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**To:** Hales, Mayor; Commissioner Fish; Commissioner Fritz; Commissioner Saltzman; Our Streets PDX; [commissioner-novick@portlandoregon.gov](mailto:commissioner-novick@portlandoregon.gov); Planning and Sustainability Commission; [raft@MILTJONES.COM](mailto:raft@MILTJONES.COM)

**Cc:** Ed Fischer; Susan Egnor; Anton Vetterlein; Eric Schnell; Harrison, Michael

**Subject:** Comprehensive Plan Testimony

Please accept these preliminary comments as testimony on the proposed comprehensive plan. I wanted to get these in before the current deadline expires and before the next City Council hearing :

1. The time for public testimony needs to be extended. This is a complicated project. Individuals and organizations need more time to fully understand the draft plan and its changes relative to the existing comprehensive plan. It is also the case that parts of this proposal have not yet been defined or explained in sufficient detail to allow for meaningful comment. See items 2 and 3 below in this latter regard.

2 Definitions for "mixed use zones" and "institutional zones" need to be provided. Note for example that OHSU is designated in the draft as being in a "mixed use" zone (not an "institutional zone.") I have yet to find anybody who can explain what this means or the practical differences between these designations for this area. Without definitions, meaningful comment is impossible.

3. Note that the Veterans Hospital is designated as being in a "mixed use" zone. Not only does nobody seem to know what this means, it is not even clear that the comprehensive plan has any regulatory authority over activities on this federal enclave (which has recently announced significant expansion). This need explanation.

4. The residential neighborhoods climbing Marquam Hill are designated as being part of the "Inner Ring District". They should be designated as "Western Neighborhoods." Not only are they not within walking distance of the Central City, they have hilly topography, streams, ravines and forested slopes as prominent characteristics; the very definition of a Western Neighborhood Pattern Area.

5. The City needs to explain how it will avoid parking and traffic bleeding from mixed use areas, institutions and development corridors into adjacent residential neighborhoods. The plan does not deal sufficiently with the impacts of traffic and parking on neighborhoods generally.

6. The comprehensive plan needs to implement longstanding district and neighborhood plans. These include the Marquam Hill Plan, Terwilliger Parkway Plan and Homestead Neighborhood Plan. Draft Policy 1.15 should be deleted. The generalizations of the comprehensive plan should not override the more definitive local planning already in place.

6. Overall, the draft plan seems to place emphasis on accommodating population growth with a nod toward preserving residential neighborhood character and livability. This is backwards. The plan should preserve Portland's residential neighborhoods and their livability as its primary goal, and allow for growth when and where character and livability are preserved. Portland's neighborhoods should not be sacrificed to achieve population growth.

Thank you for your consideration of this testimony,

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