



Bridlemile Neighborhood Association Land Use Chair, Claire Coleman–Evans, and other residents of our neighborhood have reviewed the proposed 2035 Comprehensive Plan Draft Updates and attended informational meetings regarding the proposed changes. On behalf of BNA, as approved at our March 11 meeting by unanimous approval of the board and all residents in attendance, we hereby submit the following comments on the proposed draft:

[Our recommended amendments are in **red & bold**.]

1) Fanno and Tyron Creek Watersheds

"Policy 7.58 Reduced hazard risks. Reduce the risks of landslides and stream-bank erosion by protecting trees and vegetation that absorb stormwater, especially in the steep slopes or limited access to stormwater infrastructure, **and manage storm detention on new development based on current site information including slope, soils, existing seeps and springs."**

BNA Commentary: Increasing storm events are causing more hillside slippage in our area. It is important that development in our area include the need for storm detention as we experience greater activity of seeps and storm drainage challenges.

2) Planning for natural resource protection

"Policy 7.7 Environmental protection program updates.

Improve the effectiveness of environmental protection plans, **maps**, and regulations. Updates will reflect current data and science, consider impacts on under-served and under-represented communities, and meet multiple city goals."

BNA Commentary: Our neighborhood is being confronted with numerous storm drainage problems caused by developments on slopes steeper than shown on existing maps. Lidar mapping will have a significant impact on documenting the actual slope issues that affect many of the sites in the Bridlemile/ Raleigh Hills area. Our understanding is that the Landslide Hazards Overlay Map directly correlates with 'c' (Environmental Conservation Zone) and 'p' (Environmental Protection Zone) overlays on the Comp Plan / Zoning Map. The current topographic map used by the city for our area is 11 years old and not completed with Lidar technology. Assuring that our Hazard Overlay maps are regularly updated will help our community better address these challenges.

3) Proposed Comprehensive Plan Designation Changes in BNA’s Raleigh Hills Neighborhood Center (Scholls Ferry / Hamilton / Beaverton-Hillsdale Hwy.) area

BNA Commentary: We oppose any up-zoning and/or increased density being proposed in this area for properties that will impact traffic on Hamilton St. and Scholls Ferry Rd., based on the need for concurrent multi-modal transportation improvements for area roadways. The proposed TSP project list does not include funding for needed improvements for the streets in our area. State statute requires multi-modal transportation facilities be provided concurrently with increased burdens onto the system. Therefore, limitations on development need to be considered where inadequate transportation facilities exist.

There are serious risks for pedestrians, cyclists, and drivers on these streets. School children gather daily at these narrow-edge roadways for the school bus during rush-hour traffic. Plans for improvements have been adopted by the city over the past 15 years, yet we have not received any roadway improvements. Traffic has more than doubled during this period, and partitions and zone changes will continue to bring more density and congestion.

Note: Adopted SW studies that apply include: Southwest Community Plan July 2000 and 2007 Transportation Element of the Comprehensive plan - Policy 6.41 Southwest Transportation District.

A) Proposed Plan Designation & Zone Change #751

Proposed Comprehensive Plan Designation	Single – Dwelling 5,000
Existing Comprehensive Plan Designation	Other – Note: Lack of Information
Proposed Zone (tentative, tbd in 2015)	Residential 5,000 (R5)
Existing Zone	Other – Note: Lack of Information

BNA Commentary: The City of Portland’s Map App has failed to provide the public adequate information for this item. However, the proposed change is a significant up-zoning, and the additional density cannot be supported due to the lack of funding for transportation infrastructure in the proposed TSP, including no funding for SW Scholls Ferry Rd. or Hamilton St projects, which abut the site and also including inadequate project scope along Beaverton-Hillsdale Hwy.

B) Proposed Plan Designation & Zone Change #750

Proposed Comprehensive Plan Designation	Multi-Dwelling 2,000
Existing Comprehensive Plan Designation	Other – Note: Lack of information
Proposed Zone (tentative, tbd in 2015)	Residential 2,000 (R2)
Existing Zone	Other (Other) – Note: Lack of information

BNA Commentary: The City of Portland’s Map App has failed to provide the public adequate information for this item. However, the proposed change is a significant up-zoning, and the additional density cannot be supported due to the lack of funding for transportation infrastructure in the proposed TSP, including no funding for SW Scholls Ferry Rd. or Hamilton St projects, which abut the site and also including inadequate project scope along Beaverton-Hillsdale Hwy.

