

December 2, 2014

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Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW Fourth Avenue, Suite 7100
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Re: PSC Comprehensive Plan Testimony

Dear Portland Planning and Sustainability Commission:

Thank you for the opportunity to comment on the Proposed Draft Comprehensive Plan dated July 2014. The Plan is quite complex and although you have extended the deadline for comments to March 13, 2015, several portions of the Plan have not yet been released and that deadline may not be sufficient for citizens to provide thoughtful comments on those sections or the comp plan as a whole.

I urge you to extend deadlines for comments on the draft Mixed Use Zone, Institutional Zone, Transportation Systems Plan and Parking policies, as well as formal boundaries for Centers and Corridors. These proposals are still being developed and citizens have not had adequate opportunity to evaluate details and understand how they will affect neighborhood livability. Please allow at least 90 days following the public release of each of these drafts before ending its public comment period.

In addition, because there are strong themes that carry throughout several chapters (especially the connections between the economy, land use and transportation) and key documents not yet published, it is important for citizens to be able to comment on policies in future drafts as citizens gain a better understanding of how policies will be implemented in the neighborhoods. I support Southwest Neighborhoods, Inc.'s recommendation that PSC allow citizens to comment on the complete draft 2035 Comprehensive Plan before it goes to City Council for adoption.

Here are my personal comments on the draft plan.

Proposed Draft Goals and Policies dated July 2014

Chapter 1: Guiding Principles

Equity: One of the draft plan's Guiding Principles (p. GP1-5) is to "encourage land use decisions that reduce existing disparities, minimize burdens, extend benefits, and improve socio-economic opportunities for under-served and under-represented

populations.”

1. Equity is defined in the draft Plan glossary as “when everyone has access to the opportunities necessary to satisfy their essential needs, advance their well-being, and achieve their full potential.” How will this definition be applied to zoning code or used to prioritize funding?
2. The draft Plan policies use terms such as under-served, under-represented and vulnerable communities differently throughout the document without definitions, supporting data or measureable goals for achieving equity citywide. In some sections (i.e. draft Policy 3.3, equitable development) the city aspires to “avoid or reduce negative development impacts, especially where those impacts inequitably burden communities of color, under-served and under-represented communities, and other vulnerable populations,” while in other sections (i.e. draft Goal 5.b, equitable access to housing) the city aspires to “remove disparities in housing access for communities of color, low-income households, diverse household types, older adults, and households that include people with disabilities.” The public needs easy access to the data that the plan will use to evaluate equity. Equity must also consider needs of the youth and seniors in our community, especially for prioritizing needed capital improvements for sidewalks and bicycle facilities, access to transit service, and parks and community centers.
3. The draft Plan should embrace the principles of Environmental Justice. In particular, the Partnership for Sustainable Communities (<http://www.epa.gov/environmentaljustice/sustainability/index.html>) recommends strategies that addresses housing, environment, transportation and health issues and enhance community engagement.

Internal Consistency (Policy 1.3) needs to be strengthened to assure coordination among Portland bureaus and commit to a process for resolving conflicts when they arise. This is particularly important when citizens and neighborhood associations raise issues that affect livability in their neighborhoods that involves more than one city bureau or agency, and for prioritizing projects that meet multiple community needs.

Intergovernmental Coordination (Policy 1.6) needs to include coordination with other cities in the region, particularly those that share boundaries with Portland.

Existing Plans (Policy 1.15): There are many existing plans adopted prior to the Comprehensive Plan whose details are very important to neighborhoods as they develop. Please include a list of existing community, area and neighborhood plans as an appendix. The draft Comp Plan also needs a commitment to promptly adopt modal plans into the Transportation Systems Plan in order to assure that new and modified development and construction will adhere to these adopted plans.

Chapter 2: Community Involvement

The draft Plan dilutes the role of the neighborhood association in land use projects (policy 2.31) and broadens participation among partners in general. Citizens that live or

work in a community have a vested interest in maintaining and enhancing the livability of their neighborhoods and must be key partners in decisionmaking. Some recommendations to enhance meaningful community engagement in decisions affecting growth include the following.

