



John Cole
City of Portland
Bureau of Planning and Sustainability
1900 SW 4th Avenue # 7100, Portland, OR 97201

February 2014

Dear Mr. Cole,

As Portland grows, there will be significant economic pressure to increase density within the urban growth boundary. The Comprehensive Plan Update process is diligently calling for community input to guide how this growth occurs to enhance livability and promote equitable infrastructure development.

As board members, residents and local businesses of the North Tabor Neighborhood Association, we are optimistic that the Comprehensive Plan Update will facilitate beneficial growth, yet we want to see new development that is consistent with the character and needs of our area. In this grain, we are sharing commercial, residential zoning and transportation-related recommendations that we believe will enhance the livability of North Tabor and support the wellbeing of its residents.

Pedestrian-Friendly Businesses and Transit-Oriented Development

Although we support the comprehensive plan's proposed mixed use zoning changes on NE Glisan near 60th Avenue, we want to see additional zoning revisions that will support the growth of stable, pedestrian-friendly businesses and amenities.

Glisan: Overall, our vision is that the Glisan corridor from 47th-61st Avenues is the commercial heart of the neighborhood, with pedestrian focused storefronts. We understand that per the Comprehensive Plan, Providence Hospital may be zoned as 'institutional employment'. We are interested in seeing street level businesses develop in hospital buildings as they are rebuilt. More generally, the area North of Glisan between 53rd and 58th Avenues has the capability to include much more height if built in a manner consistent with neighborhood needs. One example of acceptable increased height is Providence Hospital's 5050 NE Hoyt building, which is seven stories above ground and 99 feet tall. Providence uses a tiered design, with increasing height further north of Glisan and along the freeway. Center Commons, located along I-84, also is an example of a development that is multiple stories high.

60th Avenue MAX Station area: 60th Avenue from Glisan to I-84 should be updated near the station to be zoned as 'mixed use commercial' to encourage new development of both neighborhood commercial retail and residential uses. The area around the station has potential to support more growth if rezoning occurs as long as infrastructure is dedicated to improve the surrounding streets, add sidewalks, crosswalks and bike lanes so that pedestrian connectivity is enhanced. North Tabor residents want to see more amenities nearby the station yet at the same time, want to be able to safely travel on foot and by bike from the station and to various destinations such as Glencoe Elementary, Mt Tabor Middle and Franklin High Schools as well as Normandale/Mt Tabor Parks. One example of a mixed-use development

that is appealing is the senior housing building with the AND Café below at 55th and Burnside.

Burnside: Between 53rd and 61st Avenues, the existing ‘general commercial’ zoning should be rezoned as ‘mixed use’ with neighborhood commercial retail below and residential use above to accommodate pedestrian focused development. The south side of Burnside should have buildings where the upper stories are residential, with a stepped down approach to transition to the residential neighborhoods to the south and the east of 61st and west of 53rd Avenues.

Foster Density, Preserve Neighborhood Character, Yet Limit Displacement

As a neighborhood, we know that the area can support more growth yet at the same time, there are a few issues that need to be considered.

Here are our general residential and housing-related recommendations:

Preserve existing housing character along with adjusted residential density. Although we want to support some increased residential density near radius of the 60th Avenue MAX station, the current zoning code does not seem designed to save the current housing stock. We would endorse adjustments making it fundamentally easier to build around existing structures in a historically consistent manner instead of encouraging tear downs and rebuilds. In the spirit of this, we would like to encourage Accessory Dwelling Units, additions and duplexes attached to existing housing. We also feel that adjusting the “one left wall is a remodel” rule to require 50% of structures to remain and allow for multiple units to be built on parcels zoned R2.5-R1 if more than one unit is built.

Plan for affordable housing so that lower income residents are not displaced and can still afford to live, work and play in North Tabor. To facilitate this, we would be amenable to higher density north of Glisan between 53rd and 58th if there was zoning requiring a mixture of housing types including affordable studios, one bedroom and family sized units as well market rate development meant for middle income professionals. Thus, those in the service sector could live in the same community as retirees and professionals working at Providence Hospital or in other area of the metro region.

