

Richmond Neighborhood Association

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February 18, 2015

Sent via email: psc@portlandoregon.gov

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Re: Comprehensive Plan Issues

Dear Planning and Sustainability Commission:

At the Richmond Neighborhood Association's (RNA) regular monthly meeting on February 9, 2015, the RNA continued its discussion of issues relating to the current Comprehensive Plan Update process, and voted to take a position on the following issues.

Mixed Use-Dispersed Designation for SE Clinton St.

The RNA Board voted to request the Planning and Sustainability Commission to revise the proposed Comprehensive Plan designation for the business nodes on SE Clinton St at 16th, 21st and 26th Aves. ("Clinton business nodes") from Mixed Use-Urban Center to Mixed Use-Dispersed.

The current draft of the Comprehensive Plan proposes to designate the Clinton business nodes as MU-Urban Center. Such designation "is intended for areas that are close to the Central City and within Town Centers where urban public services are available or planned including access to high capacity transit, very frequent bus service, or streetcar service," and will allow development that will be "from low-rise to mid-rise in scale." Comprehensive Plan Update at GP10-12. The Mixed Use Zones Project currently lists the corresponding commercial zones for this designation as CM1, CM2, CM3, and CE. CM2 would allow structures up to 35'-45' to possibly 55' with amenity bonuses (or 3/4 to 5 stories), and CM 3 would allow structures up to 45'-65' to possibly 75' with amenity bonuses (or 4/6 to 7 stories)¹. Though CM3 is not presently planned for Clinton or Division, property owners in a CM2 zone could petition to up-zone their property to CM3.²

The RNA Board believes that the MU-Dispersed designation is much more appropriate for the Clinton business nodes. Such designation allows development that is "small in scale, have little impact, and provide services for the nearby residential areas. Development will be similar in

¹ Mixed Use Zones Project: Preliminary Zoning Concept – DRAFT, p.3, November 5, 2014.

² At the RNA meeting, Marty Stockton, BPS Southeast District Liaison, explained that BPS staff is considering adopting approval criteria for up-zoning property from CM2 to CM3. The Board expressed interest in having such criteria and will further explore this issue at its March meeting.

scale to nearby residential development to promote compatibility with the surrounding area.” Comprehensive Plan Update at GP10-11. MU-Dispersed would allow only CM1, which would allow structures up to 35’ (or 3 stories). (There is no CG zone at these nodes, which would correlate to the new CE zone.)

As noted in the RNA meeting, the defining character and charm of the Clinton business nodes is the small scale and older buildings at these sites. Allowing a MU-Urban Center Designation would likely lead to development that is of a much greater scale than the businesses and nearby residences at these nodes, development similar to what has been occurring on SE Division. Using the Comprehensive Plan definition for MU-Urban Center, these nodes are not within any UDF designated Town Center.

Another concern is the impact that such designation would have on the Clinton Bike Boulevard, which is already being impacted by the growing density and conflict of use along Clinton. Allowing CM2 and possibly CM3 zoning and the corresponding development along Clinton would have a huge impact on the Clinton Bike Boulevard.

The Hosford-Abernethy Neighborhood District Association (“HAND”), for perhaps similar reasons, also opposes the MU-Urban Center designation for the Clinton Business nodes.

Consistent with the RNA’s vote, the Bureau of Planning and Sustainability’s “Centers and Corridors Growth Strategy” Staff Report, dated January 14, 2015, recommends changing the designation for the Clinton business nodes to MU-Dispersed. Recommendation Nos. 22 and 42, at pp.17, 19.

Request for Design Overlays

The RNA Board voted unanimously to urge the City to add a Design Overlay for historic streetcar routes, main streets, and major transit and civic corridors, and that this be implemented in 2015, not in 2017 when the Comprehensive Plan will be formally approved.

In its December 16, 2014 letter to the Planning and Sustainability Commission, the RNA stated its strong interest in having more design guidelines/standards and design review for Division. It was, therefore, very welcomed news at the February 9, 2015 RNA meeting when Marty Stockton, BPS Southeast District Liaison, explained that BPS is considering adding a Design Overlay to MU-Urban Center designations, which would include the heart of the business districts on SE Division, Hawthorne and Belmont. The RNA strongly urges the City to add a Design Overlay to the MU-Urban Centers. The RNA also feels that Design Overlay should be applied to historic streetcar routes, main streets, and major transit and civic corridors.

Prioritize Pattern Area Standards

The RNA Board voted unanimously (1) to request the City to prioritize the Pattern Area Standards project for 2015 in its staff work plans and budget, and not wait for final approval of the Comprehensive Plan in 2017, and (2) that these Standards incorporate the current guidelines of the Boise-Elliott Neighborhood Association and the forthcoming design guidelines of the Division Design Initiative (DDI).

The DDI is a project of the inter-neighborhood Division Design Committee (DDC), initiated to make recommendations for addressing community design concerns and to inform future development patterns and planning along Division. Formed in Spring 2014, the DDC includes representatives from key neighborhood and business organizations in the inner SE Division community (RNA, HAND, Division Clinton Business Association, SE Uplift, South Tabor Neighborhood Association, and Sustainable Southeast).

The DDI is currently creating design guidelines for SE Division from SE 11th Ave. to SE 60th Ave. This project furthers the work of the Division Vision Coalition and the 2006 Division Main Street/Green Street Plan, and is the result of a year of public meetings, research, design tours, surveys, and community outreach and engagement events. The design guidelines are expected to be completed by Summer 2015.

