



Nov. 5th, 2014 (Sent this day via e-mail to addresses listed below)

City of Portland

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Subject: RCPNA Recommendations for Comprehensive Plan Update – Proposed Draft

Honorable Chairman Baugh & Commissioners,

The RCPNA Board met on Nov. 4<sup>th</sup>, 2014 and approved the following Recommendations for the Comprehensive Plan Update – Proposed Draft subject to possible amendments that may be made prior to the March 13, 2014 deadline.

Thank you for the opportunity to speak with you and your staff regarding elements of the Proposed Draft of the Portland Comprehensive Plan that directly impact our neighborhood. As you know, Rose City Park Neighborhood Association contains over 5,000 residents and is located directly east of the Hollywood Town Center. Bound by NE 47<sup>th</sup> and NE 65<sup>th</sup> Aves. and NE Fremont and I-84, to the south. We share Neighborhood Corridors NE 47<sup>th</sup> Ave. and NE Fremont St. with the Hollywood NA and Cully NA, respectively. We share the 60<sup>th</sup> Ave. Station Area with North Tabor NA and are bisected by the Sandy Blvd. Civic Corridor and Halsey St.

In general the Proposed Draft creates a number of new issues and reflects only a handful of our recommendations submitted in January of this year. We do appreciate the PSC's extension of the public comment deadline for this document until March 13, 2015. As other Neighborhood Associations have expressed we too are concerned about the implementation, height, and transportation impact of 'Mixed Use' and 'Campus Institution'. We look forward to this language as it emerges from both the Mixed Use and Campus Institution Committees prior to this deadline. We anticipate reviewing these committee proposals before submitting our final recommendations.

We have serious concerns regarding the lack of planning for off-street parking to meet the growing population's needs. The severe limitations being placed on vehicles will generate a negative impact on air quality as people search for a non-existent parking space, livability is compromised since there is no viable alternative to vehicular use for a timely commute, and

anemic access to stores and services reduces chances for viability. 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 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 is incumbent on the increased provision of timely transportation service alternatives and high gas prices. Neither which we have right now.

We appreciate that the Proposed Draft states that it will honor adopted plans such as the Hollywood and Sandy Blvd. Plan. We address the need to continue the 45' height limit in segments of the Sandy Blvd. Civic Corridors that need to step down 'Mid-Rise' to 'Low-Rise' intensity as it moves away from the Central Business District (CBD)/Regional Centers and Town Centers.

Finally, we were surprised and saddened by the dramatic change in policies in Chapter 2 – Community Involvement. The Public Involvement PEG saw most of its recommendations removed in the Proposed Draft. We offer our limited recommendations to reinstate information regarding neighborhood and business associations that had been part of the 1981 Comprehensive Plan. Nonetheless, we ask you to take serious consideration of 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 RCPNA recommendations to the Comprehensive Plan Update - Proposed Draft that is contained in the Comp Plan Map App and the Comprehensive Plan text.**

**Additions to the text of the Plan are noted with a highlight. Deletions are ~~struckout~~.**

**Comp. Plan Map/Map App Recommendations:**

1. Properties recommended for rezone/designation from R2(Multi-Family Residential) to CN2(Mixed Use-Dispersed): Deborah & John Field/Paperjam Press @ 4730 NE Fremont-Rose City Block 156, Lot 1, Ramod Chhetri @ 3436 NE 48<sup>th</sup> Ave - Rose City Block 155, Lot 16 and Peter Collins 3436 NE 47<sup>th</sup> Ave., Rose City PK, Block 156, W 1/2 of Lot 16 (subject to the approval of Dean Pottle's/ Dean's Scene property located at 4714 NE Fremont which was denied support by the RCPNA Board on Nov. 4<sup>th</sup>, 2015)

2. Property recommended for rezone/designation in Plan draft from CN2 (Mixed Use-Dispersed) to R-5(Low Density Residential), which is the existing designation, is the New Deal restaurant, located on the SW corner of NE Halsey and NE 53rd Ave. This property is identified as 5315 NE Halsey St. - Elmhurst, Block 23, Lot 10, is currently zoned R-5, Single Dwelling. RCPNA requests this property remain zoned Residential and the site function as a Pre-Existing Non-Conforming use since this will provide the neighborhood more control in maintaining the low level of commercial impact the site has on the surrounding neighborhood.