Transportation Improvements Need to Accompany Increased Density

North Tabor is located only three miles from downtown with close access to light rail and moderate access to services and parks. This close-in and central geographic location and amenities will undoubtedly attract more growth in the neighborhood over the next 20 years--and the local transportation network needs to be modernized accordingly. Due to the current congestion and parking issues connected to our proximity to I-84, Providence Hospital and the MAX, new developments should be pedestrian and active transportation focused. As a consequence of the unfortunate pedestrian deaths occurring in East Portland, we want to ensure that this trend does not continue in our neighborhood by concurrently building out a safe transportation network as density increases.

Hence, here are our general transportation-related recommendations to accommodate the expected growth facilitated by the Comprehensive Plan Update:

Glisan between 47th and 61st Avenues should be transformed into a neighborhood commercial center focused on pedestrian scale development and streetscape. 60th Avenue needs pedestrian modernization

with MAX station improvements to make the walk along 60th Avenue and Glisan pleasant and inviting from all directions.

Burnside should be modernized into a multi-modal neighborhood connector that would include frequent bus service with high quality shelters, safe pedestrian crossings, efficient neighborhood automobile conductivity and uninterrupted buffered bike lanes for commuters from 41st to 71st Avenues.

Lastly, here is a list of specific transportation-related recommendations that should be prioritized as our neighborhood grows:

Automobile:

- A traffic circulation study regarding Caesar Chavez, Glisan, Burnside and 47th including Coe Circle and dedicated left turn signals on Glisan and 47th
- A dedicated left turn signal on 60th and Burnside (for traffic turning east and west)
- Improvements such as a new traffic pedestrian crosswalk light at NE Glisan and 55th
- Traffic calming on the off ramp from I-84 to Glisan at 58th and solutions to neighborhood residential
- “Cut through” street speeding including 44th/45th, Willow, 53rd, 58th, and 61st
- Car-share parking space locations included with new developments

Bicycle:

- Full Burnside Buffered Bike Lane access from 41st-71st connecting the east Portland bike lanes with the inner east Greenways of Ankeny and Couch
- Completion of the 50's Bikeway
- Improvements over time of the Davis-Everett Greenway including traffic calming, intersection modernization at 60th and 47th, and safe access to Mount Tabor Middle school at 57th
- Parallel Greenway Access to 60th Avenue from the MAX to Mount Tabor park based on 62nd
- Improved access to Fred Meyer and Montavilla from “The Pocket”/Barrett’s Addition north of Glisan

Pedestrian:

- Glisan Streetscape including bulb-outs, a speed limit drop west of 58th, and center refuge islands with flashing beacons every one to three blocks depending on density needs
- Proper lighting/crosswalk striping at dangerous intersections like 58th and 60th with pedestrian lead crossing timing
- Burnside sidewalk modernization as properties redevelop including Street Trees
- Filling in sidewalk gaps at critical residential connections including Burnside between Gilham and 68th, the Davis Greenway, and in the Pocket connecting the MAX station with Fred Meyer and North Montavilla

Public Transportation:

- The 19 and 71 bus lines need covered, modern bus shelters and proper lighting
- Better access to the MAX station from the east and north
- Improve #20 Burnside Frequent Bus line stops that are located next to crosswalks

Freight:

- New developments should be required to provide loading zones, which do not interfere with traffic, block pedestrians, Tri-met or bicycle access and preferably be in back of the building.**Environmental Monitoring:**
- Along with transportation-related improvements, as part of ensuring that future density supports the wellbeing of North Tabor residents, we are interested in seeing air quality monitoring since our neighborhood serves as a crossroads for inner eastside transportation. With more density, we will see increased traffic on the freeway, light rail, and railroad as well as more pedestrians and bicyclists traveling at peak travel times. According to Coalition for Livable Future Atlas, North Tabor has asthma rates that are among the highest in the Portland area as neighborhoods next to I-84 are 21-40 times above the states air quality exposure benchmark for air toxins.

Thank you for your attention. We look forward to discussing these ideas further in the next phase of the Comprehensive Plan Update.

