

The comments on the Draft Comprehensive Plan from the Eliot Neighborhood Association Land Use Committee are attached. Three pages describe the basis for the following 5 recommendations:

1. Adopt the draft plan for the Eliot Neighborhood as proposed, without alteration or delay. The Draft gets the zoning 95% right. Opening it up to piecemeal changes runs the risk of unraveling a well-conceived and constructed plan. That risk is too great to leave to a process outside Eliot's control.
2. Strengthen protections for historic neighborhoods, both historic and historic conservation districts. The plan offers protections to historic buildings, "where feasible" which is already too weak, but it ignores the historic and cultural significance of entire neighborhoods; areas that embody unique architectural, transportation and cultural features.
3. Restrict the Rx zone to the Central City. Eliot is the only Albina Plan neighborhood with Rx zoning currently. Title 33 designates Rx as a Central City zone. It belongs there, not in Eliot.
4. Rein in the Rh zone. The current review of mixed use zones is expected to apply height and design limits where it abuts R zones. The Rh zone should have the same limits, including to bonuses for height and density.
5. Limit infill in inner city neighborhoods that are either historic or historic conservation districts where adequate density is provided through zoning in centers and along corridors. Current practice is contributing to gentrification by reducing the stock of existing homes that are otherwise affordable and replacing them with townhomes and McMansions that are not affordable to the average teacher or public employee.

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**Eliot Neighborhood Association**  
**Land Use and Transportation Committee**  
Mike Warwick, Chair

**Comments on the Draft Comprehensive Plan**

The Eliot neighborhood has a greater stake in the Draft than most others because of its proximity to the Central City, its historic and cultural significance and the unfortunate legacy of urban renewal actions that have significantly reduced to a fraction of its original size. The Albina Plan was the first effort to redress this legacy. By working diligently and closely with City staff, the current Draft takes additional steps, although that work is still incomplete. To continue that effort we offer the following recommendations.

- 1. First and foremost, the current Draft zoning proposal corrects many problems with the current Comprehensive and Zoning Plan (the Albina Plan). The Plan for Eliot should be adopted as is, without adjustment, and as promptly as possible to prevent further damage to Eliot from the current, inconsistent zoning.**

The Draft zoning best accomplishes the Plan’s goals to “preserve unique neighborhoods” while allowing for growth along “corridors” and focused on “centers.” This goal was achieved by reducing the current medium density zoning (R2) within the Eliot Historic Conservation District to a low density zone (R2.5). This lower zone was the dominate zone prior to the Albina Plan, so reverting to it is the *equitable* thing to do in light of the City’s legacy in the area. To compensate for potential housing loss, properties along “corridors” and proximate to the Williams/Fremont center, were zoned to accommodate more dense housing and “mixed use” development that is expected to provide employment for community residents without advanced degrees as well as additional housing.

The Draft increases areas in Eliot targeted for “mixed use” zoning. Although the new “mixed use” zone is currently undefined, Eliot is opposed to extending the schedule for plan review and adoption. Continued application of current zoning in Eliot is an existential threat to the neighborhood; one Eliot cannot afford simply to satisfy wealthier neighborhoods.

- 2. Strengthen protections for historic neighborhoods, not just buildings. This should include additional setback and/or step-down provisions and/or distances for projects within 50 feet of either historic buildings or districts (including conservation districts).**

The Plan pays lip service to historic preservation. When it is referenced it is generally specific to building preservation. There is more to history than a building here and there. The Eliot neighborhood deserves protection of its historic character and residential fabric for at least four reasons:

- A. Some researchers believe that what is now the Eliot neighborhood may have been the site of the Hall Kelly’s City, which was founded in 1834. That would make it the oldest city between San Francisco and Seattle, predating the founding of the City of Portland and of the City of Albina.

- B. Eliot was platted and developed prior to the automobile age. It was crisscrossed with street car lines. It is the last and largest remnant of Portland's original streetcar neighborhoods. That unique character and neighborhood fabric deserves protection by itself. But there are also two cultural reasons.
- C. Eliot was home to Portland's largest German community at the end of the 19<sup>th</sup> and early 20<sup>th</sup> Century. It was called "Germantown" for that reason. This community was primarily composed of "Volga" Germans; Germans who emigrated from Russia. They left behind a rich legacy of homes (mine is one) and churches when the original residents died or disbursed.
- D. The more recent and better known cultural legacy was as the commercial center for Portland's black community. Part of that legacy is also as a multicultural community, as Eliot's proximity to the railyards and industry made it home to both black and white working class families.

This legacy is an important part of Portland's history and identity and deserving of protection. It relates to the rebirth of Portland's streetcar development and its protection will prevent the elimination of cultural touchstones for Portland's German and black communities.

### **3. Restrict Rx zoning to the Central City.**

The Rx zone is characterized in Title 33 as a "Central City zone." Eliot is alone among Albina Plan neighborhoods to have Rx zoning. It should not have any Rx zones. The proposed plan reduces this to the more appropriate Rh or R1 depending on the current density.

### **4. Revise the Rh zone.**

The current Rh zone allows for heights that are incompatible with adjacent low density residential parcels and it has no provision for setbacks adjacent to historic properties or districts (which Ex does). This is an issue primarily because height and FAR bonuses are granted if the parcel is within 1,000 feet of transit facilities. We recommend some or all of the following:

- A. Incorporate the Rh zone into the Mixed Use zone.
- B. If elimination of the zone as above isn't possible, apply the same setback and step-down requirements to the Rh zone as will be imposed in the new Mixed Use zones.
- C. Reduce the distance from transit streets for height and FAR bonuses. The current 1,000 foot limit encompasses all of Eliot and almost all of Irvington, both historic districts where 75 to 100 foot tall buildings are inappropriate.

### **5. Direct infill away from historic districts (including conservation districts).**

The current draft directs infill to "inner" neighborhoods. Eliot is one of those. The existing homes that are currently affordable to teachers and city workers are being demolished by infill developers and replaced with townhomes. This is destroying the historic character of these neighborhoods. Ironically, the policy is justified as a response to "gentrification," a term which is misapplied in this case, partly due to poor statistical analysis. Home sale prices in Eliot are consistent with the median sales price city wide. The rapid increase in price is due to the purchase of homes from absentee landlords and their subsequent rehabilitation and their transition from slumlords to proud home owners. At present, existing homes in Eliot are about

as “affordable” as elsewhere in the inner city. However, part of the “statistical” increase in average home price is a consequence of infill. The townhomes that replaced existing, affordable homes are selling for two to three times the price of the home they replaced. Those prices aren’t “affordable” and they drag the average home price up. In simple terms, the City’s infill policy is causing “gentrification,” as well as destroying the “unique neighborhoods” the Plan pledges to preserve. Additional density in historic inner neighborhoods should be limited to centers and corridors through appropriate zoning rather than encouraged within established historic district boundaries.