

2nd Land Use Review Response, Response to Public Comments Transportation

LU: 26-026160-000-00-LU Date: July 1, 2026
To: Andrew Gulizia, Portland Permitting & Development, B299/R5000
From: Tammy Boren-King, PP&D, Public Works- Transportation
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Applicant: Portland Public Schools *Gabe Asch*
PORTLAND PUBLIC SCHOOLS
501 N DIXON ST
PORTLAND, OR 97227

Location: 1151 SW VERMONT ST

TYPE OF REQUEST: Type 3 procedure CU - Conditional Use

DESCRIPTION OF PROJECT

The proposed project will modernize Ida B Wells High School by redeveloping the building and the site. The existing high school will be replaced with a new building to accommodate 1700 students located on the south side of the site.

RESPONSE

This memo responds to the transportation-related aspects of public comments received to date.

Through Connections

Public comments requested clarification regarding the use of the Rieke driveway for cyclists and pedestrians. Commentors asked that the planned public access easement for the Rieke driveway provide unrestricted bicycle and pedestrian access on both the drive aisle and the eastside pathway.

In addition to this conditional use review, the project has gone through a Design Review (26-026161-LU). At the Design Review hearing for this project on 6-18-2026, the applicant presented a revised site plan, which the Design Commission approved. Staff note that Design Review contains no transportation-related approval criteria; these criteria apply only to this Conditional Use Review. In the revised plan presented at the Design Review hearing, the applicant suggested that the easement along the Rieke driveway would be limited to the eastside pathway and would require all cyclists to dismount and walk their bicycles. The easement would not include the drive aisle and would not allow mounted cycling along this approximately quarter-mile connection.

This revised site plan has not been submitted to the Conditional Use Review file as of this writing. Transportation staff's original findings regarding site connectivity, pedestrian and bicycle network availability, and circulation impacts were based on the applicant's earlier representations that the easement included bicycle access. For clarity, staff reads the term "bicycle access" as meaning that mounted cyclists are permitted to ride; pedestrian access means people walking. Staff quote Exhibit XXX, which is the applicant's access plan dated April 16, 2026 as follows:

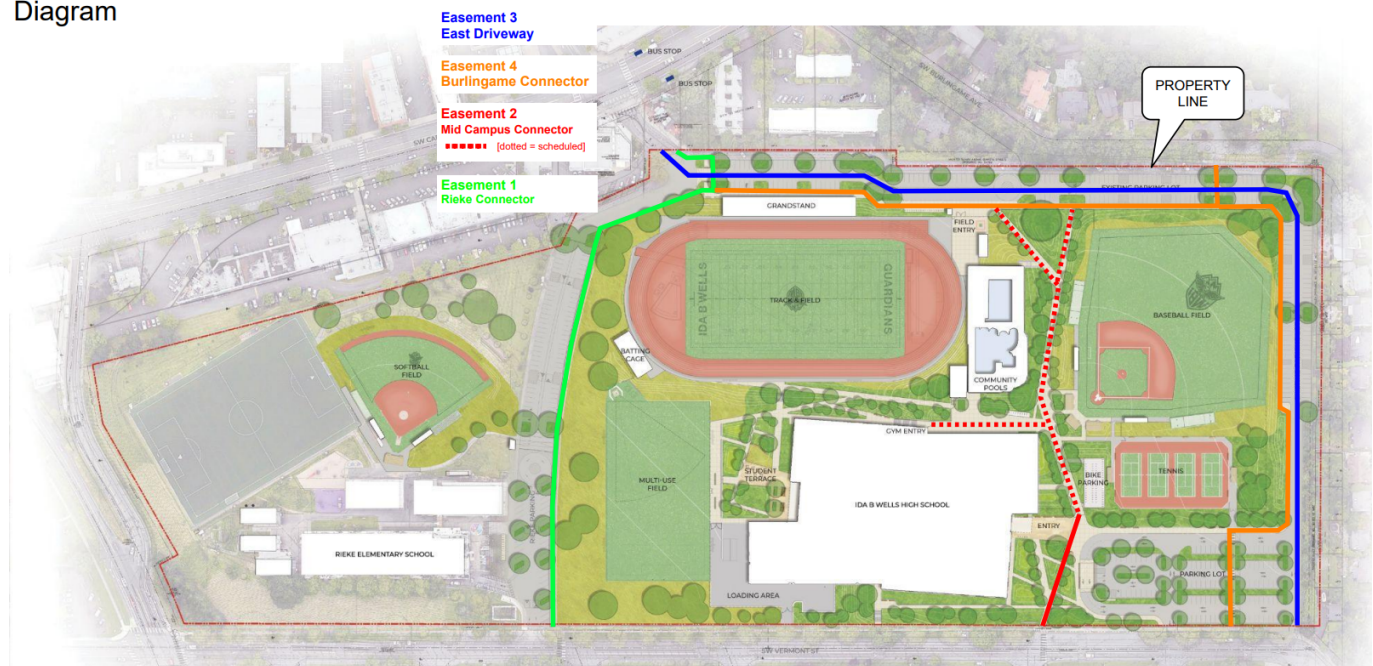
Public Bicycle Connections

- Public bike access will be provided within the eastern vehicular route, shown as the “High School and Public Bike Route” in the dashed green line on the Bike and Vehicle Diagram, attached as Exhibit B. This route will be open to the public under a public easement without scheduled restrictions and will provide bike access between SW Vermont and SW Capitol Highway.
- Public bike access will also be provided along the mapped major trail alignment along the east edge of the Rieke driveway and parking lot. This bike route is also shown as the “High School and Public Bike Route” in the dashed green line on the Bike and Vehicle Diagram, attached as Exhibit B. This route will be open to the public, under a public easement, with no scheduled restrictions. This unrestricted bike access will not be gated or fenced.

The image below is included in the access plan. Staff note the eastern route is shown in blue, not in the green described in the text above. The green shows the easement location proposed along the major public trail alignment.

Public Access Easement
Diagram

EXHIBIT I A to EXHIBIT J.3



In order to provide multi-modal access to meet the connectivity requirements, staff recommend modifying the recommended condition of approval to note that the public access easements granted through this project must allow bicycle access for mounted cyclists for routes outside of the fence line, including along the east side of the Rieke driveway or in the drive aisle for the Rieke driveway. This is the direct connection through the site. Requiring cyclists to walk the quarter mile distance while pushing their bikes does not meet the connectivity requirement for access for all modes. Staff note the alternate route available by diverting east on Vermont St. and circling the school is an approximately 3,200 feet of out of direction travel. This is over a half mile of additional travel that is an uphill climb the entire easterly leg of the journey on SW Vermont St. Staff believes the proposal as initially submitted showing bicycle access for mounted riders along the east side of the Rieke driveway connection meets the approval criteria. While not specifically proposed, allowing mounted riders to ride within the drive aisle would also meet the approval criteria. Any revised proposal that requires cyclists to dismount and walk or divert over a half mile out of direction does not meet the connectivity standards for this 35 acre site. Staff recommend the proposed condition of approval be modified to read as follows with the new text in bold:

The applicant shall submit the four public access easement agreements shown and described in the document titled “PPS Memo Access Plan Updated April 16, 2026”, included as Exhibit XXX, to the City of Portland with the school building permit application for review and approval by the City

Attorney. The public access easements must be executed and recorded prior to issuance of the building permit for the school building. The easement agreements will identify the post-construction effective date of public access as well as other essential terms, such as hours of operation and emergency closure restrictions, consistent with Exhibit XXX. **The public access easements granted through this project must allow bicycle access for mounted cyclists for routes outside of the fence line, including either the pathway on the east side of the Rieke driveway or in the drive aisle for the Rieke driveway.**

Staff further note that public testimony at the design review hearing included a request for a condition of approval that would allow public bicycle access on the Rieke Rd. drive aisle if Rieke elementary school closes. This was verbally agreed to by the applicant but this was not deemed necessary for the approval criteria to be met and was not added as a condition of approval to the final decision issued by the Design Commission.

Parking

Comments questioned the Transportation Impact Study (TIS) because it did not evaluate onstreet parking in the surrounding neighborhood. Staff acknowledge that TIS documents historically included detailed onstreet parking analysis. However, state law and local parking regulations have changed substantially in recent years.

OAR 66012 establishes state requirements for transportation planning, including parking management (OAR 66012400 through 450). In response, the City of Portland amended the zoning code to comply with state law and to support infill development, reduce reliance on motor vehicles, and align with the City's climate and equity goals. As a result, the City no longer requires onsite parking for any byright use. Parking maximums remain in Zoning Code Chapter 33.266, but parking minimums have been removed. While parking allowances for conditional uses may still be set through the conditional use review process, the approval criteria no longer include the onstreet parking impacts evaluation factor. These code changes reflect a policy tolerance for potential onstreet parking associated with new development or redevelopment.

