



HOLLYWOOD NEIGHBORHOOD ASSOCIATION
"All roads lead to Hollywood"

March 6th, 2015

City of Portland
Attn: Planning & Sustainability Commission
1900 SW 5th Ave.
Portland, OR 97204

Re: Comp. Plan Update – Recommendations from Hollywood Neighborhood Association

Honorable Chairman Baugh & Commissioners,

Thank you for keeping the record open for comments until March 13, 2015. This allowed our neighborhood association time to prepare the following comments regarding elements of the Proposed Draft of the Portland Comprehensive Plan that will directly affect our neighborhood.

Our primary concern is with the height, and transportation impact of "Mixed Use" designations and the potential to have "height inflation" in the planning and zoning definitions, meaning use of zone definitions typically found in downtown Portland, being applied to small mixed urban and residential centers like Hollywood Town Center and the Sandy Corridor and Halsey Street.

We have serious concerns regarding the lack of planning for off-street parking to meet the growing population's needs. The severe limitations on parking requirements will generate a negative impact on air quality as people search for a non-existent parking space, the livability for current residents is compromised. We recommend language changes throughout the document that will allow the Parking Study Committee to implement a management program where strategically located off-street parking could be developed for Town Centers and major corridors. We see the transition from use of the private vehicle to public transportation as a future possibility that needs to occur over a 20+ year timeframe. The transition will be supported by increased provision of timely transportation service alternatives and high gas prices.

We appreciate that the Proposed Draft states that will honor adopted plans such as the Hollywood and Sandy Blvd Plans. We request you continue the 45' height limit in the Hollywood Neighborhood and these Corridors to step down the development intensity in areas well outside of the Downtown and Central Business District (CBD) height definitions.

In Chapter 2, Community Involvement: Recommendations for public involvement were significantly weakened in the current draft. At a minimum the information regarding neighborhood associations and business associations that had been part of the 1981 Comprehensive Plan should be reinstated and we recommend you include the public

involvement material that had been removed between the Preliminary Draft and the Proposed Draft of the Comp. Plan Update.

The following are the Hollywood Neighborhood Associations recommendations to the Comprehensive Plan Update.

In The Hollywood Town Center area and on NE Sandy Blvd. Civic Corridor: adequate off-street parking needs to be included for expected apartment buildings and existing parking on Sandy for businesses needs to be continued. A height restriction of 4 stories of 45 ft. needs to be retained for all mixed use designations and residential designations in the Hollywood Neighborhood. For new development in mixed use designations, developers need to provide at a minimum, of at least one parking space per two units, TriMet needs to step up to ensuring convenient, reliable transit.

The Hollywood and Sandy Blvd. Plan was recommended for approval by the Planning Commission in 1999 after agreeing with residents that NE Sandy Blvd. needed to retain a maximum height of 45 feet. We request that the Sandy Civic Corridor retain the 45 foot height limitation as “Low-Rise” Mixed Use in the Hollywood Town Center and that this 45’ height limit be maintained eastward on Sandy Blvd. and Halsey Street.

Hollywood Neighborhood Association Recommendation: We Support the development of infrastructure, bike, and sidewalk improvements and pedestrian crossings in the Hollywood Transit Station Area, including integration of the potential Sullivan Gulch Trail improvements.

Hollywood Neighborhood Association Recommendation: We support the development of the Sullivan Gulch Trail to and through the 60th Ave. Max Station Area. This will become an essential link for bike commuting to and from downtown and needed to reduce motorized vehicle use.

Chapter 2, Community Involvement:

(Additions to the text of the Plan are noted with a highlight. Deletions are marked in red.)

Goal 2.A: Community involvement as a partnership

The City of Portland government works together as a genuine partner with Portland communities. The City promotes, builds, and maintains relationships and communicates with individuals, communities, **neighborhood associations, business associations,** **business** associations, businesses, organizations, institutions, and other governments to ensure meaningful community involvement in land use decisions.

