

March 12, 2015

Dear Portland Planning and Sustainability Commission,

The Southeast Uplift neighborhood coalition appreciates the complex efforts behind Portland's Comprehensive Plan Update 2035 (Comp Plan) and supports the goal to, "ensure Portland is on a path to become a more prosperous, healthy, educated, equitable and resilient city."

In listening to our member neighborhood associations and reviewing input from other neighborhood coalitions, the SE Uplift board has identified several points of concern regarding the Comp Plan draft and process. These comments, which were unanimously adopted by the board at the March 2, 2015 meeting, fall into the following broad categories:

- **Process:** We request additional time for the public to thoughtfully review and comment on the Comp Plan draft and map
- **Community Involvement:** We ask that the plan acknowledge the historic role of neighborhood associations and that it includes all formally adopted area, district, and neighborhood plans in an appendix and that they have the same force and effect as the plan itself.
- **Neighborhood Character:** The plan does not do enough to recognize the distinct qualities of individual neighborhoods. Additional policies around historic resources, view sheds and design are needed.
- **Transportation and Infrastructure:** We are concerned that the plan does not adequately provide for new infrastructure that is commensurate with new density.

Our specific comments and concerns are detailed below.

Request to Modify Comprehensive Plan Timeline

The process of public involvement must be real - not merely an exercise in order to declare such involvement has been achieved. SE Uplift notes the input offered by Susan Lindsay, Co-Chair of the Buckman Community Association:

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... the public was repeatedly told at the small number of hearings which actually allowed public oral comment on the proposals that written public comment on all these proposed changes would be taken well into March 2015. Yet recently I was personally informed by Planning staff that decisions were proposed to be made on these matters imminently long before the public comment period ends. How can that be?

This is particularly disturbing as we planned to host an open public forum/meeting on these proposed significant land use changes, designed with the March deadline for comment in mind...yet it appears now that your ability to hear and be informed of the large-scale discontent and concern regarding these proposals will be null and void, arriving “after the fact” in the process.

The impact of impending development in SEUL neighborhoods may be the most significant challenge since the proposed Mt. Hood Freeway in the early 1970's.

In many aspects the current situation is much more daunting. It is one thing to challenge a specific project like a freeway. Understanding the nuances and details of comprehensive planning, and the varied impacts on our neighborhoods - individually and collectively - takes time.

The complicated nature of zoning and codes, professional planner jargon, and thick volumes of supporting documents can be detrimental to the process of community involvement. While SE Uplift recognizes that our member neighborhoods will have differing opinions on Comp Plan specifics, **it is paramount the process be of necessary length and breadth for all concerned to study in detail the comp plan and then offer input that will be recognized.**

Citizen Involvement is the first goal as outlined in SB100, the landmark legislation which created much of Oregon's current statewide comprehensive planning requirements.

Given the important relationship between the Comprehensive Plan Goals and Policies and the implementation package, we join with SWNI in supporting the Multnomah Neighborhood Association's request for the following timeline changes as outlined by Carol McCarthy in her Nov. 14, 2014 letter,

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- 1) Remove the PSC vote in [May] 2015.
- 2) Change the July 2015 City Council hearings on the Comprehensive Plan Goals and Policies to [Portland Sustainability Commission] PSC hearings which allows citizens the chance to comment on revisions made by the PSC before the Goals and Policies are incorporated into the Comprehensive Plan.
- 3) The November 2015 City Council hearings would be changed to PSC hearings to allow citizens an opportunity to comment before the Comprehensive Plan and the Implementation Package move forward to City Council.
- 4) Reschedule the City Council hearings on the Comprehensive Plan and Implementation Package to February 2016.

As SWNI President Sam Pearson has noted: “Neighborhood associations need time to comment on the adopted zoning definitions from the Campus Institutional project and the Mixed Use Zone project before they are incorporated into the Comprehensive Plan.”

While we appreciate the response by PSC Chair Andre Baugh that “The PSC is the decision-maker as to when we close the record, and when we vote,” we anticipate Mr. Baugh will live up to his promise that “the PSC is prepared to increase opportunities for review and testimony if necessary.”

Community Involvement: Recognition of Neighborhood Associations and Plans

As an organization with a mission to help engage citizens in shaping their communities, we believe the following recommendations will strengthen community involvement:

1. We agree with the input of the *Northeast Coalition of Neighborhoods* (January 21, 2015) in regards to “Acknowledgment of the Legacy and Contributions of Neighborhoods,” and their support of Portland’s Public Involvement Advisory Council (PIAC) comments on Chapter 2 of the Comp Plan— in particular “clarifying that neighborhood associations and coalitions are an integral and official part of the City’s public involvement program.”
2. We support PIAC’s comment that: “Our city’s early commitment to community involvement in government is recognized internationally, and the neighborhood system has been central to that history” and that we should “restore policy language on adequate funding for the community involvement program” because “the commitment of adequate resources marks the difference between a policy that

