

April 8, 2020

Comments for PZ-20-0102 application Wishcamper Development

The Southwest Bend Neighborhood Assoc. (SBNA) has suggestions and objections to the Wishcamper development proposal. I wish to reference my previous comments dated 3/10/2020 in response to the TFR and TIF report and some but not all of Kellyanne Litton comments of 4/6/2020. My comments will follow the listing of Applicable criteria, standards, and procedures of the 3/25/2020 notice mailed to me as SBNA land use chair. I also refer to the Bend Comprehensive Plan which wasn't listed as an applicable criteria but underlay's the Bend Development Code.

There is a disparity/conflict between the Bend Comprehensive Plan, the Murphy Road Refinement Plan (MCRP) BDC 2.7 article VII, BDC 3.4, BDC 2.7, BDC 4.2, BDC 4.7 and this proposed plan and it's location. While the proposal meets the letter of the law and some codes it does so at the expense of the existing neighbors, the extended neighborhood and in many ways the future residents of this project.

The MCRP aspires to "promote pedestrian and other multi modal transportation options, ensure compatibility of uses within the development and within the surrounding area, create an interconnected system of streets with standards appropriate to the intensity and type of adjacent use, create safe and attractive streetscapes that will meet emergency access requirements and enhance pedestrian and bicycle access." Yet this development falls short of that aspiration and requirement because of it's location and lack of economic diversity or economic "gettoization". Just because people live in affordable housing doesn't mean they are less deserving of safe routes to school or any of the above listed housing requirements. Perhaps they are more deserving since they have fewer housing or transportation options. This project is located at the southern border of the UGB in a corner of MCRP. This project needs a mix of affordable and market rate housing/apartments that would fulfill the goal of "comfortable integration of transition between housing types and commercial uses" as stated in the Bend Comprehensive Plan.

**Criteria** BDC 4.2

The City of Bend advocates for responsible use of water for landscaping yet in the project landscape plan (4.2.300 7.) calls for moderate water plants many of which are non native and require more water than natives. SBNA suggests the use of more native or low water use plants. There are sufficient varieties of such plants available in Bend and it could be a show project for other affordable housing plus save money on water bills.

**Standards** BDC 2.1

SBNA disagrees with the Burden of Proof under BDC 2.1 7. under traffic bullet point 7 regarding suggestion traffic divert from busy Brookwood Blvd. to Hollygrape thus encouraging residential cut through traffic past an elementary school to relieve the over capacity Brookwood/Lodgepole intersection. This is NOT to solution to this problem.

BDC 2.7.8 Murphy Crossing Refinement Plan

As stated in 2.7.810 Purpose This development could provide a variety of housing types (economic) , promote better pedestrian and other multi modal transportation options, ensure compatibility of uses within the surrounding area and create an interconnected system of streets. The latter issue is of particular importance since SBNA has suffered several developments which aren't interconnected. This project doesn't mention any plan to extend their internal road to the road shown on Murphy Crossing street plan. Street connectivity is a goal expressed in the Bend Comprehensive Plan and in BDC 3.4 U. and other places in BDC. It is unclear if their internal road is a parking lot or road similar to that adjacent to city hall (Louisiana St.).

BDC 3.4.200 Transportation Improvements I. Future Street Plan and Extension of Streets 1-4.

The MCRP, with it's street plan, was adopted by the City Council so future development is required to follow that plan unless changed by City Council action. The plan language directs streets to be connected as does BDC 3.4.200. See above comments BDC 2.7.810.

BDC 4.7 Transportation Analysis

Compatibility, traffic and safety are important issues for each Neighborhood Association in Bend. Some important traffic and safety concerns which are relevant to this development and Southwest Bend Neighborhood have been ignored in this TFR and TIA.

The Bend La Pine School District attendance area maps show Elk Meadow Elementary, Cascade Middle School and Bend High as the schools for this development. The most important concern under Major Intersections is the lack of analysis of Ponderosa St./Poplar St and Poplar St. and Brookwood Blvd. Those intersections are the very ones that will be used by children walking to Elk Meadow Elementary or parents taking them to school. Furthermore, there are no sidewalks on Ponderosa and only on one side of Poplar. It is unknown if the lack of sidewalks on Lodgepole Dr. until it gets close to Brookwood Blvd. could affect the safety of children getting picked up or let off from busses.

Using only peak PM traffic is questionable since people are using Brookwood Blvd. north for travel to work and delivering their children to both Elk Meadow and Pine Ridge schools and then south mid afternoon to pick up their children. The idea that Hollygrape St. then Larkwood Dr. (no sidewalk) be used as an alternative route to take pressure off Brookwood Blvd. is ludicrous as it encourages neighborhood cut through traffic and routes it by Pine Ridge Elementary School, then dumps it back onto Brookwood Blvd. again.

The following is a page by page comment on the TFR and TIA.

