FYI and for the record

Attached as a PDF are my comments, for the record, on the proposed comprehensive plan.

In summary this plan is a plan to repeat the mistakes that Portland made and will result in unaffordable housing, terrible traffic congestion, more density in the neighborhoods and less neighborhood livability as has happened in Portland. These effects are well known in the planning community and planners are forcing these plans on people without regard to the harm they cause.

I have included much information via links to articles and those articles MUST be considered part of this submission - they are not merely citations, they are an inherent part of this submission. If you need all of these included in one document, let me know.

Thank You
JK
Comments on Proposed Comp Plan

The first question one MUST ask is What problem are we trying to solve? That never appears to be stated in the plan, but one can imply that the goal is to
1 Reduce car use
2 increase mass transit
3 Prevent sprawl by increased density
4 Modify roads for bikes/transit
But the reality is that NONE of these will reduce any problem and will make people less well off

Addressing each in turn, I will rely on the large collection of data on my web site, PortlandFacts.com to shorten this paper THE LINKED ARTICLES ARE PART OF THIS SUBMISSION AND MUST BE READ TO UNDERSTAND THE HARM THAT RESULTS FROM THIS TYPE OF PLAN - they are not merely references First, lets review how government really works http://www.portlandfacts.com/politic.html

Introduction

When judged by the results rather than the intentions, the costs of Portland’s planning far outweigh the benefits. Planners made housing unaffordable to force more people to live in multifamily housing or in homes on tiny lots. They allowed congestion to increase to near-gridlock levels to force more people to ride the region’s expensive rail transit lines. They diverted billions of dollars of taxes from schools, fire, public health, and other essential services to subsidize the construction of transit and high-density housing projects. Those high costs have not produced the utopia planners promised. Far from curbing sprawl, high housing prices led tens of thousands of families to move to Vancouver, Washington, and other cities outside the region’s authority. Far from reducing driving, rail transit has actually reduced the share of travel using transit from what it was in 1980. And developers have found that so-called transit oriented developments only work when they include plenty of parking. Please go to this link for the full report

1 Reduce car use

This is a goal to waste people’s time, money, energy and reduce their job choices. Cars are easier to use than transit for older people and the handicapped. Links to the full reports
http://www.portlandfacts.com/cars-vs-transit.html
http://www.portlandfacts.com/cldc1нь%20тjvvel.html
http://www.portlandfacts.com/carsnecessary.html
http://www.portlandfacts.com/carsimprove_living.html

2. Increase mass transit use

Efforts to increase transit are unlikely to matter much and may cause harm http://www.portlandfacts.com/cars_improve_living.html (repeat of above).

Mass transit spending can increase congestion by spending money on the tiny minority that take transit instead of the vast majority that drive. “Policies designed to promote transit utilization can in certain instances increase traffic congestion—as appears to have been the case in Portland, Oregon” http://www.portlandfacts.com/transit_congestion.html

Mass transit has been losing market share to over 100 years and is unlikely to reverse to any significant degree http://www.publicpurpose.com/ut-usptshare45.pdf

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Even big city transit does not save energy and is still much more expensive than driving. This indicates that increased density will not make transit cost, time or energy competitive with cars
http://www.portlandfacts.com/up10bus.html

Transit wastes people’s time - transit commute to work time is about double that of driving
http://www.portlandfacts.com/commutetime.html

Portland transit is losing share http://www.publicpurpose.com/ut-por/share.pdf

Few low income people use transit http://www.portlandfacts.com/low_income_transit.html

Transit is much more expensive than cars - it just looks cheap because taxpayers pay most of the cost http://www.urbantransport.org/costcomp.pdf

Transit does not reduce congestion
http://www.portlandfacts.com/a-498090-Wendell_Cox_Mass_transit_does_not_reduce_congestion.html

Some general transit information http://www.portlandfacts.com/sometransitfacts01.htm

Part of the transit story is the false claim that GM destroyed streetcars
http://www.1134.org/stan/ul/GM-et-al.html

We sometimes hear that Europeans use transit instead of driving and that can be our model.
Eurostat says that, in the 15 advanced countries, passenger rail fell by 23%, buses fell by 27%, trams & metro fell by 21% while passenger cars increased 25% to 78% of all motorized travel
http://www.portlandfacts.com/transit/euromotorizedtravel.htm

3. Prevent sprawl by increased density

Sprawl and density are really the opposite of each other. High density is the proposal to accommodate more people by building “up instead of out”. The downside of this is that high density costs more than low density “sprawl” and concentrates driving on fewer roads in the dense areas leading to increased congestion.

