



HOSFORD-ABERNETHY
NEIGHBORHOOD DISTRICT ASSOCIATION

March 13, 2015

Portland Planning & Sustainability Commission
1900 SW Fourth Avenue, Suite 7100
Portland, Oregon 97201

Dear Members of the Planning and Sustainability Commission,

The Board of the Hosford-Abernethy Neighborhood District Association (HAND) appreciates all the staff and volunteer work that has gone into preparing the draft Comprehensive Plan, and of your thoughtful efforts to review the many comments from the public.

The HAND board has been on record for several years regarding our concerns about climate change and the need to decrease our collective carbon foot print, as well as support of the Urban Growth Boundary. We look forward to continuing to play a part in the region's efforts to address those issues. There is recognition of the need for increased density, increased use of alternative forms of transportation, and decreased use of the automobile as tools toward that end.

We are pleased with much of the language in the Plan, but find ourselves concerned about how some of the policies will be implemented.

Our comments below address the portion of HAND located east of SE 12th Avenue, primarily residential and commercial in use. The portion of HAND between the Willamette River and SE 12th Avenue is included in the Central Eastside Industrial District and addresses in the SE Quadrant segment of the Central City 2035 Plan.

Zoning

We support neighborhood-scale commercial endeavors already in place without adding significantly more automobile traffic on a major bikeway. We would request that the lowest-intensity commercial zoning (CM-1, Commercial Dispersed) be applied to sites of existing buildings in commercial use within nodes along SE Clinton Street at SE 16th, 21st, 26th, 34th, 41st Avenues with surrounding residential zoning remaining unchanged..

Similarly we support the requested zone changes from R1 to CM2, Commercial Mixed Use along the south side of Hawthorne Boulevard between SE 12th and SE 30th Avenues, again to support the businesses that are there now, and to allow additional housing to develop over time.

We support the proposed change to CM-1 for the commercial property on Ladd Circle currently zoned R5.

Some of the most affordable housing in HAND is located near the southwestern edge of the neighborhood, within a few blocks east of 12th Avenue between SE Division Street and the Union Pacific Railroad line. Many



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of these homes are century-old, predating the current EG1 zoning designation, and, exist under conditional-use status. Under current Comp Plan proposals, housing in EG1 zones would be prohibited, leaving owners potentially unable to obtain financing for a major remodel or a sale of their houses to another homeowner. We would like to obtain protection for these more affordable houses while curtailing future residential development in the EG zones. We hope this important consideration will be heard.

We have not had an opportunity to discuss a proposal to change the zoning on the parcel near SE 15th and Clinton from R2.5 to Mixed Use.

The affordability of residential and commercial properties in our community remains an area of great concern for our neighborhood. We appreciate the work of Tom Armstrong and Lisa Bates on the gentrification matrix, but we would like to see more tools being actively employed to address this issue. We wish to keep HAND a mixed income neighborhood and do not wish to see it written off as already gentrified and beyond help.

Guiding Growth

We think every neighborhood should have a meaningful way to guide growth and development within its area, which cannot be done with a general one-size-fits-all plan or zoning. We support a range of housing types, context-sensitive infill, and the adaptive reuse of existing buildings that will allow us to preserve district identities while increasing densities. However, to accomplish this we need new tools to encourage better quality design and construction along with appropriate regulations and incentives to encourage preservation and adaptive reuse, such as a design review overlay, pattern area standards, a neighborhood or area plan, or a similar mechanism.

We prefer the use of the “Inner Ring” concept to guide future growth in our area rather than a Town Center designation that spans the inner Eastside corridors (Belmont-Hawthorne-Division). Because of the linear nature of the corridors it is difficult to create a “center” that spans multiple blocks without impacting the differing patterns of the surrounding neighborhoods. Instead of trying to get neighborhoods with divergent opinions to agree on just what type of “center” should go where — before BPS does a plan for the area — we would suggest that BPS do an Inner Southeast Plan first, complete with design guidelines. This approach would help neighbors and businesses to agree on how to create a shared vision for incorporating future growth, while preserving some of the small-town feel that currently exists on the east/west commercial corridors. We suggest a place to start a SE Plan could be the area along and around Cesar Chavez Boulevard, which has received scant planning attention to date.