Consistent with these requirements, staff did not direct the applicant to study onstreet parking demand as part of the TIS. The TIS did include an evaluation of onsite parking supply and concluded that the provided onsite parking is adequate to meet the anticipated demand. The proposed development is not expected to increase the overall trip generation of the site. Staff concur with this conclusion.

Public comments also expressed concern that allowing onstreet parking may create unsafe conditions by limiting a street to one travel lane at a time. Staff note that such conditions are an intentional design feature that results in slow speeds on local service streets as drivers are required to yield when two vehicles traveling in opposite directions meet. The City of Portland's local street standard for new local streets in single family residential zones is 28-ft curb to curb with on street parking allowed on both sides. ([TRN 1.09- Design Standards for Public Streets](#)) This is in response to OAR 660-012-0810 which reads as follow:

(2)(b) Cities and counties shall establish standards for local streets with pavement width and right-of-way width as narrow as practical to meet needs, reduce the cost of construction, efficiently use urban land, discourage inappropriate traffic volumes and speeds, improve safety, and accommodate convenient pedestrian and bicycle circulation. Local street standards adopted by a city or county must be developed as provided in ORS 368.039. A local street standard where the paved width is no more than 28 feet on streets where on-street parking is permitted on both sides of the street shall be considered adequate to meet this requirement. Wider standards may be adopted if the local government makes findings that the wider standard is necessary.

The rights-of-way in close proximity to the school on the south side of Vermont are typically 28-ft wide curb to curb, though SW Chestnut Dr. is mapped as being 36-ft curb to curb. The local street system is functioning as designed, resulting in slow speeds as drivers yield to one another.

If residents observe illegal parking, such as vehicles parked against the direction of travel, these

violations may be reported to Parking Enforcement at 5038235195. Parking Enforcement staff monitor voicemails regularly during the following hours: Monday–Friday 6:15 a.m.–11:00 p.m., Saturday 8:15 a.m.–11:00 p.m., and Sunday 8:45 a.m.–11:00 p.m. Outside those hours, concerns may be directed to the Police nonemergency line at 5038233333.

Comments were also received asserting that public rightofway should not be available for student use. Staff note that onstreet parking and local street access are public facilities available to all members of the public. Any licensed driver may legally park in an available onstreet space, and all members of the public may use local streets by foot, bicycle, or other legal mode at any time.

If residents wish to explore the creation of an Area Parking Permit (APP) zone, they may begin by visiting the City’s webpage for annual area parking permits at [Apply for an annual area parking permit for residents and employers in Zones A-U | Portland.gov](#). The establishment of area parking permits is guided by [Chapter 16.20 Public Right-of-Way Parking | Portland.gov](#). Staff note that parking permit programs are not intended as a tool to limit parking associated with uses inside the permit area. They are intended to limit commuter traffic that originates from outside the permit area and has “no apparent connection or business within the permit area.” ([16.20.801](#))

Comments were also received that vision clearance efforts are needed at intersections throughout the neighboring area in order to support use of the roadway system by pedestrians and cyclists. Public concerns regarding multi-modal safety are real and significant. While staff agree that complete infrastructure is needed City wide, staff assert the existing proposal is sufficient to offset the impact of the proposed development. The burden for correcting the existing conditions throughout the neighborhood does not fall solely on the school district. The proposal at hand creates permanent easements through the site that will secure rights for people movement in a much more direct manner than is available through the public right-of-way. In addition, upgrades are being made to ADA ramps and crosswalks within the frontage of the site. Requiring additional off site system scale improvements would create significant process and costs for the school district that would be out of proportion to the request to rebuild the existing high school. Staff do note that PBOT traffic engineering staff do take citizen reports of traffic safety concerns seriously and use citizen reported concerns as a basis for decision making when planning how to spend public infrastructure dollars. Non-urgent traffic safety concerns, such as requests for on-street parking removal to increase vision clearance, can be made at <https://www.portland.gov/transportation/823-safe>, by calling 311, or by call 503-823-4000 7 days a week from 7 AM to 8 PM.

Corrections

Staff note that the original transportation response incorrectly referred to “SW Chestnut St.” All references should be to SW Chestnut Dr.

Staff also note that the original response referenced a document titled “PPS Memo Access Plan Updated April 25.” This was in error. The correct document is dated April 16, 2026 and is Exhibit XXX in this Conditional Use Review.