Conversely, most jobs and shopping centers are now in the suburbs (“sprawl”), so driving is spread over a wide area with less congestion. People often confuse Los Angeles style development with sprawl, but the reality is that Los Angeles is the densest MSA in the county - Los Angeles is an example of high density, not sprawl (NY central city is denser, but not the MSA.)

Sprawl is poorly defined, but here are several definitions of Sprawl
http://www.portlandfacts.com/smart/sprawldefined.htm

Here is what actual Portland sprawl looks like
Is this really what we want to stop with planning?
UW study  Rules add $200,000 to Seattle house price  “The skyrocketing of home prices from 1989 to 2006 was largely because of laws intended to preserve the area's character, analysis finds “ http://old.seattletimes.com/html/business/technology/2004181704_eicher14.html

“In Portland’s case, median home prices were 1.8 times median family incomes before planners drew the growth boundary. Since then, the population inside the growth boundary has grown by 60 percent but the boundary has been expanded to add only 14 percent more land. As a result, median home prices today are 4.1 times median family incomes. Because all Oregon cities must have growth boundaries, Oregon in 2014 was the fifth-least-affordable state after Hawaii, California, New York, and Massachusetts. Of course, higher prices also have to do with increased land-use regulation, stiffer development fees, and other costs, but cities like Portland wouldn’t dare to impose those restrictions and fees if there weren’t an urban-growth boundary to prevent people from escaping to low-cost housing elsewhere” http://hi.org/antiplanners/?p=11612

People DO NOT want high density - Portlanders voted 3:1 against more density http://www.portlandfacts.com/SMART/metrodensityvote.htm

Page of links to housing cost references http://www.portlandfacts.com/housing.html
http://www.portlandfacts.com/housing/housingcost.htm


4. Roads

You can build your way out of congestion http://www.portlandfacts.com/roads/buildwayout.htm

Traffic Calming kills people http://www.portlandfacts.com/roads/buildwayout.htm

One-Way Streets are safer than Two-Way Streets http://www.portlandfacts.com/onewaystreets.htm

Miscellany

If smart growth doesn’t work, what does? We did just fine before city planners were given dictatorial powers. Our cities grew in a low cost, orderly manner by converting close in farms to housing as has been done for thousands of years. (The term “suburbs” is an ancient term that means beyond the wall.) Note that his country is NOT running out of farmland and farmland acreage is being kept out of production by government policy.

Anything outside of the earliest city core was most likely built on farmland. In Portland thus includes almost everything on the East side of the Willamette river, including Ladd’s Addition.

To answer the question of what does work: First get rid of what DOES NOT WORK - most government planning! Keep only enough planners to discover what the people really need to live the way they want and provide the needed infrastructure.

About planners: This memo from the planners on the Colombia River Crossing planners details how to make it
As to health effects of “sprawl”. “No correlation between urban form and obesity has been proven” https://nextcity.org/daily/entry/urban-design-planning-obesity-geography-studies

High density REDUCES socialization “The statistical revelation behind all of these findings is that for every 10% increase in density, there is a 10% decrease in socialization” http://www.portlandfacts.com/smart/socialinteractionandurbansprawl.htm

High Density construction cost is much higher than single family construction, contributing to unaffordable housing http://www.portlandfacts.com/smart/densitycost.htm
Restricting land availability, to force higher densities, increases land costs which adds more to the cost of housing. See below

Density has little effect on daily driving until you get to very high densities (probably because the congestion prevents driving) http://www.portlandfacts.com/smart/densitycongestion.htm

Limiting buildable land (as this plan does) increases the cost of housing

Obama’s chief economic advisor said “Restricted supply leads to higher prices and less affordability. We see the association in the relationship between land use regulations and affordability in several dozen U.S. metro areas (Figure 3) This house price appreciation experienced especially in those cities towards the right of the figure presents affordability challenges for nearly all, but they can hit the poorest Americans the hardest” Read the whole speech here

Nobel economist, Krugman described the cost of zoning before the housing bubble burst “But in the Zoned Zone, which lies along the coasts, a combination of high population density and land-use restrictions - hence “zoned” - makes it hard to build new houses. So when people become willing to spend more on houses, say because of a fall in mortgage rates, some houses get built, but the prices of existing houses also go up. And if people think that prices will continue to rise, they become willing to spend even more, driving prices still higher, and so on”
http://www.portlandfacts.com/krugmanbubble.html

