

Dear PSC Chairman Baugh and PSC Commission Members

At its regularly scheduled March meeting, held March 12, 2015, the ICA Board of Directors approved the Resolution attached to this email. In particular, I call your attention to the first 3 action items regarding zoning changes (keep in mind that in the material supporting the resolutions I defined the Broadway Edge as the north side of Broadway in the Irvington Historic District from NE 7th to NE 28th and from Broadway to NE Tillamook-the area is better defined on the attached zoning map):

1. For the area in the Broadway Edge presently zoned CX between NE 7th and NE 16th, change this zoning to CM 2, which is mixed use neighborhood, subject to the final zoning details.
2. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 16th from RH to R-1.
3. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 22nd from R-1 to R-2.

The Resolutions respond to those portions of the draft Comp Plan that affect density, height, massing and scale, primarily on the Broadway "edge" of the Irvington Historic District. We believe that these changes will provide a better transition from the predominate R-5 zoning, moving first to R-2, then to R-1, and finally to RH or the commercial zones. It is interesting to note that east of NE 22nd, this form of transition already exists, from R-5 to R-2 to commercial.

City staff admit that the vacant and underutilized land within certain residentially designated areas have a combined development capacity that is double the expected growth. This means that it is possible to be more selective about where development occurs in residential zones and in historic districts. This is the case for the Irvington commercial and multifamily zoning areas noted on the attached maps and which are part of the historic district. We have known about this over capacity for some time in Irvington because of the FAR study we did in connection with the proposed "Irvington Squire" project.

I am attaching a copy of an 2009 FAR study that the ICA land use committee undertook when the original Irvington Squire was proposed for the corner lot at NE 15th and Hancock. Please take the time to review this report. When we did this analysis we were stunned to see the results. This iteration of the project did not get

built. This study graphically shows the amount of development capacity already in the zoning system, at least in the RH zone that takes up approximately 10 blocks on the Irvington's Broadway edge. Please note what a 71 foot height limit does to an adjoining historical structure. And the last two pages shows the effect of a 4 to 1 FAR. I did not incorporate all aspects of the study, but if there is interest, I would be happy to provide the entire study.

The zoning for the Broadway Edge, between NE 7th and NE 26th, and between Broadway and Tillamook, and the density that results from such zoning, was put in place as part of the Irvington Community Plan of 1993, 17 years before the Irvington Historic District was approved by the State and the Feds. I was involved in the 1992-93 Irvington Neighborhood Plan and, frankly, I and others approved such over zoning on the southern edge, the Broadway Edge, with way too much density. It was a mistake on our part, in my opinion.

Given my experience with land use and planning in the neighborhood, I am absolutely convinced that Irvington will continue to take on a fair share of new density under the changes approved above by the ICA Board. The City does not need to maintain a zoning system with twice as much capacity, which I believe results in less development, not more. Owners are more likely to stay on the sidelines until a project comes along that will maximize the density and the profit of the owners.

We hope that staff and PSC are able to make the changes proposed by the ICA Board for the north side of Broadway that is in Irvington, without making changes to the corridor designation. Our proposed changes are not intended to limit the densities promoted by adjoining neighborhoods for their portions of Broadway. Again, one size does not fit all.

Regarding items 5, 6 and 7, we strongly support the implementation and full development of the proposed Inner Ring Policy. We would like to participate in such development.

We have learned recently with two partition applications that the criteria for reviewing a partition does not include a factor for its impact on an existing historic district. In particular, an applicant wants to partition a 5000 sq. ft. lot into two legal lots, one 3500 and the other 1500. This 5000 sq. ft. platting is an integral part of the Irvington history. In our work to counter the proposed Historic District boundary reduction proposal, we did more digging into the various plats that make up the District and the role of Elizabeth Irving in their development. It turns out

that she was very particular about how the plats were broken up into blocks and lots, decreeing that even after she sold a chunk of land to developers to sell to the public, they were not allowed to deviate from her block/lot layout. She is the one who is responsible for the pattern that is almost universal in Irvington north of Hancock where we have long, skinny north-south blocks with 50' X 100' lots on either side. Even east of 24th, where there were plats that she didn't directly control (but her relatives had their hands in them), the developers copied her block/lot layout so as to tie their developments into the very successful "Irvington District" to the west. This additional work has reinforced our belief that these 50' X 100' lots are an important historic aspect of the District and should be preserved, especially as it relates to infill construction.

Finally, recent articles in the Tribune and the Eastmoreland Comments suggest a diminution in the role of neighborhood associations, which if accurate, we are very much opposed to.

Thank you for your consideration. By return email, please confirm timely receipt of this comp plan testimony for the ICA Board with attachments. Thanks.