Sincerely,

North Tabor Neighborhood Association

An Sen Acupuncture

Laurelhurst Cafe

Colour on Burnside



June 1, 2014

Susan Anderson, Director
Portland Bureau of Planning and Sustainability
1900 SW 4th Ave., Suite 7100
Portland, OR 97201

Re: **Proposal for an Enhanced Housing Choice code update package**

Ms. Anderson,

It's time for us to address the mismatch between the types of homes encouraged by our codes and the needs of real people and households who live in Portland. Demographic shifts have yielded smaller households, and an increasing number of Portland residents don't need and can't afford the typically sized home. Furthermore, by expanding its palette of housing choices, Portland will meet its goals to reduce carbon emissions and provide affordable housing into the future.

Fortunately, there are some fairly simple ways to update regulations and allow the market to meet demand for smaller homes within the single dwelling zones that comprise most of the land area in our city. We can do this without compromising the character of established neighborhoods.

As building professionals and Portland residents, we request that the City of Portland consider a package of code changes as part of some public process to allow enhanced housing choices in residential zones. Such changes would support in-fill residential development types that meet multiple objectives, including:

- Discreet, neighborhood-friendly development that makes efficient use of existing housing stock and infrastructure to serve a broader variety of household configurations
- Financial viability for smaller homes and shared housing models that are more affordable and energy-efficient, match demographic trends, and yield smaller per-person carbon footprints
- Encourage "empty nesters" in larger home to remain in their neighborhood and age in place
- Bring back historic forms of affordable housing that meet standard life safety requirements, while increasing access to housing for the most vulnerable members of our community
- Meet Portland's 20-minute walkable neighborhood goal to enhance livability and reduce carbon emissions

The following are possible opportunities for code updates to meet these objectives, each accompanied by the reason for the change and possible approaches for implementation:

- **Encourage accessory dwelling units**

Support ADUs as affordable, flexible, and discreet examples of in-fill housing that match well with

emerging demographic trends.

- For ADUs under a certain size and height, waive the requirement that ADUs match the exterior design of the primary dwelling and/or provide a community design standard alternative for ADUs of any size.
- Allow one ADU per house in planned developments.
- Drop the requirement that the combined occupancy of an ADU + primary dwelling can't exceed that of a single household (as defined by zoning code).
- Consider allowing both an internal and detached ADU on a single lot, subject to total square foot limits (as done in Vancouver, BC). (1, 2)

- **Permit existing homes to be divided internally**

Allow internal divisions of existing homes into 2 or more units so existing housing stock can be adapted to changing market demand. This would also reduce market pressure to demolish well-built older homes.

- Permit internal conversions of houses to plexes in single dwelling zones so long as the house retains its single dwelling appearance and other restrictions are met.
- Revisit Portland WWII-era codes when such conversions were allowed, many in close-in neighborhoods.

- **Allow small house 'cottage cluster' development**

Increase the number of lots created in new subdivision without increasing the total allowable residential square footage. This would provide a financially feasible way for developers to build right-sized homes for smaller households.

- Allow slightly higher densities (ie bonus lots) in subdivisions or planned developments in exchange for house size and bulk limits. This would supplement existing common green and common court provisions of the code.

- **Eliminate household size definitions**

Remove archaic (and often discriminatory) household size definitions and occupancy limits from the zoning code. Rely instead on existing noise, nuisance and building code regulations to address life safety and community impact concerns associated with larger households.

- Either drop household size limits altogether or define a household as “one person or group of persons who through marriage, blood relationship or other circumstances normally live together.”(4)

- **Allow micro-kitchens**

Acknowledge the diversity of household configurations by allowing a primary kitchen plus micro-kitchen(s) under a certain size within a dwelling unit.

- Maintain the existing 1-kitchen limit for a single dwelling, but redefine “kitchens” to be cooking facilities with over 16 square feet of floor area that regardless of size must comply with Section “29.30.160 Kitchen Facilities” of the Maintenance code.