The unique character of our neighborhoods is an essential part of Portland's identity and history. However, the overwhelming surge in development associated with the resurgence of the housing market over the last 24 months is quickly changing the look, feel, and character of Portland's neighborhoods. Design issues and concerns have been raised extensively by neighborhoods across Portland, reinforcing the critical importance of more context-sensitive design standards and an increased need for design review.

As neighborhoods are asked to accommodate more growth and density, it is vital that we have the urban design tools to help uphold our long term goals for new development and better integrate urban infill within the fabric of existing communities. We thank you for your long term vision and Comprehensive Planning work and strongly urge you to prioritize the development and implementation of increased design review and new Pattern Area Standards.

Sincerely,



Allen Field
Chair
Richmond Neighborhood Association

cc: Susan Anderson, Director, Bureau of Planning and Sustainability
Joe Zehnder, Chief Planner, Bureau of Planning and Sustainability
Marty Stockton, Southeast District Liaison, Bureau of Planning and Sustainability

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December 16, 2014

Sent via email: psc@portlandoregon.gov

Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, OR 97201

Re: Comprehensive Plan Issues

Dear Planning and Sustainability Commission:

At the Richmond Neighborhood Association's (RNA) regular monthly meeting on November 10, 2014, the RNA discussed several issues relevant to the current Comprehensive Plan Update process, and voted to take a position on several of them.

Neighborhood Center Designation for Belmont-Hawthorne-Division Area

The RNA Board voted to urge the city to designate the Belmont-Hawthorne-Division area as a Neighborhood Center, not a Town Center as proposed in the 2035 Comprehensive Plan Update.

The current Comprehensive Plan Policy Framework focuses on compact development and density defined by transit streets, main streets, town centers, and transit centers. A new policy direction represented in the draft Comprehensive Plan is the Healthy Connected City Strategy, which has at its core, the Complete Neighborhoods Objective: "By 2035, 80% of Portlanders live in a complete neighborhood with safe and convenient access to goods and services needed in daily life."

This new policy direction is centered on a typology of centers, places of focused activity, services and housing, having varying sizes with differing roles. These include: Major Centers (Central City, Gateway), Town Centers, Neighborhood Centers, Local Centers, and Corner Markets.

Town Centers¹ are defined as having the following characteristics:

- Serve a broad area of the city and a number of area neighborhoods and districts, with some regional function;

¹ "Town Center" and "Neighborhood Center" definitions are from the Urban Design Framework, November 7, 2013, presentation to Neighborhood Centers Policy Expert Group, p. 13; Comprehensive Plan Update: Working Draft, Section II – Urban Design Framework, p. II-4 (January 2013); and Neighborhood Centers Policy Expert Group Centers Typology Discussion, July 19, 2012.

- Substantial employment component;
- High-capacity transit/light rail;
- Room for 7,000 households;
- Mid-rise scale buildings (5-7 stories tall); and
- Play an important role in accommodating growth

Neighborhood Centers have the following characteristics:

- Smaller centers that primarily serve adjacent neighborhoods;
- Frequent bus service;
- Room for 3,500 households;
- Low-rise scale buildings (3-5 stories tall); and
- “Neighborhood Centers have a central role in helping us achieve more “complete communities” – where Portlanders have the option of meeting many of their daily needs within walking distance of home.”

Most board members and neighbors in attendance agreed that the definition of “Neighborhood Center” is a more accurate description of the Belmont-Hawthorne-Division area. This area primarily serves the adjacent neighborhoods, not a broad area of the city, it does not have a regional function; it has frequent bus service but not high-capacity transit or light rail; it has room for 3,500 households but not 7,000 households (in 2010 there were 4,000 households with a housing capacity of 6,200 households²) and there are low rise buildings 2-4 stories tall, not 5-7 story mid-rise buildings.

Accordingly, the RNA Board voted to request that the Belmont-Hawthorne-Division area be designated a Neighborhood Center, not a Town Center.

Historic Resources

The RNA Board voted to request the city to update the historic resources inventory to analyze key historic resources in Richmond and identify buildings which may warrant preservation. The existing historic resource inventory has not been updated since the mid-1990’s.

Preserving the Division Main Street Overlay

The Board voted to request that Division Main Street Overlay be preserved and expanded. There is a concern that the Mixed Use Zones Project eliminate the Main Street Overlay when new mixed use zones and standards are adopted. This Overlay is one of the few existing frameworks that provide for context-specific design standards for Division Street and other main street corridors. There is strong interest in having more design guidelines/standards and design review for Division and there is a concern amongst the RNA Board that we may be losing what could be a viable framework for augmenting more context-specific design standards for corridors like Division.

² Households figures are from US Census 2010 and ESRI Business Analyst , as listed in BPS’ July 18, 2012 Neighborhood Centers Study Areas.

Further exploration of retaining and amending this Main Street Overlay should be considered as a means of increasing more neighborhood specific design standards for the special and often neighborhood-defining character that exists along main street corridors in Portland.

Increased Neighborhood Notification

The Board voted to request that the notification requirements for new developments be strengthened to include a broader notification area, as well as earlier notification to the community.

Current notification requirements are too open-ended and often do not allow adequate time or notice to affected community members to have meaningful or timely input. A visit to the community by developers in the conceptual phases of a project proposal, as well as earlier visits to the neighborhood association prior to submittal for permits, would facilitate more effective community input, help reduce conflicts, and support opportunities for creative solutions to be identified and negotiated to meet the goals of both the neighborhood and the project applicant.

Sincerely,



Allen Field
Chair
Richmond Neighborhood Association

cc: Marty Stockton, BPS Southeast District Liaison