lands inventory estimates that 78% of the City's development capacity is for medium and high density development (38% Multi-family; 40% medium density - attached housing; and 22% Single-family). In general, Ms. Bragar's comments seem more appropriate for implementation work which will be beginning soon, but staff would welcome Council direction on any desired revisions to the city's housing policies.
Jennifer Bragar (HLA)	6/8/2020 (written)	Section 7 (Housing)	<p><i>HLA recommends the addition of a policy dedicated to decreasing the City's proportion of Low Density Residential land and increasing the types of housing allowed in all zones.</i></p>	As noted above, most of the City's existing development capacity is for multi-family and medium density housing. Proposed Plan Policy 7.1.1 calls for more middle housing opportunities in the City's low density zones. This is consistent with the direction of HB 2001. Ms. Bragar's comments seem more appropriate for implementation work which will be beginning soon, but staff would welcome Council direction on any desired revisions to the city's housing policies.
Jennifer Bragar (HLA)	6/8/2020 (written)	Section 7 (Housing)	<p><i>HLA recommends that the city discuss and include zoning map amendment goals, such as the addition of new zones associated with TOD.</i></p>	The work on the draft plan policies did not attempt to presuppose the zoning concepts and map changes that would be developed during the implementation phase. Ms. Bragar's comments are more appropriate for implementation work which will be beginning soon.

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Chelsea Winn	6/8/2020 (written)	Section 7 (Housing)	<i>Ms. Winn's comments are about encouraging more diversity in Milwaukie and correcting the city's history of housing segregation. More focus is needed to allow multi-unit housing and subsidized housing.</i>	Comments noted.
Cole Merkel	6/9/2020 (written)	Section 7 (Housing)	<i>I am happy to see consideration for our unhoused and housing unstable neighbors. Ending our homeless and housing affordability crises will require an all hands on deck approach. It is essential that the city work in conjunction with government partners at the county, state and federal levels, while also building strong relationships with community nonprofit partners and affordable housing developers. I would like to see these efforts catalyzed in policy in the strongest, most binding language possible, both in this document and beyond.</i>	Comment noted.
Councilor Kathy Hyzy	5/26/2020 (written)	Section 7 (Housing)	<i>The bar graph doesn't add up to 100 percent.</i>	Staff will update the graphic with the correct numbers.
Councilor Kathy Hyzy	5/26/2020 (written)	Section 7 (Housing) (pg 105)	<i>General note here that it seems odd we don't mention HB 2001 anywhere. It is on P 117, so I don't feel too strongly about it.</i>	As noted, HB 2001 is referenced on page 117, as well as on page 32. Staff did not go into great detail on HB 2001, as the city's Community Vision, and its desire for expanding middle housing options in Milwaukie, was in place well before HB 2001 became law. Discussed by Council on 6-9-20.
Councilor Kathy Hyzy	5/26/2020 (written)	Section 7 (Housing) (pg 106)	<i>Livability—Something about "consider the impacts of growth and development on existing residents" is bothering me a little, as impacts typically implies only burdens, not benefits. Could we say "impacts and benefits" or "Impacts and opportunities"? A lot of what we do around livability is intended to improve life for those who already live here, too, and a big part of why we work so hard of housing affordability is to helps struggling families, seniors who want to age in the communities they're embedded in, etc. etc.</i>	Staff will adjust language to add "benefits" or "opportunities" to "impacts" as discussed by the Council on 6-9-20.
Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	Section 7, 8	<i>I know the Council will hear, and to some extent has already heard, testimony opposed to virtually any increases in density or changes to "neighborhood character." This is to be expected. I want to add my voice to those who disagree. The City Council has the opportunity to encourage the development of ADUs, middle housing, cottage housing, universal design, mixed-use neighborhood hubs, and other housing options right now. It may take years for a similar opportunity to appear. A failure to enact those changes will unnecessarily constrain local housing choices. In simple terms, I'd love it if my children and grandchildren can afford to live in Milwaukie. They will need more options to be able to do so.</i>	Comment noted. Staff would encourage Council to discuss whether new policy or updated language is needed.
Jennifer Bragar (HLA)	6/8/2020 (written)	7.1	<i>HLA recommends adopting stronger anti-displacement policies (see HLA examples)</i>	Draft Policy 7.1.9 addresses displacement of renters. Staff would welcome direction from Council on expansion of the policy or any additional policies.
Joshua Freeman	6/8/2020 (written)	7.1	<i>As our neighbor Portland experiences more and more gentrification of its' neighborhoods there is an exodus of African Americans. A large portion of those residents are moving to East Portland or even out of state. Others like myself are moving to Milwaukie. I do not pretend to speak for all African Americans living in Milwaukie but their voices need to be heard. Please see the attached document from PAALF. While it was created for Portland the ideas, thoughts, and plans are also applicable for Milwaukie. [STAFF NOTE: Find the PAALF document in Attachment 3]</i>	Comment noted. Staff requests direction from Council for any additional policies or language addressing gentrification.

