



Southwest Neighborhoods, Inc.

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March 6, 2015

Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Re: PSC Comprehensive Plan Testimony on the Transportation Chapter of the
Comprehensive Plan, TSP Update, Parks and Land Use

Dear Portland Planning and Sustainability Commission:

Southwest Neighborhoods, Inc. (SWNI) submitted comments on Portland's draft Comprehensive Plan on September 5, October 31, and November 21, 2014 and January 2, 2015. The SWNI coalition members consist of 17 neighborhood associations and three business associations, and these comments reflect the consensus of our committee members and Board of Directors. SWNI continues to study the draft and submits the following additional comments, based on committee motions approved by the SWNI Board on February 25, 2015.

As stated in previous letters to Portland City Council, SWNI requests more inter-bureau cooperation so when projects are being proposed the Bureau of Environmental Services and Bureau of Transportation work together toward solutions to stormwater and transportation needs

Transportation Systems Plan Update

The Portland Bureau of Transportation published a staff report with numerous updates of the Transportation Systems Plan on January 30, 2015.

SWNI recommends that PBOT complete a more thorough update of the TSP as soon as possible, for the reasons listed below, and to incorporate the outcomes of the Southwest in Motion Study (SWIM) that is scheduled in FY 2015-16.

- a) The current Transportation Systems Plan is written in a one-size-fits-all manner. While the draft plan aspires to honor different pattern areas in Portland, there are very few policies that reflect unique characteristics of SW Portland. Some of the remaining work, such as district-specific policies, is needed sooner rather than later. As we noted in our January 2 letter, any consideration of costs and benefits in the transportation chapter of the Comprehensive Plan must account for issues such as lengthy gaps and deficient conditions in the existing bicycle and pedestrian network, topography, lack of connectivity and lack of stormwater management system in areas with impervious soils that will add to costs of

transportation projects but also provide benefits outside of the transportation realm (environment, public health, protection of property and resources, etc.). Without a grid system or alternative routes, the greatest benefits for the most people in SW Portland are on the major roadways. The primary pedestrian network needs to be accessible to people of all ages, needs, and abilities, citywide.

- b) Many comments on the TSP and comp plan submitted prior to PBOT's January 9 deadline are not reflected in the January 30, 2015 materials. Many of our member neighborhood associations recommended segmenting or re-scoping transportation projects to focus on the most important segments and most needed improvements, and identified new projects that are needed today that were not listed in the 2007 plan. Will these comments be carried forward to the next update? We are very concerned that the volunteer time spent providing thoughtful comments in this update will not be addressed in the TSP in the near future.
- c) The TSP staff report (page 4) states that "any new projects proposed will be in response to the land use changes or if the system is unable to meet level of service." SWNI disagrees with that statement because many infill developments over the past 20 years did not include needed infrastructure improvements and SW Portland has more "waivers of remonstrance" than any other coalition. The TSP needs to address transportation system needs citywide.
- d) New projects are particularly needed to address deficiencies within proposed centers and corridors. Centers cannot function as such until adequate and safe pedestrian and bicycle facilities and crossings are provided and transit service levels are improved so that all residents can access businesses and employment locations. SWNI requests that the Comprehensive Plan ensure that all Centers and Corridors have adequate and accessible pedestrian and bicycle facilities that allow residents to access the centers and corridors without relying on a motor vehicle. Each Center and Corridor should have supporting projects in the Transportation Systems Plan to create a complete neighborhood.

SWNI recommends the attached Priority Projects from the Staff Rankings.

Committee members prioritized ten projects out of the PBOT staff's top ranked list of projects in SWNI neighborhoods in the financially constrained 1-10 year list (January 30, 2015 ranked list of projects) (see attachment). SW Capitol Highway between Multnomah and Taylors Ferry and Barbur Blvd. remain our top priorities for needed pedestrian, bicycle, and safety improvements.