3. At NE 60<sup>th</sup> Ave. between NE Halsey and the 60<sup>th</sup> Ave. Max Station add the comment "NE 60th, between Halsey and the MAX station, is substandard for pedestrians, bikes, buses, and even cars. It is busy at all times of the day. In addition to Tri-Met bus stops the school buses

have 2 stops within this same stretch. The full use of the 60th Ave. MAX station is greatly hampered since 60<sup>th</sup> Ave. contains sidewalks only a few feet wide making it dangerous and unpleasant for pedestrians, especially impairing access for handicapped and families with young children. We recommend pedestrian and bicycle upgrades to this section of NE 60th, so that it can be safely shared by all members of the community."

4. On NE Sandy Blvd. Civic Corridor from NE 50<sup>th</sup> Ave. eastward, state "definitive definition of "Mixed Use" for this area needs to include adequate off-street parking for expected apartment buildings, continued parking on Sandy for businesses, and a height restriction of 4 stories or 45 ft. as a continuation of the CS identified in the Hollywood and Sandy Blvd. Plan. We want to promote diversity and stability in Rose City Park. One way to achieve that is through a mix of rentals and condos in the new buildings along Sandy Blvd. Developers need to provide one parking space per unit, and 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 RCPNA neighbors that the section of NE Sandy Blvd. from NE 50<sup>th</sup> to 54<sup>th</sup> needed to retain a maximum height of 45 feet. We now recommend that the Sandy Civic Corridor from NE 50<sup>th</sup> eastward retain the 45 foot height limitation as 'Low-Rise' Mixed Use from the Hollywood Town Center eastward.

### **Transportation Plan Projects & Land Use Map App and Comp. Plan text.**

Sandy Blvd Streetscape Improvements, Phase 2

RCPNA Recommendation: Support expanding this process to include a Visioning for Sandy Blvd. as a Civic Corridor from the eastern end of the Hollywood and Sandy Blvd. Plan through NE 82nd Ave.

60th Ave MAX Station Area Improvements

RCPNA Recommendation: Strongly supports the development of infrastructure, bike, pedestrian improvements including sidewalks and pedestrian crossings in this Station Area, from the Halsey St/ NE 60th Ave. to the 60<sup>th</sup> Ave. Max Station. The Station Area improvements need to resolve the need for improved bike/vehicle/freight movement at Hassalo St. from the 60<sup>th</sup> Ave. intersection to Normandale Park and integration of the Sullivan Gulch Corridor improvements. Upgrading the NE Halsey and 60<sup>th</sup> Ave. intersection to address traffic failure with southbound turns from Halsey St. onto 60<sup>th</sup> Ave. and westbound turns from 60<sup>th</sup> Ave. onto Halsey St. as well as pedestrian safety. These improvements are needed prior to up-zoning area to Multi-Family.

Sullivan's Gulch Trail, Phase 2

RCPNA Recommendation: Strongly support the development of the Sullivan's Gulch Trail to and through the 60th Ave. Station Area. It is an essential link for bike commuting to and from downtown and needed to reduce motorized vehicle use. It has been envisioned by RCPNA that the 60th St. Station area may serve as a 'Bike Central' for NS bicycle commuters to access Max. Ancillary uses could support this trip connection through bike lockers, repair shops, etc. that could be encouraged as commercial elements in the Light Industrial zone near the Station.

Halsey St Bikeway

Halsey St. is unique in that it connects the Gateway Regional Center to the Hollywood Town Center and serves as a primary commute corridor for NE Multnomah County. It is constricted in width by a built environment limiting the safety of bicycle use in certain segments.

RCPNA recommends shifting bike routes at least one block off Halsey St. for safe commute travel through this constricted area. The constriction appears highest on Halsey St. from NE 67th through to NE 45th. NE Broadway and Tillamook St. offers an excellent alternative bike routes. We oppose losing a lane of vehicular travel in exchange for a bicycle lane in that section of Halsey.

