

Pauline's 78-page Introduction

The August 16th transmittal email implies the attachment is proposed amendments to three documents-

- Bend Comprehensive Plan
- Transportation System Plan
- Bend Development Code

However, the August 11th 78-page document is almost entirely amendments to the Bend Development Code.

Suggestion- add clarity by using a more accurate description of the amendments, such as the following,

Most of August 11th proposed amendments update the Bend Development Code (BDC) to incorporated specific elements from adopted documents-

- Comprehensive Plan ("Comp Plan")
- Transportation System Plan (TSP)
- Standards & Specifications
- Plus, minor housekeeping amendments

Suggestion- add an "Overview" to help citizens understand the framework of land use planning, such as the following,

The **BDC** is the tool which guides development by implementing the policies and designations of the [Comprehensive Plan](#).

- The **BDC** needs to be updated to incorporate the various policies adopted in the **2016 Comp Plan** (of which the **2020 TSP** has been made a part).
- The **BDC** needs to be updated to be consistent with the **2022 Public Works Standards & Specifications** which were revised this spring.

Stated Purpose-

- Provide for consistency and clarity between all of these documents.
- **Most frequent topics referred to-**
 - Complete streets
 - Low Stress Network
 - Level of Traffic Stress (LTS)
 - Mobility Hubs

Initial Review Findings

The majority of the issues identified in this detailed review are not intended to challenge the worthiness of any of these topics but are an attempt to give a “layperson’s perspective” of the proposed wording and make suggested wording to add further consistency and clarity.

Specific Questions by Sections:

Pages 1 through 6 - Amendments to the Bend Comprehensive Plan

The proposed “Bicycle Key Routes Low Stress Network” figure on page 3 has a title and legend that lists separately

(green lines) for “Bicycle Low Stress Network (LSN)

(red lines) for “Key Rotes (note “route” is mis-spelled in legend)”

Question #1 - Are key routes a subsection of the LSN? The title and legend could be interpreted that Key Routes are separate. Suggest the title and legend be reworded for clarity. Note- On page 6, the LSN figure uses green lines to delineate all LSN which also includes the Key routes shown on the figure on page 3.

Question #2 - Does the Comp Plan include definitions which are consistent with the intended BDC definitions after this 78-page amendment is adopted?

Pages 7 through 13 Bend Development Code Definitions

On page 7 & 8, the Bike Lane states, *may be lane-only, buffered, separated or other types as defined in the City of Bend Standards and Specifications.*

Question #3 - Where are they “defined” in the Standards and Specifications? Suggest the definition specifies where. [I first looked in the “drawings” and the street sections call out the bike path. Several days later, I stumbled on text by accident in the “design” section part II of the recently updated Standards and Specifications. I suggest adding the section references 3.3.5 and 3.6.1 in the BDC.]

Page 8, definition of Complete Street -

Suggestion - Replace the proposed definition with the exact sentence from TSP policy 7-40 - " *A complete street is one that is designed to allow everyone to travel safely and comfortably along and across the street by all travel modes.*

Question #4 - Why are you referring to CP policy 7-43? This "CP" policy doesn't mention "complete street."

Page 9: "Driveway throat" - This important definition needs to be more specific. There is no length defined. It is not a "clear and objective" standard without a measurable length. The site plan for PLSR20220416 is a perfect example of a throat with an unacceptable level of traffic conflict.

Question #5 - Is there a code that provides a "clear and objective" standard to measure when the throat length is sufficient to avoid unsafe traffic conflict?

Suggestion - Provide text that specifies a "clear and objective" standard for the appropriate Driveway throat of a site plan.

Page 10 - Low Stress Bicycle Network (LSN) / Low Stress Bicycle route / Neighborhood Greenway. There is a lack of clarity when looking at these three definitions together. Consider the confusion of the proposed text-

- LSN is a map of "low stress bicycle routes"
- Then Low stress bicycle routes are defined as "LTS 1 or 2"
- But then the routes shown include routes that are obviously LTS 3 and LTS 4

Question #6 - Is the Low Stress Network a document, including a map, which describes the facilities or just a map?

Question #7 - I found a City of Bend document online titled, "[Low Stress Bicycle Design Elements](#)". Is this a relevant document?

Question #8 - What is a "Level of Traffic Stress 1 or 2?" Are these "levels" the same as the "LTS" described in the document referred to in Question #7?

