

Far Southwest Neighborhood Association

Portland, Oregon

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Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Re: 2035 Comprehensive Plan

In his letter of March 6, SWNI's President Sam Pearson referred to four earlier letters submitted by SWNI, each with considered observations on the Plan, to which he added the latest comments on the Transportation Systems Plan, Land Use and Parks, all of which we fully endorse. This letter will take each chapter and offer some comments, observations and suggestions.

On page GP 1-2 of Chapter 1 it states "The goals and policies in this Plan . . . are all for the purpose of informing and guiding land use decisions." In the next paragraph it says "there may be competing or conflicting policies" (when applying goals and policies to particular situations, such as specific development proposals or area plans).

This contradicts Goal 1.C on page GP 1-4 and Policy 1.3 on page 1-7 which both claim that the Plan is "internally consistent." If this was true, there would be NO competing or conflicting policies. *Any such policies should be resolved in favor of the policy that does the least harm and preserves the character and integrity of the existing area.*

Goal 1.D refers to implementation tools/actions "to protect the public's current and future interests." This will be addressed further in Chapter 2.

Policy 1.15 is totally unacceptable and needs to be deleted from the Plan. By stating that "the goals and policies of this Comprehensive Plan supersede any goals or policies of a community, area, or neighborhood plan that conflict with a goal or policy in this plan" *you are superseding the public's current and future interests which Goal 1.D claims to protect.*

In Chapter 2 individuals and generic communities are recognized as the "civic infrastructure." Missing from this infrastructure are the Neighborhood Associations which have played an important role in the "civic infrastructure" of the city for many years.

By eliminating Neighborhood Associations as recognized public bodies, *you are denying an important part of that public the right to express their community needs and current and future interests through their representative organizations.*

Goal 2.G needs to include "Neighborhood Associations" after "organizations".

In the Glossary, there are generic references to "Community" and "Neighborhoods," but no reference to "Neighborhood Associations." The definition of "Neighborhoods" needs to be deleted and replaced in the Glossary with "Neighborhood Association: a community with defined boundaries, as recognized by the City of Portland, existing in all areas of the city; a NA may include residential, commercial, mixed use, industrial, educational and environmental areas."

In Policy 4.8, suggest changing the wording from "limit reductions in" to a more proactive "protect privacy and solar access for residents and neighbors . . ."

In Policy 4.13, does "respect existing entitlements" include recognizing the validity of Covenants and Restrictions (CC&Rs) and acknowledging that they CAN supersede building codes and policies when they are more restrictive than those codes and policies?

Policy 4.14 – I could find no reference to "healthy residential design and development" in Chapter 4. Rather than say "(see those policies below)", please cite them by #, i.e. "(resource efficient is 4.47)." Is "healthy residential" 5.40 or something else?

Suggest moving Policy 4.25 wording into Policy 4.46.

The sections on "Resource-efficient design and development", "Designing with nature" and "Hazard-resilient design" are well done and comprehensive, as is "Environment and Watershed Health" in Chapter 7.

I'm sure you have already caught and corrected the numbering errors on pages GP 6-17 and 6-18.

Skipped Chapter 8. Comments on Chapter 9 will be sent in a separate letter.

Thank you for considering these comments.

Sincerely,

Marcia Leslie, Chair
Far Southwest Neighborhood Association