

HAYHURST
NEIGHBORHOOD
ASSOCIATION

July 6, 2017

One Page of
Concerns:

Condensed Version

LU Case #LU 16-159330 LDS EN

Hayhurst Neighborhood Association is not against development, however, this particular proposal is not appropriate for a number of reasons.

Connectivity Avoiding connection of the two portions of SW Pendleton will minimize the negative effects of this proposed development:

1.) 33.654.110.B1c requires consideration of the terrain, natural resources and trees on the site when making a determination about street connectivity, including streams, flood hazard areas or wetlands. Connecting SW Pendleton goes against the City's larger goals of trying to induce a mode shift from autos to active transportation.

(EXHIBIT #1 Phil Healy, Transportation Planner, Report submitted into the record at 6/22 hearing)

2.) Seeps and springs on the site of the proposed development require the protection described in City Codes 33.640, 33.640.010, 33.640.100, 33.640.200. Three springs are documented outside the currently delineated Environmental Conservation area on this site.

(EXHIBIT #2 Jonathan J. Rhodes, Hydrologist Expert Report submitted into the record at 6/22 hearing and NA Addendum Memo dated 7/5)

3.) Fanno Creek and Tributaries Conservation Plan. The Fanno Creek Plan acknowledges that seasonally saturated aquifers commonly occur in the subject watershed. Newly identified springs clearly drain into the delineated wetland.

(Jonathan J. Rhodes Report, p. 4)

(EXHIBIT#3 Pendleton Creek Sub-Basic Drainage Areas)

(EXHIBIT#4 MAP of tributaries of Fanno Creek)

4.) Pedestrian and bicycle safety: Safe Routes to School. SW 48th is heavily used by parents, school children and residents of SW Portland. It is the only Safe Route to School north of Hayhurst Elementary School.

(EXHIBIT#5 PPS School Finder 2017-18)

5.) Minimum density: Because this site is in a Landslide Hazard Zone there's no minimum density required. Therefore, a proposal with fewer home sites meets approval criteria. In fact, through the environmental approval process the City may require a reduction in the number of proposed lots. PCC.33.430.250(A)(4)

(EXHIBIT #6 Unique Water Traits of Portland's Westside)

EXHIBIT #1

Phil Healy's Transportation Report

Phil Healy

Transportation Planner

Education: Bachelor of Science, Geography, 1986, Portland State University

I have completed several short courses from Oregon State University for transportation, traffic engineering, access management, site circulation, and traffic calming.

Relevant Work Experience:

- Associate Planner, Washington County, 1988-1992
- Transportation Planner, Washington County, 1992-1997
- Senior Transportation Planner, Washington County, 1997-2007
- Senior Transportation Planner, Port of Portland, 2007-2017

My experience includes both the preparation and review of hundreds of land use staff reports, both rural and urban. I reviewed and am familiar with every aspect and issue associated with urban land development projects, including land divisions, commercial, industrial, institutional, and public transportation developments. I have a great deal of experience in implementing street, pedestrian, and bicycle connectivity requirements for all of the above categories of development.

LU 16-159330 Street Connectivity testimony

I am a transportation planner with more than twenty years of experience in Oregon. I reviewed and implemented street connectivity regulations for hundreds of residential land divisions during my previous employment at Washington County. My comments are limited to the proposal/requirement of a through public street for this subdivision.

The Portland Master Street Plan Map 11.11.6 Southwest District shows potential Street Connection Point and Alignment Uncertain chevrons directed southward from the “northern” SW Pendleton Street to the south, along with a Street Connection Point Certain arrow in the middle portion of the site directed to the south towards SW Iowa Street. This implies that a street connection must be carried through from SW Pendleton Street to SW Iowa Street. Because of scale of the map it is unclear if the connection to the south is intended to be made along the existing SW 48th Avenue or through the development site, or some other arrangement. The map also has a Street Connection Point Certain arrow directed from the middle portion of the site to the east. The exact meaning of these designations is unclear but what is clear is that they need to be considered in concert with the street connectivity requirements found in 33.654.110.