Question #9 - Are Greenways part of the LSN? Are they LTS 4 as defined per the document in question #7?

Question #10 - Does the LSN include all the BPRD trails?

Question #11 - Does the Standards and Specifications have design text and exhibits for the different LTS routes?

[For such an important component to the multi-modal transportation system, it seems strange that there is not more clarity on the LSN in the BDC. Even the Standards and Specifications are incomplete. The designer is referred to the ODOt Analysis Procedure Manual Chapter 14. I understand it isn't always wise to "spec" items in two locations and therefore I understand relying on ODOT's detail but at least consider an overview and some links to the Standards and specifications, plus the ODOT Chapter 14.4.]

Page 12 - Arterial **means a complete street(?)** that serves as a main route connecting

.....

- Confusing because not all of existing Bend's arterials are complete streets.
Question #12 - By stating an arterial means a complete street, are you implying all arterials need to become "complete streets (new and existing)?"

Suggestion - Perhaps BDC 4.7 needs a provision to provide clear and objective standard if and when a development would be required to convert an incomplete arterial to a "complete" arterial. For example, if your project has some frontage on an arterial which is not a complete street, would the project get conditioned to make the arterial a complete street..

Suggestion - It would be **clearer** to point to the standards in the "Standards and Specifications" page R-1A.

Question #13 - What is the traffic volume which differentiates major to minor?

Question #14- What is the typical speed limit for both?

Page 12- Collector means a complete street.....

Not all existing collectors are complete streets. Not all existing collectors can be made into complete streets

Suggestion - Add some text to explain how this definition impacts existing collectors. Perhaps this text would be better located in 4.7 as part of the TFR requirements.

Suggestion - Include a reference to Standards and Specifications page R-1B for the same reasons as stated for Arterial definition.

Pages 13 through 19 BDC Chapter 2

Page 15 - BDC 2.1.1100 (A) Onsite drainage.....*comply with BDC 3.6.500.*

Question #15 - BDC 3.6.500 pertains to Short term rentals. Is the code reference wrong and if so what is the correct reference? [BDC 3.5.600 may be the correct reference.]

Page 15-BDC 2.1.1100(C) Garage and Carports must be accessed from abutting alleys.

Question #16 - What happens if a mid-block lot abut the right-of-way of an alley, but the alley improvements don't exist? Would the applicant have to improve the entire alley?

Page 16- 19 - Mobility Hubs will become a permitted use in commercial zones (BDC 2.2.300), mixed-use zones (BDC 2.3.400), industrial zones (BDC 2.4.300), public facility zone (BDC 2.6.200), juniper Ridge (BDC 2.7.2030), and Bend Central District (BDC 2.7.3220).

Question #17 - Shouldn't the design standards in each of these subsections be review to determine if there should be applicable standards that should be added for mobility hubs?

Page 18 **typo** - (*all other uses in table 2.4.300 remain the same.....* Should it be 2.6.200?)

Pages 20 through 62 BDC Chapter 3

Page 20 BDC3.1.100 *Purposeconsisting of complete streets.*

Question #18 - Why include the "complete streets" phrase?" The definition of complete streets includes.....*bicycle facilities, walking facilities and facilities for vehicles.....*but not all streets are required to have bicycle facilities per the Standards and Specifications. Local streets may have no bike facilities. The policy says "select" local streets?

Page 25 BDC 3.1.400 (F)(3)(e) All other uses.....the city engineer may determine that an alley is not adequate.

Question #19 - How will the city engineer make this determination and will it be a "clear and objective" standard?

Page 27 BDC table 3.3.300 *All residential uses within the Commercial and Mixed-Use zoning districts = minimum [parking] requirement is 1 space per dwelling unit. (There is currently no parking requirement listed for residential uses in the Commercial and Mixed zones other than the CB and MU.)*

Suggestion -The preceding underlined statement that there is no parking requirement listed for most Commercial and Mixed zones is incorrect. This “housing keeping” amendment should be deleted in its entirety. These zones have parking requirements as noted in the BDC excerpts below.

Table 2.2.300 (commercial zones) has two relevant footnotes.

**New residential use [are only permitted] as part of a mixed-use development.*

**Mixed-use (residential with commercial/civic/industrial), mixed-use developments shall be subject to the use limitations prescribed for the respective individual uses.*

3.3.300 Vehicle Parking Standards for On-Site Requirements.

The minimum number of required off-street vehicle parking spaces (i.e. parking that is located in parking lots and garages and not in the street right-of-way) is determined based on the standards in this section.