**The following are recommended changes to the Comprehensive Plan Update – Proposed Draft, July 2014.**

Chapter 2 Community Involvement

**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 and business associations, businesses, organizations, institutions, and other governments to ensure meaningful community involvement in land use decisions.

*RCPNA Commentary: Neighborhood and business associations need to be called out since they are geographic in nature and cover most of the city. Neighborhood associations offer a means to relay important land use and transportation proposals to residents and businesses throughout their neighborhood.*

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

*RCPNA Commentary: The Office of Neighborhood Involvement has become the leading bureau at 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 these 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 and 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.

**RCPNA 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 communities to allow the reader and city bureaus to understand their roles.*

#### Partners in Decision Making

**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 them reflect the diversity of the people and institutions they serve." *<Insert maps depicting the #1 Portland Neighborhood Associations and #2 Portland Business Associations>*

**RCPNA Commentary:** *Both neighborhood 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 or proposal.*

#### Invest in Education and Training

**Policy 2.3 Community capacity building.** ONI and other Bureaus 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.

**RCPNA Commentary:** *The Office of Neighborhood Involvement has developed citizen involvement training into an art form. 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.*

**Policy 2.1 Partnerships and coordination.** Maintain partnerships and coordinate land use and transportation planning engagement with:

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

### Chapter 3 Urban Form – Corridors

#### Civic Corridors

Civic Corridors are the city's busiest, widest and most prominent streets. They provide major connections among centers, the rest of the City 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/Regional Centers and contain supportive mixed uses for Town Centers and Neighborhood Centers.

**RCPNA Commentary.** *The concept of NE Sandy Blvd. consistently being built up with five to ten stories from near the City Center at NE 7<sup>th</sup> out to NE 122<sup>nd</sup> 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 versus Town Centers connecting to Neighborhood Centers. The section of NE Sandy Blvd. from NE 47<sup>th</sup> to NE 57<sup>th</sup> has been through several studies, including the Hollywood and Sandy Boulevard Study. There was the agreement by the Planning Commission back in 1999 with the approval of this study that from NE 50<sup>th</sup> eastward development along Sandy Blvd. would NOT exceed 45 feet in height, which is currently considered four stories. RCPNA strongly recommends retaining the 45' height limitation on Sandy Blvd. from NE 50<sup>th</sup> eastward as 'low-rise' development along this corridor. Higher structures than 45' would structurally create a canyon effect and negatively impact the adjacent low density residential light and air.*

**Policy 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.

**RCPNA 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.

**RCPNA 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 the development of these Corridors needs to consider air pollution caused by the Corridor’s dual use as major mobility and freight corridors.*

**<Add New>** 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”

*RCPNA 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 and geological features are not lost with new development. These corridors should serve as beacons for 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 Pattern Area.

*RCPNA Commentary:* Language needs to be added here to help design review carry out the elements that are unique to the 5 Pattern Areas. Further, we recommend the establishment of separate Design Review Boards for each of these Pattern Areas. The over-sight 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, Hawthorne, and Fremont.

#### **Chapter 6 Economic Development - Campus Institutions.**

**Page GP6 -15 Policy 6.55 Development impacts.** Protect the livability of surrounding neighborhoods through regular communication with adjacent neighborhood associations in the provision of adequate infrastructure for trip generation, transit/shuttle services, and campus development standards that foster suitable density and attractive campus design.

*RCPNA Commentary.* It is critical for Institutions to maintain a level of communication with the affected neighborhoods. This on-going relationship will serve to help facilitate discussion of potential development impacts. The general intent stated in the initial paragraph for Campus Institutions concludes, “Examples of new directions in the policies below include designation of major campuses as employment land, regulatory improvements, and transportation-related improvements.” There is no mention of these transportation improvements in any of the proposed policies. Transit services, whether through shuttles or Tri-Met, should be encouraged and has the least impact on neighborhoods together with walking and biking as modes of travel.

**Page GP6-16 Policy 6.58 Satellite facilities.** Encourage opportunities for expansion of uses, not integral to campus functions, to locate in centers and corridors to support their economic vitality. Expand campus shuttle service and/or provide secured separate pedestrian path where trip generation between campus facilities needs to be managed.