Dean Gisvold,
ICA Board member and Land Use Chair

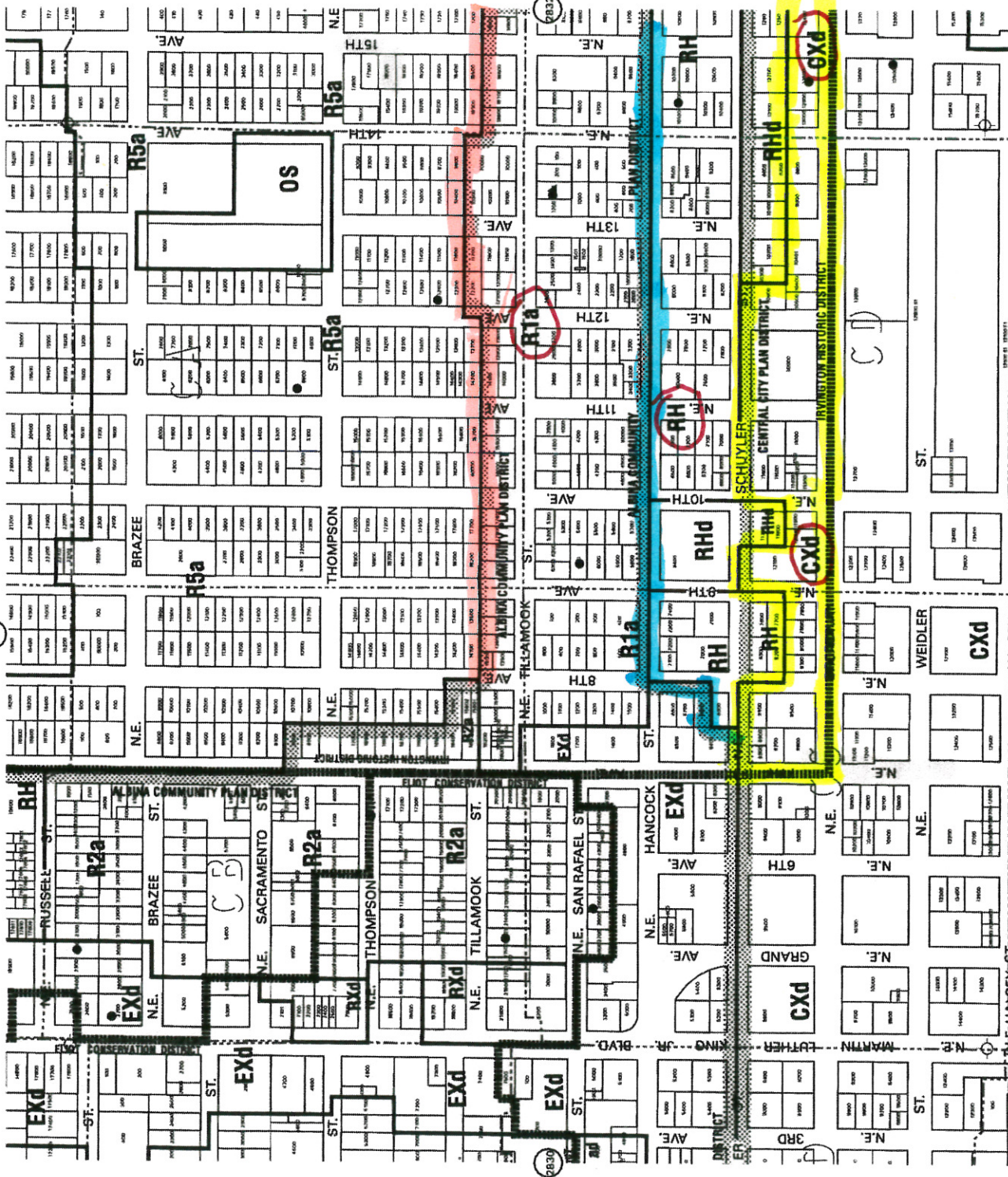
Recommendations for Board Action:

1. For the area in the Broadway Edge presently zoned CX between NE 7th and NE 16th, Change this zoning to CM 2, which is mixed use neighborhood, subject to the final zoning details.
2. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 16th from RH to R-1.
3. Rezone the multifamily zoning in the Broadway Edge between NE 7th and NE 22nd from R-1 to R-2.
4. If it is needed to accomplish recommendation no. 1 above, discuss with stakeholders the re-designation of NE Broadway from a civic corridor to neighborhood corridor, which is defined as:

"Neighborhood corridors are narrower main streets that connect neighborhoods with each other and to other parts of the city. They support the viability of neighborhood business districts and provide location for additional housing opportunities close to local services, amenities, and transit lines."

5. Make the Inner Ring policy part of the Comp Plan.
6. Amend the City Code to add a new criterion to the criteria for partitions occurring in an historic district that would allow the decision maker to consider the effect of such partition on historic character and fabric of an historic district.
7. The roles and responsibilities of neighborhood associations must be maintained.

Approved by ICA Board at its
regular March meeting 3/12/15



R10 Comment Zoning
 Maximum Potential Zoning as per Comprehensive Plan
 State ID Map Boundary

ZONING REVIEWED: 10-29-2010
 MAPS MAP ACQUIRED: 07 - 2010
 LOCAL RESOLUTION: SW 1/4 SEC. 26 - 1N - 1E

CITY OF PORTLAND, BUREAU OF PLANNING & SUSTAINABILITY
 SCALE: 1" = 200'

