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Planning and Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
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Re: Testimony on Comprehensive Plan Update Issues

Dear Planning and Sustainability Commission:

This testimony is being provided on a variety of issues relating to the Comprehensive Plan Update.

Neighborhood Center Designation for Belmont-Hawthorne-Division Area

The Belmont-Hawthorne-Division area should be designated 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;
- Substantial employment component;
- High-capacity transit/light rail;
- Room for 7,000 households;
- Mid-rise scale buildings (5-10 stories tall); and
- Play an important role in accommodating growth

Neighborhood Centers have the following characteristics:

¹ “Town Center” and “Neighborhood Center” definitions are from the Comprehensive Plan Update Proposed Draft Summer 2014, Section II - Urban Design Framework, January 2013, page GP3-11 to GP3-12.

- 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.” Comprehensive Plan Update: Working Draft (January 2013), page II-4.

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 - 10 story mid-rise buildings.

Historic Resources

The city should 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 Division Main Street Overlay should be preserved and expanded. The current Mixed Use Zones Project should not 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.

Much of Division St. is designated under the proposed CM2 zoning, which would allow structures up to 35’-45’ to possibly 55’ with amenity bonuses (or 3/4 to 5 stories). This would eliminate the current 4-story height limit established in the Division St. Overlay in 2006 and amount to an up-zoning on Division St, which has experienced intense development the past few years, adding approximately 500 new apartment units and another 120+ units are planned at SE Division and 50th Ave.

Further exploration of retaining and amending this Main Street Overlay should be considered as a

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

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 notification requirements for new developments should 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.

Three-Story Height Limit on SE Division St.

There should be a three-story height limit on SE Division for those properties that are not already four-stories.

There is significant community backlash against the extensive development that has changed the look and feel of SE Division in just a few short years. There have been eight 4-story apartment buildings built the past 2 years between SE 31st Ave and 39th Ave/Cesar Chavez Blvd and a new 27-unit, 4-story apartment building (without parking) is planned for 3021 SE Division. In addition, a 72-unit building, without parking, was recently completed at SE Division and 48th Ave. and a 120+-unit building, with parking, is planned for SE Division and 50th Ave.

This backlash has been frequently expressed at RNA meetings, including Land Use meetings, and has been voiced through an online survey created by the Division Design Initiative (“DDI”).³

The Division Design Committee, in partnership with Portland State University students, developed a “Division Perceptions Survey” (<http://divisionperception.suprmap.org>) to get a

³ 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 drafting 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. The design guidelines are expected to be completed by summer 2015.

“better understanding on how the residents along the Division Street corridor feel about the rapid changes that have taken place in the last 18 to 24 months, design preferences, and their vision for the future of Division.” In the survey, 83% of respondents expressed a preference for 2 and 3 story buildings, while 90% overall stated a preference for “smaller” buildings.

Mixed Use-Dispersed Designation for SE Clinton St.

The proposed Comprehensive Plan designation for the business nodes on SE Clinton St at 16th, 21st and 26th Aves. (“Clinton business nodes”) should be revised 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)⁴. Though CM3 is not presently planned for Clinton or Division, property owners in a CM2 zone could petition to up-zone their property to CM3.⁵

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 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.)

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,

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

5 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.

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.

Request for Design Overlays

There should be Design Overlays MU-Urban Center designations, historic streetcar routes, and main streets.

Prioritize Pattern Area Standards

The City should 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 these Standards should incorporate the current guidelines of the Boise-Elliot Neighborhood Association and the forthcoming design guidelines of the DDI.

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.

SE Caruthers between SE 35th Pl. to 38th Ave.

The Long Range Comprehensive Plan Designation for SE Caruthers between SE 35th Pl. to 38th Ave. should be changed from a Commercial designation to R5, or at a minimum to R2.5. This area is currently zoned R5 and consists of single family residences. These properties have a Comp Plan designation of “Urban Commercial”, which will be renamed “Mixed Use – Urban Center”.

A petition signed by most of the residents on SE Caruthers in the subject area favor changing the designation to R5. This area of Caruthers (which is one block north of Division), from 35th Pl to 38th, is the only portion of Caruthers that has a Commercial Comp Plan designation. Allowing commercial development to occur on Caruthers would not be well suited for this street; such development should be isolated to Division St.

Very truly yours,



Allen Field