

November 4, 2014

Portland Planning and Sustainability Commission
Comprehensive Plan Update
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Dear Portland Planning and Sustainability Commission:

Thank you for the opportunity to comment on Portland's Proposed Draft Comprehensive Plan. South Portland Neighborhood Association (SPNA) has reviewed and discussed the draft plan for several months. Our Land Use Committee on October 21 adopted the following comments regarding changes we request be incorporated into the plan.

- SPNA requests that the Bureau of Planning and Sustainability provide the details for the new mixed use zoning designations as soon as possible, and request the Planning and Sustainability Commission extend the official record and hold additional public hearings on the Comprehensive Plan for at least 90 days following the release of the provisions of the mixed use zones.
- SPNA believes it is essential that the Comprehensive Plan contain policy language directing that the city establish zoning code parking requirements for multi-unit residential at a base level of one space per unit. Code provisions can allow lower ratios (but never lower than one space per three units) only when there are permanent, effective programs encouraging alternative modes. Examples of such programs could be to provide Tri-Met passes as part of rent payments, or institute Residential Permit Parking program rules that charge significantly high fees for renters' permits.
- SPNA supports retaining neighborhood associations' role as Portland's primary program for citizen involvement. Language in the draft plan seems to ignore nearly 50 years of effective citizen participation by NAs promoting the livability of distinct communities. The Comprehensive Plan must maintain the current standing of Neighborhood Associations in planning, land use, and development processes. We ask that the draft plan add a Glossary definition of "Neighborhood Associations" as defined by geographic boundaries as established by the Neighborhood Associations and accepted by the city per city codes.
- SPNA is concerned about language in Policy 1.15 that states the updated Comprehensive Plan supersedes any goals or policies of a community, area or neighborhood plan that conflicts with goals or policies of this plan.
- SPNA supports identifying Barbur Concept Plan "nodes" for future transit stations, but we emphasize that Barbur at Gibbs was deliberately not a node identified in the BCP – and that Naito at Gibbs was.
- SPNA requests that the plan recognize the possibility of extending the streetcar to the Sellwood Bridge, and for this reason, the new Comp Plan should identify potential stations along Macadam.

- SPNA requests that the draft Comp Plan identify short term rentals as an issue that needs development of parking and traffic policies.

Please let us know if you have any questions about these recommendations.

Sincerely,

Jim Gardner

Chair, SPNA Land Use Committee

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