

Mayor Ted Wheeler  
Portland City Council  
Portland City Hall  
1221 SW Fourth Avenue  
Portland, OR 97204  
July 13, 2017

Dear Mayor Wheeler and Members of the Portland City Council:

This letter is the Hayhurst Neighborhood Association's (HNA) submittal to rebut Mike Robinson's July 6, 2017 memo placed into the record for LU 16-159330 LDS EN.

We have been asked by the City Council to brief so we will be.

The HNA agrees that the approval criteria need to be followed. Code section 33.654.110.B.1.c. requires consideration of the terrain, natural resources, and trees on the site when making a determination about street connectivity (see Phil Healy memo previously submitted into the record by the HNA).

As demonstrated through the existing conditions map in the subdivision plans and in the HNA's expert testimony there are significant terrain challenges (12 -15% slopes) and natural resources (seeps and springs outside of the environmental zone) on this site.

The applicant continues to parse language and provide elaborate explanations to try to write away the natural resources on the site. For instance, they use the term "wet areas" instead of seeps and springs throughout Mr. Robinson's July 6th memo.

In addition, there have been findings made by City staff and the Hearings Officer that there will be significant changes required to the terrain (17' fills and 220' or 6' wall constructed) in order to build the through street section. This is all evidence in the record that the requirements of code section 33.654.110.B.1.c. have not been met.

The applicant goes to great lengths to argue that the small section of road is necessitated, but that it will not be used. The HNA is submitting a public records request (submitted separately) to try and understand why this is so important to City staff and to the applicant.

City staff has even spent time altering the Safe Routes to School maps without any public input, instead of meeting with the neighborhood to address the actual issues associated with SW 48<sup>th</sup> Avenue.

Creating a through street onto a roadway (SW 48th Avenue) that is not adequately surfaced and does not meet City engineering standards is not a benefit to the neighborhood.

The combination of these factors builds to a determination that the construction of a through street is not only not a requirement of the code, but that it will be detrimental to the neighborhood. We believe that our City Council will follow the code and protect natural resources.

Again, the HNA is not opposed development and has never been. The HNA's desire is simply for the city to follow and enforce the code. We urge you to follow the code and deny this application, in its current form, for subdivision.

Janet Hawkins

Chair, Hayhurst Neighborhood Association