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Cole Merkel	6/9/2020 (written)	7.1.1	<i>Change "Provide the opportunity" to "Require"</i>	The City's plan and zoning ordinance can only make opportunities available for developers to provide a wider range of housing. The City doesn't require that specific types of housing be built.
Elvis Clark	6/1/2020 (Written) 6/2/2020 (Oral)	7.1.1, 7.2.2, 7.2.7	<i>What the Comp Plan is effectively saying is that low and medium residential neighborhoods are no longer affordable in a collective sense; and instead, Milwaukie should be remade into a more densely packed community of houses.</i>	The policies referenced by Mr. Clark focus on expanding housing options in low and medium density neighborhoods, and are not a commentary on detached single family residences. Detached single family residences would continue to be permitted, and would be expected to remain the vast majority of housing units in these areas. The community has expressed strong support for allowing middle housing throughout Milwaukie, dating back to the Community Vision.
Elvis Clark	6/1/2020 (Written) 6/2/2020 (Oral)	7.1.3	<i>These policies threaten the very nature of Milwaukie as a space most friendly for raising families.</i>	Staff believes that Policy 7.1.3 is reflective of the strong community support expressed for expanding housing options. Any zoning changes would require a land use application and would be subject to a Type IV or 5 process with extensive public notice.
Cole Merkel	6/9/2020 (written)	7.1.3	<i>Change "Promote" to "Require"</i>	The word "require" does fit the wording structure of this policy. Substituting the word "Utilize" or "Use" would result in a slightly stronger policy if the Council believes a change is needed.
Elvis Clark	6/1/2020 (Written) 6/2/2020 (Oral)	7.1.4	<i>This is clearly not something the City can do, because the City's housing market is largely driven by factors outside the City's control. Such factors include house prices in surrounding areas and whether, for instance, there is a wave of in-migration from places like high cost states like California.</i>	Comment noted. While the city cannot control the housing market, it can "aim" to keep housing affordable through tools and programs that are available.
Joshua Freeman	6/8/2020 (written)	7.2	<i>Milwaukie lacks enough affordable housing for people who are moderately low-income. There is a dire need for middle housing as suggested in the Comp Plan. Only by creating more affordable housing can we hope to mitigate the rising cost of rent and of purchasing homes. Milwaukie has the space and means to follow a path of urban infill.</i>	Comment noted. Staff requests direction from Council for any additional policies or language around affordable housing.
Cole Merkel	6/9/2020 (written)	7.2.2	<i>Change "Allow and encourage" to "Require"</i>	The City does not have mechanisms in place to require housing that is affordable. The proposed policy is written to allow affordable housing and expand the range of housing in the community.

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Bradley Bondy	5/15/2020 (Written)	7.3.8	<p><i>Overall I'm quite happy with the current draft of the Comprehensive plan. The city has shown a strong commitment inclusion, sustainability and equity. And, importantly, the city has recognized the role it must play in accommodating future growth in the region, especially as migration due to climate change accelerates in the coming decades.</i></p> <p><i>There is however one tweak I feel is necessary to help realize these goals, Policy 7.3.8 currently calls for allowing for the reduction of off street parking minimums near frequent transit, however this policy should be changed to call for the full elimination of off street parking minimums near frequent transit and light rail. This change wouldn't prohibit new developments from including parking, but it would give developers the freedom to choose whether to include parking, and how much to include.</i></p> <p><i>Parking is land, money, and resource intensive to build, Structured parking can cost 10's of thousands to construct, and underground parking can cost up to 50 thousand dollars per space. Requiring that it be included in all developments will increase the costs and carbon footprints of housing and other developments, and the space that it occupies will take away from what could otherwise be housing or open spaces.</i></p>	Comment noted. There was extensive discussion with the CPAC and Planning Commission on the wording for Policy 7.3.8, and there will be opportunities during the code implementation work to determine whether certain situations warrant the elimination of off-street parking requirements for residential development, similar to what is in place for commercial development in the DMU zone.
Dan Eisenbeis	6/2/2020 (Oral)	7.3.8	<i>Mr. Eisenbeis provided oral testimony that in some case, the city should allow the complete elimination of parking requirements.</i>	Comment noted.
Councilor Kathy Hyzy	5/26/2020 (written)	7.4.1	<i>"amenities and or to provide.."</i>	Policy 7.4.1.b had mistakenly excluded "that" from before "provide opportunities" when staff incorporated the Planning Commission's proposed edits, as seen in Attachment 4. Revising this error seems to address Councilor Hyzy's comment.
Councilor Wilda Parks	6/5/2020 (written)	7.4.1(a)	<i>A concerning word for me is in 7.4.1a the word "foster". The usual word in other areas is encourage, or promote. While foster means encourage, it also means stimulate or advance. If encourage is used generally I would prefer that foster be replaced with encourage in 7.4.1a.</i>	The Council discussed this and decided to keep the word "foster" on 6-9-20.