***Hollywood Commentary:** Neighborhood associations and business associations need to be specifically identified since they are geographic in nature and cover most of the city. Neighborhood association and business associations offer a means to relay important land use and transportation proposals to residents and businesses throughout Portland’s neighborhood areas.*

Goal 2.B: Social justice and equity

The city of Portland seeks social justice by working to expand choice and opportunity for all community members, recognizing a special responsibility to identify, orient, and

involve underserved and under-represented communities in land use planning. The Office of Neighborhood Involvement (ONI) promotes the integration of community diversity into Bureau public out-reach programs, and neighborhood, and business associations. The City actively works to improve its land use-related decisions to achieve more equitable distribution of burdens and benefits.

***Hollywood Commentary:** The Office of Neighborhood Involvement has become the leading bureau in the city in developing contacts and citizen involvement with diverse populations that are often underserved. ONI provides the neighborhood and business associations with opportunities for greater inclusion of diverse populations in all our activities.*

Goal 2.E: Meaningful participation

Community members have meaningful opportunities to participate in and influence all stages of planning and decision-making. Neighborhood associations, business associations and other affected stakeholders are to be notified when issues impact their communities. Public processes engage the full diversity of affected community members, including under-served and under-represented individuals and communities.

***Hollywood Commentary:** Neighborhood associations and most business associations have developed procedures and a means to facilitate public involvement for land use and transportation issues that impact their areas. It is important to list these associations to allow the reader and city bureaus to understand their rolls.*

Partners in Decision Making

Policy 2.1 Partnerships and coordination:

Maintain partnerships and coordinate land use and transportation planning engagement with....

***Hollywood Commentary:** Transportation planning should also be included in the coordination. If the term 'land use' is intended to be all inclusive in reverence to transportation then that needs to be clarified in a definition in the Glossary.*

Policy 2.2 Broaden Partnerships:

“Work with neighborhood associations and business associations, as depicted in Graphics #1 and # 2 to increase diversity and to help the reflect the diversity of the people and institutions the serve.” (Insert maps depicting the (#1) Portland Neighborhood Associations and (#2) Portland Business Associations.)

***Hollywood Commentary:** Both neighborhood and business associations are geographically identified throughout the city. Including them in a map form provides the user of the Comprehensive Plan a better understanding of who may be impacted by a pending study of proposal. Invest in Education and Training.*

Policy 2.3 Community capacity building: The Office of Neighborhood Involvement (ONI) and other Bureau enhance the ability of community members, particularly those in under-served and/or under-represented groups, to develop the relationships, knowledge, and skills to effectively participate in land use planning processes.

***Hollywood Commentary:** The Office of Neighborhood Involvement has developed and provides citizen involvement training. They have and continue to be instrumental in the city developing communities of diversity that participate regularly in public involvement programs. Inserting this language identifies that they will continue to serve this vital role.*

Chapter 3 Urban Form – Corridors

Civic Corridors are the city's busiest, widest and most prominent streets. They provide major connections among centers, the rest of **Portland** and the region. They support the movement of people and goods across the city, with high levels of traffic and, in some cases, pedestrian activity. Civic Corridors provide opportunities for growth and transit supportive densities of housing, commerce, and employment. Development in Civic Corridors is intended to be mid-rise **to low-rise in scale**. Mid-rise development includes buildings from five to 10 stories in height, but most frequently ranging from five to six stories, that are to be located nearer the City Center and Regional Centers. Low-rise development includes buildings from three to five stories in height, but most frequently ranging from three to four stories. The low-rise development Civic Corridor segments are to be located further from the City Center and contain supportive mixed uses for **Town Centers and Neighborhood Centers**.

***Hollywood Commentary.** The concept of Hollywood Neighborhood and Halsey Street from 39th to 102nd and NE Sandy Blvd from Couch out to NE 122nd consistently being built up with five to ten stories is not reasonable. The scale of the structures should reflect where sections of these corridors are in proximity to the City Center/Regional Centers connecting to Town Centers verses Town Centers connecting to Neighborhood Centers. The Hollywood Neighborhood and the section for NE Sandy Blvd from NE 47th to NE 57th have been through several studies, including the Hollywood and Sandy Boulevard Study. There was the agreement by the Planning Commission with the approval of these studies that development would NOT exceed 45 feet in height, which is currently considered four stories. Hollywood Neighborhood Association strongly recommends retaining the 45' height limitation in Hollywood Town Center and on Sandy Blvd from NE 50th eastward as 'low-rise' development along this corridor. Higher structures than 45' would have a negative effect on livability and negatively impact the adjacent low density residential light and air.*

Police 3.38 Integrated land use and mobility:

Enhance Civic Corridors as distinctive places with transit-supportive densities of housing and employment, and high-quality transit service and pedestrian and bicycle facilities and **strategically located off-street parking facilities** that are models of ecologically-sensitive and **human-scale** urban design.

