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**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>  
**Subject:** Central City 2035 Plan and the COP Comprehensive Plan

Please submit the following to any/all planning documents/endeavors of all agencies within the City of Portland.

Reviewing history of our regional and city planning is important in formulating our present 2035 Comprehensive Plan update. From what can be interpreted from the 2035 documents leaves much to be desired of what our State and City planning documents intended and required from the early 1970's. Governor McCall would be very disheartened of how the new generation of Planners have changed many intentions of our planning endeavors.

I was an original member of Columbia River Association of Governments (CRAG) that became METRO back in the mid 70's .I have served decades in our neighborhood association, several planning committees, President of Citizens to Save the Willamette Riverfront and the PDC South Waterfront Urban Renewal Advisory Committee.

From this planning background, for brevity, I want to focus on two major issues in the 2035, even though there are several more issues.

Our GREENWAY: 2035 in many cases is disregarding the Height and Setback requirements of the State and City Greenway regulations. Height is required to be "stepped down" to the river even beyond the Greenway zoned area. Buildings are required to be "similar in scale to nearby buildings". The Planners of the 70's recognized that Portland was unique with river and mountain views in all directions and that we topographically we lived in a theater.

Citizens to Save The Willamette Riverfront was successful in challenging proposed buildings in the Johns Landing area along the Willamette that did not heed those requirements. We challenged proposals like the 12 story Forum Building in the north end of Johns Landing that was reduced to 5 stories, and enlarged the 25 ft. setback to between 75 ft. to 100 ft. for acceptance of the 5 stories when nearby buildings were 2 to 3 stories. We prevailed on the then named Avalon Hotel building reducing the height and enlarging the setback to over 100 ft. on average and saving a natural river cove area. And we prevailed on three other buildings near Willamette Park. Maybe it is time for our citizens to do so again.

The 2035 Plan doesn't respect the regulations and intent of prior planning. For example, the Bridgehead heights of 325 ft. within/near the Greenway zoned areas is absurd, especially when height zoning farther away from the river is less. In the South Portland area the 2035 has 25 ft. setback distance from top of bank while other areas have 50 ft. A prime example of setback and height malfeasance is the almost complete Macadam Apartment building on the old Tequila Willy restaurant site in Johns Landing (LU14184450 GW). It is 6 stories high built less than 25 ft. from top of bank as measured from cantilever decks, all of it built on illegal land fill into the Willamette River. (see photo attachments)

Our NEIGHBORHOODS: 2035 is harming our neighborhoods on density, height, and traffic issues. Our R5 and R10 zoned neighborhoods have been and will be besieged by insidious zoning tricks that is harming livability. In the past two decades we have so-called minor tweaks that have been really zone changes but not called so.

For example in R5 we've had the hidden allowance of corner lots of blocks to allow for two homes versus one. For a typical 200 ft. x 200 ft. block that means the eight homes once allowed doubles to 16, a 100% density increase. Then more recently we've had Accessory Dwelling Units allowed in side or backyards increasing density. We've had lot front, side and backyard setback reductions increasing density. With these reductions we've lost landscaping and solar access. We've had height increases and a new interpretation of how to measure height that use to be based on existing grade to be able to be manipulated by having retaining walls, berms, etc. around a building to be the point to measure height.

There are at least five other devices like this that our Planning agencies have crept in zoning tricks without having to go through public notice processes required in a zone change. 2035 is perpetuating this methodology of Planning. For us in Southwest Portland like South Portland, Multnomah, Burlingame we have the devices of using future proposed mass transit, Neighborhood Centers, Corridors, etc. as a means to increase density and heights without respect for the R5 and R10 adjacent neighbors; and in most cases without parking requirements to meet the user demands.

In many cases these tricks and upzonings are not needed to meet future growth. First, PSU was predicting for Metro in the 90's- 2000's that our population growth would be in the 5-7% range per year, it actuality it was less than 2%. Based on this planning growth hypothesis Planners in late 90's came to our CTLH Neighborhood Association (now South Portland) wanting to upzone our neighborhood, especially around the Johns Landing area. We were predominately a R5 neighborhood with low-rise commercial zoning a few few block depth from SW Macadam. Planning wanted to increase height/density on average double. Carl Simons, our CTLH President and myself, Land Use Chairman and the rest of our Board questioned the need for this rezoning. We based this on how our then present zoning allowed for much more build-out. We did a study of our present build-out and hired transportation planners from Seattle to review our traffic potential, or lack of. The result was that less than 50% of our area had been built out both for residential and commercial zoning. We also discovered that over three of our major intersections along SW Macadam had "F" (failure) level of service and several streets were nearing there capacity. If up-zoning preceded the results would further harm our neighborhood and others that use our neighborhood to access Central Portland.

2035 hasn't studied our present zoning and all the tricks employed now in our zoning/building regulations to assess whether we need 2035 as proposed if enacted to meet a assumed growth rate that is suspect.

Another example of misguided premises is in South Waterfront. Planning in the area was based on PDOT's premise through Matt Brown, Planner that 40% of all trips in the area would be by multi-modal use. Two years ago a study showed that less than 8% of trips were multi-modal. Vehicles were the predominate means of transportation. Metro's recent audit by Susan Flynn confirmed this for the Metro area. And Robert Geller, Planner also recently confirmed similar

numbers. In fact Geller from statistics has found that in 1997 regionally that only 12% of trips were multi-modal, and that that number is the same today.

These Transportation Fallacies are important to understand in the context that much of the 2035 planning proposals are made under false assumptions like creating Neighborhood Centers and Corridors that are over 4 times the density of present zoning.

Much of Metro's down to our City's Planning is based on surveys, not votes, from the 70's and 80's. Our 2035 Comprehensive an needs a reality check, a real audit. Planners for decades have been planning our region to accommodate growth, but has it? It seems we have many negative results for all the Planning we have. If you don't believe me or many other citizens, then let's have a vote of some of these false premises.

The 2034 Comp Plan is a continuation of creating a "fantasy land".

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