*RCPNA Commentary.* The Providence office building workers at NE 43<sup>rd</sup> and Halsey regularly generate trips to Providence Hospital on NE Glisan and likely receives trips from this hospital as well. The intersection at NE Halsey and NE 47<sup>th</sup> Ave. has been pushed into failure mode due to these added trips. Satellite facilities located within one-mile of the main campus need to have shuttle services linking them throughout the workday.

#### **Chapter 9 - Transportation**

**Page GP9-5, 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 ~~private vehicles~~ **single occupancy cars and trucks**.

***RCPNA Commentary.** Over 70% of the congestion we currently experience on our streets is caused by single occupancy cars and trucks. The term 'private vehicles' is too broad as it would apply to carpooling vehicles, motor cycles, scooters, and bicycles.*

#### **<New>Policy 9.43a Transit Traffic Management.**

Encourage the addition of bus pullouts and/or bus zones 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.

*RCPNA Commentary.* Traffic congestion created by and associated with buses stopping in motor vehicle travel lanes is counter-productive to promoting freight travel and reducing fuel consumption and emissions.

### **Chapter 9 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.”

***RCPNA Commentary:** We recommend the policy and 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 the 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.~~

***RCPNA Commentary.** What the heck does this mean? The statement “broad City policy goals and local land use context.”? We recommend deleting this part of the phrase as it is using vague references and language that undermine the understanding by the average citizen. It also may infer goal language that would best be repeated here for clarity. We hold serious concern that local businesses and commerce may be unduly harmed if left out of the consideration of on-street parking uses.*

**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.

*RCPNA 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 over 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 their inhabitants need parking in order to work, play and grow. Parking spaces in the neighborhoods are needed for deliveries, the residents, friends and relations who visit, and care givers who tend those in need.

**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. ~~Taxi / commercial transit / shared vehicles~~ Zero emission vehicles
5. ~~Zero emission vehicles~~ Taxi / commercial transit / shared vehicles/ Other private vehicles
6. ~~Other private vehicles~~

*RCPNA Commentary:* Zero emission vehicles should be promoted. The remaining ones on the list should be given equal rating as #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.”

*RCPNA Commentary:* The Civic Corridors need to support transportation functions while enhancing segments of the neighborhoods. They 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.

<New>

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 associations.

**Neighborhood Association.** A group of residents, business representatives, and/or other interested citizens that devote their time and energy to improve and enhance a well-defined, geographic area that they and others live.

*RCPNA Commentary: The definitions for Office of Neighborhood Involvement and Neighborhood Associations are needed to correctly identify these terms in the proposed Plan.*

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Thank you again for allowing our participation in this process. These proposed recommendations to amend 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 the downtown and help work with us in embracing the Pattern Areas concept as well as broaden the vision for the Civic Corridors so development can best be guided to integrate with the integrity of existing neighborhoods.

Please let me know if you have any questions or I can be of assistance to clarify these comments.

Respectfully,



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### **Additional testimony by RCPNA Members:**

**Stephen Effros:** "As new residents of the Rose City Park neighborhood, we love how well this community is connected to other neighborhoods in Portland. There are multiple transportation options available, from surface street connectors like Sandy Blvd to Hwy 84, to a network of bus connections on Halsey at NE 58th where we live, to the MAX line stop at NE 60th, and several nearby bike boulevards. However, we have been surprised at how poorly NE 60th, between Halsey and the MAX station, is set up for pedestrians, bikes, buses and even cars, considering how busy it is at all times of the day. We'd love to use the 60th St MAX station more often, but this street, with sidewalks only a few feet wide, is so dangerous and unpleasant for pedestrians, that we have trouble using it, especially with our two young kids. We would like to therefore recommend that the Plan Update include pedestrian upgrades to this section of NE 60th, so that it can be safely shared by all members of the community."

**Sharron Fuchs:** "On NE Sandy Blvd. from NE 47<sup>th</sup> the eastward, state "definitive definition of "mixed use" to include adequate off-street parking for expected apartment buildings, continued parking on Sandy for businesses, and a height restriction of 4 stories or 45 ft."

