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## Southwest Neighborhoods, Inc.

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October 31, 2014

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

Re: PSC Comprehensive Plan Testimony

Dear Portland Planning and Sustainability Commission:

Thank you for the opportunity to review Portland's Proposed Draft Comprehensive Plan Goals and Policies dated July 2014. Southwest Neighborhoods, Inc. (SWNI) has distributed information to its 17 neighborhood associations and member business associations, and SWNI hosted a Comprehensive Plan workshop on September 30 to provide an opportunity for citizens to discuss key points.

SWNI especially wants to thank Joan Frederiksen, West District Liaison, Bureau of Planning and Sustainability (BPS) for her explanations about the draft Comprehensive Plan and helpful assistance in answering questions from our residents and neighborhood associations.

The following comments are based on motions approved by the SWNI Board of Directors on October 22, 2014. They are arranged in the order that the topics appear in the comprehensive plan and are not in priority order.

SWNI requests that the Bureau of Planning and Sustainability provide the details for the new mixed use zoning designations and the new campus institutional zoning as soon as possible, and that the Planning and Sustainability Commission extend the hearings of the Comprehensive Plan or that the record of the hearings be left open for at least 90 days following the release of the provisions of these definitions. Without the definitions and the deadline extension, the citizens and neighborhood associations will not be able to evaluate the impacts of the proposed new zoning designations. SWNI sent a letter on September 5, 2014 requesting an extension, as did many other neighborhood associations, but the recent announcement that the written comment period for the goals, policies and land use map will remain open until March 13, 2015 is not sufficient for this purpose.

Chapter 1, The Plan and Guiding Principles

- SWNI 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 a goal or policy of this plan. SWNI requests that, before the close of the written comment period, 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.

#### Chapter 2, Community Involvement

- SWNI requests a more specific definition of “community involvement” with regard to land use and other issues. The Comprehensive Plan must maintain the current standing of Neighborhood Associations in planning, land use, and development processes. 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 code.

#### Chapter 3, Urban Form (also Chapter 9, Transportation)

- The draft Comprehensive Plan directs growth to Centers and Corridors. SWNI believes that Centers cannot function as such until adequate and safe pedestrian and bicycle facilities are provided and transit service levels are improved. SWNI requests that the Comprehensive Plan ensure that all Centers and Corridors have adequate and accessible pedestrian and bicycle facilities and safe crossings to meet this chapter’s goals (Page GP3-6). Each Center and Corridor should have supporting projects in the Transportation Systems Plan to create a complete neighborhood.
- SWNI believes that, even in Western Neighborhood pattern areas, the urban trail system should not be considered the primary means of pedestrian mobility; instead, the Comprehensive Plan should regard trails as a useful supplement to the goal of improved mobility for pedestrians.
- SWNI requests that the designation of Multnomah Village and Macadam in Southwest Portland be changed from neighborhood center to neighborhood corridor (Figures 3-1, 3-2 and 3-3).

#### Chapter 7, Environment and Watershed Health

- SWNI is concerned that the draft Comprehensive Plan does not adequately address the environment, and requests that the Planning and Sustainability Commission include the environmental zone regulations, plans and related items that are in the current Comprehensive Plan Policies 8.9-8.17 (inclusive) in the 2035 Proposed Draft Comprehensive Plan Chapter 7, Environment and Watershed Health.

#### Chapter 8, Public Facilities and Services

- SWNI requests that Policy 8.77, Public Trails, under Parks & Recreation in Chapter 8 be moved to the Chapter 9, Transportation.

#### Chapter 9, Transportation

- SWNI does not support policies such as Policy 9.30 that imply that Regional Trafficways such as Barbur Blvd., Beaverton-Hillsdale Highway and Macadam Ave. should be widened with general purpose traffic lanes.
- SWNI believes it is premature to include parking policies (Policies 9.48-9.53, inclusive) in the draft Comprehensive Comp Plan until the Citywide Parking Strategy Study is complete. SWNI requests that even where alternative modes exist, all new development that increases density in its immediate area should provide off-street parking.

Chapter 10, Administration and Implementation (also Chapter 6, Economic Development)

- SWNI requests that language in the second bullet on page GP10-8 under Land Use Designations be amended by deleting the second sentence. The language in the second bullet should read "General use and intensity expected within the area." SWNI also requests that Section 33.110.240.E of the zoning code that allows corner lots that are zoned R5 or R7 to be rezoned to R2.5 if they are larger than 50 feet by 110 feet should be removed from the zoning code associated with the draft 2035 Comprehensive Plan.
- SWNI requests that language in Policy 10.5.20, Institutional Campus, be altered to eliminate or de-emphasize the commercial aspect of the proposed campuses. Policy 10.5.20 should be under its own heading and not a subheading under "Employment" as it appears on Page GP10-13. SWNI believes that institutions should be focused on their primary role, colleges and schools on education, hospitals on medical care, etc, as opposed to highlighting their roles as employers and commercial centers.

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

Sincerely,



Sam Pearson  
President  
Southwest Neighborhoods, Inc.

Cc: John Gibbon, SWNI Land Use Committee Chair  
Roger Averbek, SWNI Transportation Committee Chair  
Eric Engstrom, Portland Bureau of Planning and Sustainability  
Joan Frederiksen, Portland Bureau of Planning and Sustainability  
Courtney Duke, Portland Bureau of Transportation