1. It is especially important to retain the legal role of Neighborhood Associations in land use issues.
2. Neighborhood Associations and Business Associations must comply with standards developed by the Office of Neighborhood Involvement, including public notice and public meetings before decisions are made. Other partners in decisionmaking may not follow similar practices and their representatives may represent a very limited group. Policies 2.1 and 2.2 need a public process for resolving issues where the recommendations of different groups may conflict.
3. Local residents and Neighborhood Associations often identify issues where there needs to be better inter-bureau or regional cooperation in planning for improvements—particularly for issues related to stormwater and transportation infrastructure. The community involvement program needs to be responsive to these types of issues and include a process for resolving conflicts or priorities among bureaus to achieve livability goals within our neighborhoods.
4. The draft Plan Chapter 2 recognizes the need for adequate time for citizens to review and respond to draft plans and proposals, but too often today, that does not happen. The community involvement program needs to commit to at least 60 days written notice for the public to comment on all plans, proposals and projects from all bureaus.
5. The draft plan needs to commit to district liaisons, similar to the Planning and Sustainability Bureau's District Liaisons, for other major bureaus (PBOT, BES, etc), to facilitate communication between the bureaus and the community.
6. The draft plan needs to assure that the city will provide citizens a response to the comments they receive on specific issues (Policy 2.12). These responses may be grouped as long as all issues and concerns raised by citizens are addressed in the response.

Chapter 3: Urban Form

I support draft Plan's focusing growth in Centers and Corridors, but a high percentage of the housing that will exist in 2035 will be housing that already exists. The City of Portland has issued—and continues to issue--thousands of "waivers of remonstrance" that allow developers to avoid making street improvements, resulting in gaps in sidewalks and bike lanes in existing centers and corridors. Public investments in infrastructure and maintenance must be prioritized to areas of existing housing and businesses in the proposed centers and corridors (especially transportation infrastructure), and not just be focused on areas targeted for growth and new development. The city must require developers to construct sidewalks and bicycle lanes in centers and along corridors, regardless of existing conditions.

Equitable Development (Policy 3.3.a) needs definitions of these buzzwords in order to

implement the policy (see comments on equity above).

Center Connections (policy 3.16) must be accessible to people of all ages and abilities.

Green Infrastructure in Centers (Policy 3.17) needs to protect and enhance viewsheds in key locations (i.e. Terwilliger Parkway, Willamette Greenway) while preserving the tree canopy (see also Policy 9.17, Street Views). In addition, when the Bureau of Environmental Services builds green infrastructure in centers and corridors they must consider the transportation needs of the community and enhances, not impedes, pedestrian or bicycle travel or access to transit.

Transportation Hub (Policy 3.20) needs to recognize regional transportation hubs as well as the role of the Central City. Policy 3.20 declares downtown Portland as the region's transportation hub, yet many citizens travel to other regional transportation and employment hubs to meet their needs (i.e. Washington Square, Beaverton, Tigard, Tualatin, Gresham, Vancouver). The draft Plan needs to acknowledge the importance of regional centers outside of Portland in terms of how Portlanders travel to work, shops and services. Where I live, Washington Square is the closest regional hub (closer to my house than downtown Portland) yet there is poor transit service to get there (i.e. none on evenings or weekends).

Transportation (Policy 3.28) should add "and frequent transit service" since not all Town Centers in Portland have high-capacity transit service. This policy for Town Centers should also emphasize "access to Town Centers by people of all ages and abilities" since there are many Town Centers and frequent transit service lines that are currently accessible to some people only by walking on dirt roads or paths.

Transportation (Policy 3.32) in Neighborhood Centers also needs to be accessible by people of all ages and abilities.