Dan Eisenbeis	6/2/2020 (Oral)	8.1.4(b)	<i>Mr. Eisenbeis was concerned about using the term "compatible" for neighborhood hubs and that it could risk implementation of the hubs concept, and recommended that the policy language be revised to more closely match Policy 7.4.5. He felt the policy should focus more on how to utilize development code regulations, as opposed to manage neighborhood hubs.</i>	Comment noted. Staff is open to revising the policy language to more closely match Policy 7.4.5, which uses the terms "transitions" and focuses on development standards.
Stephan Lashbrook	6/5/2020 (written)	8.1.4(b)	<i>Ensure that new development is compatible with the height, massing, and building form of allowed by zoning on adjacent residential properties. A hub development need not be identical to the height, massing or form of buildings allowed by nearby zoning for a finding of compatibility.</i>	Staff response: To ensure compatibility it may be appropriate for the form to be similar but not identical to surrounding development.
Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	8.1.4 (b)	<i>Policy 8.4.1(b) includes language specifying that neighborhood hubs are to be "compatible with the height, massing and building form of adjacent residential properties." If the language remains in the Plan, we need not spend much more time talking about new neighborhood hubs because there will be little to no incentive for anyone to develop new hubs. In my opinion, the proposed language is too restrictive, especially where the properties around the proposed hubs are developed with single-story buildings.</i>	Comment noted. Staff would encourage Council to discuss whether updated policy language is needed.

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Councilor Kathy Hyzy	5/26/2020 (written)	8.1.9	<i>This is a general note about this whole topic—really more salient to section 12, but since I’m here—this is the first place the UGMA is mentioned—and the first time I ever realized “UGMA” stands for “agreement” not “area” because we always talk about “the UGMA” as if it were an area. We never talk about an MPA in meetings. I don’t know what to do about it here, but note that I had some confusion, so maybe others will. A reference in this section to MPA map and page number might be helpful—I immediately wanted to look at a map when I read Policy 8.1.9.</i>	Staff will add a reference to the MPA map (see figure X). The UGMA is included in the document's glossary. Discussed by Council on 6-9-20.
Courtney Johnson	5/31/2020	Section 9 (Parks and Recreation)	<i>The City should consider adding a policy that supports the use of native plant and drought resistant species in our parks.</i>	Comment noted. Policy 6.3.5 encourages the use of native and climate resilient vegetation, but it is not specific to parks.
Councilor Lisa Batey	6/4/2020 (written)	9.4	<i>The numbering at the end of the page is wrong, with 9.2.7 and 9.2.8.</i>	Comment noted. Staff will revise the draft Comp Plan.
Courtney Johnson	5/31/2020	10.9	<i>Consider adding a policy that supports community-level renewable energy development.</i>	Policy 6.3.8 currently calls for development of community solar and other community efforts.
Councilor Kathy Hyzy	5/26/2020 (written)	10.4.2	<i>Strike the “to” on second line</i>	Staff will revise this error.
Councilor Lisa Batey	6/4/2020 (written)	Section 11 (Economic Development)	<i>I was intrigued by Stephan's testimony before the PC about urban renewal and downtown parking garage. Of course, our current UR plan does call that out as a potential project. I do not really feel the need for the Plan to call out the potential for future UR zones, but am curious about staff thoughts on that. Did you add anything on that?</i>	Staff did not add policy language for the creation of new Urban Renewal areas. That should be left to future City Council’s to decide based on financing needs.
Councilor Kathy Hyzy	5/26/2020 (written)	Section 11 (Economic Development) (Pg 157)	<i>Callout box says it’s under 5 percent, but I think earlier in the document there’s reference to just 7 percent. Which one is correct?</i>	Councilor Hyzy is correct. The discussion of inflow/outflow of jobs on page 153 notes that 7 percent of employed residents work in Milwaukie, which is the correct number (5 percent was derived from using the wrong denominator). Staff will update the document accordingly.
Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	12.4.3	<i>Policy 12.4.3 would rely on "community identity" as a prerequisite for annexation. While I question the long-term financial efficacy of annexing all possible land into the City, I think that reliance on "community identity" is an invitation to the kind of racist and classist planning that has typified American communities for most of the last 120 years. I think that relying on "community identity" as with "neighborhood character" as a decision-making criterion will move us away from our community vision and not towards it.</i>	Comment noted. Staff would appreciate direction from Council on whether any changes to Policy 12.4.3 are needed.
Rebecca Hayes	6/2/2020 (Written and Oral)	12.4.3	<i>Policy 12.4.3 Ensuring that annexations programs respects “Community Identity” ... How do you ensure without making it a pre-requisite to annexation? I think it would more advantageous to focus on adaptation & change rather than have a requirement. During the last 3 years, I have often referred to AARP’s Livable Community models and ask that the City of Milwaukie perpetuate injustice and to move toward an age-friendly City in Oregon.</i>	Comment noted. Staff would appreciate direction from Council on whether any changes to Policy 12.4.3 are needed.
