## Eastmoreland Neighborhood Association

Date: March13, 2015

To: The Planning and Sustainability Commission

Cc: Deborah Stein, Principal Planner & Marty Stockton

From: Eastmoreland Neighborhood Association

Rod Merrick and Nelson Clark, Eastmoreland Land Use Co-Chairs

Robert McCullough, President

Subject: Portland Oregon Bureau of Planning and Sustainability (BPS)

Residential Densities memo dated February 25, 201[5]

Recognizing that the PSC will be strongly influenced by staff comments and recommendations, we are very concerned that the memo on these vital issues was prepared in advance of the closing date for submittal of testimony. Meeting schedule cannot be considered a justification for bypassing the schedule and providing staff insufficient time to digest and present the issues in a balanced fashion.

The Eastmoreland Neighborhood Association is equally concerned with what we regard as misinterpretation of the issues and the testimony derived from the MapAp and other comments submitted prior to the date of the subject report. This memo addresses the most obvious misinformation contained in the report:

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<u>Quote</u>: "Reed's proposal was followed by a request by the Eastmoreland Neighborhood Association to down designate the entire Eastmoreland neighborhood, also with the intent of preserving the scale and architectural quality of the neighborhood and reduce the potential for demolitions and lot divisions particularly for large lots that could be subdivided to below 5,000 sq ft (as allowed in R5)".

Rebuttal: The Eastmoreland Neighborhood has requested R7 zoning for the entire neighborhood because an R7 zone most accurately reflects the current density and lot sizes within the neighborhood as a whole. Because of the widespread presence of underlying lots of record throughout and especially in the SE quadrant, R5 zoning allows for the development of lots much less than 5000 sq ft, making smaller, more affordable homes and houses on larger lots vulnerable to demolition and redevelopment and removing the present diversity of more affordable housing. These redevelopment

projects are bringing substantial unintended and unwelcome changes to the character and density of the neighborhood. An R7 designation addresses both issues .

Eastmoreland is not asking for something new, but rather a return to what the lot sizes were designated before the 1990s consistent with the development patterns of a mature neighborhood. Once R-5 meant 5000 sq ft, lots. The definition was changed so that lots can be 3000 sq ft with 36 ft front. (PDX Title 33: 33.10 table 110-6) An R7 designation now allows lots as small as 4200 SF.

## Page 19 and 20 summary of Eastmoreland Map App testimony

Over 75 comments were made on the Map App regarding an R5 to R7 zone change within the Eastmoreland neighborhood and other comments were submitted in writing. Our neighborhood volunteers carefully counted and evaluated the comments.

- Of the MapApp comments, about 64 were in favor of the R5 to R7 zone change. Many also favored extending the R7 zone to include the entire neighborhood up to SE Cesar Chavez Blvd and none opposed it. Of those opposing the zone change, only one lived in Eastmoreland. The opinions expressed in the very large number of MapApp responses and comments made at association meetings make it extremely clear that the neighborhood, as a whole, wants a zone change from R5 to R7.
- Eastmoreland residents cited many reasons for supporting the R-7 classifications.
  - Eastmoreland is a beautiful neighborhood with diverse housing, styles, landscaping and trees.
  - Residents want to preserve the housing and lot sizes that dominate the neighborhood and do not want to allow big houses to be placed on new, smaller lots.
  - The recent demolitions, lot divisions, and construction have caused considerable concern. The new houses are selling for much more than the old ones so there is less diversity and less affordable housing.
- The opposition is limited in number and has several concerns.
  - Nine of the ten opponents live outside of Eastmoreland.
  - Several (2) want other neighborhoods to have the opportunity to do the same thing.

- Seven opponents write that the new MAX station needs more people living near it so there should be lot splitting, higher density, multifamily housing, high rise apartments or condominiums. This fails to recognize the the Bybee station is a destination station and that there are no plans to remove Westmoreland Park, the Eastmoreland Golf Course, or the Rhododendron Garden for a new town center. Lot splitting, or replacing 20 small houses with 20 to 30 big ones, is not going to affect the success of MAX.)
- Two opponents suggest the establishment of a historic district.
  (Presumably they don't know both the difficulty in doing so and that it would not stop lot splitting, etc.)
- Some opponents believe Portland needs more inexpensive housing. (Some hope that if a \$425,000 one and a half story house is torn down after grandma dies, it will be replaced with 2 houses that moderate income families can afford. But recent history shows the \$425,000 house being replaced by 1 or 2 houses selling in the \$1,000,000 range. That is not affordability or diversity. There are several streets in Eastmoreland with large houses on large lots and the houses fit. Building McMansions on small lots do not fit, and that is what recent experience suggests is happening.)

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When the February 25 memo discusses the historic significance, it does not reflect current, broader interpretations of historic preservation. In the particular case of Eastmoreland, it leaves out dozens of equally "historic" buildings and, more significantly, it almost completely ignores a very substantial, high level of typical historical structures which are the dominant backbone of the Eastmoreland Neighborhoods residential landscape. This high level of "common vernacular" is what unites the residences from 27<sup>th</sup> to 39<sup>th</sup> and Woodstock to Crystal Springs Blvd. The entire area is also unified by continuous traditions of individual residential landscape planting and street tree density that is well recognized throughout the city. To substantiate these claims, The Historic Survey Sub-Committee of the Eastmoreland Land Use Committee is working on an update of the Historic Landmarks Resources Inventory that will more completely record the full range of historic dwellings as well as the neighborhood's high level of common vernacular housing types.

The Eastmoreland Land Use committee and the Eastmoreland Neighborhood Association have worked with Portland Planning Division personnel for three years

attempting to prevent some of the development abuses. We have hoped there was a way to ameliorate problems involving the division of lots, underlying lots of record, scale and design of new houses consistent with neighborhood character, notification of neighbors and protecting the environment when demolition occurs, and scale of new houses in proportion to the lot size. The February 25 memo does not discuss the Eastmoreland Neighborhood's desire to include all of its members in the zoning change (Berkeley Addition, etc.).

We again request that the February 25 staff report be revised and resubmitted based on all testimony provided and to accurately reflect the issues. We thank you and your staff for your efforts under pressing circumstances.