The draft Plan policies on Corridors (Policies 3.38-3.42) use weak verbs to encourage improved infrastructure for walking, biking and accessing businesses and transit service. Policy 3.39 should "improve" public streets, sidewalks and bicycle facilities to support the vitality of business districts, create distinctive places, provide a safe and attractive pedestrian and bicycle-friendly environment, and contribute to creating quality living environments for residents. Policies 3.40 (Neighborhood corridors) and 3.44 (transit station areas) should have similarly strengthened language that will make these centers and corridors accessible to all Portlanders. Each center and corridor should have supporting projects in the TSP to create a complete neighborhood.

Policies under "neighborhood corridors" need to identify nodes where multi-family development may be more desirable than the entire length of the corridor. Like civic corridors, these neighborhood corridors must have accessible sidewalks and bike paths to enable people of all ages and abilities to get to the services, amenities and transit lines they connect to.

Community Connections (Policy 3.44) must assure accessible pedestrian connections for people of all ages and abilities.

City Greenways needs a more distinct definition because there is some inconsistency in how “greenways” and “green streets” are used in both of their transportation and water quality functions. These policies need a clearer description of how “greenways” integrate into the city’s transportation and stormwater systems. Some city-designated bicycle greenways in Southwest Portland are on unimproved streets without landscaped water quality facilities. Some Urban Trails are on unimproved streets that lack sidewalks and are not accessible to people of all ages and abilities. City greenways do not work when the greenways connect to busy streets that lack sidewalks and bike lanes. Greenways policies also need to consider how the different bureaus (Transportation, Parks and Recreation and Environmental Services) will manage them.

Pattern Areas: The comprehensive plan policies must recognize different needs in different parts of the city (i.e. the pattern areas) and allow for different types of growth (i.e. centers in outer SW Portland may look different than centers in inner SE Portland).

Western Neighborhoods Pattern area, Policies 3.88 and 3.90, seem to rely on trails as the primary means of mobility in Western Neighborhoods, and do not emphasize the need for active transportation that is present in other pattern area descriptions. Only 33% of SW Portland’s busy streets contain sidewalks. The urban trail system can create pedestrian connections in areas that lack sidewalks but these trails are often not accessible to all Portlanders, especially those with mobility issues, and the system depends on volunteers for construction and maintenance. The Western Neighborhoods Pattern Area Policy 3.88 needs to be revised to read: “Provide safe and accessible pedestrian and bicycle connections in centers and along corridors.” Trails (Policy 3.90) enhance the pedestrian network but do not replace the need for accessible sidewalks to key destinations.

Western Pattern Areas may need flexibility in applying policies for right-of-way designs, streets and stormwater improvements, and parking. Waivers of remonstrance should not be granted for needed street improvements in centers or along corridors. If cost-effectiveness is used as a criteria for prioritizing publicly-funded projects (proposed Goal 9H), the analysis must consider the benefits of required stormwater infrastructure as well as other infrastructure (i.e. bridges and retaining walls) that improve connectivity.

Centers and Corridors

1. The draft Plan does not identify specific boundaries for centers and corridors. Please allow at least 90 days for the public to comment on proposed boundaries for centers and corridors.
2. In general,
 - Keep Hillsdale and West Portland as town centers.