Hollywood Commentary: Off-street parking spaces will be required to maintain commercial vitality along these corridors. This concept was approved by the Planning Commission in 1993 in the Livable Cities – Growing Better Study stating on p. 78, "For larger Main Streets projects, more extensive private improvements and public investments might be undertaken including the addition of such facilities as – pocket parks; landscaping; and parking lots/garages shared between various businesses and uses, including possibly some city-owned facilities." The addition of "human-scale" is a very critical attribute for creating an

attractive pedestrian space. This can be done through simple design elements such as building façade step-ups in height that give the pedestrian more light and air while lessening the impact of the “canyon” effect.

Policy 3.39 Design to be great places:

Encourage public streets and sidewalk improvements along Civic Corridors to support the vitality of business districts, create distinctive places, provide a safe, **healthy**, and attractive pedestrian environment, and contribute to creating quality living environments for residents.

***Hollywood Commentary:** The term “healthy” needs to be inserted in this policy to assure that design, materials, and environmental features are to be considered in these pedestrian environments since these streets have air quality impacts due to being used as mobility and freight corridors as well.*

Hollywood Recommended Additional Policy:

Policy: 3.42 “Enhance as Centers of Community:

“Enhance Civic Corridors as unifying places of community identity by maintaining and enhancing neighborhood integrity through preserving historic features and structures, promote development designs integrate the character and scale of the existing neighborhood and structures that step down in building height near the lower density residential uses.”

***Hollywood Commentary:** This added policy addresses key elements that were in the 1981 Comprehensive Plan and the earlier draft of the Comp. Plan Update. It is critical that historical/geological features are not lost with new development. These corridors should serve as beacons for the community identity.*

Chapter 4 Design and Development - Historic and cultural resources

Page GP4-11 Policy 4.37 Continuity with established patterns.

Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources **and elements unique to the local neighborhood.**

***Hollywood Commentary:** Language needs to be added here to help design review carry out the elements that are unique to the five Pattern Areas. Further, we recommend the establishment of separate Design Review Boards for each of these Pattern Areas. The oversight by such a Board would likely help guide better development along NE Sandy Blvd. rather than the mismatched facades that have been going up on Division, Hawthorn, and Fremont.*

Chapter 9 – Transportation

(Additions to the text of the Plan are noted with a **highlight**. Deletions are marked in **red**.)

Page GP 9-5 GOAL 9.C: Environmentally sustainable

The transportation system increasingly uses renewable energy, or electricity from renewable sources, achieves adopted carbon reduction targets, and reduces air pollution, water pollution, noise, and Portlanders’ reliance on **single occupancy** vehicles.

Hollywood Commentary: Over 70% of the congestion we currently experience on our streets is caused by single occupancy vehicles.

Hollywood Recommended Additional Policy: Policy 9.43a Transit Traffic Management

Encourage the addition of buss pullouts and/or bus zons at transit stops so freight movement and traffic flow is maintained and not obstructed by buses stopping in travel lanes when discharging and/or boarding passengers.

Chapter 0 Transportation – Parking Management

Page GP9-13 **Policy 9.48** Parking management.

“Manage parking supply to achieve transportation policy objectives for neighborhood livability, safety, business district vitality, VMT and carbon reduction, and improved air quality.”

Hollywood Commentary: We propose adding the term carbon. We suggest the overall policy goal to include carbon reduction, which would be a more targeted approach toward reducing single occupancy cars/trucks (70% of congestion-which is the other target for VMT use) while supporting carpooling, electric vehicle use and scooters. This has the added benefit of better aligning the Comprehensive Plan with city and regional climate action plans.

Page GP9-13 **Policy 9.50** On-street parking.

Manage parking and loading demand, supply , and operations in the public right of way to encourage safety, economic vitality, and livability. Recognize that eh curb zone is a public space, and as such, a physical and spatial asset that has value and cost. Allocate and manage on-street parking and loading within the curb zone in a manner that achieves the highest and best use of this public space to support adjacent uses. in support of broad City Policy goals and local land use context.