33.654.110.B.1.c. requires consideration of the terrain, natural resources, and trees on the site when making a determination about street connectivity.

c. Characteristics of the site, adjacent sites, and vicinity, such as:

- (1) Terrain;*
- (2) Whether adjacent sites may be further divided;*
- (3) The location of existing streets and pedestrian connections;*
- (4) Whether narrow frontages will constrain creation of a through street or pedestrian connection;*
- (5) Whether any of the following interrupt the expected path of a through street or pedestrian connection:*
 - *Environmental, Pleasant Valley Natural Resource, or Greenway overlay zones;*
 - *Tree groves;*
 - *Streams;*
 - *Special flood hazard areas; or*
 - *Wetlands; and*

There have been findings made that there will be significant changes required to the terrain in order to construct the street. A pedestrian path could be constructed along the east property line with much less grading impact.

33.654.110.B.1.a requires that through streets and pedestrian connections should generally be at least 200 feet apart. The new through street will be spaced less than 200 feet from SW 48th Avenue. A pedestrian path could be constructed along the east property line that would meet the City’s spacing guidelines.

Testimony has been provided that there will be minimal use of the new street for through traffic. This information diminishes the argument for the need of a through street in the first place due to its

minimal benefit to auto connectivity compared to the impact to terrain and other natural resources described in 33.654.110.B.1.c.

There is not a compelling need for additional connectivity for cars in this area. There is no significant reduction in vehicle miles travelled. In fact, it goes against the City's larger goals of trying to induce a mode shift from autos to active transportation.

Introducing additional traffic onto roadways which are not adequately surfaced and do not meet the City's engineering standards, while at the same time not requiring or assuring improvement to minimal standards, is not a benefit to the neighborhood.

The combination of the above factors builds to a determination that the construction of a through street is not only not required, but will be detrimental to the neighborhood.

Phil Healy
2003 SE 52nd Ave.
Portland, OR 97215

EXHIBIT #2

*Jonathan J. Rhodes
Testimony submitted
for Record at 6/22
Hearing*

AND

*Addendum (NA)
7/5/2017*

7/5/17

Addendum

(NA)

To: Portland City Council

Re: LU 16-159330-LDS EN

The Hayhurst NA submits the following:

1. Regarding reductions in low flows and temperature elevation in streams draining the area, due to the proposal's introduction of impervious surfaces, the following excerpt is from the City's Fanno Creek and Tributaries Conservation Plan (p. 146, 1994):

Impervious surfaces permit less rainfall to infiltrate the soil, reducing groundwater recharge and lowering volume of water in creeks contributed by groundwater. This may cause neighboring creeks to dry up early in the season, which can damage or destroy habitat for resident fish, amphibians and invertebrates, and eliminate a source of water for terrestrial animals. Heated runoff from impervious surfaces and reduced vegetative cover can raise water temperatures in nearby creeks and degrade aquatic habitat. Runoff can also carry pollutants into these creeks. Impervious surfaces also interfere with the transfer of air and gases.

Jon Rhodes read a portion of the foregoing excerpt as part of his oral testimony on 6/22/17 to City Council.

2. Regarding the springs on the site draining into the wetland and then into a channel and a waterbody, the following excerpt is from: APG2 WETLAND DELINEATION REPORT EVERETT CUSTOM HOMES: EVERETT HEIGHTS RESIDENTIAL DEVELOPMENT, Prepared by Anchor QEA, LLC, dated July 2016 (p. 2):

"The study area drains toward the west and southwest to an unnamed open drainage in the southwest corner."

The following, from the stormwater report from OTAK, also indicates that water draining from the wetland (and hence from the springs) drains to the channel in the SW corner of the property:

The following excerpt from Everett Heights Request for Land Division Approval Environmental Review, prepared by OTAK, dated 1/30/17 (p. 20), also indicates that water from the springs draining to the wetland flows "relatively quickly" to the channel in the SW corner of the site:

The existing wetland occurs to the east of SW 48th Ave and to the north of the drainageway that crosses the southwest corner of the site. The wetland does not occur along the drainage way, but on the uphill side of the drainageway in an area with slopes ranging from 3% to 12%. This is an unusual location for a wetland, which typically occur in low flat areas that retain surface water for long periods. The slope of this wetland indicates that surface runoff would flow through it relatively quickly and direct precipitation is likely inadequate to create the wetland. That being said, there are three possible sources of additional hydrology sources

3. Regarding temperature elevation from road runoff at the channel crossing from increased area of impervious surfaces draining to the creek, the following excerpt is from the Everett Heights report, prepared by OTAK, dated 1/30/17 (p. 20):

Required street improvements along the SW 48th Street frontage will replace the existing ditch with pavement, curb, and gutter, and the street stormwater runoff will be routed through a LID facility and conveyed to a new culvert at the location of the existing culvert.