“Smart growth and other land-use restrictions cost U.S. homebuyers at least $275 billion in 2005 This conclusion is based on several measures of housing affordability in more than 300 metropolitan areas. The 48-page report finds that high housing prices are almost always due to government planning rules that prevent homebuilders from meeting the demand for new homes. Such rules cause prices to increase much faster than incomes, which quickly makes housing unaffordable “ http://americandreamcoalition.org/penalty.html

California has more draconian land use laws than Washington and hence is more unaffordable “California cities have the least affordable housing and the most congested traffic in the nation. California’s housing crisis results directly from several little-known state institutions, including local agency formation commissions (LAFCos), which regulate annexations and the formation of new cities and service districts, the California Environmental Quality Act, which imposes high costs on new developments, and a 1971 state planning law that effectively entitles any resident in the state to a say in how property owners in the state use their land “
look like planners are listening to the public (with proper public meetings and input), while actually ignoring them!  http://www.portlandfacts.com/crc_decision_making.html

Former Metro planning director, Rich Carson said planners are mostly fascists
http://www.portlandfacts.com/planners_arc_fascists.html
(Richard Carson is a doctorate student at Washington State University  He is a former planning director for METRO that planned for the 15 million people, 25 cities and three counties in the Portland region  He is a former planning manager for the state of Oregon, Metro, Oregon City and Clark County Washington )

How Staff Tricks the Elected Officials:  http://www.portlandfacts.com/politics.html

Some other information related to planning issues:
We are not running out of resources  http://www.portlandfacts.com/no_limit.html

World population NOT out of control  http://www.portlandfacts.com/worldpopulation.html

Recycling is Garbage

The great recycling myth
http://www.spectator.co.uk/2014/01/why-kerbside-recycling-is-just-slave-labour-for-councils/

Household Recycling is State-Endorsed Slavery  Household Recycling is State-Endorsed Slavery
http://www.breitbart.com/london/2014/07/05/household-recycling-is-state-endorsed-slavery/

Highly Recommended Videos:
How “smart Growth” is destroying prosperity
The War on the Dream, Wendell Cox  https://www.youtube.com/watch?v=f32AynGMMcc

How city planners are making housing unaffordable, Randal O'Toole
https://www.youtube.com/watch?v=WbhKVGT0V7U

A better way to redevelop downtowns  Deregulating Down towns, Steven Greenhut (Orange County Register)  https://www.youtube.com/watch?v=mg1HWn75tY

Deregulating Land Use - Wendell Cox (publicpurpose com)
https://www.youtube.com/watch?v=BDzKAr3Ff1E

Comments on Specific Quotes From the Proposed Comp Plan
Quotes are from  04.Community Framework Plan-no changes proposed.pdf
Italics are quotes from the plan, underlines added

The Community Vision
The Community Framework Plan encourages growth in urban growth areas and rural centers, with each area center separate and distinct from the others  These centers of development are of different sizes, they may contain different combinations of housing, shopping, and employment areas  Each provides places to live and work  The centers are oriented and developed around neighborhoods to allow residents the ability to easily move through and to feel comfortable within areas that create a distinct
sense of place and community
This appears to be planner boilerplate - whose vision is this? Where did it come from? Is it really what the people want? Planners love to create a place for everything and plan for every detail. But they cannot forecast the future, so their plans eventually end up hurting people as described above by Obama's chief economic advisor.

A primary goal of the plan is to provide housing in close proximity to jobs resulting in shorter vehicle trips, and allows densities along public transit corridors that support high capacity transit, either bus or light rail.
Voters firmly rejected light rail multiple times - why does this plan ignore the wishes of the people by including light rail?

development in each of the urban growth areas would have a higher average density than currently exists
Do most people want higher densities? Portland voted against higher density by a 3:1 margin http://www.portlandfacts.com/smart/metrodensityvote.htm (Repeat of above link)

A minimum of 25 percent of the new housing would be duplexes, townhouses, or apartments
Planners do not like single family homes and think they are a waste of space. And this plan will increase housing costs, so fewer people will be able to afford a house

Most of northern Clark County would remain as it is today,
This deprives landowners of their property rights and creates an artificial shortage of land which increases housing unaffordability.