PBOT has also proposed nine new citywide programs in which smaller but needed projects would be funded. SWNI requests to be considered as a stakeholder in the future development of and investment prioritization of the new citywide programs.

At the PSC hearing on February 24, PBOT staff described their process for prioritizing projects using criteria-based outcomes, and admitted that the process is in its early stages and may need additional review. We testified that these draft scores and rankings need to be made publicly available, and thank staff for providing details on SW Portland projects to SWNI on February 27. Unfortunately, this only provided two weeks to review the draft SW Portland TSP project scores, without sufficient time for committee and board meetings to formalize SWNI comments in accordance with ONI guidelines. SWNI requests that as the criteria-based project rankings are refined, that our coalition is considered as a stakeholder in reviewing the process and results.

Land Use

SWNI recommends the following additions to Chapter 10 of the Comprehensive Plan Proposed Draft to remedy land use processes negatively impacting neighborhoods.

The impact of the city's current "one-size-fits-all" policies that allow a standard density, scale, height and mass of development to be imposed in all plan areas of the City prompts SWNI to request additions to the policies set forth in Chapter 10 of the proposed comprehensive plan. The impact of these policies is especially jarring in the demonstrably unique Western Pattern neighborhoods, corridors and centers. In the Western Neighborhoods, such an approach results in the exacerbation of existing infrastructure deficiencies noted above. They also produce development that conflicts with the residents' reasonable common sense assumptions regarding the meaning of zoning designations and their expectations that new structures will be in some degree compatible with existing development.

To address these concerns wherever they arise throughout the city, SWNI's Board of Directors endorses the proposal of the Multnomah Neighborhood Association that language be added to the end of Policy 10.6 as follows:

"In land divisions, each lot cannot exceed the maximum density outlined in each land use designation. To exceed the maximum density, a Comprehensive Plan amendment would be required."

The particular process that prompts the requested language is dividing corner lots. If properly sequenced it allows the development of two living units in a common wall configuration on a historic corner property and results in the development of a third single family lot a of size much smaller than the standard lot envisioned by the area's zoning designation.

SWNI also recommends that an additional section be added to Policies in Chapter 10 as follows:

“Building Heights and Stories. Building heights and the maximum number of stories are to be measured from the lowest elevation of the building site.”

This recommendation arises out of concerns regarding the impact that the height of new structures envisioned for Multnomah Village will have on the carefully defined and promoted character of that unique district. It is, however, stated in much broader terms to address the concerns created by the current city ordinances, working in combination with the UBC, that result in new development which “looms” over existing development, significantly altering the character of neighborhoods and often impacting the stability, both economic and physical, of adjoining properties. This is particularly pronounced given the Western Neighborhoods’ significant variations in topography.

Parks

The SWNI Parks and Community Centers Committee reviewed the 2035 Draft Comprehensive Plan Parks Policies and SWNI Board passed a motion to request that the Planning and Sustainability Commission include the following comments, suggested policy changes, and language edits as part of the public record.

Policy 8.72 Acquisition, Development, and Maintenance

Increase the supply of parks, natural areas, community gardens, and recreational facilities, giving priority to: **1)** areas where serious geographical and service level deficiencies exist, **2)** acquisition of lands appropriate for parks, natural areas, community gardens, and recreational facilities that have been declared surplus by other public agencies, or that have been foreclosed for tax delinquency, and **3)** acquisition of environmentally unique areas and watersheds.

Policy 8.73 Service Equity

Invest in acquisition and development of parks, natural areas, community gardens, and recreational facilities making continuing progress toward equitable service level goals.

Policy 8.75 Capital Programming

Maintain a long-range park capital improvement program that balances acquisition, development, and operations; and provides a process and criteria for capital improvement project selection.

Policy 8.76 Park Planning

Improve parks, natural areas, community gardens, and recreational facilities in accordance with current master plans. Where there are no master plans, develop them with public input.

Policy 8.7 Park Trails

Establish, improve, and maintain a citywide system of park pedestrian trails that are a component of a larger network of pedestrian pathways.

