

April 10, 2016

City of Portland
Planning and Sustainability Commission
Mayor Hales, Councillors Novick, Fritz, Saltzman and Fish

Ladies and Gentlemen:

I am writing regarding the Residential and Open Space Zoning Map Update Proposed Draft. I am a resident of the Woodstock neighborhood. I have been attending neighborhood meetings regarding land use issues for the past three years. I had an opportunity to become more involved and concerned about the proposed Comprehensive Plan changes through this involvement. Although I have submitted testimony throughout this process and via the MapApp, I once again find it necessary to address and oppose the proposal to implement up-zoning of areas designated for increased density (generally R5 to R2.5) in the previous Comprehensive Plan (section 4d. in the current Residential and Open Space Zoning Plan).

I have reviewed the “analyses” provided for the various areas throughout the city proposed for such conversion in the appendix to the Draft document. They all read very much the same, leading me to believe that no REAL neighborhood specific analysis has been performed, but that the text is merely a prelude to a rubber stamp of approval.

The proposal for implementing this up-zoning was first raised (publicly anyway) less than a year ago, despite the fact that the comprehensive plan revision process has been underway much longer than that. Many of the steps in the adoption of a new Comprehensive Plan and opportunities for public input have already passed. The neighborhood has been given only one opportunity to provide input - at a meeting organized by the Woodstock Neighborhood Association at the command of the BPS, on December 9, 2015 (not December 10, as stated in the Residential and Open Space plan document). The BPS provided no assistance in publicizing this meeting or in identifying affected property owners. This meeting was not designed to get feedback from the community about the plan itself, but rather on the criteria being used to make the decision. Ironically, one criterion that was not included was the opinion and concerns of the neighborhood. The criteria were designed to lead to a foregone conclusion to adopt previous arbitrary Comprehensive Plan designations as actual zone designations. The fact that, in Woodstock, many of these “dual-zoned” properties abut unimproved streets has been totally ignored. Outright zoning of these parcels for a denser designation will allow denser development without any prior review on the part of the Bureau of Development Services for the existence of adequate infrastructure and space for access of emergency vehicles and will allow developers to develop these properties without properly developing surrounding streets. Traffic on Woodstock Boulevard is already at a standstill throughout most of the day since there are few alternative improved east-west streets nearby. The nearest through street to the north, SE Steele, is currently experiencing significant increases in traffic with lack of any traffic controls or sufficient crosswalk markings between SE 52 and SE Cesar Chavez (39th). I can't even identify an alternate east-west through street south of Woodstock until one gets to Johnson Creek Boulevard. The report cites traffic improvements (details not specified) slated for SE Cesar Chavez Blvd during years 1-10, but improvements there will have little effect on the properties proposed for conversion to a more dense zone designation.

The report identified bus route #75 as a “frequent service” bus line thereby justifying higher density residential development. Bus line #75 is a north-south route and goes nowhere near downtown Portland. One has to transfer to a different line to get downtown, completely negating the “frequent service” qualification. The #19

bus, which does run on Woodstock Boulevard between SE 52nd Avenue and SE Chavez Blvd and into downtown via Eastmoreland and Westmoreland, is not a frequent service line and takes a rather circuitous route to downtown. There is no bus service on Woodstock Boulevard east of SE 52nd Avenue. Woodstock simply does not have adequate public transportation to support the planned arbitrary up-zoning.

The history of how these properties were assigned this denser zoning designation is concerning. As I understand it, during the last Comprehensive Plan process in the 1980's, residential properties within a certain specified distance of an arterial street with bus service (not necessarily FREQUENT bus service) were designated R2.5, rather than the more prevalent zoning designation of R5. This approach was TOTALLY ARBITRARY and failed to take into consideration the character of surrounding neighborhoods or the existing actual density, which in many cases is less than the official zone designation. I have seen no documentation that these designations underwent any sort of neighborhood review at that time. Since that time, only two properties in Woodstock have gone through the necessary land use process to adopt the Comprehensive Plan designated zoning as the actual zoning designation and one of these cases was strongly opposed by the surrounding neighbors. In my opinion, if development at the old Comprehensive Plan designated density level has not occurred within the past 30-plus years, that density designation needs to be completely reconsidered. It has been stated that Portland has sufficient vacant lots to meet its anticipated needs for increased residential density without implementing these arbitrary changes and without the current lot splitting and excess building of large and unaffordable houses currently underway. An analysis of the existing population density in Woodstock indicates that it already meets the targeted density for designated Neighborhood Centers without implementation of these arbitrary old Comprehensive Plan designations. Instead, these underlying designations represent a "ticking time bomb" that most residents are completely unaware of until a developer gets their hands on one of these properties. Zoning for these properties should remain at their current official zone designation. The old Comprehensive Plan designation, if different, should be REMOVED, NOT implemented.

I appreciate the Commission's serious consideration of this testimony.

Sincerely,

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