

**From:** [Thomas Karwaki](#)  
**To:** [BPS Comprehensive Plan Testimony](#)  
**Cc:** [Planning and Sustainability Commission](#)  
**Subject:** Supplemental Consolidated Zoning Map Comments of NPLUG  
**Date:** Friday, July 15, 2016 4:59:22 PM

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The North Portland Land Use Group, the land use committee chairs of the eleven North Portland Neighborhood Associations, supports these comments of the Piedmont Neighborhood Association:

Planning and Sustainability Commission  
1900 SW 4th Ave, Suite 7100  
Portland, OR  
97201

Hello,

On behalf of the Piedmont Neighborhood Association and North Portland Land Use Group we object to the Comp Plan rezoning proposal 1356.

The rezoning concept is expressed in a draft of the Comprehensive Plan 2035, in which property defined by streets N Borthwick/N Kerby, between N Dekum and N Rosa Parks, would be rezoned from R5 to R2.5.

Here is the link to original report:

<http://www.portlandoregon.gov/bps/article/568819>

pg. B-24 for Piedmont specifically.

Rezoning this area would be inappropriate for numerous reasons, as enumerated below:

Effects of zoning change:

- On existing community
- On future growth
- Unintended consequences

On existing community:

An analysis of the history of this part of our neighborhood is important. The main feature of this area was a convent and a school for troubled girls, founded by the Sisters of the Good Shepard in 1902, and moved to new buildings in Piedmont in 1917.

The main building, also known as Villa St. Rose, is now on the National Registry of Historic Places, and is used for affordable senior housing.

The Rosemont facility and property were purchased by the City of Portland in 1995, and plans for development went to bid under the parameters that there would be a mixture of housing options for a range of income levels. The city fast-tracked the planning and infrastructure before construction- streets, sewer, permitting.

Walsh Construction Co. won the bid, because their proposal addressed the desired and stated goals of providing different housing types for a diverse demographic- some rentals, some affordable homes built by Habitat for Humanity, some market-rate homes. Northwest Housing Alternatives now owns the Rosemont Commons, 100 apartments for affordable senior living in Rosemont Court, and 18 affordable-rent apartments in Rosemont Town Homes.

We feel that the city urgently needs to sponsor more bold development projects such as these, and not succumb to current trends for development projects within these target zones that are unresponsive to existing neighborhood

needs and contexts.

Additionally, the cohesive neighborhood feeling is in evidence by a colorful street painting that was created by the local residents at the corner of N Dekum and North Borthwick, and the proposed Comp Plan changes do not support a unifying principle that would support further neighborhood assets such as these.

On future growth:

The current demographic of the proposed rezoning area is 16% African American, 9.9% Latino, 30% renters, and \$34,784 median income. The 35 units in the proposed rezoning area are affordable housing for residents/renters with relatively low median income, and the residents of this historically ethnically and economically diverse area would be at risk for displacement. The type of development made possible by the proposed rezoning would lead to further gentrification and to displacement of low-income residents.

We recognize the projected growth in our city in the future. However, re-zoning, and the development patterns within this area, will not properly address density goals, as current trends show that after the demolition of existing houses, investors and developers are building larger, expensive single family houses that do not provide housing opportunities for renters, lower income home buyers, and multiple families. Increase in building size does not translate to increase in density.

Future affordability?

To date, the few infill and remodeling projects done by developers on the street have resulted in no affordable housing. In fact, these projects have resulted in less affordable housing as previous section 8 tenants who'd been long time residents on the street were forced to move as a result of such development. In our experience, developers have built environmentally unfriendly, expensive properties that result in less diversity in our neighborhood.

Unintended consequences:

This "piecemeal" approach to addressing density goals is inadequate to the greater task, and the effects in and near to these affected areas are too great to be of benefit to the larger surrounding community.

The Residential and Open Space Zoning Map (Proposed Draft, March 2016) does not give a convincing argument for the rezoning. The fact that Rosa Parks to the south is zoned R1 is irrelevant, and the fact that Rosemont Commons to the North is R2 is clearly a very special and unique case. Both east and west are R5, nothing is R2.5. It is not clear why these blocks were singled out, and the general feeling in the neighborhood is that it certainly was not explained properly.

It is also not correct to describe the area as "very well served" – both the grocery store and the coffee shop on the corner of Albina and Rosa Parks are not really nice and inviting facilities, and the Max Yellow line and New Seasons Market on Interstate are not really close.

Zoning ordinances should be embraced to protect the integrity of neighborhoods and the quality of life of the people who live in these areas. They should not be adopted to allow developers to profit from indiscriminate land use.

Thank you for your consideration.

Sincerely,

Piedmont Neighborhood Association and North Portland Land Use Group.

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