**Page 4** Why does Murphy Crossing Refinement Plan (MCRP) supersede City's Functional Classification Map for determining the width of Awood Dr. but not the current zoning map? When MCRP was adopted by City Council RM zoning was 7-15 units per gross acre as stated in the plan, now it is 21.7 units per gross acre plus a density bonus for affordable housing which didn't exist when MCRP was adopted. In one case the MCRP supersedes and in another it

doesn't. That doesn't seem logically consistent or fair since both cases are to the developer's cost advantage.

**Page 6** Table 1 uses weekday PM peak hours yet Brookwood Blvd. is very busy during the AM hours since people are going to work **and** taking their children to school while in the PM hours the children are home from school and only people are returning home from work. There are two elementary school in this neighborhood located off Brookwood Blvd. Perhaps the weekday AM peak hours are greater than PM peak hours which could skew certain assumptions.

The major intersections map doesn't consider Brookwood Blvd/Poplar or Ponderosa/Poplar which is the logical route to Elk Meadow Elementary where the children in the development are assigned to attend. This is a critical missing piece of information. Further if and when the connection to Murphy Rd. happens that will not affect the route to Elk Meadow Elementary School.

**Page 7 and 8** Again using only PM peak hours and not considering the future school traffic distribution from the development at intersections #1 and #2.

**Page 9** Poplar St. is presently classified as a Local St within the City's Transportation System Plan, however with this development that could change with parents taking their children to school again contributing to peak AM traffic.

**Page 10** As noted Ponderosa St. is a Major Collector but does not have sidewalks, bike lanes, curbs, adequate right of way width and is in poor condition. Ponderosa St. needs a major upgrade. There is no mention of Lodgepole Dr. which is being proposed as a connection to Ponderosa St. and no mention of Poplar St. which provides access to Elk Meadow Elementary School via Ponderosa St.

**Page 11** Paragraph 2: Brookwood Blvd. does not have sidewalks on both sides of road by the school. There is an asphalt path leading to the school but no sidewalk in front of the playing field in front of the school. Paragraph 3: US 97 has a non standard inadequate deceleration lane to Ponderosa St. and no acceleration lane, also non standard, from Ponderosa to US 97. All of these conditions are unsafe.

**Page 12** Since Poplar St. is a route to Elk Meadow School, it should be included in Table 2. As a condition of approval an extension of the multiuse pathway from Romaine Village Way to the development should be guaranteed.

**Page 17** Based on the 1 mile circle shown on page 6 the intersection of Poplar St. and Brookwood Blvd. should be included as it is just on the border of 1 mile and is the route to Elk Meadow School from the development.

**Page 18** See comments page 6 regarding peak hours and parents bringing and picking up children at Elk Meadow School. There are pedestrians crossing with school arrivals and dismissal, not many during the so called peak hours. Of course not many pedestrians during winter. At this time there is no opportunity to go north on US 97 except by going south to the Baker Rd. US 97 interchange or getting to Brookwood Blvd. via Poplar St. or Lodgepole Dr.

**Page 23** Fig.16 proposes neighborhood cut through traffic on Hollygrape St.and Larkwood Dr. past Pine Ridge Elementary School as a solution to traffic exceeding City's Performance standards at Brookwood Blvd./Lodgepole Dr. intersection. Furthermore it suggests using Poplar St., which hasn't been included in any of the analysis's, as an easier way of turning left from Brookwood Blvd. to travel east accessing the development. These proposals don't take into consideration that elementary school children are using these roads (Larkwood Dr., Poplar St., Ponderosa St.) with no sidewalks to and from school.

**Page 23 & 24** The Traffic Facilities Report hints that mitigation of problems will be solved with development to the north of this proposal. However MCRP has been on the books since 2006 and no development has taken place. What should happen is development to the north be planned and started before any development of the southern most section of MCRP. That would provide proper exiting, two exits out of the affordable housing proposal rather than one. Given the vagaries of economic development cities can't always count on sequential logical progress with their plans. This proposal is putting the cart before the horse in the name of pushing affordable housing in an area that doesn't have the infrastructure to support it.

### **Bend Comprehensive Plan**

There are laudable goals in the comprehensive plan, specifically 5-14, 5-21, 5-31, 5-38, 5-45, 5-50 and 5-51. Concepts of connectivity: safe routes to schools: 1/4 walk to transit corridor: length of maintenance of affordable rents: range of housing types: medium and high density developments need good access to transit, schools K-12: bikeways: emergency equipment access all have relevance to this proposal. It is up to the City of Bend to see that those concepts are met and promoted in each development.

The concept of transect, grading development from dense to less dense as the city approaches it's UGB is not implemented here. The project with a density of close to RH is adjacent to the UGB, abuts RL housing and even less dense housing within the county.

However the location and lack of infrastructure for the Wishcamper proposal doesn't fulfill many of those goals. That is not the fault of the developer but rather a combination of city actions or lack thereof, state requirements, timing and economics. It is unfortunate that this proposal is coming at this time rather than after the northern part of MCRP has been partially implemented. In another location with sufficient infrastructure this project would help Bend's affordable housing shortage. Given these issues SBNA cannot recommend approval of this project.

Thank you for your attention,

Judy Clinton

SBNA land us chair