2831

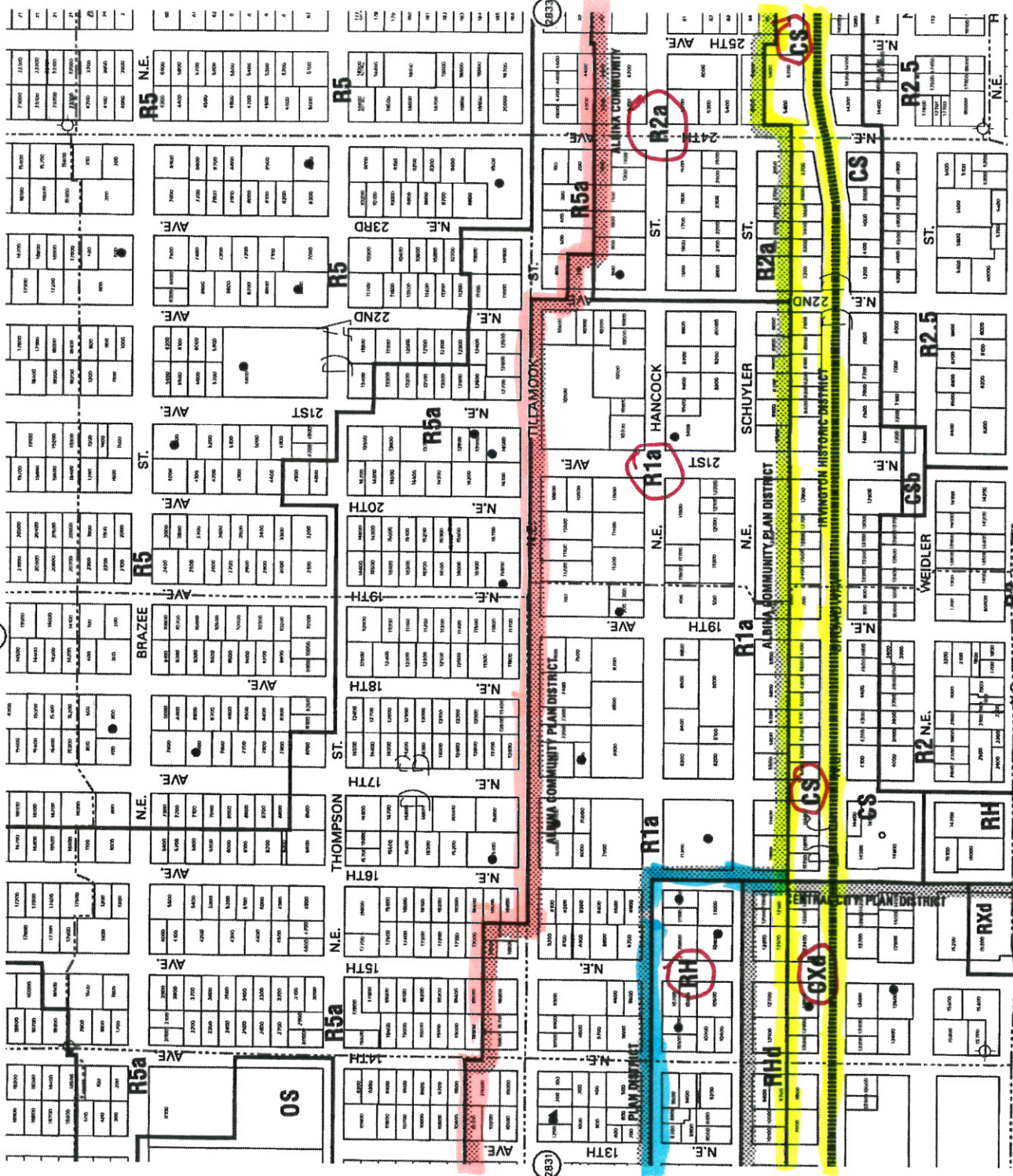
NOTE: Zoning designations are subject to change; verify zoning prior to development or sales.

● HISTORIC LANDMARK
 ▲ CONSERVATION LANDMARK

- Plan District Boundary
- Historic or Conservation District or N.R.M.P. Boundary
- Zoning Line

1

2



CITY OF PORTLAND, BUREAU OF PLANNING & SUSTAINABILITY
10-29-2010
07-2010
SE 1/4 SEC.
26-TN-1E

Current Zoning: R10
Maximum Potential Zoning as per Comprehensive Plan: R10

Scale: 1" = 300'