In order to achieve the vision of Clark County as a collection of distinct communities surrounded by open space, agriculture, and forest uses, Clark County and each of the cities and will adopt certain types of policies
Whose vision is this? Almost certainly NOT the vision of the average citizen. Who gave Clark County the right to dictate to cities?

All planning should be in the form of complete and integrated communities containing housing, shops, work places, schools, parks, and civic facilities essential to the daily life of the residents Community size should be designed so that housing, jobs, daily needs and other activities are within easy walking distance of each other
This plans for multiple grocery stores, multiple doctors, hospitals, multiple industries, multiple home improvement stores, multiple department stores all be within a very small are filled with potential customers. NOT EVEN HONG KONG IS THAT DENSE! This is another totally unrealistic planner fantasy of the perfect world.

2.1.1 Establish density targets with jurisdictions in the county for different types of communities, consistent with the definitions of Urban Growth Areas and Rural Centers
This will make all neighborhoods denser - is this what people really want?

2.1.3 Establish maximum as well as minimum lot sizes and densities in urban areas
This will make all urban neighborhoods denser - again, is this really what people want?

All cities and towns are to encourage infill housing as the first priority for meeting the housing needs of the community
Mandates increased density in all neighborhoods. Infill means tearing down low cost existing homes to replace them with multiple high cost houses on the same lot, second
houses squeezed in next to existing homes, filling every vacant lot. This can be seen in most Portland neighborhoods and is the subject of protests. Again, is this really what people want?

2.1.10 Establish a mechanism for identifying and mitigating adverse impacts on housing production and housing cost which result from adoption of new development regulations or fees. This is an admission that this plan will increase costs and pretends that basic economics can be overcome by “mitigating”. That would require taxpayers pay over ½ the cost of every new home because plans like these can be expected to double (or more) the cost of a home.

This is another example of planners being out of touch with reality. It also show that the planners know that this plan will make housing unaffordable and simply don't care about people's well being.

5.1.1 Encourage transportation systems that provide a variety of options (high capacity transit, high-occupancy vehicles, buses, autos, bicycles or walking) within and between and rural centers. This is more anti car (really anti-mobility) planning. Again, is this really what people want?

5.1.3 To reduce vehicle trips, encourage mixed land use and locate as many other activities as possible to be located within easy walking and bicycling distances from public transit stops. Planners just don’t like cars. They plan as if transit saved money (it doesn’t), saved energy (it doesn’t), saved time (it doesn’t) or reduced pollution (it doesn’t because it uses more energy than cars.)

5.1.4 Encourage use of alternative types of transportation, particularly those that reduce mobile emissions (bicycle, walking, carpools, and public transit). This is an outright lie - it falsely states that “public transit” will “reduce mobile emissions”. The reality is that Federal transit data shows that transit uses about 30% more BTU per passenger-mile than cars. See: Table 2.14 of http://cta.ornl.gov/data/tebd34/Edition34_Chapter02.pdf

5.1.5 Establish residential, commercial and industrial development standards including road and parking standards, to support the use of alternative transportation modes. This means keep road capacity and parking spaces lower than needed to try to force people out of cars. Planners refuse to admit that transit has been losing market share for over 100 years and is currently under 3% in most areas.

5.1.8 Encourage a balanced transportation system and can be maintained at acceptable level-of-service. Balanced, in planner code speak, means getting people out of cars, by spending more money on bike lanes, transit and making it harder to drive with narrower roads, bike lanes, giving entire streets to bikes, bubble curbs, and speed bumps.

9.1.5 Develop transit-friendly design standards for commercial and industrial areas. Encourage businesses to take responsibility for travel demand management for their employees. More getting people out of car rhetoric with a requirement that employers help, typically, by restricting parking and being required to buy bus passes for employees under threat of fines.
10.1.4 Establish development standards for higher densities and intensities of development along priority and high capacity transit corridors that encourage pedestrian, bicycle, and public transit usage. Planners claim that such corridors reduce driving, and they may by a few percent, but the vast majority of the residents still drive and they are concentrated that driving in small areas, increasing congestion.

10.1.5 Encourage street, pedestrian path and bike path standards that contribute to a system of fully-connected and interesting routes to all destinations. Their design should encourage pedestrian and bicycle use and be defined by buildings, trees and lighting, and discouraging high-speed traffic. Less road capacity and more congestion as bike lanes and trees take up former road space.