



March 13, 2014
City of Portland
Attn: Planning and Sustainability Commission
1221 SW 4th St.
Portland, OR 97204

RE: Mt. Scott-Arleta Neighborhood Association Draft Comprehensive Plan Testimony

Dear Chairman Baugh and PSC Commissioners:

Thank you for considering our testimony in regards to the City of Portland's Draft Comprehensive Plan, summer of 2014. The mission of the Mt. Scott-Arleta Neighborhood Association (MSANA) is, "to actively maintain and improve our neighborhood, to foster community and keep neighbors up-to-date on events and happenings both locally and on a city-wide level." This letter is written addressing the draft Plan in context to concerns that the MSANA board has heard from our neighbors, and addresses specific policies within the Plan document.

Neighborhood Concerns:

In summary, we have heard concerns about the following:

Retaining Neighborhood Character: The neighborhood consists of primarily traditional single-family, detached dwellings on 5,000 square foot lots (50 ft. wide by 100 feet in depth). We have a diverse housing stock ranging from turn of the century bungalows; traditional American Foursquare homes with large porches, and post-war modern suburban housing (ranch and split-levels) recognizing the rise of automobiles. Within the past couple of years we have seen the housing market recover and the State of Oregon attracting new residents from out of state. An estimated 33,549 individuals move to Multnomah County from out of state each year. Our neighborhood is experiencing demolitions and building of new expensive homes of overwhelming size on existing lots. These homes dominate the surrounding blocks in height, scale and site coverage. While we understand there is a clear demand for larger and new single family homes, there is a need to recognize and encourage housing design that fits within our neighborhood context.

Honoring the Voices of Our Neighborhood: Our neighborhood plan was adopted on January 31, 1996 by Ordinance No. 169763 and Resolution No. 35491. This plan took policies from the city's adopted Comprehensive Plan and provided the opportunity for the neighborhood to establish its' own objectives under each. It allowed for projects, programs, and other provisions which are unique to Mt. Scott-Arleta yet reinforcing the city's Comprehensive Plan elements. Over the years the elements in this plan have been used to guide the work of the Neighborhood Association and have been the subjects of requests for capital improvement projects and grant applications (Arleta Triangle project at 72nd and Woodstock, Foster Road Transportation Plan, etc.). Please recognize that broad policy language to describe "categorical" land use patterns (Five Portland plan approach) does not take into account distinct characteristics and contexts of Portland neighborhoods that each have their own histories, stories, and current narratives to tell.

Plan Policies:

Our comments regarding specific Plan policies are addressed below:

Chapter 3: Urban Form

Civic Corridors

Civic Corridors are the city's busiest, widest and most prominent streets. They provide major connections among centers, the rest of the City and the region. They support the movement of people and goods across the city, with high levels of traffic and, in some cases, pedestrian activity. Civic Corridors provide opportunities for growth and transit supportive densities of housing, commerce, and employment. Development in Civic Corridors is intended to be mid-rise in scale. Mid-rise development includes buildings from five to 10 stories in height, but most frequently ranging from five to six stories.

Abundant trees and high-quality landscaping beautify Civic Corridors and offset the impacts of their large paved areas. These corridors exemplify the benefits of green infrastructure by cleaning and soaking up stormwater runoff and minimizing urban heat island effects, while also being enjoyable places to live, work and gather. Civic corridors are safe for all types of transportation. Civic Corridors policies apply to the roadway, the public realm of the street and the buildings that line the street.

MSANA Comment: This description of transportation facility use, land use, and multi-modal use seem to be conflicting with one another. High levels of traffic and bicycle/pedestrian activity often conflict with one another. The description above and policies 3.38- 3.41 (pg.

GP3-13) are conflicting and confusing. At one point Foster Road was/is considered a Civic Corridor. The neighborhood was involved in the Foster Road Streetscape Plan update. This plan (keeping the street the same width) provides for less vehicular travel lanes and in doing so enhances safety for transit riders, pedestrians and bicyclists. Safety is of utmost importance in these corridor areas. The implementing policies talk about “safe” environments it’s not clear what “safe” means in terms of users. Policy 3.39 (pg. GP3-13) only speaks to pedestrian safety. Since City Council has adopted the Updated Foster Streetscape Plan in 2014, we would hope that when this Comprehensive Plan is adopted that the description of Civic Corridors above would not somehow delay the Foster Road plan from being fully implemented.

The description of the Civic Corridors state, *“They support the movement of people and goods across the city, with high levels of traffic and, in some cases, pedestrian activity.”* If these areas support higher density (mid-rise developments) with commerce and employment, you would assume that this would only increase and support pedestrian/bicycle activity. Housing and Commerce will need parking. The City has heard the complaints about parking from the new mid-rise developments building along Division Street. Some of these developments included very little to no parking what-so-ever. These developments have impacted the surrounding neighborhood as patrons to these new commercial businesses and new residents compete for parking spaces, blocking access to driveways, and creating hazards to pedestrians and cyclists. Great Places (Policy 3.39, pg. GP3-13) can also include and should include the need for vehicle parking – encourage shared-use agreements, create public/private partnerships for shared use of parking areas, metered and time limited parking, and neighborhood parking permits, etc.