This indicates that warmed runoff from the road expansion would be supplied to the channel and downstream, exacerbating existing water temperature problems in Fanno Creek.

In closing, one of the most obvious and primary ways that the project as proposed is clearly inconsistent with the approval criteria in the City Code is that the Code clearly requires the modification of the project to have fewer adverse impacts on significant resources and functions, including those in the designated environmental zone. Per Jon Rhodes, a sizable body of scientific information clearly indicates that reducing the amount of impervious surfaces (streets, sidewalks, homes) from that currently proposed would reduce impacts on significant resources, functions, and values, and minimize impacts on hydrology, water quality, and aquatic systems. This is the most formidable hurdle to the project as proposed.

EXHIBIT #3

Pendleton Creek Sub-Basic Drainage Area

**Figure 3-21
Pendleton Creek Sub-Basin
Drainage Areas**

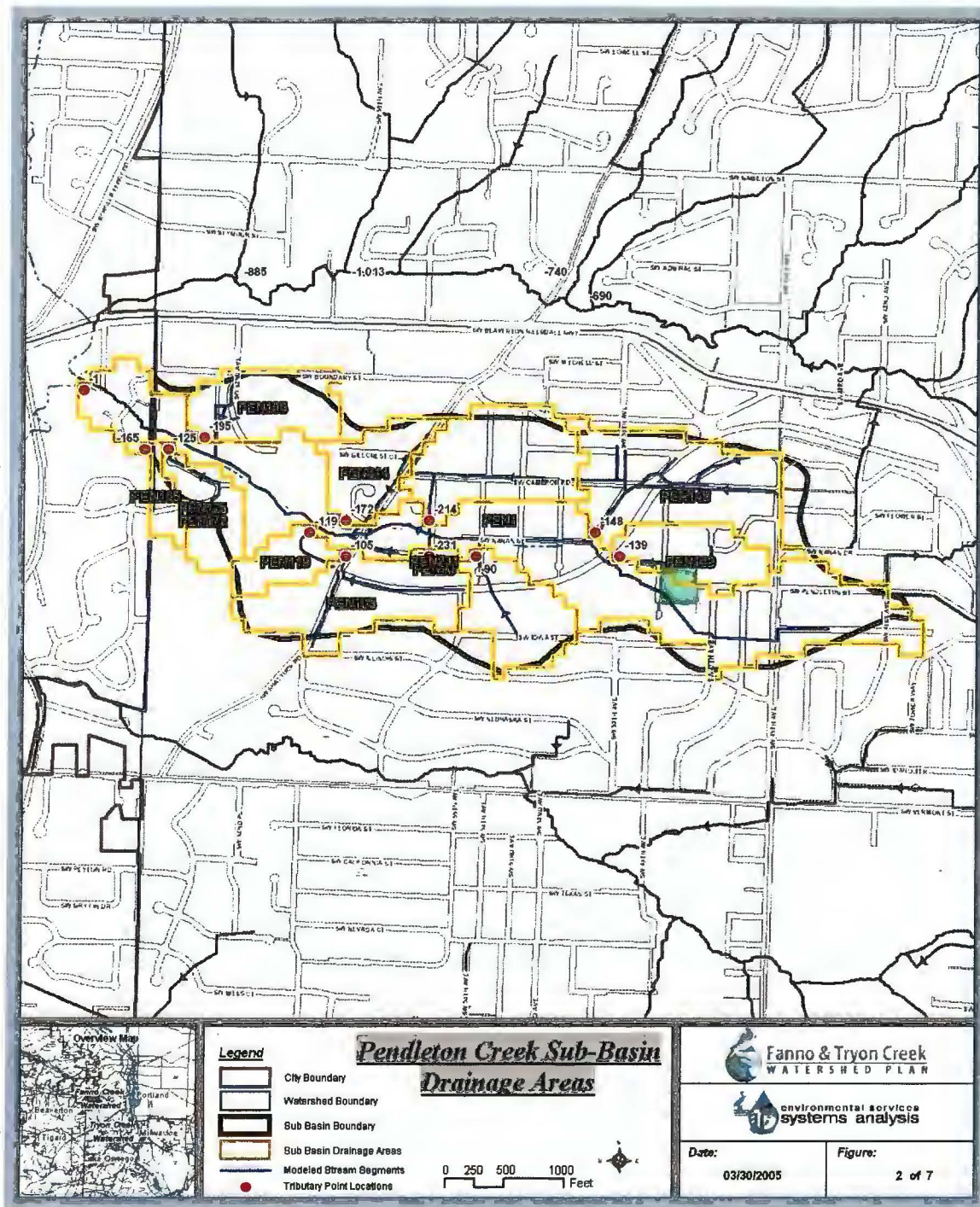


EXHIBIT #4

MAP OF
TRIBUTARIES
TO FANNO
CREEK

Up Fanno Creek chronicles the life and near-death of a small, urban stream in Portland, Oregon. "Drano Creek," nearby neighbors once called it, and on hot summer days in the late 1960s you could sometimes smell it before you could see it. The once flourishing waterway was so filled with sewage, agricultural waste, and industrial pollutants that it was on the verge of extinction. It also posed a health risk so serious that it helped shut down all residential and commercial development in its area for almost a year. Like other urban streams around the country, Fanno Creek was temporarily saved from almost certain destruction by the passage of the Clean Water Act in 1972. Thanks to that law and the efforts of a growing army of wetland advocates, the creek has recovered significantly from the abuses of more than a century of mostly unchecked or poorly regulated land-use practices. Point-source pollution, once thought to pose the greatest threat to the creek's biological survival, is now largely under control. But the long term outlook for Fanno Creek's existence is anything but rosy, as Eric Lindstrom quickly learned when he set out to discover his personal Watershed Address. *Up Fanno Creek* tells his story as well, and in the process shows what it means to become a wetlands advocate—accidentally or not.

