

Eastmoreland Neighborhood Association

March 12, 2015

Subject: Draft Proposed Comprehensive Plan Update
Eastmoreland Neighborhood Association Testimony- Supplemental Questions

C: Stockton, Engstrom, Zehnder, Anderson

Dear PSC Chairman Baugh and PSC Commission Members,

This letter is a supplemental effort to distill our full testimony into a series of policy questions for your consideration.

We have added a number of process questions in light of the handling of public testimony from recognized organizations across the city and considering other issues that will likely emerge in the process of implementation.

Process Issues

Should the schedule of the Comprehensive Plan be restructured to insure that Bureau of Planning and Sustainability (BPS) staff are provided at least 30 days to summarize timely submitted testimony for Planning and Sustainability Commission (PSC) consideration and prior to PSC deliberations on specific issues.

Regarding public testimony, should BPS staff summaries be written to accurately reflect (or characterize) not only the ideas and comment but to indicate the level of public support or opposition for a particular point?

Regarding Policy Expert Group work, under what circumstances should BPS supervisory staff be allowed to substantially revise and omit ideas developed and incorporated into final draft versions without a full analysis and the relevant Policy Expert Group approval?

Should BPS staff summaries of Testimony from Neighborhood Associations and other recognized organizations be reviewed for approval by such organizations prior to being submitted to the PSC for consideration?

Should changes in the zoning code be virtually modeled in 3D in context for impacts prior to adoption and implementation?

Should changes in the zoning code be marked as revised for a period of at least one year to assist users of the code in efficient application?

Should comprehensive plan implementation phase mandate policy impact analysis addressing the context and numerous other criteria that support urban design, sustainability, resilience, and other livability goals?

Should comprehensive plan implementation mandate policy analysis of economic impacts to the value and cost of land and housing affordability as a result of encouraging redevelopment speculation and displacement?

Should the City renew its commitment to support Neighborhood Associations and other equivalent public interest organizations as integral to the *ongoing success of formulation, implementation and enforcement* of land use policies?

Should zoning standards be clarified so that lot sizes, density standards and associated definitions are combined or electronically cross referenced?

Land Use Planning Policies

(Zone for Context) Is the “five Portlands” pattern concept intended to be a primary response to the policy “One Size Does Not Fit All”? Or is the **policy** intended to support zoning tailored to neighborhood and district planning context so as to reinforce distinctive character as suggested elsewhere in the plan.

(Zone for Context) Should the zoning code be restructured to electronically link a district or site to all relevant criteria to support *goals 4A* (Context-sensitive design and development) and *4B* (Historical and cultural resources) in support of localized context sensitive standards?

(Zone for Context) Should the concept of Neighborhood or district plans be reintroduced as the long term basis for physical planning and zoning as a “Key Direction” of neighborhood planning?

(Truth in zoning). Should the Land Use Designations in the Zoning code be restructured to clearly and accurately represent the intended development standards especially for consistency between minimum lot sizes and residential density and FAR standards?

(Truth in zoning) (Zone for Context). Should Alternative Development Options (33.110.240) be used to create global entitlements that undermine the density and lot size standards irrespective of context?

(Truth in zoning) (Zone for Context). Should historic lots of record (33.110.213) be used to create global entitlements that undermine the density and lot size standards irrespective of context and encourage wasteful demolition and infill?

(Zone for Context). Should the highly energy and cost inefficient “skinny house” that produces a streetscape dominated by garages and driveways and violates adopted design standards applied to other structures in the same zone be substantially revised and allowed only where part of an adopted neighborhood plan on 6 year vacant land?

(Zone for Context). Should the highly energy and cost inefficient “skinny house” be limited to areas zoned for R2.5 density with minimized garage and driveway and so that the *house is proportional to the lot size?* (while encouraging attached common wall housing?)

(Truth in zoning). Should the “narrow lot house”, (a 30 to 40 foot wide lot) be allowed only where part of an adopted neighborhood or where such a pattern is consistent with earlier

precedents and so that the *house is proportional to the lot size* and does not encourage speculative lot splitting, demolition and removal of affordable and viable housing?

(Truth in zoning). Should the “corner lot attached or duplex ” be limited to areas zoned for R2.5 density or part of an adopted neighborhood plan with mandatory design standards where the *house is proportional to the lot size* and does not encourage speculative lot splitting, demolition and removal of affordable and viable housing?

(Sustainability) Should existing green infrastructure (i.e. vegetative cover to sustain flora and fauna and reduce storm runoff, and large tree canopy shading to reduce heat absorption, community food plantings, etc.) be typically sacrificed for minor increases in single family residential density (such as skinny and narrow lot divisions)?

Neighborhood Specific Requests

1. In assigning appropriate zoning designations should all of the following be considered?

- Existing land use patterns and density
- Historical development patterns
- Housing Affordability
- Historic and Cultural Resources: streetscape and architecture
- Sustainability and resilience criteria
- Access to transit
- Access to Services

Neighborhoods in question: All

2. Existing Land Use Patterns and Density

Given the analysis that the average size lot within the neighborhood boundary is 6,370 SF or greater with less than 10% smaller than 4550 SF is the appropriate designation R7?

Neighborhoods in question: Eastmoreland (R5-R7 proposal), etc.....

3. Housing Affordability and Diversity

Should the zoning code provisions provide entitlements (including alternative development options, reduced lot sizes, use of random historical lots of record) that are in effect incentives for redevelopment demolitions for construction of:

- **larger and more expensive** houses to replace affordable and viable post World War II workforce housing and compromise existing density standards?
- **larger and more expensive** houses on smaller lots that places upward pressure on similar nearby lot values and housing prices?
- **new construction and major remodels** that reduce the diversity of house and lot sizes and prices?

- New houses that erase the historical and cultural record of the past 100 years in which the neighborhood was built?

Neighborhoods in question: Eastmoreland (R5-R7 proposal), etc.....

4. *Historic and Cultural Resources : Streetscape and Architecture*

Should neighborhood plan district standards be encouraged to support the unique streetscape and yardscape, architectural scale and character, and treatment of driveways and garages characteristic of the Eastmoreland, College View, Campus Heights, etc., and Berkeley Addition subdivisions by limiting lot coverage and house sizes to comport with the existing scale, favor renovation, and discourage teardowns?

Neighborhood in question: Eastmoreland (plan district expansion proposal)

5. *Access to transit and access to services in centers or corridors.*

Should portions of neighborhoods with limited bus transit services beyond a quarter mile walk of existing and proposed routes be zoned to maintain existing density by designation as medium density R7? And especially where underlying historic lots of record are driving much higher density development?

Neighborhoods in question: Eastmoreland SE quadrant (R5-R7 proposal), etc.....

Summary

We hope these questions will assist in evaluating the Comprehensive Plan Testimony from the Eastmoreland neighborhood as well as addressing similar situations across the city. We look forward to continuing the good working relationship with neighborhood liaisons and City staff in bring this to fruition.

Thank you for your consideration.

Rod Merrick AIA, Clark Nelson, Land Use Co-Chairs



Eastmoreland Neighborhood Association
Robert McCullough, President