**Susan Ferguson:** "As a long time aficionado of Jane Jacobs, I do support mixed use development, but we must be careful how it is implemented. The Pearl is an extreme example of mixed use, having become a ghetto for the privileged. We want diversity and stability in Rose City Park. One way to achieve that is through a mix of rentals and condos in the new buildings which will be going up on Sandy Blvd. I'd like to see affordable housing targeting specific populations (e.g. 25% seniors, 25% young people just starting out, with the remaining 50% being market rate--both condos and apartments.) Developers need to provide one parking space per unit, and TriMet needs to step up to ensuring convenient, reliable transit. (I lived in Toronto where we owned a house and had one car, which we parked in our driveway, yet chose to use transit frequently as the wait was usually less than 5 minutes.)

The City of Portland held a design contest a 10 years ago to come up with aesthetically pleasing designs for houses on small lots. The idea was that if builders chose one of these designs to build, permit fees would be substantially reduced. The City could demonstrate that it is listening to its taxpayers by doing something similar with condos and apartments. We don't want to see the cheap facades that have been going up on Division and Hawthorne and Fremont repeated on Sandy. Have a juried design review, with balanced citizen input; winning designs end up with reduced permitting fees which would partially offset the cost of providing a parking space for each living unit.

Crowded streets come with increased density. We already have overcrowded streets, in part because people choose to park in the street rather than in their garages or on their driveways. I support an annual parking fee for on-street parking permits. My husband and I have 2 small vehicles, both of which we park in our garage. When friends visit us, we encourage them to park in our driveway. We pay property taxes on both our garage and driveway. Why shouldn't people who park in the street pay a fee to park on the public roadway? Such a fee would accomplish not only raising funds to repair our streets, but it would reduce congestion as some people would "rediscover" their driveways and/or garages."

**Terry Parker:** I have an issue with **Policy 9.47 Regional Congestion Management** .To put the statement "to price or charge for auto trips and parking, better account for the cost of auto trips, and to more efficiently manage the regional system" in context, any monies collected must be used to improve motor vehicle flow and capacity. To use the monies collected other than to make motor vehicle improvements or to subsidize or fund an alternative transport mode would be discriminatory in that it no longer accounts for the cost of auto trips. Likewise, any gas tax dollars and/or other motorist paid taxes and fees need to be deducted from the cost of driving before additional charges are considered to be relevant. This is an equity issue in that transit is taxpayer subsidized at over 60 cents per passenger mile and bicyclists basically freeload paying no user fees at all while continually wanting more space on the roads including reserved infrastructure that removes motor vehicle lanes and parking. In other words, if the monies collected are not being used to directly support auto trips and motor vehicle infrastructure, then the monies collected are being used to support something else that should be financially self-sustainable on its own. Policy 9.47 should be eliminated.

**Janet Hammer:**

1. VMT and carbon reductions are both of value. I don't think it needs to be either/or.
2. Parking - while we want to encourage a vital commercial area that provides goods and services that serve the neighborhood, what options are there for minimizing parking impacts to neighbors (e.g., resident parking stickers, zones with a time limit)? Also, why is so much of 58th Avenue between Sacramento and Alameda a no parking zone and can that be changed?
3. Bike/Ped path - there is an area between the ridge and the golf course that is risky for pedestrians and cyclists (the curve around 72nd). It would be helpful to have a designated path there.



March 4, 2015 (Transmitted this day via e-mail to the following)

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Subject: RCPNA Board Final PSC Recommendations on Comprehensive Plan Update

Honorable Chairman Baugh and Commissioners:

Thank you for the opportunity to complete our Planning and Sustainability Commission testimony on the Proposed Draft of the Comprehensive Plan Update. We appreciate the guidance and responsiveness of your staff as we wrangle through the many layers of this document, including maps and the Transportation Systems Plan. A particular thanks to our District Liaison Nan Stark and Senior Planners Barry Manning, Bill Cunningham, and John Cole for their continued assistance.

On March 3, 2015, the RCPNA Board met and approved our Land Use and Transportation Committee testimony submitted to the PSC for their hearing on February 24, 2015. This document, attached, focuses on the transportation related policies and project improvement that will directly affect the RCPNA neighborhood. We also reaffirm our testimony that we submitted to the PSC on November 5, 2014, attached, with the addition of a particular note that the Inner Ring's higher density along Civic Corridors still needs to be reflected in the text of Chapter 3 – Urban Form and Chapter 4- Design and Development.