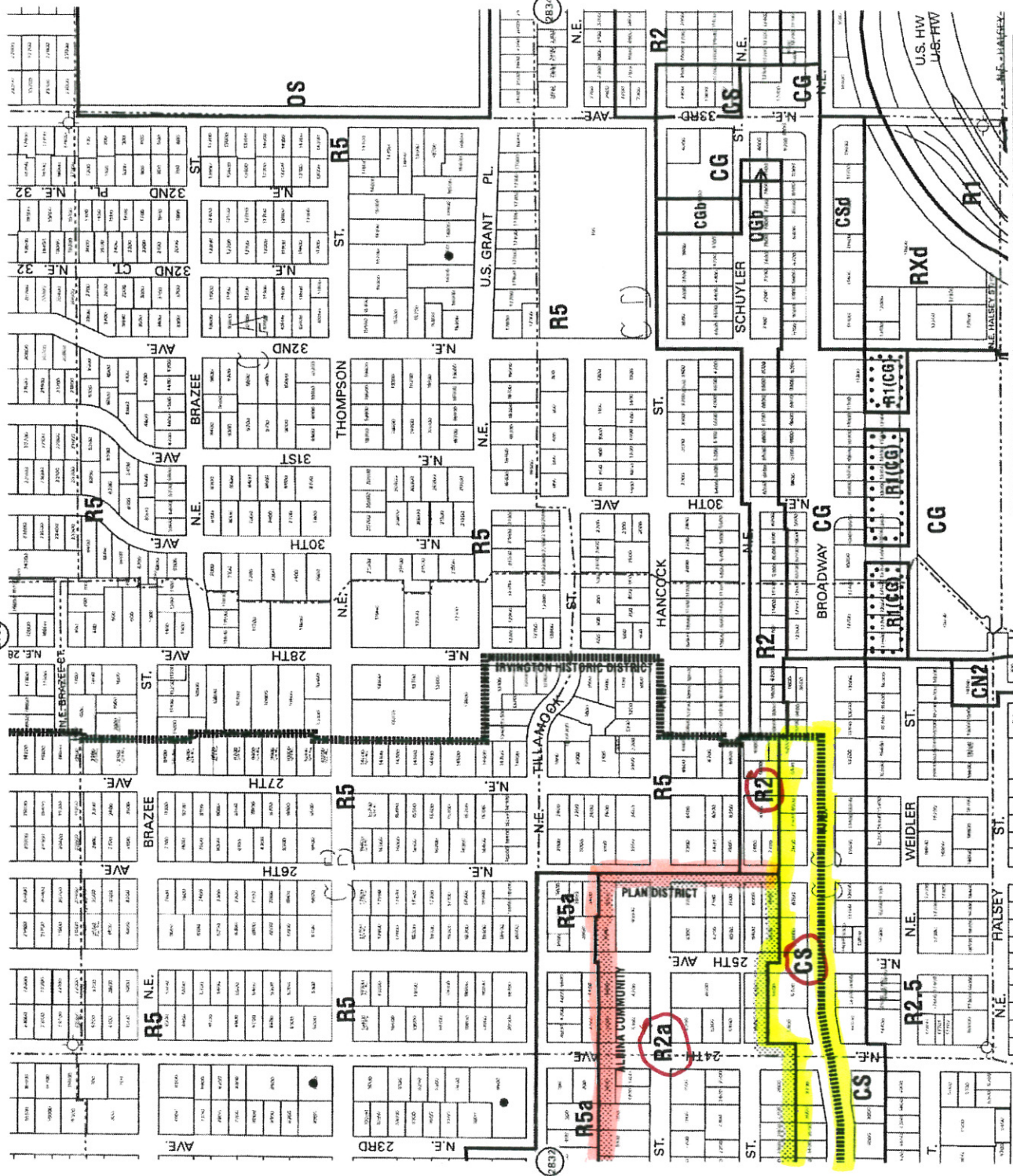
2832

NOTE: Zoning designations are subject to change; verify zoning prior to development or sales.

● HISTORIC LANDMARK
▲ CONSERVATION LANDMARK

Plan District Boundary
Historic or Conservation District or N.R.M.P. Boundary
Zoning Line

3



R10 Current Zoning
 Maximum Potential Zoning as per Comprehensive Plan
 State ID Map Boundary

FORMING REVISIONS
 10-29-2010
 MASSIMILIANO ACCIARETTI

07 - 2010
 SW 1/4 SEC. 25 - 1N - 1E

2833

NOTE: Zoning designations are subject to change; verify zoning prior to development or sales.

● HISTORIC LANDMARK

Plan District Boundary
 Historic or Conservation District or N.R.P.M.P. Boundary
 Zoning Line

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2833

RH Areas with Maximum FAR of 4:1

Map 120-10

Map Revised January 1, 2015

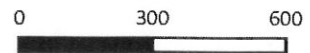


----- City Boundary



Boundary of Existing/Potential
RH - Zoned Area

4



Scale in Feet

Bureau of Planning and Sustainability
Portland, Oregon

Quarter Section(s): 2831, 2832

Apply to Zoning Map

The MUZ Project will work closely with the City's District Liaisons to publish a map of proposed zoning. This process will help fine tune the mapping/application of new zones where specific circumstances may warrant application of a different zone than recommended through the conversion table. Examples of these circumstances could include areas: of unique topography or natural resource impacts; with significant historic resources; where transition to a different development pattern may be desired (e.g., less auto oriented or more employment focused).

Public Review

The Portland Planning and Sustainability Commission (PSC) will hold public hearings on the new zoning codes, proposed conversion approach, and proposed map in mid-2015. Adjustments may be made based on public testimony. The PSC recommendations will be forwarded to Portland City Council for final public hearings and adoption in late 2015.

Comparison of Current and Conceptual Zones

The table below compares key use and development parameters for exiting zones and for conceptual new mixed use zones.

	Small-size Zones				Medium-size Zones						Large-size Zones		
	Existing Zones			Concept Zone	Existing Zones			Concept Zone			Existing Zones		Concept Zone
	CN1	CN2	CO1	CM1	CO2	CM	CS	CG	CM2	CE	EX	CX	CM3
Commercial													
Retail sales and service	L	Y	N	L	L	L	Y	Y	Y	Y	Y	Y	Y
Office	L	Y	Y	Y	Y	L	Y	Y	Y	Y	Y	Y	Y
Quick vehicle servicing	N	L	N	V	N	N	N	Y	V	Y	N	L	V
Vehicle repair	N	N	N	V	N	N	Y	Y	V	Y	Y	L	V
Commercial parking	N	N	N	TBD	N	N	Y	CU	TBD	TBD	CU	CU	TBD
Self-service storage	N	N	N	V	N	N	N	L	V	Y	L	L	V
Residential	Y	Y	Y	Y	Y	Y	Y	Y	Y	L	Y	Y	Y
Industrial	L	L	L	L	L	L	L	L	L	Y/L	Y	Y	Y
Height	30	30	30	35-38	45	45	45	45	35-58	45	65	75	45-78
FAR*	.75:1	.75:1	.75:1	1:1 - 2.5:1	2:1	1:1	3:1	3:1	2:1 - 3.5:1	2:1 - 3:1	3:1	4:1	3:1 - 4.5:1

Neighborhood Civic

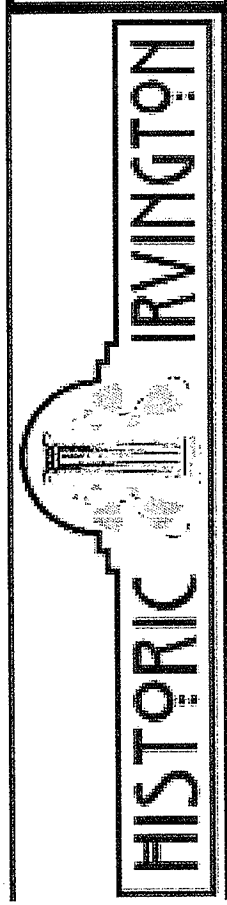
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*

Y = Yes, allowed	N = No, not allowed
L = Limited	V = Variable based on location
* = Currently, except in EX zone, residential is not counted in FAR limits and is allowed to the height limit and zone setbacks. Residential uses are proposed to be counted in FAR in new zones.	