Table 3.3.300 is the standard for all uses unless there is an exception listed in the code. In addition, there are a number of credit options listed in this section for circumstances such as adjacent on-street parking, 5% reduction for mixed-use, distance to transit stop and more. But the starting point for multi-family residential is this table and is noted below. This table lists one exception which is also noted below. It is the existing parking rate minimum for all Multi-unit residential in all zones except for the listed exceptions.

Table 3.3.300

Multi-unit residential	Studio units or 1-bedroom units – 1 space/unit
	2-bedroom units – 1.5 spaces per unit
	3- or more bedroom units – 2 spaces per unit

All multi-unit residential uses within the
CB and MU Zoning Districts

1 space per dwelling unit

Page 29 BDC 3.4.100 *Purpose and Authority. One of the primary purposes of this chapter is to provide standards for attractive and ~~safe~~ complete streets that.....*

Question # 20 - If the local streets don't have bicycle facilities, is it correct to imply all streets will be "complete" when you define complete streets as having bicycle facilities?

Suggestion - Don't overuse the phrase "complete street," especially in a location that applies to all streets.

Page 31 *BDC 3.4.200 (B) completely deleted because "a variance is not required since an applicant can apply for a Waiver and Modification of Public Improvement Standards in BDC 3.4.150*

BDC 3.4.150 pertains to a waiver of a specific requirement for "public improvement standards" whereas this section, 3.4.200 (B) Variance, pertains to a variance to the transportation design guidelines. These are two completely different types of requests. Here is a good [city resource](#) intended to help the community understand the difference.

Question #21 - Is there an actual ordinance which repealed this subsection or is this a placeholder for future action?

Page 32 through 33 - BDC 3.4.200(F) *Minimum Rights-of-way and Street Sections*. The changes to BDC 3.4.200(F)(1) are long overdue. There was so much redundancy.

Question #22 - When did the Standards and Specifications get revised? [Oops, I found the answer / skip this question please]. The changes to the local street sections to allow local two-way streets with less twenty feet for two through lanes will come as a shock to the community. I read the 3.4.2.2 local streets design standards and noticed the inclusion of the fact that this narrow design could violate the Oregon Fire Code. A broader perspective would include this as a potential safety issue.

Question #23 - How does a “queuing street” *provide standards for attractive and safe* (Section 3.4’s stated purpose. Oops, you propose to delete the word safe.....) *complete street* (which local streets won’t be).

Question #24 - If the right-of-way is 60 feet for all local streets, what was the reason for the narrow “queuing streets?”

Question #25 - The design standards 3.4.2.2 only mention reduced need for parking, low traffic volume, and short segments. Are these “clear and objective standards” [clear and objective standards must be measurable, or if not this, than that” according to planning staff]?

Page 44 - BDC 3.4.200 (L)(2) *Bicycle lanes must be constructed on all collector and arterial stress. Low stress.....in compliance with City of Bend Standards and Specifications for providing a level of traffic Stress LTS 1 or LTS and any low stress street crossings.*

Question #26 - What if the street in question is an existing street which has constraints which would make it extremely difficult to build a complete street?

Question #27 Who decides on whether LTS 1 or LTS 2 and how is the decision made? [sorry, this is redundant to question #8.]

Question #28 - Where are the specific standards and specifications for the specified designs? [Again, a redundant question. Unfortunately, a designer has to go to multiple locations to be sure the proposed design is right.]

Page 51 BDC 3.6.300 (D) Mobility Hub must include.....may include.....

Question #29 - Where are the development standards?

Page 59 BDC 3.8.500 (G)(3) Garage and carport (cottage housing...) setback 20 feet from a street.

Question #30 - Is this a setback from a private street pavement or a public street right-of-way? If it is a setback from a private street and a new public street replaces the private street, won’t the public sidewalk fall within the original 20-foot setback? This new provision needs clearer wording.

Page 61 (c) garages and carports at cottage clusterthis sounds identical to page 59. Same comment/question #30.

Pages 62 through 78, BDC Chapter 4

Page 73 BDC 4.7.600 (F)(2)(b) added *or reduced the level of traffic stress to achieve a 1 or 2.*

Question #31 - How is this reduction measurable?

Page 74 BDC 4.7.700 Revised equation

Question #32 - Can you provide an example of both old and new calculation on a typical project?