

March 13, 2015

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

RE: Division Design Committee Comprehensive Plan Comment Letter

Dear Planning and Sustainability Committee Members,

Before I tell you what concerns me about the draft Comprehensive Plan, I want to thank you for the countless hours of time you have devoted to the Comp Plan process. Your thoughtful consideration of the issues is greatly appreciated.

Most of my concerns center around how the Plan is to be implemented. The language of the Goals and Policies points us (to my mind) in the right direction. However, past experience tells me how easily these good ideas can run off the rails, leaving me concerned about how to ensure that the values and vision espoused in the Plan's policies are reflected in what is built — or not — in our city. There is no clear path for reconciling what trumps what when conflicts occur. Below are a few other concerns.

### **Neighborhood Corridors**

#### **Policy 3.37 Green Infrastructure in Corridors —**

Talks about enhancing corridors with distinctive green infrastructure ... and yet the Mixed Use Zoning Committee is talking about reducing/eliminating landscaping requirements for inner ring corridors since greenery is not part of the current pattern of development (as it is further east). Many of these areas are already park deficient and have long been told that the Parks Bureau cannot afford to acquire any more land in their neighborhoods and are now being told that landscaping requirements will be reduced. There is hope that plazas, perhaps with large trees, might appear as part of bonusing scenarios, but how will this "amenity" to some, "necessity" to others, be treated amidst the demands for density? How do our proposed corridor development policies keep us from increasing, instead of diminishing the heat island effect?

Consider joint approaches to green infrastructure requirements. In cases where multiple lots or whole blocks are being redeveloped by more than one developer, can the City explore allowing (and if feasible, encouraging) shared energy systems, joint (and more distinctive) stormwater management approaches, rooftop gardens that span more than one building, etc.

### **Increasing Employment along Neighborhood Corridors**

Policy 3.42 Multiple Roles of Neighborhood Corridors (also covered in Policy 3.78 & Chapter 6)

Talks about vibrant neighborhood business districts with quality multi-family housing...

Their role in providing **employment** is mentioned other places, but it easily could be assumed to mean primarily the lowest paying retail and service types of jobs. There needs to be more emphasis on encouraging family wage employment, including maintaining incubator and small start spaces on gentrifying corridors and on identifying employment clusters as they emerge.

Neighborhood Business Districts section in Chapter 6 contains good ideas, but it is not clear how things like Policy 6.64 Investment priority, an important goal re: prioritizing development on corridors where people have limited access... can be implemented or if Policy 6.65 on Involuntary Commercial Displacement can be implemented quickly enough on some of the rapidly redeveloping corridors.

## **Nodal Development**

Can our zoning be crafted to encourage **phased development** and accommodate the **ebbs and flows of the economy** at the same time? Developing miles and miles of mixed use buildings along our corridors does not lead to vibrant districts or walkable neighborhoods.

- Consider an overlay on corridor nodes where the retail uses are the strongest that keeps ground floor retail/commercial happening without interruption along a limited streetscape. SE Division has a historically nodal pattern with residential spans between small commercial nodes.
- Allow fully residential buildings between commercial nodes with ground floor units that can be converted as demand grows over decades. Or focus other employment (hopefully with family wage jobs) on the ground floor where it doesn't interrupt the retail environment (see next bullet).
- Allow first floor spaces that can function as Live/Work or are allowed to shift to residential uses when the economy can't support all the commercial spaces.
- "Old town overlays" to protect the small historic core of commercial corridors. Using the national "Main Street" approach, encourage neighborhoods and business districts to identify older buildings with historic or cultural significance to the community that help anchor the sense of place for a district. Instead of zoning them for higher density (a recipe for certain demolition), create an overlay for a block or two (if they exist in a cluster) or for dispersed structures that helps encourage owners and communities to take advantage of resources and regulatory incentives to preserve, adapt and reuse those structures.

## **Design Guidance**

Inner Neighborhoods Pattern Area Policies 3.76 - 3.81 and the Design and Development policies in Chapter 4 lay out wonderful lists of design considerations that should be included in new or renovated development, but there is no way to ensure these things will be considered, whether it's a single lot infill project or the redevelopment of whole blocks as is the case on SE Division. I am sensitive to the time and money involved in design guidelines, design review, etc. However, if the City wishes to get more of us on board with redevelopment and infill designed to help us respond to climate change, then people need to have more say in what is being built in their neighborhoods and business districts. There also is a great need to increase the design literacy of our entire community. Finding ways to help people better understand development proposals and give voice to their ideas and concerns beyond saying "no" or "I don't like it" should be a high priority for a city that is expecting to grow.

## **Notification**

The City needs to take a careful look at its entire array of notification requirements. However, given the current, rapid rate of development there needs to be a short term focus and interim adjustment of the notification requirements for new development/redevelopment affecting centers and corridors. The Division Design Initiative has put forward one such proposal. This cannot wait until the Comp Plan is adopted by City Council and forwarded to the State LDCD in 2017.

Thank you for your consideration of these comments.

Sincerely,

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