Also at this March 3<sup>rd</sup> Board meeting we approved the following additional recommendations for the Comprehensive Plan Update. Over the past several months participation at our RCPNA meetings has grown and part of their concern raised is how the Civic Corridor and Mixed Use designations will impact development along Sandy Boulevard.

Last night the Board agreed that RCPNA is seeking to develop a Design Overlay that would be implemented with required Design Review, a 'd' Overlay, for our section of the Sandy Civic Corridor. Upon reviewing the Proposed Draft it became apparent that the document appears to be missing the language that needs to be in place to support existing and the creation of new area and corridor plans.

The following amendments are recommended:

### **Community Involvement Goals**

#### **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, businesses, organizations, institutions and other governments to ensure meaningful community involvement in **the development of area and corridor plans and** in land use decisions.

*Commentary: Land use decisions are but one of the processes by which public involvement takes place. A more lasting example of this partnership is evident in area and corridor plans that have been developed. This language helps recognize these important sub-area plans as a form of community contract developed through collaboration between city bureaus, other public agencies, and neighborhood and business associations.*

### **Partners in Decision Making**

<New> **Policy 2.2+ Developing and Implementing Area Plans.** Numerous neighborhood and area plans have been recognized by the City and are to be used to guide new development. These neighborhood plans are to continue to be recognized and are to help inform the public engagement process in the development of new corridor and area plans, such as for Centers and Civic Corridors.

*Commentary: We propose this new policy language be inserted after Policy 2.2 –Broaden Partnerships as it provides a clear example of how successful pattern of partnerships that have been sustained over the years by the city in collaboration with the neighborhoods. It is very important that the existing neighborhood and area plans continue to be recognized in order to maintain this legacy.*

### **Citywide Design and Development**

**Policy 3.2 Growth and Stability.** Direct the majority of growth and change to centers, corridors and transit station areas **through the use of public engagement tools such as area plans, design tool kits, and effective design standards,** allowing the continuation of the residential scale and characteristics of Portland's residential neighborhoods.

*Commentary: We inserted these public engagement tools as successful examples that have been used to interface between development and the public. These examples offer a means by which neighborhood stability can be retained as growth occurs in nearby centers and corridors. This language was placed as a higher policy since it should apply citywide.*

## Civic Corridors

**Policy 3.39 Design to be great places.** Improve Encourage public streets and sidewalks improvements and support design overlays and area plans along Civic Corridors to support promote the vitality of business districts, celebrate historic designs in addition to creating distinctive places, provide a safe, healthy, and attractive pedestrian environment, and contribute to creating quality living environments for residents.

*Commentary: 'Improve' is a stronger directive than 'Encourage'. Improved public streets and sidewalks on Civic Corridors should be considered a minimum requirement for this designation. Civic Corridors and Centers offer a unique opportunity for all the livability elements to come together through the development of area plans and design overlays. We also inserted the mention of 'historic' to emphasize the need to preserve existing character as part of the context of creating distinctive places.*

### Comprehensive Plan Map.

RCPNA formally request that the city add the 'd' (Design) overlay on the Comprehensive Plan Map and Zoning Map along the Sandy Civic Corridor from the Hollywood Town Center through to the Roseway Neighborhood Center.

Thank you again for your consideration. We look forward to working with you and your staff as we continue to firm up the final elements of this Plan with an eye towards the next steps in implementation.

Respectfully,



Tamara DeRidder, AICP  
Chair, Rose City Park Neighborhood Association  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213  
503-706-5804

CC:

Honorable Mayor Charlie Hales- [mayorhales@portlandoregon.gov](mailto:mayorhales@portlandoregon.gov)

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Attached Comprehensive Plan Update Testimony:

- A. RCPNA LU&TC PSC Testimony dated February 23, 2015
- B. RCPNA Board PSC Testimony dated Nov. 5, 2014



# Rose City Park Neighborhood Association

February 23, 2015 (Transmitted this day via e-mail to the following)