- **Scale System Development Charges for new homes based size**

Correct the current situation in which a builder pays the same System Development Charges for a 1,000 sf home as for a 5,000 sf home.

- Scale residential SDCs based on home size
- See p. 35 of the 2007 Metro Report on System Development charges for other US

jurisdictions with scaled SDCs.

- **Adopt new rules for movable, temporary, and/or extremely low income housing**

Create safe, sanitary and legal housing options for homeless and/or extremely low income residents that meet all life safety requirements of the maintenance and landlord/tenant codes (ie. Egress, smoke detectors, ventilation, hand/guard rails . . .), but not necessarily the full standards for new construction under today's building code.

- Establish minimum standards for design, siting, and residential occupancy of moveable structures, including tiny homes on wheels
- Open the door for limited experimentation with low-cost housing models that meet basic life safety standards to host homeless and/or extremely low income residents.

For demographic, affordability, and environmental reasons, the time is right to update our zoning code to expand housing choices in residential zones. We look forward to working with the City on this effort.

Sincerely,

North Tabor Neighborhood Association

Cc: Mayor Hales and Commissioners Fish, Fritz, Novick and Saltzman
Planning and Sustainability Commission

(1) Both a 'secondary suite' and 'laneway house' are permitted on a residential lot in Vancouver, BC

(2) Laneway Houses Continue to Surge in Popularity in Vancouver, BC (Vancouver Sun, 12/29/13)

(3) The Roommate Gap: Your City's Occupancy Limit (Alan Durning, Sightline Institute, 1/2/13)

(4) Victoria, BC definition of "family"

January 21, 2015

Attn: Portland Sustainability Commission, Bureau of Planning and Housing, City of Portland
Officials and Other Interested Parties

Re: North Tabor N.A.'s Official Land Use Comments on the Draft Comprehension Plan

In February 2014 the North Tabor Neighborhood Association sent a letter of comments for the first draft of the comprehensive plan. We thank BPS for listening to us as it included most of what we asked for in transportation and land use. This current letter is not meant to supplant our first which is also attached, as is our endorsement of low income housing options we made last June, but as an addendum to enhance many of the concepts outlined last year and focus on changes that keep North Tabor affordable for all residents of Portland. Our Board is young demographically, with more than a third under thirty with one-third being renters. Thus, it resembles the demographics of North Tabor as we are a young neighborhood with only a 40% home ownership rate.

The Board of the North Tabor Neighborhood Association passed these land use and zoning change recommendations **UNANIMOUSLY** at the Jan 20th meeting. This was a meeting of the general membership, and had support of those in attendance. Expect a follow up letter to offer our support and comments on the transportation related projects next month to support the added density we are requesting. Before the bulk of our land use recommendations, a few specific requests not covered on the draft map.

Mixed Use Dispersed: 6235 and 6305 East Burnside are nonconforming properties with business uses but zoned residential that should be changed to “mixed use dispersed” in the comprehensive plan.

We also would like to request that the northern/western slopes around the **Fred Meyer** (ne 66th and Glisan) be assessed for **liquefaction risk**. This property was built on fill, so we would like to see if plantings or other techniques are needed to prevent slides into the residential neighborhood when an earthquake occurs.

North Tabor highly endorses the comprehensive plan's **Urban Habitat Corridor** including the “bird and pollinator flyway” through North Tabor. This idea should be integrated into any public park or planting project that progresses forward, including bioswale installations or other green street treatments.

A North Tabor Anti-Displacement Growth Plan

North Tabor has been documented by the city of Portland to be at very high risk for gentrification and displacement. Though we as a community understand that density and growth are needed to accommodate new residents over the next generation, we would like this community built in a sustainable way that saves our neighborhood character and working class culture. To accomplish this affordability is key, so here are some specific suggestions related to zoning and in-fill that North Tabor feels could aid in keeping our community affordable for all residents as we grow.

R1 zoning: In these medium density cases, the housing of people should be prioritized over the housing of private automobiles. Particularly if this aids in our request to upgrade the 19 bus to frequent service. Newer apartments and mixed use buildings should be encouraged to have commercial or live-work spaces for self-employed craftspeople on the ground floor as much as possible.