Civic Corridors need to be safe, complete, and innovative streets for all modes of travel and supportive of adjacent land uses. This idea of “Civic Corridors” isn’t fully developed at this time which is understandable, however, it would be beneficial to create a policy that states that all “Civic Corridors” have their own “Transportation & Design Plans” with elements that are specific and relate to the characteristics of each individual Civic Corridor.

Chapter 5: Housing

MSANA COMMENT: We agree with the proposed Housing Goals listed and recognize the need for housing type diversity, equitable access to housing, and affordable housing as housing costs increase throughout the city. If the city wants equitable access to housing policymakers must also consider special populations and the use of Universal Design features for the elderly, those with disabilities, and children. Housing for these special populations is important and appropriate near transit corridors.

We recognize that some of the housing stock in our neighborhood is in disrepair and actually some pose actual risk (fire, life and safety) that they should be replaced. Most of our neighborhood was platted with lots of 5,000 sq. feet or smaller. The neighborhood shares a historical development pattern, common streetscapes (porches, landscaped yards), and houses proportioned to lot size.

We often hear from residents the confusion over zoning (R2.5a) for single-family lots that are split to create smaller lots (2,500 sq. foot lots) “skinny homes” on a 25 foot wide by 100 ft in depth and are three stories in height if you count the two stories typically above the garage. The “a” overlay is confusing to residents and there has been new development that has been granted the bonus density that does NOT fit with the surrounding block. The design review for bonus density is NOT necessarily meeting the intent of the language of the code, *“To encourage the provision of well designed housing that is attractive and compatible with an areas established character.”*

We are seeing more homes demolished and replacement housing that is built at a scale that overshadows neighboring homes and yards that leave little open spaces (front and backyards) for landscaping, gardens and other passive uses. These new homes are built maximizing lot coverage and have little to no front yard space.

We understand that these homes provide additional density but they do not fit with the characteristics of neighborhood and are generally less affordable than the houses that they replaced. Attached dwelling units sharing a common wall, duplexes and triplexes on corner lots, should be encouraged instead so that houses are built proportional to the lot size and zone designation -- however, context to height and scale to the surrounding block should be considered as well.

The city should also re-evaluate its’ policy of historical “lots of record”. If these lots can not be consolidated into larger lots that meet the density standard of the zone it is only then they should be considered for development -- again this is to ensure compatibility with the existing neighborhood and housing styles and lot layouts.

Are the current “infill” standards, policies, regulatory design criteria making housing more affordable within the city and are they truly compatible with existing neighborhood characteristics? From what our board hears, many of our neighbors do not think so. The result is larger, less diverse, less affordable housing that do not blend with the characteristics of the neighborhood. We are seeing less and less usable green spaces on these lots as lot coverage is maximized. We have seen our neighborhood tree canopy decrease as large trees have been cut down to make way for new developments that maximize the lot area. Once the Comprehensive


Plan is adopted and the city moves toward implementation the allowable lot coverage and bonus density for development especially in the R2.a zone should be reconsidered. Our neighborhood supports seeing a reduction of lot coverage standards to allow for usable yard space. As board representing the voices of our neighborhood we see the allowance of the additional density accrue to private development interests at the expense of the existing and future neighborhood residents.

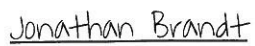
Our board hasn't heard many negative comments regarding accessory dwelling units. Our neighborhood is unique in that it was platted with numerous alleyways for access. Some alleys are well maintained because they are used for access and others go unused and are under utilized areas that can create public nuisances. Right-of-way design standards for accessory dwelling units that want to utilize alleyways should be reviewed to lessen barriers and utilize green street/alley features.

Closing Summary

Portland neighborhoods each differ in their needs and each need to be heard and involved in planning processes. Neighborhood plans can reinforce Comprehensive Plan policies but can be structured in the context to address the needs and desires of the residents and business community. The neighborhood supports density but it should not be detrimental to natural spaces and existing urban canopy, housing affordability, and overall neighborhood compatibility and characteristics.

Thank you for your consideration,


Erika Palmer-Wilson, MSANA Co-Chair


Jonathan Brandt, MSANA Co-Chair

Cc: Marty Stockton, SE Portland District Liaison

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Home demolitions skyrocket in Portland, neighbors demand advance warning



New homes are being built in established neighborhoods throughout Portland, particularly in the Southeast. Photographed here, a new home nearly four times the size of houses around it is being constructed in Mt. Scott-Arleta. (Melissa Binder/The Oregonian)

Print (http://blog.oregonlive.com/portland_impact/print.html?entry=/2013/12/home_demolitions_skyrocket_nei.html)
(<http://connect.oregonlive.com/staff/mabbey/index.html>) By [Melissa Binder](http://connect.oregonlive.com/staff/mabbey/posts.html)
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on December 11, 2013 at 7:20 AM, updated April 25, 2014 at 2:49 PM

Maria Baker got a call from a nervous neighbor one Friday morning: The house two doors down was about to be demolished. Did she know?

The Eastmoreland resident did not. She screamed and ran outside.

"I marched over there and I stood between the tractor and the house," she said.

Baker couldn't stop the demolition, and now two new homes are being built on the property.

Cases such as Baker's lie at the heart of a fight arising in some of Portland's most established close-in neighborhoods.

The number of single-family home demolitions has skyrocketed since the end of the recession. City regulators have approved more than 230 demolitions so far this year, up 40 percent from all of 2011.

Now neighbors are pushing back, arguing they deserve ample advance warning when a house is about to come down.

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