City of Portland  
 Planning and Sustainability Commission [psc@portlandoregon.gov](mailto:psc@portlandoregon.gov)  
 1900 SW 4<sup>th</sup> Ave.  
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CC: Susan Anderson, BPS Director, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)  
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 Alison Stoll, Exec. Director Central NE Neighbors, [alisons@cnncoalition.org](mailto:alisons@cnncoalition.org)

Subject: RCPNA Comments on Transportation System Plan

Honorable Chairman Baugh and Commissioners:

Thank you for the opportunity to comment on the TSP transportation projects and comprehensive plan elements that will directly affect our neighborhood. We are very pleased at the number of projects in our area that have reached the Constrained Funding Project list. On February 19, 2015 the RCPNA Land Use & Transportation Committee approved the following additional recommendations regarding the TSP Constrained Projects List. These comments are supplemental to the RCPNA Board comments of Nov. 5, 2014. We have included both commentary for clarity.

Project

40068	10180	Sandy Blvd Corridor Improvements, Phase 2	Sandy Blvd, NE (47th - 101st)	Retrofit existing street with multi-modal street improvements including bicycle facilities, redesign of selected intersections to improve pedestrian crossings, streetscape, and safety improvements. Project design will consider freight movement needs, consistent with policies, street classification(s) and uses.	\$ 6,481,860	Years 11 - 20
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**RCPNA Comments 11/05/14:** Support expanding this process to include a Visioning for Sandy Blvd. as a Civic Corridor from the eastern end of the Hollywood and Sandy Blvd. Plan through NE 82nd Ave.

**RCPNA Additional Commentary:** Do not remove existing parking on Sandy Blvd. nor reduce existing travel lanes. Rather, focus on pedestrian safety and crossings along this busy freight corridor. Left turn signals are needed to aide pedestrian safety at major intersections such as 57<sup>th</sup> and Sandy Blvd. Redirect bicycle travel lane improvements off this major corridor since safe parallel bike corridors such as Sullivan’s Gulch and bikeways either exist or are being built during this time period.

40086	10320	Halsey St Bikeway	Halsey St, NE (39th - I-205)	Design and implement separated in-roadway bicycle facilities.	\$ 8,957,492	Years 11 - 20
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**RCPNA Comments 11/05/14:** Halsey St. is unique in that it connects the Gateway Regional Center to the Hollywood Town Center and serves as a primary commute corridor for NE Multnomah County. It is constricted in width by a built environment limiting the safety of bicycle use in certain segments.

RCPNA recommends shifting bike routes at least one block off Halsey St. for safe commute travel through this constricted area. The constriction appears highest on Halsey St. from NE 67th through to NE 45th. NE Broadway, Hancock, and Tillamook St. offers an excellent alternative E-W bike routes. We oppose losing a lane of vehicular travel in exchange for a bicycle lane in that section of Halsey. **RCPNA reaffirmed this comment 02192015.**

40104	Railroad/ ODOT	Sullivan's Gulch Trail, Phase 2	Banfield Corridor, NE (21st - I-205)	Construct a multi-use trail for pedestrians and bicycles within the Banfield (I-84) Corridor from 21st Ave to I-205.	\$ 28,200,000	Years 11 - 20
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**RCPNA Comments 11/05/14:** RCPNA Recommendation: Strongly support the development of the Sullivan's Gulch Trail to and through the 60th Ave. Station Area. It is an essential link for bike commuting to and from downtown and needed to reduce motorized vehicle use. It has been envisioned by RCPNA that the 60th St. Station area may serve as a 'Bike Central' for NS bicycle commuters to access Max. Ancillary uses could support this trip connection through bike lockers, repair shops, etc. that could be encouraged as commercial elements in the Light Industrial zone near the Station.

**RCPNA Additional Commentary:** Assign Sullivan’s Gulch Trail immediate funding, Years 1-10. Construction of this key bicycle commute corridor is needed for safety and to off-set congestion increases created by Mixed Use Commercial development along major E-W corridors.