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- makes a meaningful difference in the City's work and one that looks good on paper." (Nov. 10, 2014).
3. We join PIAC in requesting that an independent body, rather than the Planning and Sustainability Commission, oversee the Community Involvement Program.
 4. We concur with a related sentiment expressed by *Southwest Neighborhoods, Inc.* (SWNI) that the Comp Plan "must maintain the current standing of Neighborhood Associations (NA) in planning, land use, and development processes." We find a remarkable citywide concurrence in these sentiments, regardless of the specific differences our neighborhoods may have on details of the proposed Comp Plan. As expressed by the Eastmoreland NA, "Historically neighborhood associations are the designated contacts in land use review, requesting neighborhood planning and protecting Portland citizens from destructive impulses of urban freeway visionaries, the pressures of irresponsible development and careless abuse of environmental and cultural resources."
 5. SE Uplift seeks to strengthen the current standing of NAs in this process, particularly in regards to notification requirements and realistic time frames that allow NAs to offer constructive input on proposed demolitions, developments, and other aspects relating to their neighborhoods. To that end, we agree with the *Richmond Neighborhood* (Dec. 16, 2014) that "current notification requirements [for new developments] are too open-ended and often do not allow adequate time or notice to affected community members to have meaningful or timely input."
 6. In previous years, many of our neighborhoods have worked with city staff to develop plans that are specific to their neighborhoods. These adopted plans should not be discounted. We join with SWNI in requesting that, "all area, district, neighborhood, and environmental plans be compiled and included as an appendix in the Comprehensive Plan and be considered to have the same force and effect of the plan itself.

Respecting Neighborhood Character

We appreciate the Plan's recognition that "one size does not fit all." As a coalition made up of 20 neighborhoods with distinct histories and cultures, however, we do not feel like the five pattern areas described in the Plan adequately protect what makes our neighborhoods unique and livable. We believe that additional policies need to be developed around the following areas:

1. Historic Resources: We join with the Richmond and Sunnyside neighborhood associations in requesting that the Historic Resources Inventory be updated as soon

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as possible. The inventory has not been updated since the 1980s. There should be policies in place to require more frequent updating.

2. **Design:** While many of our neighborhoods are slated to receive significant new development over the course of the Plan's timeframe, the vast majority of our coalition area does not have mechanisms like design overlays or community design standards in place to assure that new development is compatible and respectful of existing character. We believe that more design scrutiny and more opportunities for public input in design are critical.
3. **View sheds:** While there are protections of view sheds west of SE 12th avenue, most of our coalition area has no protections. Being able to see Mt. Hood and the West Hills, as well as places of cultural importance can add to a sense of place in a neighborhood. We ask for policies that protect view sheds on the east side of Portland.

Transportation and Infrastructure

In order for this to be a truly comprehensive plan, we believe that more work needs to be done to align new infrastructure needs with new development and growing populations. Significant investments in a variety of infrastructure will be necessary to accommodate the projected population growth in the next twenty years including new parks, sewer capacity upgrades, transit, etc. As North Portland Neighborhood Services (NPNS) has aptly noted "that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers."

By addressing this challenge we mean not just stating lofty goals in terms of livability. It is imperative that we establish specific commitments with achievable deliverables to ensure additional development does not degrade our quality of life in critical areas, for example:

- **Parks** - even today the Map App shows a large swath of the SEUL district is park deficient, and that's before our coalition area experiences a marked increase in population and density.
- **Environment** - many neighborhoods have expressed interest in health overlay zones.
- **Roads & Transit** - we're close to a billion dollar backlog of street maintenance. It's hard to imagine how meaningful enhancements can be made to our transit options when basic city functions like street maintenance lag seriously.

A few areas where we can specifically point to additional thought to better align resources with aspirations:

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1. **Unimproved Roadways:** Portland has over 100 miles of unimproved roadways, many of which are in our coalition area. Current policies are insufficient and lead to only incremental improvements at best. Directing growth to a neighborhood like Woodstock without having a subsequent plan for improving the unimproved roadways that lead to the neighborhood center is not a coordinated growth approach.
2. **Orphan Highways:** 82nd Avenue and SE Powell Avenue are two critical parts of SEUL's transportation network. They also are corridors that are slated for significant new development in the Plan. We are concerned that the state ownership of these roadways is often at cross-purposes with the city's aspirations for adjacent land use. We request that additional policy language be developed that clarifies state and local coordination of state highways.

Conclusion

The Southeast Uplift Coalition of Neighborhood anticipates engaging with issues pertaining to the Portland's proposed Comprehensive Plan 2035 in greater detail in the upcoming months. We look forward to continuing Portland's respected tradition of community involvement throughout this process. We thank you and city staff for your important work and appreciate your consideration of our comments.

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