Rebecca Hayes	6/2/2020 (Written and Oral)	12.4.3	<i>The many changes and challenges we have faced over the last few years; we can look forward too many more ahead. The ability to allow flexibility in a mix of density areas, housing options and adaptive re-use of buildings for the citizens of Milwaukie is necessary. The ability to scaleup and scaledown people age, it is essential for more housing options, on a scale of affordability.</i>	Comment noted.

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Rebecca Hayes	6/8/2020 (written)	12.4.3	<i>Annexation and "community identity" - how to ensure that without making that a pre-requisite. Better to focus on adaptation and change rather than have a requirement.</i>	Annexation requires a finding that the proposed annexation is consistent with the Comprehensive Plan. Policy 12.4.3, as well as other plan policies, provide a degree of discretion for the Council in its annexation decision. Staff is open to revising the policy language and welcomes Council direction.
Councilor Lisa Batey	6/4/2020 (written)	Section 13 (Transportation)	<i>Jon Stoll made a passing comment about the double-tracking of the railroad line. His brother, Russ, has been more involved in following that issue, and as far as I am aware, no one in the City has followed it much since Jeremy Ferguson (who served on a state board on the high-speed rail) left. Russ says it is going to be the recommendation of that high-speed rail project to double-track through Milwaukie. I know that transportation planning around it -- what happens at Harmony but also whether we need to somehow grade separate one of our central Milwaukie crossings -- is really for the TSP. But do you think we should acknowledging the potential double-tracking somewhere in the Comp Plan?</i>	Staff didn't address it. It would be something that should be discussed in the update to the TSP.
Councilor Lisa Batey	6/15/2020 (written)	Section 13 (Transportation)	<i>Apparently double-tracking is a key part of Alternative 1, the preferred alternative, in the draft Environmental Impact Statement that was issued back in 2018 for ODOT. This apparently cuts 5 or so minutes off the passenger rail trip by avoiding holding for freight rail. Will the addition of a few more passenger rail trains - which are relatively short - create an unbearable problem with delays on Harrison, Oak, 37th and Harmony? Maybe not. But that in combination with increased freight rail traffic - which seems to be happening already in the years since the data was collected - might. I do think it is possible we (or future City Councils within the next 20 years) will have to be thinking about the need to grade separate the rail from at least a couple of crossings - most likely at Harmony Rd, but also at one of the crossings near the downtown area, so that emergency responders can move freely, among other reasons. I suggest that we call out somewhere in the Comp Plan the need to pay attention to these developments and plan accordingly.</i>	Staff feels this would be something that should be discussed in the update to the TSP.
Ernesto Dominguez	6/1/2020 (Written) 6/2/2020 (Oral)	Introduction	<i>I wish that the story and history of genocide/colonization by white assassins had been made clear in the history part of the document. It would have been good to read that the land that is Milwaukie was stolen.</i>	Comment noted. As previously noted, staff will be updating the history portion of the introduction.
Courtney Johnson	5/31/2020	History (Intro)	<i>I am glad to see the inclusion of the native inhabitants of our area as the starting point for our city's history. Land acknowledgment is an important step in showing respect for indigenous stewards of the land we now call home, and correcting the stories that erase indigenous culture and histories. I encourage the City to consider expanding this section to reflect the complex and rich history of native people on this land, including the relationship of the Clackamas Indians to other Chinookan people and their current status as members of the Confederated Tribes of Grand Ronde.</i>	Comment noted. Council has previously requested that staff revise the history section of the introduction, and reach out to the Grande Ronde tribe in an attempt to portray a more accurate representation of native history.
Councilor Kathy Hyzy	5/26/2020 (written)	Milwaukie History Section (pg 14)	<i>Was the first paragraph run by the Grand Ronde? If not, is it too late to do that? I'd also like to suggest we work in a quick mention of the treaty of 1853 (if I have that year right), as we do now open Council meetings with a reference to it. It may even work to lift and just tweak a sentence from that meeting opener to fit in this paragraph.</i>	The introduction was reviewed and revised by Greg Hemer (Planning Commission/Milwaukie Museum), but was not reviewed by the Confederated Tribes of the Grand Ronde. Staff would recommend incorporating the language from the Council meeting script, and staff can solicit input from the Grand Ronde, if the Council believes this addition is not sufficient.