* Important

5

R-1 One dwelling unit per 45 height 1000 sq ft
 R-2 One dwelling unit per 40 height 5000 sq ft



Protecting Our Heritage

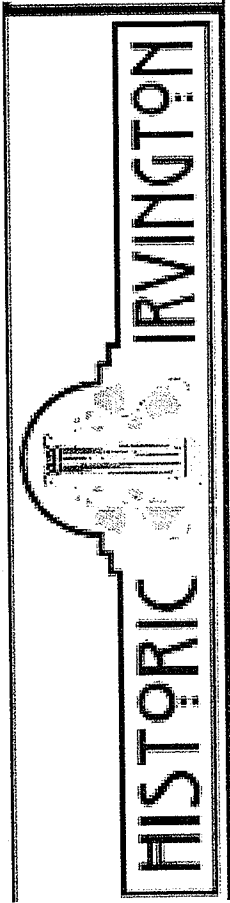
*Irvington Community Association's Fight
Against the Irvington Squire*

Dean Gisvold

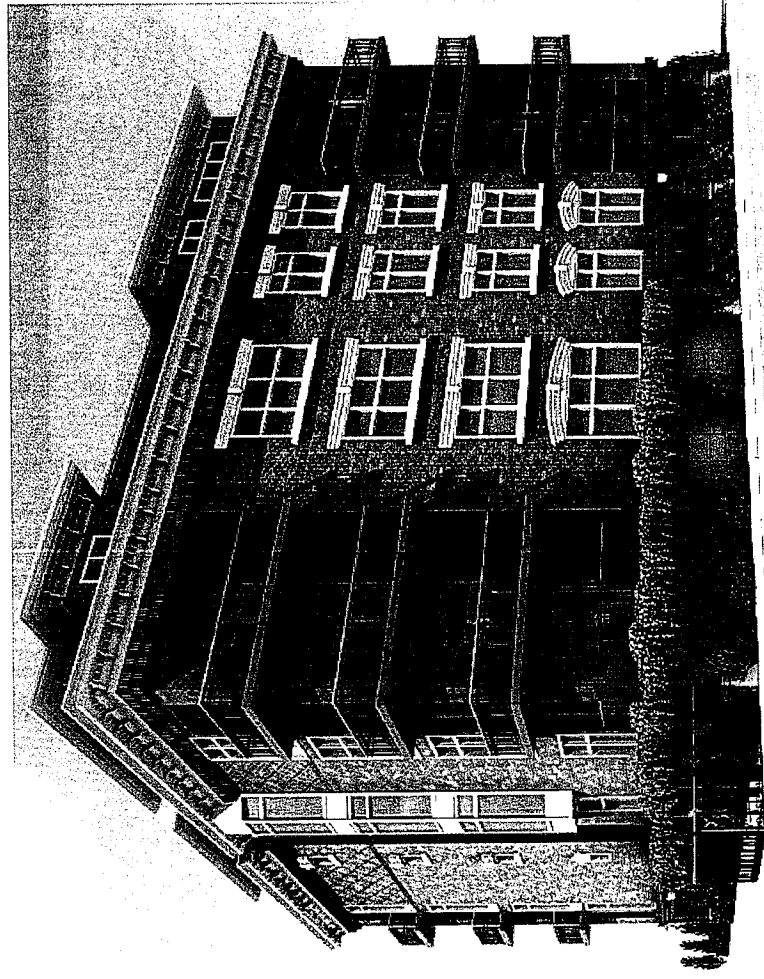
Dean Smith — *PG&E manager
former city planner*

Co-chairs, ICA Land Use Committee *former newspaper
journalist
w/ on journal*

July 28, 2009



What the Fuss was About



Proposed 6-story, 18-unit Irvington Squire in Irvington's Historic Conservation District