Designating East Burnside and NE Glisan as **Neighborhood Corridors** North Tabor highly encourages and thanks the BPS for listening to our first letter. The recent addition of 61st to 67th NE Glisan as “Mixed Use Neighborhood” we also support for long term development of an integrated business district through the entire length of NE Glisan Street from PPMC past 82nd in Montavilla.

We would like to request that the north side of Glisan between 53rd and 58th be upgraded to **Town Center** in the comprehensive plan, which is what we argued for in description in our Feb 2014 comprehensive letter with heights to at least that, or higher with amenities, of PPMC and Center Commons. The transportation street grid in these four blocks is not needed, as Center commons to the east and PPMC has shown to the west. As a community we feel that these blocks would be a proper place for a large development. As the freeway is just to the north, even very tall buildings would not shade lower density neighborhoods. There is very close MAX station access with the Blue, Red and Green lines providing the most complete transit service in the city including downtown, the airport and all of East Portland. This would of course require upgrading the 19 to frequent service, which we will be requesting as well to help lower SOV trips to PPMC..

Employment Access: **The North Tabor Town Center** could provide housing for even entry level employees of PPMC, with higher income professionals having options as well to walk to work. There is also the industrial employment zones in Rose City Park. Being less than three miles from Lloyd Center and downtown, this Town Center would be within easy bike commuting distance. At close to the very geographic center of Portland, everything the east-side has available is easily accessible. These issues taken together make this a prime location for a mixed income, mixed use, active transportation focused town center. If this Town Center has a focus on workforce housing, this develop could aid significantly in providing housing for the service industry workforce of the Downtown core.

Inclusionary Zoning for the North Tabor Neighborhood Town Center

North Tabor encourages Portland to lobby for a statewide law change to allow for local

inclusionary zoning. When state law is changed, then we would like these four blocks (NE Glisan 5300 east to the Freeway off-ramp at 58th) changed to **Town Center** where we could require INCLUSION of the following possible criteria:

50% Affordable Housing Requirement. A possible breakdown could look like low-income(10%)/workforce(40%) housing. Any large development of the size that would decommission the street grid would need to be focused on residents of Portland that work in the “new economy.” As such, a significant number should be apartments affordable to the working classes.

Some small public gathering plaza (possibly at the corner of 53rd where the 50's bikeway passes north-south.) Green roof techniques, LEED certification, solar and public space roof access for residents, or community garden space. Are all possible environmental requirements.

A development of this size could have two-story commercial space for a natural grocer, hardware store, full sized gym or other commercial neighborhood endeavor. **A possible multi-use path and entrance on the Northside** heading east from the 53rd bikeway with residential/ commercial building access could be built, by-passing Center Commons to the north and connecting directly to the 60th street MAX station around NE Oregon. Here, the greenway would continue east into “The Pocket” past 60th avenue. This design could allow for high density housing over-looking the freeway where it would not shade single family neighborhoods while concurrently providing direct MAX access to PPMC. The bikeway would fill a gap in the low-stress network south of the Gulch and by-pass the heavily congested intersections of 58th - 60th and Glisan plus the on/off ramps from the freeway. Two story commercial development would allow for a larger Town Center leveraging the request for the 19 frequent bus service, with the ability to have height above allowing for affordable housing for a significant workforce.

Inclusion of car share parking (public and develop only) and truck loading zones

The removal or dismantling of any historically significant structures on these blocks before redevelopment, so if and when a development of this size does occur, it can be done in a sustainable way so as much of the building history could be reused, salvaged or relocated as possible.

R2-2.5 Zoning: Recently NE 57th avenue between Burnside and Glisan has experienced a series of demolitions of older smaller homes where the properties were sub-divided and larger, Skinny Houses have been put in their place. This has completely changed the character of this street. Just to the west, at 307-317 NE 56th avenue there is a series of three row-houses that are just as dense, but are much more in character with North Tabor. These units still have garages, but since the narrow wasted space between units has been changed into interior living space there is more room on the property for a front porch and planting space in both front and back yards. With Skinny houses there is no room for a tree of any significant size, where in row houses the back and front yards can be landscaped with one. **Front porches create community** which North Tabor has always had, and would like to remain intact, as we grow. Row houses also have less exterior wall space so are more environmentally efficient for heating and cooling needs. Thus, we would request that code encourages **townhouses over skinny houses** whenever possible.