The committee recommended moving Policy 8.78 to Transportation.

Policy 8.79 Natural Areas

Manage natural areas and resources to protect and improve their ecological health, in accordance with both the natural area acquisition and restoration strategies, and provide compatible public access.

Policy 8.80 Recreational Facilities

Provide a wide variety of recreational facilities and services that contribute to the health and well-being of Portlanders of all ages and abilities, as called for in Vision 2020, page 29.

Policy 8.81 Specialized Recreational Facilities

Establish and manage specialized recreational facilities with the park system to respond to identified public needs.

Policy 8.82 Enterprise Facilities

Maintain existing special recreational facilities (such as golf and motorsports) as enterprises to meet public needs and ensure maximum use and financial self-sufficiency.

Policy 8.83 Public-private Cooperation

Encourage cooperation with the private sector to provide recreational activities that meet identified public needs.

Committee members also approved these proposed new policies from the current Comprehensive Plan (1980, rev. 2011):

11.38 Master Development Plans

Maintain master development plans for city parks that address user group needs, development priorities, development and maintenance costs, program opportunities, financing strategies and citizen involvement.

11.39 Maintenance

Provide programmed preventive maintenance to all city parks and recreational facilities in a manner that reduces unplanned reactive maintenance and emphasizes the use of scheduled service delivery.

11.41 Improvements

Base the priorities for improvement and development of parks, natural areas, community gardens, and recreational facilities on documented needs and the following criteria: low

long-term maintenance costs, location in deficient areas, broad community support, location adjacent to schools and other public facilities, support of neighborhood stabilization and community development projects and policies according to with park master development plans.

11.46 Recreation Programs

Provide recreation programs and services including cultural, educational, historical, health and physical fitness, and sports (competitive and non-competitive) as required to meet a balanced program that includes the needs of the especially handicapped and the elderly within existing resources.

Committee members also approved these proposed new policies from Parks 2020 Vision. We recommend they be included in Chapter 8.

Parkland population ratio

Maintain the current ratio of parkland to population—20 acres per thousand people.

Cultural arts facilities

Provide a full range of cultural arts facilities.

Recreation fees

Reduce the reliance on recreation fees through general fund revenues.

Protect existing resources

Acquire sufficient lands to protect existing resources (e.g., land along the Willamette and Columbia rivers) to complete natural resource areas (e.g., Forest Park, Kelly Butte), and to protect locally significant natural areas (e.g., Rosemont Bluff).

Civic involvement

Apply and refine the public involvement processes outlined in Planning for Southwest Parks and in Planning & Development Division Policies and Procedures when planning, developing and programming city parks, natural resources, and recreation programs.

Community gardens

Provide community gardens and expand the number of community gardens to meet the demand. There should be a community garden site within walking distance of every resident who needs one. Make sure there are a variety of garden types for people to learn from (e.g., culinary and medicinal herbs, fruit, and habitat or ethnic gardens).

Thank you for your consideration of these comments in support of meaningful public engagement in this draft of the Comprehensive Plan.

Planning and Sustainability Commission
SWNI Comments on the Draft Comprehensive Plan
March 5, 2015
Page 7

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Pearson". The signature is fluid and cursive, with the first name "Sam" being more prominent than the last name "Pearson".

Sam Pearson
President, Southwest Neighborhoods, Inc.

Attachment: SWNI TSP FC 1 to 10 years Priority Project Ranking

Cc: Mayor Charlie Hales
Commissioner Steve Novick
Commissioner Amanda Fritz
Leah Treat, Director, Portland Bureau of Transportation
Susan Anderson, Director, Portland Bureau of Planning and Sustainability
Mike Abbate, Director, Portland Parks and Recreation
Eric Engstrom, Portland Bureau of Planning and Sustainability
Joan Fredericksen, Portland Bureau of Planning and Sustainability
Art Pearce, Portland Bureau of Transportation
Roger Averbeck, SWNI Transportation Committee Chair