Hollywood Commentary: The meaning and application of the phrase “broad City policy gals and local land use context.” is too vague to be useful in this policy, therefore we recommend deleting it.

Page GP9-13 **Policy 9.51** Off-street parking.

Limit Manage the development of new parking spaces to achieve land use, transportation, and environmental goals. Regulate off-street parking to achieve mode share objectives, promote compact and walkable urban form, encourage lower rates of car ownership, and promote the vitality of commercial and employment areas. Utilize transportation demand management and pricing of parking in areas with high parking demand.

Hollywood Commentary: The term “limit” definitely should be replaced with “manage”. The term “limit” is not encompassing enough for what is needed here. The term “manage” allows for a strategic implementation of off-street parking when and where it is needed. There should be a gradual transition over from single occupancy vehicles to other modes of travel over the next 20 years. It will not happen overnight without drastic consequences to economic vitality and neighborhood livability. Over time these same parking spaces could then be transitioned into additional Mixed Use or transitioned to serve an increasing

number of spaces for car pool, shared cars, motor cycles, scooters, and electric cars/carts. Businesses need parking in order to be viable, seniors need parking in order to thrive, living quarters and the inhabitants need parking in order to work, play and grow. Parking spaces in the neighborhoods is needed for deliveries, the residents, friends and relations who visit, and care givers who tend to those in need.

To date we in the Hollywood neighborhood have seen no studies or on-the-ground evidence that the sizable new apartment buildings built in our neighborhood, with no required parking, have encouraged lower rates of car ownership, therefore we recommend deleting the phrase *encourage lower rates of car ownership*, unless the Plan has a specific policy to reduce car ownership and leasing.

Policy 9.6 Transportation hierarchy for people movement.

Implement a hierarchy of modes for people movement by making transportation system decisions according to the following prioritization:

1. Walking
2. Cycling
3. Transit
4. Zero emission vehicles Taxi/commercial transit /shared vehicles
5. Taxi/commercial transit/shared vehicles/Other private vehicles Zero emission vehicles
6. Other private vehicles

Hollywood Commentary: Zero emission vehicles should be promoted. The remaining ones on the list should be given a rating of #5.

Appendix A: Glossary

Civic Corridors: “These are a prioritized subset of the city’s most prominent transit and transportation streets. They connect Centers, provide regional connections, and include segments where commercial development and housing are focused. Civic corridors are intended to become places that continue their important transportation functions by maintaining a safe and efficient traffic flow that is compatible with the adjacent neighborhood residential and commercial uses. They are also intended to provide livable environments for people and evolve into distinctive places that are models of livability, commerce, and ecological design.”

Hollywood Commentary: The Civic Corridors need to support transportation functions while enhancing segments that are intended to evolve into models of both livability and thriving commerce. This language is intended to assure pedestrian functions for crossing the Corridor are enhanced and the travel speed do not compromise safety.

Page G-9 Glossary

Office of Neighborhood Involvement (ONI): A City of Portland bureau that provides assistance through promoting community involvement, drawing together representatives from Portland’s diverse communities, and supporting information exchange within the city network of neighborhood and business associations.

Neighborhood Association: A group of residents, business representatives, and/or other interested citizens and property owners who devote their time and energy to improve and enhance the livability of defined geographic area recognized by ONI.

Business Association: A membership organization of business representatives, residents, and other interested citizens and property owners who devote their time and energy to improving the economy, business and community environment in a defined, geographic area recognized by ONI.

***Hollywood Commentary:** The definitions for Office of Neighborhood Involvement and Neighborhood Associations and Business Associations is needed to identify these organizations that also actively participate in the Portland land use and transportation process.*

Thank you again for extending the comment period to enable our participation in this process. These propose recommendations to the Proposed Draft of the Comprehensive Plan Update are critical to our neighborhood livability, economic vitality, and to help us meet our goal for increased diversity. We look to you to step out of downtown and work with us in embracing the Pattern Areas concept as well as broaden the vision for the Town Centers and Civic Corridors so development can be guided to integrate with the integrity of existing neighborhoods. Please let us know if you have any questions or we can be of assistance to clarify these comments.

Respectfully,

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