- Keep SW Barbur, SW Beaverton-Hillsdale Hwy/SW Capitol Highway, and SW Macadam as civic corridors.
 - Keep SW Capitol Highway/SW 49th from Hillsdale to Portland Community College's Sylvania Campus as a neighborhood corridor.
 - Extend SW Multnomah Blvd. neighborhood corridor from Multnomah Village to SW 45th.
3. In some sections of the draft plan, the terms "centers and corridors" are lumped together even though "centers" are specific geographic areas while "corridors" are streets that may be over 8 miles in length.
 4. All "centers" need to have accessible pedestrian and bicycle facilities (policy 3.15). Policies 3.28 and 3.32 need to make sure that all Portlanders can walk, bike and access transit in centers and transit station areas and along corridors.
 5. Corridors, especially neighborhood corridors, should not be rezoned for increased density throughout the corridor. Proposed corridor zoning should consider "nodes" where mixed use development would be appropriate along the corridor.
 6. The map proposes to consider the seven "nodes" from the Barbur Concept Plan as "future transit alignment and potential station areas". I support this use of the Barbur Concept Plan recommendations for areas of increased density in Metro's SW Corridor Work.
 7. West Portland Town Center: The city must address the deficiencies that are preventing the West Portland Crossroads from achieving its potential as a town center. This Town Center serves a highly concentrated population of under-served, under-represented and vulnerable communities in SW Portland and is serviced by two frequent service bus lines. In Metro's "State of the Centers" report (11/1/2011) the population, dwelling units and employment densities in West Portland were higher than the regionwide town center average, but its non-single-occupancy-vehicle mode share was much lower than the regionwide average. West Portland Town Center lacks safe sidewalks, bike lanes and crossings in the center and needs public investments in infrastructure to meet neighborhood livability goals.

Mixed Use Areas and Institutional Employment Centers

1. There needs to be better consistency between Chapter 3, Chapter 6 and Chapter 10 regarding land use, employment and mixed use zoning. For example, the unspecified policies referenced on the bottom of page GP3-18 are not sufficient to understand how issues related to mixed use areas and institutional campuses will be addressed in our neighborhoods.
2. The draft plan's proposed Institutional Employment Center and Mixed Use zoning areas must mitigate neighborhood impacts of institutional growth, such as transportation infrastructure needs, traffic congestion and parking. It's not clear how Policy 3.57 (employment area geographies) will be applied to land use decisions.
3. The draft plan does not include specific policies for home-based businesses that are projected to be 9% of the city's economic growth. How will the city mitigate

neighborhood impacts of home-based businesses, such as traffic and parking? Policy 6.62 is not sufficient.

4. The city's List of Significant Projects needs to assure that there is adequate infrastructure to support the proposed institutional, employment and mixed use areas.

Chapter 4: Design and Development

Goal 4.C, Human and Environmental Health, will not be achieved by allowing "mixed use zoning" in areas near environmental threats (i.e. along freeways or near brownfields and superfund sites as has been proposed in the Central Eastside Industrial District). Offsite impacts (Policy 4.28) does not do enough to protect human health (see earlier comments regarding Environmental Justice and Partnerships for Sustainable Communities). The proposed liberal use of mixed use zoning citywide has the potential to create cancer clusters within some neighborhoods.

Scales and Patterns (Policy 4.13) should not allow a range of architectural styles and expression—it seems contradictory to other language in this policy that encourages design and development that complements the general scale, character and natural landscape features of neighborhoods. Preserve existing Comp Plan language regarding neighborhood livability with specific area plans. Require community engagement in development proposals, especially those where waivers or other exceptions to city policies or codes are proposed, before decisions are made.

Reducing Natural Hazards and climate change risks and impacts (Policy 4.61): I support the proposed downzoning changes in areas that are historical landslide areas or at risk of natural disasters.

Chapter 5: Housing

Policies 5.23-5.38 discuss housing affordability, but they don't discuss the cost of transportation as a factor of affordability and the importance of providing access to low cost transportation alternatives such as walking and access to transit.

Chapter 6: Economic Development

I am very strongly opposed to Policy 6.15 and 6.41 that propose to develop pristine areas such as West Hayden Island for economic development. Brownfield and grayfield redevelopment (former industrial sites, gas stations and underdeveloped shopping centers and parking lots) should be a much higher priority in the comprehensive plan policies than "greenfield development" or annexation.

West Hayden Island (Policy 6.41) must be deleted. I strongly agree with numerous comments made at Comp Plan hearings that oppose the development of West Hayden Island for industrial purposes. There are ways to accomplish the city's need for

industrial land inventory, and planners need to reevaluate areas the city is considering for mixed use zoning. For example:

1. Policies 6.38 and 6.38 should be strengthened to develop brownfields and grayfields before allowing industrial uses in undeveloped areas (greenfields).
2. Policy 6.43 (Dispersed employment areas) will encourage former industrial areas such as the Central Eastside Industrial District to develop as another Pearl or South Waterfront residential/commercial area, whereas CEID may be better suited for industrial zoning.