As the Comprehensive Plan specifies, future development should take into account neighborhood context, solar access, and the preservation and/or adaptive reuse of historic buildings. The latter cannot be accomplished if we do not update the Historic Resources Inventory as soon as possible. In addition we would ask that public view corridors be considered in development schemes. Such corridors have not been updated since 1989, and on the Eastside none have been identified east of 12th Avenue. It would be nice to avoid situations like the partial loss of views of the Hollywood Theater marquee as a result of a neighboring development.



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We are concerned with the mass and scale of the new development along Division in the Richmond neighborhood. In order to reduce the "canyon effect", we would request that heights of buildings be tied to street width, and that narrower streets like Division and Belmont Streets have lower height limits (38') than would be appropriate for larger, wider streets such as Hawthorne or Powell Boulevards. We are not opposed to adding additional floor(s) using a bonus system that encourages community amenities, such as affordable housing, plaza spaces, green space, extra green features, but believe there should be rules regarding set-backs and step-backs of additional of floors above the base height to avoid loss of light, air and view for existing lower buildings. The surrounding community should be consulted the propriety of planned amenities and the amount and design of added height.

Infrastructure Needs

To successfully accommodate the projected increase in population expected in the next twenty years, HAND, not for the first time, emphasizes the need for more open space areas, community gardens, and a community center for inner Southeast.

We question the Mixed Use Zoning Committee recommendation that landscape standards be reduced in the inner neighborhoods. Corridors without a tree canopy or other greenery tend to function as heat islands. We need more and/or larger trees, rather than fewer and smaller ones. Where there is a requirement to build to the lot line we recommend looking for creative ways to add greenery. Consider green walls and roofs, and creating space for trees.

We must find a way to align increased density more closely with infrastructure development than our city has done in the past. Recalling that it took over 10 years to redo the streetscape on SE Division, and the effects of that project, it would be unfair to ask neighborhoods to take on additional growth without the streets, transit and open space to support that growth. And, of course, the right mix of goods and services is essential..

Public Involvement Concerns

We advocate for a requirement that neighborhoods be given notice of large-scale commercial or mixed-use development proposals in their neighborhoods and the opportunity to meet with developers whether or not a land use review is required. The notification and meetings with developers should occur both at the pre-app stage, and again when the developer is ready to apply for required permits. Such meetings can provide opportunities for meaningful communication between developers and residents, and often lead to better projects for all concerned. Following such meetings a list of suggestions and concerns should be compiled and the architects/developers should be asked to supply a written response as to how the concerns and ideas will be addressed.

We are proponents of a robust, freestanding, advisory body that is adequately funded and supported to oversee public involvement during the ongoing implementation of the Comprehensive Plan. Many of our comments indicate we are concerned about the lack of appropriate tools and safeguards for implementing the Plan's Goals and Policies.



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As timing and structure allow, members of the HAND board have been participating in the work of the Mixed Use Zoning Committee, which could have significant impacts on our neighborhood. We hear rumors of work on pattern area standards, special considerations for “Inner Ring” neighborhoods with regard to design standards, and historic preservation, the potential creation of area-based “Design Review Commissions” to review large scale development proposals, and other concepts, any or all of which could become effective when the plan is adopted in 2017, but there is no guarantee.

These ideas all seem to have merit, but there is a dire need for a better system of design guidance before 2017. Judging by what has occurred on SE Division in just the past two years, more of our neighborhoods could see major changes in character in the immediate future while the community (neighborhood and business associations), lacking any meaningful tools to respond to and shape proposed development, are shut out of the process. There has to be a way to address this dilemma before final adoption of the Plan by the State LCDC in 2017, even though such measures may be stop-gap in form and would be superseded when the final plan is adopted.

In Closing

We applaud the Comprehensive Plan’s emphasis on moving our city toward a more equitable future. We do consider an increase in green space, transit, access to goods and services, and community gathering spaces that are close (walkable) to residential areas as key strategies for reducing our carbon footprint. However, although these ideas are reflected in the draft Plan we lack confidence in the City’s ability to implement them without undoing many of the very things that currently make significant contributions to the livability of our neighborhoods.

We would especially like to express our appreciation for the support we have received from Marty Stockton, our Liaison Planner, for helping us navigate the Comprehensive Plan content and process.

Thank you for considering our recommendations.

Sincerely,

Susan Pearce, HAND chair