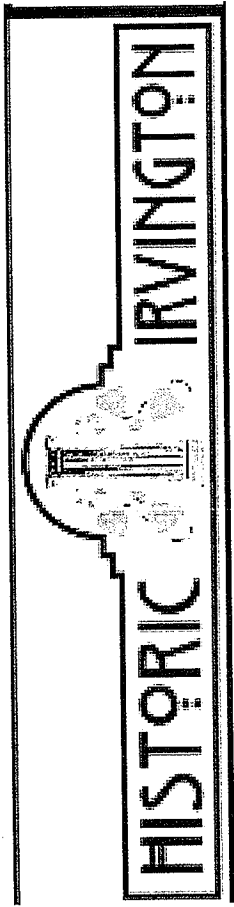
Cement

1/4 block

2 1/2 stories

non-descript structure

18 units



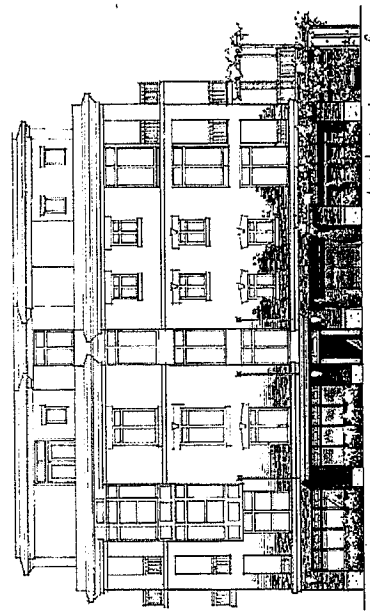
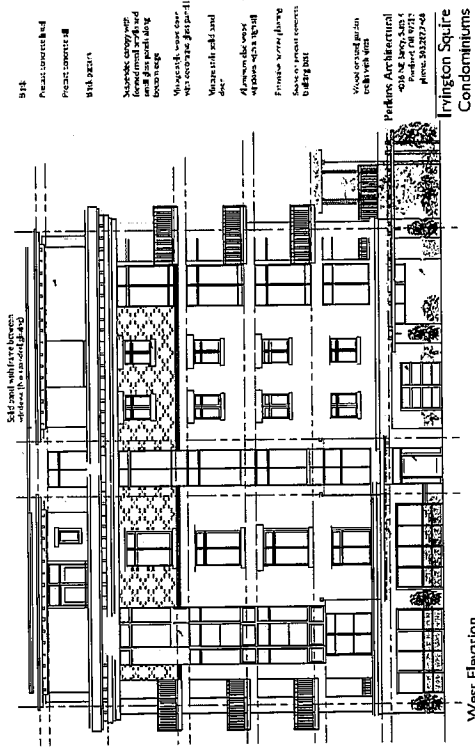
The Irvington Squire Project

- Developer's Initial Proposal to ICA
 - 6 stories - 65 feet *Out 2006*
 - 18 units
 - Neighborhood objected to height/mass
- Developers Initial Filing with City
 - 6 stories - 71 feet tall (+ mechanicals)
 - 18 units
 - No change in building footprint

Jan 08

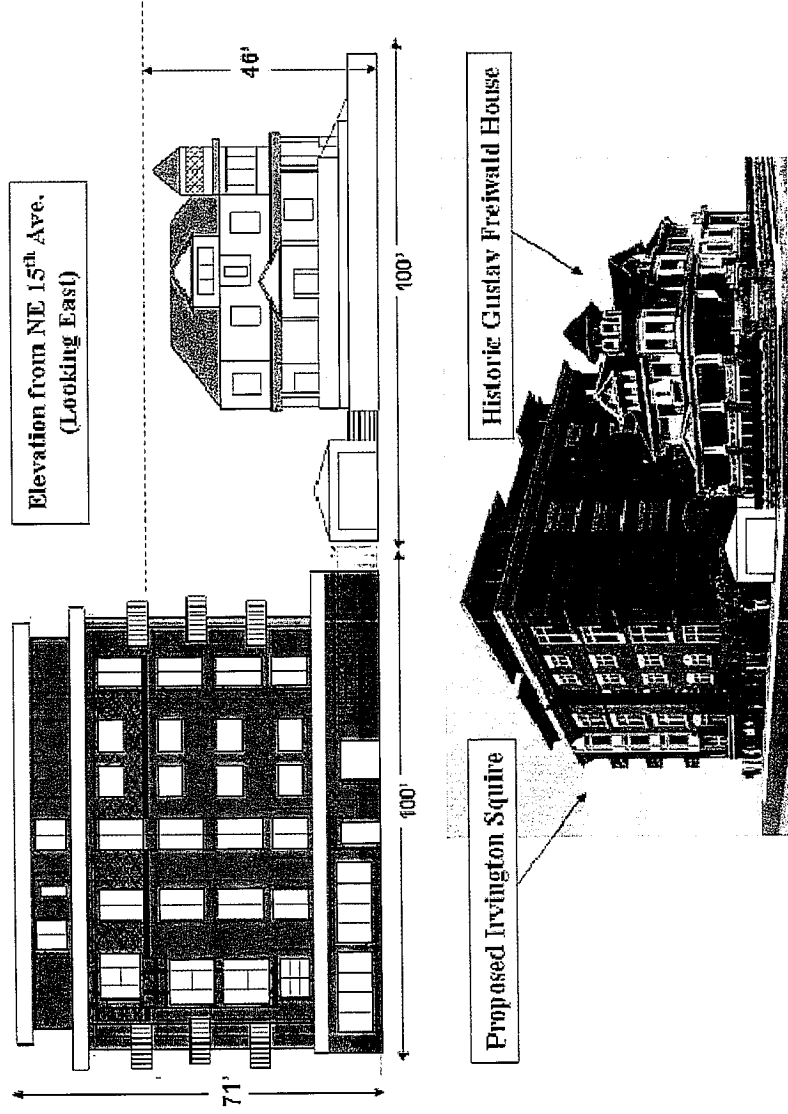
- Developer's Revised Proposal
 - 5 stories - 64 feet
 - 14 units
 - Top floor with increased setback
 - No change in building footprint