70071	Sixties Neighborhood Greenway	60s Aves, NE/SE (Hancock - Springwater Trail)	Design and implement bicycle facilities.	\$ 1,500,000	Years 1 - 10	
113200	11320	60th Ave MAX Station Area Improvements	60th Ave MAX Station Area, NE	Implement pedestrian and bicycle improvements in the 60th Ave MAX Station Area identified in the Eastside MAX Station Area Communities Project.	\$ 7,570,723	Years 1 - 10

**RCPNA Comments 11/05/14:** Strongly supports the development of infrastructure, bike, pedestrian improvements including sidewalks and pedestrian crossings in the NE 60th St. Station Area, from the Halsey St/ NE 60th Ave. to the 60th Ave. Max Station. The Station Area improvements need to resolve the need for improved bike/vehicle/freight movement at Hassalo St. from the 60th Ave. intersection to Normandale Park and integration of the Sullivan Gulch Corridor improvements. Upgrading the NE Halsey and 60th Ave. intersection to address traffic failure with southbound turns from Halsey St. onto 60th Ave. and westbound turns from 60th Ave. onto Halsey St. as well as pedestrian safety. These improvements are needed prior to up-zoning area to Multi-Family.

**RCPNA Additional Commentary:** 50's N-S Bikeway should be improved prior to 60's Bikeway. Existing on-street parking along NE 60th St. needs to be retained. Vehicle travel lanes on NE 60th St. bridge over I-84 need a minimum of 11-ft width due to sizes of buses and freight on this busy route.

The following recommendations are specific to the Transportation elements of the Proposed Draft of the Comprehensive Plan as stated in the RCPNA Board letter to the Planning and Sustainability Commission dated Nov. 5<sup>th</sup>, 2014:

**Policy 2.1 Partnerships and coordination.** Maintain partnerships and coordinate land use and transportation planning engagement with:

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

**Policy 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.

**RCPNA 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.*

## **Chapter 9 - Transportation**

### **Page GP9-5, 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 ~~private vehicles~~ single occupancy cars and trucks.

**RCPNA Commentary.** *Over 70% of the congestion we currently experience on our streets is caused by single occupancy cars and trucks. The term ‘private vehicles’ is too broad as it would apply to carpooling vehicles, motor cycles, scooters, and bicycles.*

### **<New>Policy 9.43a Transit Traffic Management.**

Encourage the addition of bus pullouts and/or bus zones 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.

**RCPNA Commentary.** *Traffic congestion created by and associated with buses stopping in motor vehicle travel lanes is counter-productive to promoting freight travel and reducing fuel consumption and emissions.*

## **Chapter 9 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.”

**RCPNA Commentary:** *We recommend the policy and 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 the 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.~~

**RCPNA Commentary.** *What the heck does this mean? The statement “broad City policy goals and local land use context.”? We recommend deleting this part of the phrase as it is using vague references and language that undermine the understanding by the average citizen. It also may infer goal language that would best be repeated here for clarity. We hold serious concern that local businesses and commerce may be unduly harmed if left out of the consideration of on-street parking uses.*

**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.

**RCPNA 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 over 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 their inhabitants need parking in order to work, play and grow. Parking spaces in the neighborhoods are needed for deliveries, the residents, friends and relations who visit, and care givers who tend those in need.*

**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. ~~Taxi / commercial transit / shared vehicles~~ Zero emission vehicles
5. ~~Zero emission vehicles~~ Taxi / commercial transit / shared vehicles/ Other private vehicles
6. ~~Other private vehicles~~

**RCPNA Commentary:** *Zero emission vehicles should be promoted. The remaining ones on the list should be given equal rating as #5.*

Thank you again for your time and consideration. We encourage you to consider language in the Plan that will allow the Centers and Corridors Parking Study as well as the Mixed Use Zoning Committee the flexibility in implementation alternatives, such as strategically located shared parking areas/ structures, to support the economic vitality and livability of our neighborhoods.

Respectfully,

A handwritten signature in black ink, appearing to read "Tamara DeRidder", written in a cursive style.

Tamara DeRidder, AICP  
Chairman, RCPNA  
Co-Chair, LU & TC (acting Chair)  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR. 97213

Note: The RCPNA Board is scheduled to meet on March 3, 2015 to review the additional recommendations by our LU & TC. Our By-Laws direct the LU & TC to make comments on behalf of RCPNA when the review is time sensitive, as it is here. The Board's decision on these comments will be forwarded to you for the record.