Regulatory climate (Policy 6.17) is much too detailed. In particular, review processes in Policy 6.17.d should not be expedited at the expense of meaningful citizen involvement. What a developer considers an “unnecessary delay” may be a very necessary delay to the citizen or Neighborhood Association that is reviewing the proposal.

Campus Institutions (Policy 6.55) must recognize the significant impact these campuses have on the surrounding neighborhoods, particularly transportation, parking and housing impacts. Existing master plans and conditional use zoning help balance the needs of the campus with the needs of the neighbors and should not be changed.

Home based businesses (Policy 6.62) also needs to consider the transportation and livability aspects of these businesses on neighborhood livability.

Chapter 7: Environment and Watershed Health

I am concerned that watershed health (mandated by the federal Clean Water Act) in practice often trumps accessibility of public streets (mandated by the Americans with Disabilities Act). BES stormwater requirements make it more difficult and costly to provide sidewalks and bike lanes where needed and developers have succeeded in getting waivers for these requirements. “Ditches to swales” may not provide a walkable surface in the neighborhoods and may invite on-street parking that forces walkers into the travel lane. This chapter needs improved coordination among bureaus to support neighborhood livability and accessibility goals.

Protecting Natural Resources in Development Situations (Policies 7.9-7.13) need to emphasize inter-bureau coordination and cooperation. State and Federal Coordination (Policy 7.12) is not sufficient.

Impervious surfaces (Policy 7.24) is too narrow. Additional language should encourage appropriate use of pervious surfaces. There may be instances where the construction of impervious surfaces (i.e. sidewalks) to promote active transportation also benefits the environment through decreased use of fossil fuels.

Coordinated stormwater management (Policy 7.32) recognizes the importance of coordinating transportation and stormwater system planning in areas with unimproved or substandard rights of way, and is a good first step. There needs to be a process for

resolving conflicts between bureaus that impede neighborhood livability improvements. Multiple bureaus should contribute to the cost of improvements that benefit their respective missions.

Watersheds. Policies 7.56 through 7.58 are specific to the Fanno/Tryon watersheds in SW Portland. SW Portland has poorly drained soils, steep slopes and sensitive natural resource areas that require context-sensitive solutions to water quality issues in the Fanno/Tryon Creek watershed and Willamette River sub-watersheds. In particular, Policy 7.32 regarding coordinated stormwater management needs to apply in these watersheds.

Chapter 8: Public Facilities and Services

This draft chapter needs a policy to mandate public facility improvements by private developers and prohibit waivers of remonstrance, particularly along busy streets and in centers and corridors. When waivers are issued in these areas, future improvements pass the cost of needed infrastructure onto the taxpayer.

Public rights-of-way (Policies 8.33-8.43) are a good start to identifying the many functions of public rights of way. This topic needs to be expanded upon with an opportunity for public comment on how the policies would be implemented.

Stormwater Management (Policy 8.39) needs to consider the community benefits of these services in the right of way (Policy 8.41) and require that stormwater facilities in unimproved rights-of-way enhance the pedestrian environment (i.e. pervious pavement) (see Policy 7.32).

Parks (Goal 8.H) aspires to safe, convenient and equitable access to high quality parks, natural areas, trails, and recreational opportunities. While the Plan includes policies for parks and recreation (Policies 8.72 through 8.83) the Plan needs more detail regarding how these goals and policies will be achieved in parks-deficient neighborhoods.

Chapter 9: Transportation

The Transportation Systems Plan is not expected to be available for public review until sometime in 2015 and it seems premature to include this chapter without a chance to review the plan as a whole. Please allow at least 90 days following publication of the draft Transportation Systems Plan to facilitate meaningful public engagement in the draft TSP and how it would affect neighborhood livability.