Mary 08

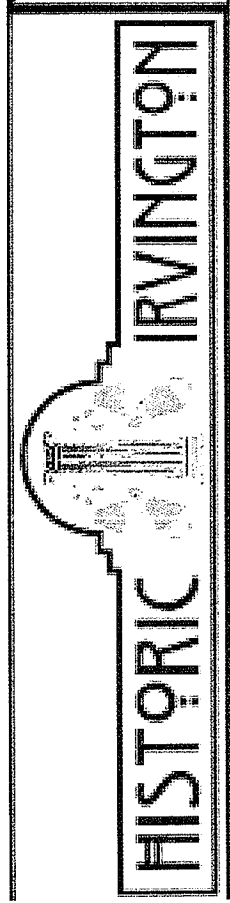


HISTORIC IRVINGTON

Establishing the Context



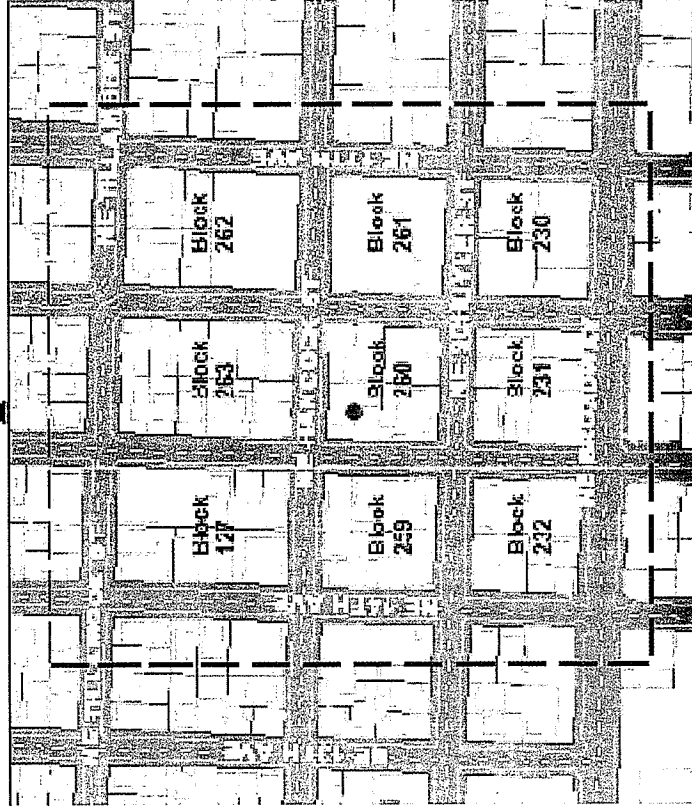
The developer's first formal application showed a project that literally dwarfed the adjacent Gustav Freiwald House.



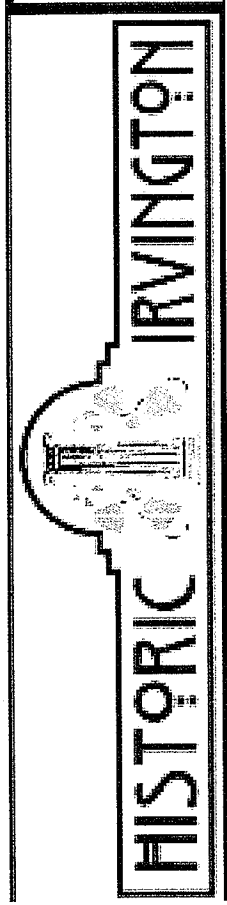
Focusing on the 'Impact Zone'