ADU's: North Tabor endorses zoning changes in R5 or higher so that each house would be allowed **at least one interior Granny Flat (or ADU in city code terms) AND an exterior ADU.** We encourage zoning and code changes to allow ADU's to be added above, or in replacement of, any free standing garage **wherever** it lies on the property. **Set backs should be reexamined.** There are tens of thousands of old garages in this city where a studio, apartment or small home could be placed. Any secondary ADU should be designated for long term residents (see cooperative ownership below).

TINY HOUSES: We also encourage the City of Portland to look into zoning for high quality, mobile, Tiny Houses or Developments along unimproved city residential roadways, driveways, back yards, alleys or other creative locations as a form of affordable housing for the very low-income residents of Portland. In North Tabor, the NE 65th alley south of the new crosswalk at NE Glisan could be a small test case.

R5 and higher zoning: North Tabor encourages the City of Portland to revise its existing statutes to save as many of the older homes as possible while allowing for creative density increases. We support easing restrictions on additions, and **taxing demolition construction waste.** In our neighborhood, we have many older residents that could be, or have been have been, displaced due to costs, yet they own an older house that has an upstairs they do not use or need any longer. Currently they may be forced to sell their home and move someplace smaller. Possibly in the East Portland “landing zones” or further where access to services is more limited. To encourage **aging in place**, we would like city code to allow for duplexing of properties...or turning the upstairs, basement or side addition into a “Granny Flat” that is a certain % of the entire square footage for long term housing (see cooperative housing below). This is in **addition** to any exterior ADU as argued above.

City wide, code should encourage **cottage houses** on larger lots instead of the current demolition and rebuilding that replaces smaller homes with larger homes. This extra small unit density should be dedicated to long term housing.

COOPERATIVE HOUSING: Looking at the cases above, North Tabor endorses updating city code and state law to make it significantly easier for **land-trusts and cooperative ownership**, specifically for 5,000 square foot and larger lots. Instead of needing to have a 20% down payment on a \$400,000 skinny house, which excludes much of the workforce in the city of Portland, with easy cooperative ownership Granny Flats or Garage ADU's could be turned into cooperative housing where the new owner would have a certain % ownership in the property as a whole; The driveway and open space would be shared. Thus, instead of demolishing an older small house to put up an expensive house as large as code allows, the current owner can remain in place and another individual can buy into the existing property, build an additional granny flat or ADU and own a piece of North Tabor **WITHOUT** destroying much of what is already built. This, combined with easing restrictions on additions, would create an economic climate where the buy-in to own a piece of North Tabor could remain in reach for a significantly larger percentage of Portland residents. This environment would also encourage the adding onto existing structures in a sustainable way. If combined with a tax on demolition waste, Cooperative Land Trusts could also be used to save older established larger homes, which then

could remain as affordable housing for lower incomes.

We want a younger couple with do it your-self skills that works in the service industry to be able to afford to OWN a piece of North Tabor, and not just struggle to rent an expensive apartment...if they can find one. Easy cooperative ownership could fix this.

In conclusion, the Board of the North Tabor Neighborhood Association understands that density is needed, but we do not want a replication of the displacement that happened over the past generation to Eliot, Overlook or other areas of inner Portland. As a central East Portland neighborhood that will experience significant pressure over the next generation we need to think creatively, and outside the traditional land use code, to remain an affordable neighborhood.

Expect a follow up later next month with recommendations on mass and active transportation projects, parks, North Tabor Vision Zero and parking management tools.

Thank you for all your work and planning,

The North Tabor Neighborhood Association

For more information, questions or for further discussion of these ideas feel free to contact:

Terry Dublinski-Milton
NTNA Transportation and Land Use Chair
terry.dublinski@gmail.com