This draft chapter ignores the 59 miles of unimproved streets and huge gaps in sidewalk and bicycle facilities citywide. Centers and corridors need public infrastructure to support growth and past and current city actions that “waive” requirements has done a disservice to many communities in Portland.

This draft chapter uses terms such as “under-served”, “vulnerable users” and “unequal burdens” in many places without defining these terms or how they would be applied when implementing the policies. As noted in the “equity” discussion above, the draft Plan needs to identify the communities that are referenced with specific measurable goals, and provide easy public access to the data.

Here are some specific comments on the draft chapter.

Support Great Places (Goal 9B) should be strengthened to prioritize investments in centers and corridors.

Opportunities for Prosperity (Goal 9F) should delete the sentence “The transportation system helps people and businesses reduce spending and keep money in the local economy by providing affordable alternatives to driving.” It is not clear how this goal is carried out in policies or why it even belongs in the draft Plan.

Cost Effective (Goal 9H) should be deleted as a goal of the comprehensive plan. Because of past city decisions, many needed transportation improvements are costly to build because they require stormwater management, retaining walls and bridges to improve connectivity. The city has not found it cost-effective to improve dirt roads even though its growth strategy supports the investment. While I fully understand the strains on the city’s transportation budget, I also recognize that other Comprehensive Plan goals are important and needed projects may be rejected because they may not be considered cost-effective (see also Policy 9.58).

“Transportation hierarchy for people movement” (Policy 9.6) is a good start but needs further vetting. My biggest concern is the bullet that allows rationales if modes lower in the hierarchy are prioritized and I recommend you delete the rationale for exceptions. If exceptions are allowed, there needs to be a process for public comments on the exception before the decisions are made. In SW Portland both PBOT and ODOT have frequently found reasons over the last 30 years why sidewalks and bicycle facilities should not be built, even on the busiest streets, but the public was not given an opportunity to understand what the agency rationale was nor comment on the proposal before decisions were made. Whether it was new homes on SW Capitol Highway between Multnomah Village and West Portland that were granted waivers of remonstrance for sidewalk and bicycle improvements in 2010 and 2014, or large commercial businesses that were not required to build bike lanes on city bikeways in 2011 and 2012, or an ODOT overcrossing built on Barbur Blvd. in 1985 without bike lanes, this practice of infrastructure exceptions must not continue without public input before decisions are made.

Geographic Policies (Policy 9.9) needs public investments in centers and corridors so these areas become accessible to people of all ages and abilities (not trails as suggested in the Western Pattern Area).

Land use, development and placemaking (Policies 9.10 through 9.13) supports the strong connection between land use and transportation that is central to Oregon's land use laws. Unfortunately, some "centers" currently have unimproved roads (dirt streets) and lack sidewalks and bicycle facilities that would facilitate access to key destinations and services. The transportation infrastructure in centers and corridors must be improved by public investments in order to absorb the growth envisioned in the draft plan and enhance neighborhood livability. These policies should also reflect the different needs in each pattern area and allow for context-sensitive designs that meet the needs of both the local and broader communities.

Street Views (Policy 9.17) need a process for identifying and protecting these street views. Streets with significant views such as Terwilliger Parkway and the Willamette Greenway need their viewsheds preserved while maintaining the tree canopy.

Prosperity and Growth (Policy 9.28) should be revised to read, "in partnership with TriMet and Metro, maintain, expand and enhance Portland Streetcar, frequent service bus, and high capacity transit service to better serve Civic Corridors with the highest intensity of potential employment and household growth and transit use."

Intercity Passenger Service (Policy 9.29) should clarify whether this applies to rail and bus service. Intercity passenger rail and bus service should also head south toward California and east toward Bend and Boise.