Irvington Squire Impact Zone

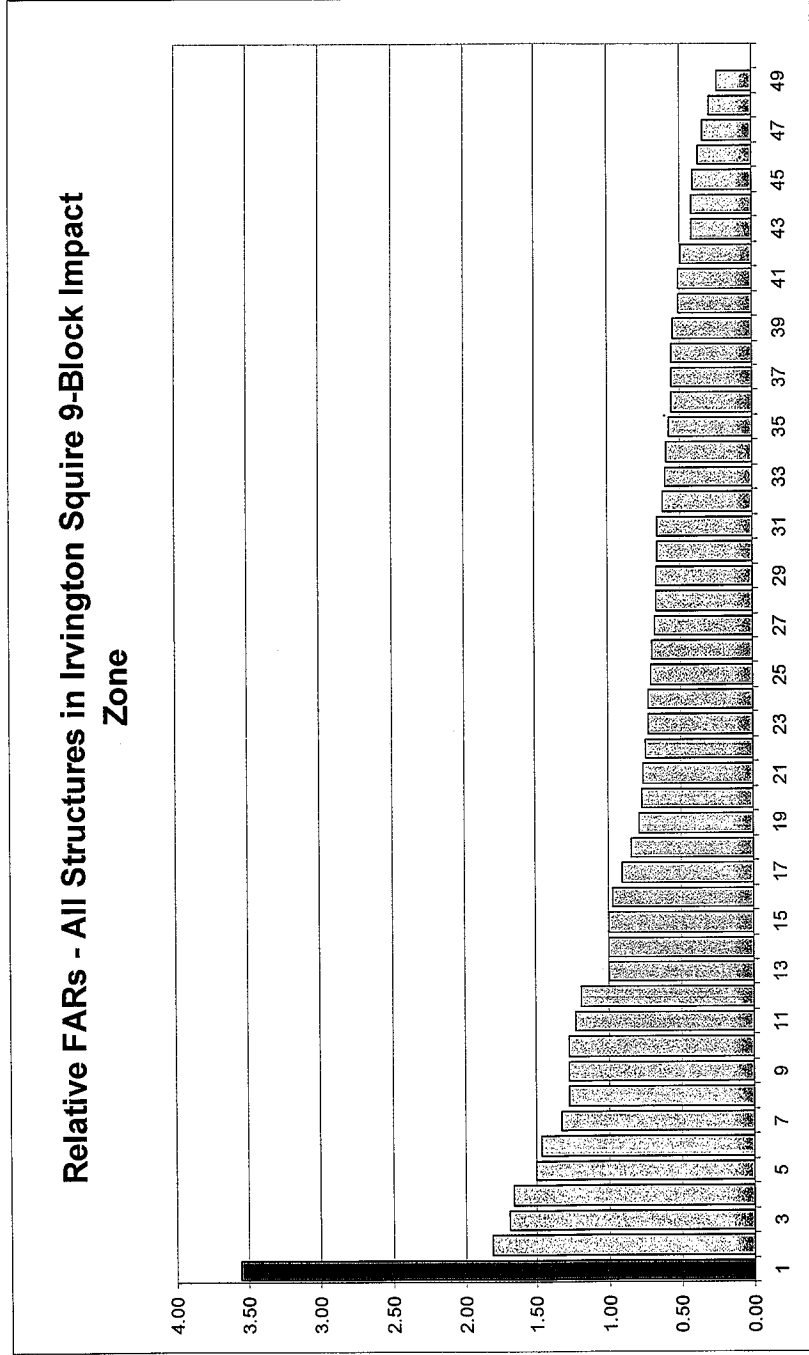
Long -122.45016 Lat +5.53



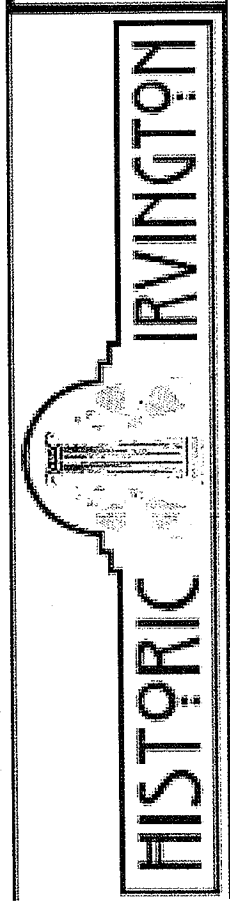
It was important to establish the context, not only of for the Freiwald House but also of the neighboring "impact zone". The ICA submitted a 10-page argument plus block-by-block analysis. **18**



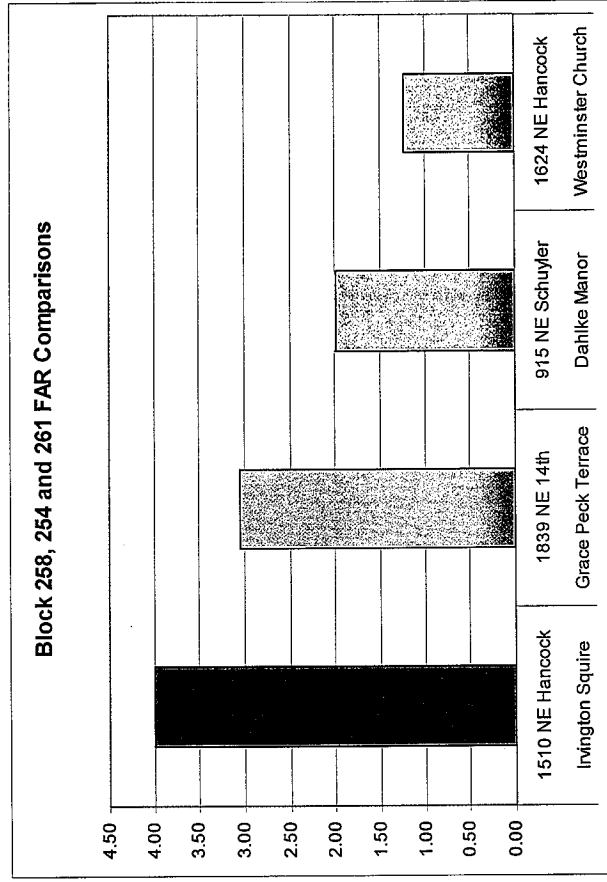
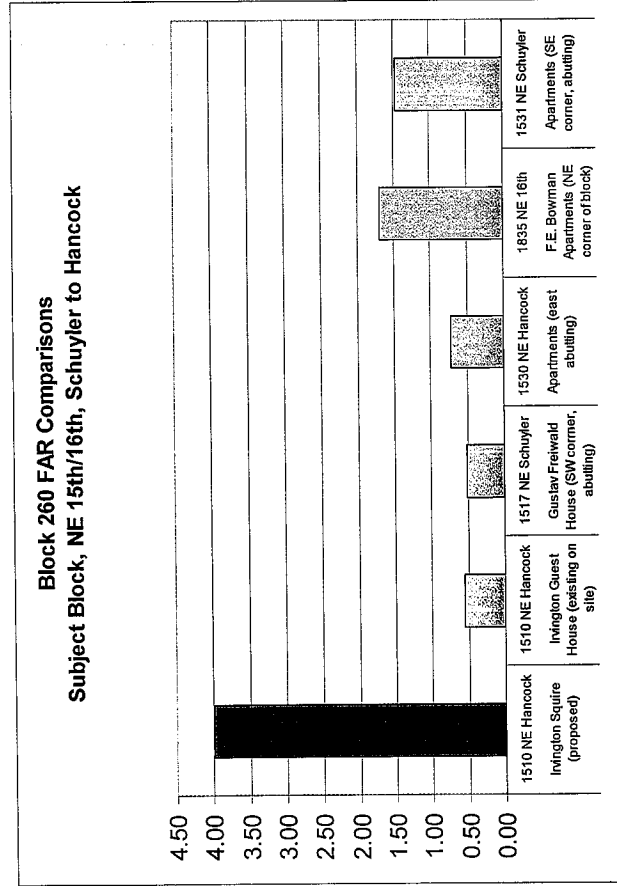
Making the Key Argument – Part 1



With height and bulk our main arguments, we calculated FAR on every building in the surrounding blocks and presented it graphically to BDS Staff and the Landmarks Commission. **19**



Making the Key Argument – Part 2



For further context, we compared the “reduced size” Squire with the buildings on its block (left) and also the three largest buildings in the entire neighborhood (right).