C) Proposed Plan Designation & Zone Changes #678, 658, 665

Proposed Comprehensive Plan Designation:	Mixed use – [Civic Corridor] Dispersed
Existing Comprehensive Plan Designation	Urban Commercial

BNA Commentary: The proposed increased mixed-use (residential and commercial) intensity cannot be supported due to the lack of funding for transportation infrastructure in the proposed TSP, including no funding for SW Scholls Ferry Rd. or Hamilton St projects, which would be impacted by development at the site, and also including inadequate project scope along Beaverton-Hillsdale Hwy. (Proposed but unfunded corridor improvement #90020 does not even extend to this site.)

Respectfully submitted on behalf of Bridlemile Neighborhood Association,

Claire Coleman-Evans, Land Use Chair
6260 SW Hamilton Way, Portland, OR 97221

Attachments:

- 1) 2035 Comprehensive Plan Proposed Draft Map App, Proposed Change #751
- 2) 2035 Comprehensive Plan Proposed Draft Map App, Proposed Change #750
- 3) 2035 Comprehensive Plan Proposed Draft Map App, Proposed Change #678
- 4) 2035 Comprehensive Plan Proposed Draft Map App, Proposed Change #658
- 5) 2035 Comprehensive Plan Proposed Draft Map App, Proposed Change #665

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2035 Comprehensive Plan Proposed Draft Map App

Map App Explorer

Land Use

This proposed change intends to:

Apply a new designation to reflect the Urban Design Framework. New zones comparable to zones now in place will be applied.

Proposed Change #	665
Proposed Comprehensive Plan Designation	Mixed Use - Civic Corridor
Existing Comprehensive Plan Designation	Office Commercial
Proposed Zone	Office Commercial 2 (CO2), or closest comparable zone
Existing Zone	Office Commercial 2 (CO2)

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Map App Explorer

Land Use

This proposed change intends to:

Apply a new designation to reflect the Urban Design Framework. New zones comparable to zones now in place will be applied.

Proposed Change #	658
Proposed Comprehensive Plan Designation	Mixed Use - Civic Corridor
Existing Comprehensive Plan Designation	Office Commercial
Proposed Zone	Office Commercial 1 (CO1), or closest comparable zone
Existing Zone	Office Commercial 1 (CO1)

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2035 Comprehensive Plan
Proposed Draft Map App

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Land Use Transportation Infrastructure

What's up near you?

This proposed change intends to:

Apply a City designation to property within the Urban Services Boundary.

Proposed Change #	750
Proposed Comprehensive Plan Designation	Multi - Dwelling 2,000
Existing Comprehensive Plan Designation	Other
Proposed Zone (tentative, tbd in 2015)	Residential 2,000 (R2)
Existing Zone	Other (Other)

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Existing Comprehensive Plan Designation	Other
Proposed Zone (tentative, tbd in 2015)	Residential 5,000 (R5)
Existing Zone	Other (Other)

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Proposed Change #	678
Proposed Comprehensive Plan Designation	Mixed Use - Civic Corridor
Existing Comprehensive Plan Designation	Urban Commercial
Proposed Zone (tentative, tbd in 2015)	Storefront Commercial (CS), or closest comparable zone
Existing Zone	Storefront Commercial (CS)

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2035 Comprehensive Plan
Proposed Draft Map App **Map App Explorer**

Land Use Transportation Infrastructure

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Proposed Comprehensive Plan Designation	<u>Mixed Use - Civic Corridor</u>
Existing Comprehensive Plan Designation	<u>Urban Commercial</u>
Proposed Zone (<i>tentative, ibd in 2015</i>)	<u>Storefront Commercial (CS) or closest comparable zone</u>
Existing Zone	<u>Storefront Commercial (CS)</u>

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