The Fanno Creek Watershed



\$19.95
ISBN 978-0-9881884-0-2
51995>



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EXHIBIT #5

PPS School Finder 2017-18



PPS School Finder

Enrollment Page

N



▼ hayhurst X Q

Show search results for hayhurst

2017-18 Attendance Areas

K-5: Hayhurst

6-8: Gray

9-12: Wilson

Hayhurst
K-5

SW Cameron

SR to S

SR to S

S
5th

wcoffey@pps.net | (

only existing
through SR to School
from NORTH



600ft

-122.736 45.487 Degrees

SAFE ROUTES TO
SCHOOL

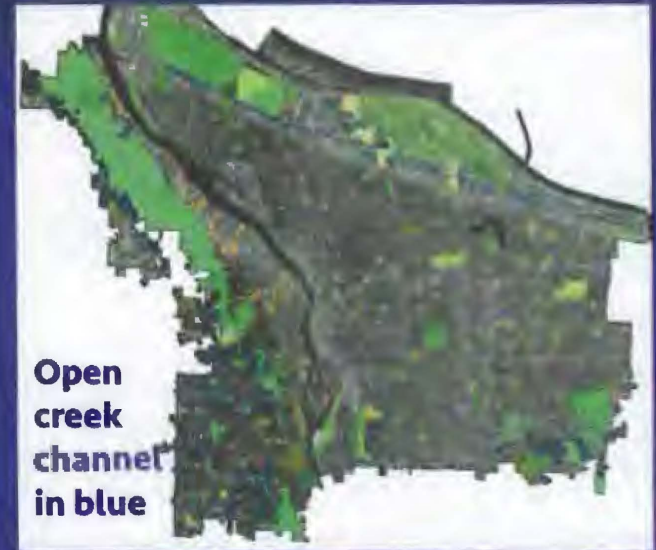
EXHIBIT #6

Unique Water Traits of Portland's Westside