Regional Trafficways (Policy 9.30), reads as if it's a good idea to add lanes to busy regional thoroughfares. Widening regional roadways like Barbur Blvd., Beaverton-Hillsdale Highway and Macadam with general purpose travel lanes will decrease safety for pedestrians and bicyclists, increase noise and air pollution, and reduce livability by encouraging even more traffic through our neighborhoods. It's not a coincidence that regional trafficways are often designated high crash corridors.

Multimodal Goods Movement (Policy 9.31) needs additional wording at the end, "and redeveloped brownfields", to help encourage brownfield redevelopment.

All of the policies related to freight movement need to encourage less noise from motor vehicles (jake brakes, train whistles, etc.), cleaner emissions such as low carbon fuels, and use of smaller delivery vehicles to commercial centers.

System Management (Policy 9.42) needs to incorporate a transportation hierarchy for all modes, including freight.

Connectivity (Policy 9.44) needs a commitment of public and private investments to build bridges over streams and acquire property for right-of-way to improve connectivity in areas where streams and slopes have made it costly to meet this standard. Especially in areas where infill development is proposed in places where connectivity is challenging, pedestrian/bike path easements should be required.

Regional Congestion Management (Policy 9.47) states that Portland will coordinate with Metro on a regional congestion management approach. This is not enough. Portland needs to improve coordination with adjoining jurisdictions (i.e. Washington County, Beaverton, Tigard, Lake Oswego, Gresham) on plans for transportation facilities that travel through multiple jurisdictions.

Parking Policies (Policies 9.48 through 9.53) The city hasn't begun its Citywide Parking Strategy Study so these policies seems premature. At a minimum, the policies need to consider whether alternative modes are in place (transit, pedestrian access to transit, bike paths, etc.) before limiting off-street parking in new developments. Geographic policies for pattern areas may also be needed.

Project Selection Criteria (Policy 9.58) does not define the criteria or data that will be used to measure these goals and I recommend deleting it. Some of the proposed criteria are buzzwords whose meaning may change over time. As of this date (12/2/2014) the city has not published how these proposed criteria will be used for selecting projects for public comment.

At a minimum, the policy needs to be separated into two distinct policies.

1. The first sentence discusses transportation criteria to “cost-effectively achieve access, placemaking, sustainability, equity, health, prosperity and safety goals” without indicating how the criteria/goals will be measured. In particular, the policy needs to specify how “cost-effective” will be measured—what costs and what benefits will be considered—for public comment (see Goal 9H).
2. The second sentence says the TSP will coordinate with other capital planning projects. The policy needs to recognize that inter-bureau cooperation is a two way street, particularly when managing stormwater in the public right-of way. Transportation improvements and stormwater improvements can meet mutual bureau goals and contribute to community livability where the infrastructure is lacking, as it is in SW Portland (Policy 8.38).

Chapter 10: Administration and Implementation

This chapter appears to be specific to land use actions. It needs to consider other chapters in the comprehensive plan, such as the Community Involvement Manual. It also needs to propose methods that will improve inter-bureau coordination with a process for resolving conflicts between bureaus.

List of Significant Projects

The TSP Project List is not expected to be released until January 30, 2015. The Feb. 24 hearing date and March 13 comment deadline do not give citizens adequate time to evaluate whether these projects are sufficient to address growth throughout the city; a 90-day comment period would extend the deadline to April 30. In particular, the List of

Significant Transportation Projects must identify transportation needs in all proposed centers and corridors.

Glossary

There need to be clear definitions for equity (and its associated buzzwords), greenways that distinguish between urban street and unimproved street greenways and trails that serve transportation needs to key destinations.

The definition of “neighborhoods” excludes neighborhood associations but the plan must retain the important role of neighborhood and business associations in enhancing livability within their community. Please include a definition for neighborhood and business associations.

It is not clear why there are definitions for both “family wage” and “living wage”.

Thank you for your consideration of these comments as you prepare the next draft of the Comprehensive Plan. Please let me know if you have any questions.

Sincerely,

/s/ 12/2/2014

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