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Councilor Kathy Hyzy	5/26/2020 (written)	Milwaukie History Section (pg 14)	<i>In the last P on this page, there is reference to Japanese Americans “losing” their property. It wasn’t lost, it was taken, often by neighbors and other local residents. I’d appreciate it if we could be more explicit about that. If there’s time, I’d suggest reaching out to these folks for a little guidance on the most accurate wording for the sentence: http://www.oregonnikkei.org/</i>	Commissioner Hemer also reviewed and revised the section on Japanese Americans in Milwaukie during and after WWII. Staff can reach out to the Japanese American Museum of Oregon to attempt to improve this section, if requested by Council. In general, staff attempted to keep the introduction relatively brief, given the length of the policy document. The city has several other documents with a more detailed account of the city's history.
Councilor Kathy Hyzy	5/26/2020 (written)	Milwaukie History Section (pg 16)	<i>I realize we talk about redlining later on under housing and on P 62 in Natural Resources, and I really like what’s included there—but I’d love it if there is a way to work in a brief sentence acknowledging that the city’s growth was shaped in part by federal and local land use policies that were designed to exclude people of color. Otherwise it feels a little like we’re allowing the historical narrative to be one-sided and artificially uncomplicated all over again. In the last P on the page, “reliant primarily on infill and redevelopment opportunities” feels incomplete. Reliant for growth, maybe?</i>	If Council desires additional context be provided in the introduction regarding the impact of exclusionary zoning and land use policies on the city's development, staff can accommodate that request. Staff agrees with the proposed addition of "for growth" to clarify to what infill/redevelopment is referring.
Councilor Angel Falconer	6/16/2020 (written)	Milwaukie History Section	<i>Councilor Falconer provided some written language to include in the history background section of the Comp Plan around: Ceded Lands, Chinese Inclusion Period, and Housing Discrimination. The full comments can be found in Attachment 3.</i>	Staff is working on incorporating those comments into the History Section.
Councilor Kathy Hyzy	5/26/2020 (written)	Planning for Diversity (pg 43)	<i>Under Planning for Diversity, I’d like to see a brief mention of the fact that land use planning has historically created barriers to diversity within communities in the United States. (I’m not tied to that phrasing)</i>	Council discussed this at the 6-9-20 meeting and decided to say that housing and transportation planning in the United States has historically created barriers...
Councilor Wilda Parks	6/5/2020 (written)	Glossary	<i>In page 54 occurrences of the word Hub in the reading material, it refers to Neighborhood Hubs, but, on page 179 the term Hub is used to refer to Regional Hubs. Perhaps a different word there, for clarity sake.</i>	Page 179 states: “Regional Centers are hubs of commerce and local government services....” This language is taken directly from the Metro definition for Regional Centers. Staff will substitute “concentrated areas” for hubs. This was discussed by Council on 6-9-20.
Councilor Kathy Hyzy	5/26/2020 (written)	Glossary	<i>Please add the Clackamas Regional Center to the glossary, and maybe to a map somewhere—call it out on the MPA map?</i>	Staff has consolidated the definition of the various types of centers (town, neighborhood, regional, etc.) into one section in the glossary, and noted that Clackamas Town Center is the only regional center in the city or its MPA. However, staff can reformat the glossary if so requested by Council. Staff can also add the regional center to Map 14.
Councilor Kathy Hyzy	5/26/2020 (written)	Glossary	<i>Think about adding the MPA to the glossary, too. I don’t have strong feelings on this, just seems like a way to further clarify the UGMA/MPA stuff.</i>	Staff will add the MPA to the glossary.
Jennifer Bragar (HLA)	6/8/2020 (written)	BLI	<i>The city is not in compliance with Metro Housing Rule, OAR 660-007-0060. The city must commit to reaching the construction mix and minimum residential density standard in OAR 660-007-0030 and 660-007-0037.</i>	The proposed post-acknowledgement changes to plan policies do not change the housing mix and density set forth in the existing plan and zoning map, therefore OAR 660-007-0060 does not apply. Findings addressing the OAR will need to be made during the upcoming plan implementation stage of the project. Nothing in the proposed plan policies implies that overall density in community will be reduced so 660-007-0037 is not relevant. OAR 660-007-0030 requires that at list 50% of the housing capacity be for attached or multifamily housing. As stated above 78% of Milwaukie's buildable land capacity is for medium density (attached) and multi-family dwellings.

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Casey and Ross O'Keefe	5/8/2020 (Written)	General	<i>We would love to turn our garage into an Accessory Dwelling Unit but the system development costs are too high for most people to afford to accomplish this task that live in Milwaukie. We love living here but think this would be an amazing asset to our current housing crisis. Please reduce or eliminate this burden to your taxpaying citizens.</i>	Comment noted. Staff informed the commenter of current city efforts to reduce the cost of ADU's.
Bill Corti	5/16/2020 (Written) 6/2/2020 (Oral)	General	<i>The commenter submitted a letter requesting that City Council rezone his properties and several other nearby properties from their current R-1-B designation to Downtown Mixed Use (DMU). He also requested that City Council consider designation a 10-foot wide bike pathway along the east side of the light rail line between Monroe and Washington to facilitate better pedestrian and bicycle access to the Downtown Milwaukie light rail station.</i>	Comment noted. Staff informed Mr. Corti that the current proposal is limited to amendments to the Comprehensive Plan policy document, and does not include any amendments to the Comprehensive Plan land use map. Staff did note that he was free to submit his rezone request to Council in advance of the code implementation and potential map amendment work. The Council reiterated this during Mr. Corti's oral testimony on June 2.