From the SW Watershed Resource Center

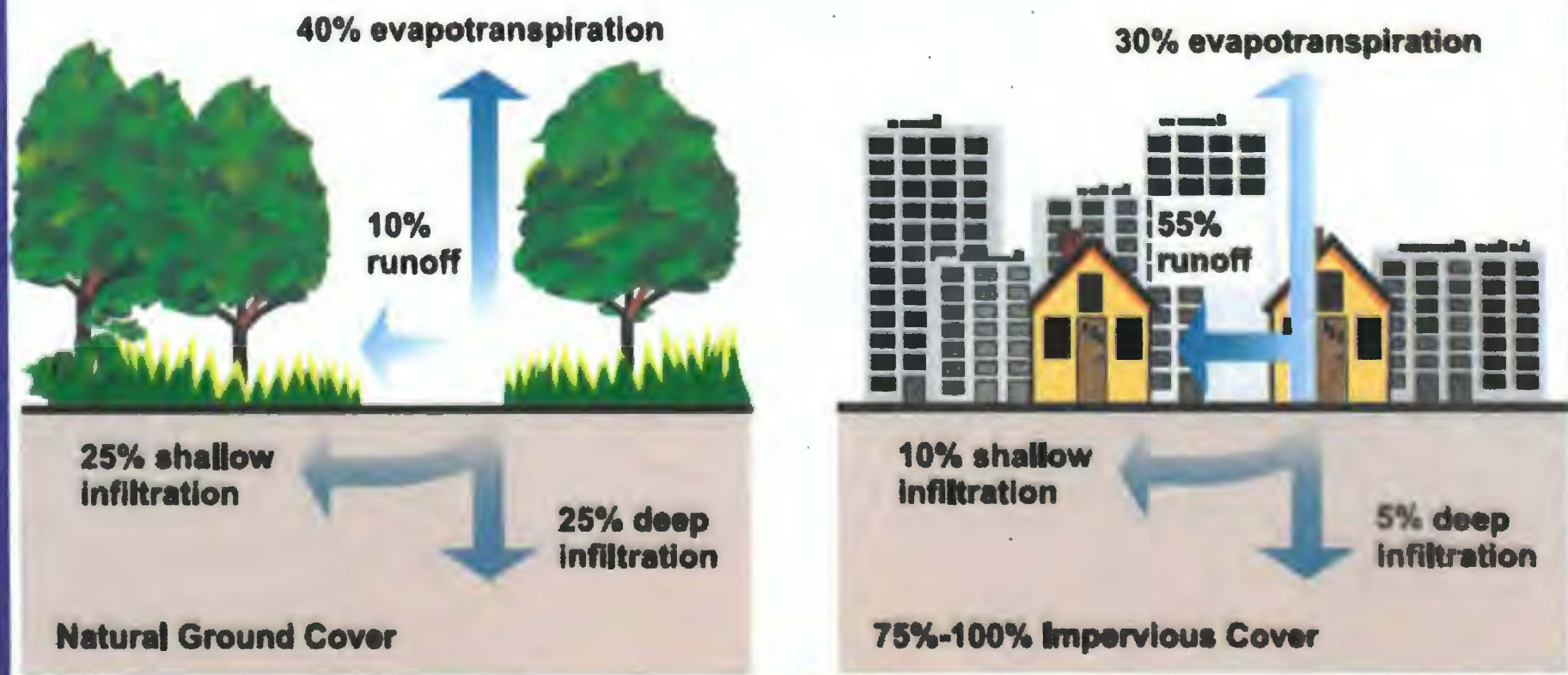
Portland's West Side

- Loess (Portland Hills Silt, similar to clay)
 - Poor infiltration
 - Small particles = small pore spaces = reduced volume
 - Absorbs water slowly and releases it slowly
- Steeper topography
 - Difficult to infiltrate due to surface runoff
 - Increased soil particle mobility = erosion
- More open creek channel & erosion
- Landslide hazard areas
- High Groundwater
- Site development challenges



Stormwater practices relying on infiltration of runoff are often inappropriate for the West Side.