Metro	5/29/2020	General	<i>Upon review, Metro staff concludes that the proposed updates to the City's Comprehensive Plan, if adopted as written, are in substantial compliance with the relevant sections of the UGMFP and conform to the purposes of its performance standards. Included in this determination is the expectation that the City will update the lists of permitted housing types for its land use designations so as to be consistent with the requirements of State House Bills 2001 and 2003 by the June 30, 2022 deadline. Metro wishes to acknowledge several elements of the Comp Plan Update that go above and beyond the requirements of the UGMFP. The City's policies concerning watershed integrity, tree canopy, and climate readiness offer significant protections for natural and human environments in the face of a changing climate. The Plan's emphasis on expanding the diversity of allowable housing types will expand choice, access, and affordability for all residents. And though it is not part of UGMFP code, Metro commends the City's attention to the need for inclusive planning and new forms of public involvement. We encourage you to coordinate with your Metro liaison to stay connected to regional grant funding and other resources that may be available to support the City in its efforts to better engage with historically underrepresented communities .</i>	Staff would like to thank Metro for their thorough review of the document.
Rebecca Hayes	6/2/2020 (Written and Oral)	General	<i>The establishment and ongoing support of a Diversity, Equity & Inclusion Committee my only addition would be for you to consider including all ages and abilities. I will rely on my colleagues in CPAC to address this, knowing that they have my support.</i>	Comment noted.

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Elvis Clark	5/17/2020	General	<p><i>I oppose the draft Comp Plan, as a risk to Milwaukie's long held attractiveness as a place for raising families with space and relatively low traffic neighborhood streets. The Comp Plan risks "stacking and packing" Milwaukie much more so than otherwise. STAFF NOTE: Staff has included Mr. Clark's main bullet points, but not the entirety of his text, which exceeded the maximum cell size for this spreadsheet. Please see Attachment 6 for the full text of Mr. Clark's letter. I wonder how much of this new Comp Plan is politically motivated, influenced by for instance Mayor Gamba who now shows a desire to advance his own political career by running for US Congress.</i></p> <p><i>There is the assumption in the Comp Plan that smaller houses will make housing more affordable. Yet increased traffic congestion begins to exert higher costs for other items of living - by limiting automobile, or making it more difficult, opportunities to shop for more competitive prices on goods and services goes away.</i></p> <p><i>But there is also the Climate portion which is off kilter for Milwaukie residents. Milwaukie cannot materially affect the temperature of earth. No consideration is given to the negative environmental effects of the alternative renewable energy forms.</i></p> <p><i>In looking back at rezoning and infill, the Comp Plan makes use of the perceived notion Single family neighborhoods were a product of racism. But the irony to this is that it is the Planning profession which originally looks to improve works home place conditions by supporting the exodus of working class from the urban core to the suburbs (Milwaukie becoming a bedroom community).</i></p> <p><i>It is not just me raising the specter of the Comp Plan risking a form of "Stack and Pack" for Milwaukie its traditional bedroom community charm. Prominent citizen now departed Ed Zumwalt penned much skepticism about this new</i></p>	<p>Comments noted. Mr. Clark has not identified any specific goals or policies that he would like revised, so staff would welcome additional clarity from him if he has edits that he believes could improve the document. Mr. Clark provided additional written and oral testimony on June 2, which staff has responded to below.</p>
Jon Stoll	6/1/2020	General	<p><i>I believe one of the Council's primary goals is Affordable Housing.</i></p> <p><i>One way the City of Milwaukie can support affordable housing is by looking for situations where unreasonable zoning decisions or assignment by government inertia are putting a damper on expanding the pool of affordable housing.</i></p> <p><i>For example, I own two residential properties that our zoned Industrial (M). In discussions with City Planning staff, it appears there was no conscious decision to zone these as Industrial. Rather, it was through annexation and assuming the prior zoning from Clackamas County.</i></p> <p><i>There may be other parts of the city where the zoning does not quite match reality. There should be some vehicle for property owners to get the zoning changed / appeal process, without having to pay exorbitant fees. In the case of one of my properties, it was built in 1920, long before there was likely zoning, and for this historic property it is a regulatory travesty to be impaired by the inability to make any changes to it.</i></p>	<p>Comment noted. Mr. Stoll's properties are located in one of the city's main manufacturing areas, and there are a patchwork of residential and industrial uses. Existing residential units are permitted as legal non-conforming uses, but new residential units are not permitted. Mr. Stoll explored converting the properties to a use that is not outright permitted in the manufacturing zone, which is why he faced regulatory impediments.</p>

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Jon Stoll	6/1/2020	General	<i>The second major input I have concerns the Union Pacific line through Milwaukie. It is highly likely that in the near future (5 years?), UP will want to double track through the City. If this is the case, it would make an excellent opportunity to construct an under or overpass, so that emergency vehicles can get through, and to facilitate easier transit access for the citizens of Milwaukie.</i>	Comment noted. Staff believes this in an implementation item beyond the scope of the Comprehensive Plan.
Mary Zellharie	6/1/2020	General	<i>In speaking about the Comprehensive Plan, I would say that I am happy to know you have included a Comprehensive Plan Implementation Committee, in fact my husband Gene Zaharie has been selected to serve on that committee. I think it is important that there be community involvement in the implementation of this plan as you had it in the development of the plan and I hope they can find ways to include key parts of it in spite of the financial hardship that Milwaukie and all government agencies in Oregon find themselves now because of COVID 19.</i>	Comment noted.
Reach CDC (Alma Flores)	6/1/2020	General	<i>I am writing to support the city of Milwaukie's adoption of the 2020-2040 Milwaukie Comprehensive Plan. As the Director of Housing Development for REACH CDC, I recognize the importance of policies, investments, programs, and staff needed to see a project become reality.</i>	Comment noted. City staff appreciates Reach CDC's support for its housing policies.
Ronelle Coburn	6/2/2020	General	<i>The sad reality is that the majority of the our cities' residents identify with being "traditionally left out of the planning process" and feel that their voices don't matter so it's a waste of time to participate. After 10 months of working hard to get informed, educated, talking to hundreds of my neighbors, and participating to the extent allowed, I feel just like the majority and have started wondering why I'm bothering. And it's difficult to imagine that this very statement will not delight many of you reading this as you hope and imagine I will just go away and stop "interfering" with YOUR plans for what you call OUR city. Recently I thought, "how many of city staff, electeds, committee members, and commissioners do I trust?" The answer: 2.</i>	Comments noted. The Comprehensive Plan update has involved over two years of community engagement. Staff has spent countless hours responding to Ms Coburn and her neighbors at community events, via email, on the phone, and during the Planning Commission public hearings. Several of her comments were incorporated into revised policy language, while many others were not, based on direction from Planning Commission. We encourage her to stay involved in the process and in future implementation work.
Ben Rousseau	6/2/2020 (Written) 6/2/2020 (Oral)	General	<i>I am here to give you my overall support for the Comprehensive Plan as it is written with the following exceptions: 1. I would like to add my voice in support of the written testimony submitted by Stephan Lashbrook. 2. I ask the Council to look at this as more than just a land use document, and utilize our Comprehensive Plan to commit to policy that will guide the city toward realizing our 2040 Vision in other facets of community life. Inclusion and Diversity".</i>	Comments noted.

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North Clackamas Watershed Council (Neil Schulman, Executive Director)	5/26/2020 (Written) 6/2/2020 (Oral)	Multiple	<i>We believe the Comprehensive Plan Public Review Draft does a strong job of incorporating strong protections for watersheds, water quality, access to nature, fish and wildlife habitat, tree cover, protection of the Willamette Valley, and stormwater management within City boundaries. We are also pleased with the strong scientific and natural resources management basis for these components, and with the inclusion of equity criteria in key aspects, including the pursuit of tree canopy goals in low-income neighborhoods. In these areas, as in others, the Council believes that where the City of Milwaukie leads, other jurisdictions in our watersheds and County will likely follow. Strong goals, policies, plans, and implementation will therefore have a ripple effect beyond Milwaukie alone. STAFF COMMENT: Please see Attachment 2 for the complete text of the letter. The letter generally supports the goals and policies, and does not call for any changes to specific policies.</i> <i>6/2 Oral Testimony: Mr. Schulman recommended additional language related to equity be added to policies in the natural resource section, similar to what is included in Policy 3.4.4 regarding equitable distribution of tree canopy.</i>	Staff appreciates the quality of comments provided by NCWC, and Mr. Schulman's participation throughout the Comp Plan process. The current draft of the document incorporates numerous comments and recommendations provided by NCWC during Block 3 and in advance of the Planning Commission public hearings. In regards to Mr. Schulman's recommendation during his June 2 oral testimony related to expanding the discussion of equity within the natural resource section of the document, staff is happy to further explore potential revisions to the policies, if Council has any specific edits that they would like to recommend.
Courtney Johnson	5/31/2020	Multiple	<i>I support the Plan update including the forward-looking vision for our city and the thoughtfulness and inclusiveness that has gone into this process. I encourage the City to continue its outreach efforts to help community members understand how this plan may impact their specific neighborhood. There is a lot of misinformation and rumor that can happen during any proposed change.</i> <i>It is clear that an immense amount of work has gone into this document to make it understandable and useable by the public, and overall the document is thoughtfully worded and clearly organized. For example, the use of text columns helps break up the page and creates a more accessible format. Using hyperlinks within the document to quickly access particular sections would be a useful addition.</i> <i>Regarding the specific policies adopted, it appears that some policies could be considered aspirational, while others require specific processes, analyses, or actions by the City decision-makers. Consider whether there are language choices that could help members of the community better understand which goals and policies are aspirational, and which are enforceable.</i>	Comment noted.