Impacts of Urbanization

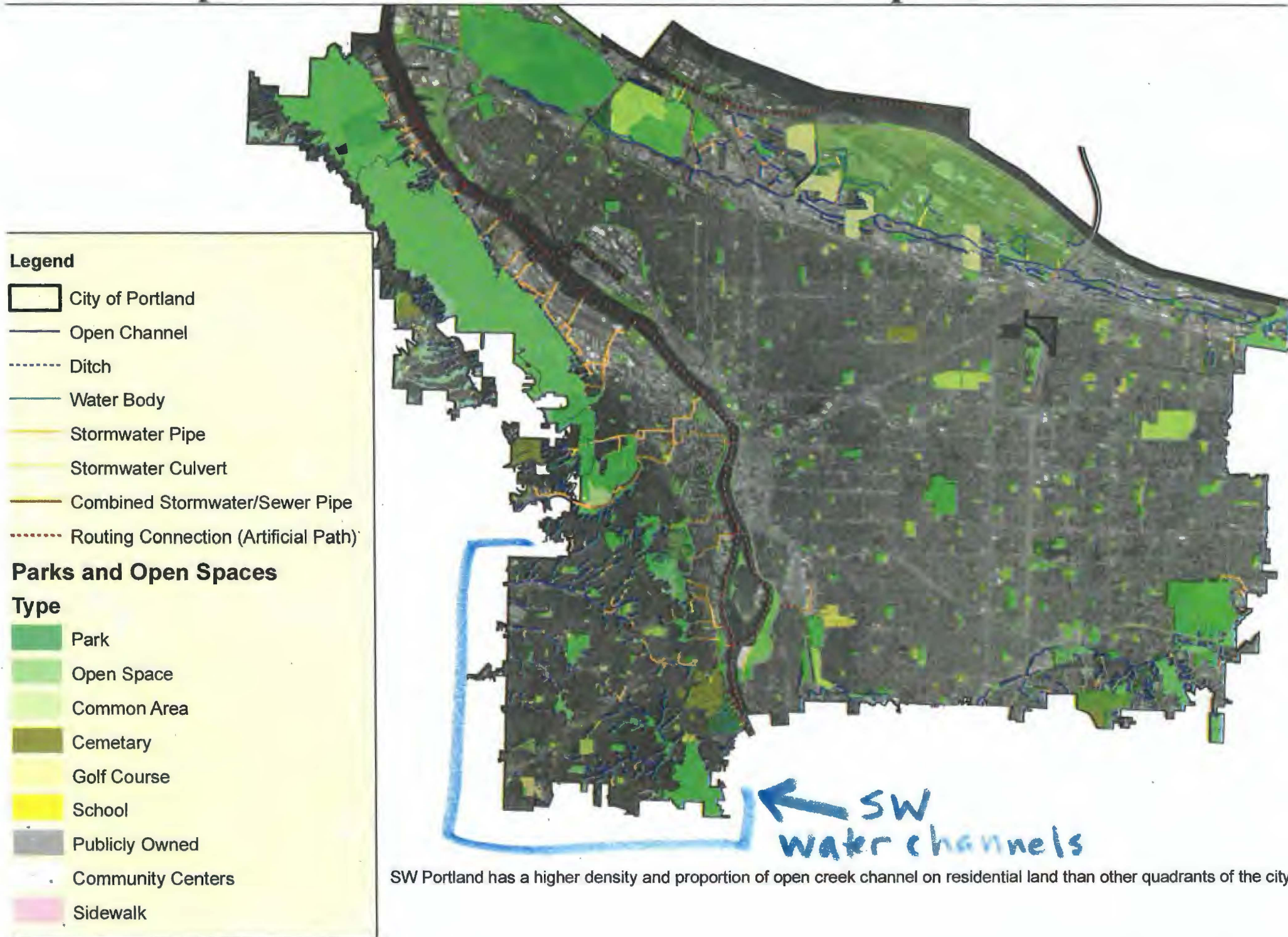


Impacts of Urbanization

- **Impervious surfaces** reduce infiltration and roughness, increase flow rate
- More intense **floods and droughts**
- Creek downcutting/incision
- Increased **sediments** in runoff create problems for **aquatic life**
- Soil compaction
- Faster spread of **invasive species**
- **Loss of habitat** connectivity and complexity: trees and canopy levels
- Reduction in habitat for beneficial species
- Increase in habitat for **urban pest** species



Open creek channel and land ownership in Portland



Water Quality in SW Portland

- SW Portland creeks listed for:
 - Temperature
 - Heavy metals
 - Bacteria
 - Phosphorus
- Stormwater runoff negatively impacts water quality:
 - Rain picks up heat from asphalt, concrete
 - Roads convey oils, brake pad lining dust (heavy metals), exhaust/particulate matter (PAHs), roof materials (zinc) to creeks