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Stephan Lashbrook	5/31/2020 (Written) 6/2/2020 (Oral)	Multiple	<p><i>The Planning Commission and City Council has received considerable testimony about the need for more focus on diversity, equity, and inclusion. While I appreciate the language added to the Plan to address those concerns, I do not know whether it goes far enough. If you were a person of color, a Native American, African, Asian, or someone from anywhere south of the US Border - if you were gay, transsexual, or somehow just different from the majority of people around you when you arrived in Milwaukie, would you feel welcomed? Would you feel encouraged to participate in the decision-making for your new community? Does the language in the new Plan go far enough to address this? I don't know, but it needs to. If you have not already done so, I hope the Council hears directly from people who identify themselves as members of those groups to see what advice they may offer.</i></p> <p><i>STAFF NOTE: Comments where Mr. Lashbrook requested changes to specific policies or background sections are included below. Please see his complete comment letter in Attachment 2.</i></p>	Comment noted. Staff would encourage Council to discuss whether new policy or updated language is needed.
Desi Nicodemus	6/2/2020	Multiple	<p><i>My name is Desi Nicodemus. I live and work as a teacher in Milwaukie, also as a black man that is now raising my son in this community. I wanted to share my thoughts with you on the Milwaukie Comprehensive Plan. I have bulleted my thoughts below. BLOCKED OUT – The indigenous people of this area, the Clackamas, were forcibly removed from their homes along the east bank of the Willamette and relocated to the Grand Ronde Indian Reservation. Oregon's long history of racism is reflected in Milwaukie's housing policies, which together with discriminatory lending practices, prevented people of color from moving here and meant that programs to encourage homeownership in Milwaukie primarily benefited White people. Milwaukie traded explicitly racist deed restrictions for exclusionary zoning laws that discriminate against low-wealth families, but the result has been the same: the city remains over 80% White today. Leaving these policies in place perpetuates a system of institutional racism, and does not reflect the values of diversity, equity and inclusion that Milwaukie now claims to support.</i></p> <p><i>PRICED OUT – Milwaukie's housing prices have surged since the end of the Great Recession, rising over 90% since 2012. This is bad for renters, who have seen a 30% spike in rents in the same period, and only benefits people who already have accumulated wealth through homeownership. Milwaukie's workforce is getting priced out. The median home sale price in Milwaukie is over \$400,000. If families should spend no more than 30% of their gross income on housing, then even the highest paid NCSd teachers can no longer afford to buy homes in the community they serve. We need to increase the availability of workforce housing, including duplexes, triplexes, fourplexes and multi-dwelling developments so that more of our teachers, cops, nurses, etc. can afford to live in the communities they love.</i></p>	Comments noted. As mentioned above, staff will be revising the history section of the introduction to provide a more complete and realistic picture of Milwaukie's history, and will also be providing more context of past zoning and land use policies. The proposed policies address the need for workforce housing and expanded housing options, but staff would welcome any Council direction on areas that should be revised or expanded.

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Desi Nicodemus	6/2/2020	Multiple	<i>HOUSELESS, BUT NOT HOMELESS – Hundreds of unhoused or unstably housed students call Milwaukie home. In addition to preserving and expanding affordable market-rate housing in Milwaukie, the city should collaborate with NCSD's Family Support Center and other community partners to work on preventing displacement of Milwaukie's most vulnerable students and provide support for families who have already experienced displacement, including funding for emergency rental assistance, removing financial and regulatory barriers for permitting subsidized housing, emergency shelters or transitional housing, permanent supportive housing and programs to provide wraparound services.</i>	Comment noted. Several of Mr. Nicodemus' comments seem more appropriate for implementation work or program development, but staff would welcome Council direction on any desired revisions to the city's housing policies.
Councilor Wilda Parks	6/5/2020 (written)	Multiple, middle housing	<i>What is the middle housing pricing structure for Milwaukie? So how far off the mark for affordable is our missing middle supply? If middle housing isn't affordable housing, how can we plan to achieve affordable housing throughout the city, not amassed in one area? There are 25 references to middle housing, but 68 references to affordable housing. Affordable types of housing are, without a doubt, crucial to our city. This document provides ways we can help developers achieve this goal.</i>	The Vision and the Milwaukie Housing Affordability Strategy (MHAS) call for more housing including housing that is described as middle housing. The assumption is that middle housing (given its higher densities) will be more affordable than standard single family housing. The draft Comp Plan proposes additional policies to justify map and code changes to increase the supply of middle housing.

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