



October 13, 2014

VIA EMAIL AND US MAIL

Planning & Sustainability Commission
1900 SW 4th Avenue
Portland, OR 97201-5380
psc@portlandoregon.gov

RE: Comprehensive Plan Testimony

Dear Planning & Sustainability Commission:

I write on behalf of the Sabin Community Association (“SCA”) to provide testimony regarding the proposed draft of the Portland Comprehensive Plan. The SCA appreciates the hard work by City staff and community stakeholders to create a thoughtful vision for Portland’s future. The draft Plan articulates a set of policies that will serve our community well through the coming years. However, we believe that the draft Plan could be improved in several ways, as discussed below.

OVERVIEW

The SCA sees the comprehensive planning process as an opportunity to address concerns shared citywide by many neighborhood associations and individual citizens. New planning guidelines should discourage demolitions and encourage preservation of dwellings. At present, demolitions in Sabin are typically no longer replacing dilapidated dwellings or filling gaps. Instead, new construction is replacing older, generally sound homes with single-family or at most, two single-family houses. This trend is eliminating the historic resources of our neighborhoods, is environmentally destructive, is making housing less affordable, and does little or nothing to contribute to density. The Plan should adopt policies to favor preservation and renovation over demolition, and the City should implement and enforce those policies through its building and zoning codes.

RECOMMENDATIONS ON SPECIFIC POLICIES PROPOSED IN THE DRAFT PLAN:

“Policy 3.79: Inner Neighborhoods infill. Fill gaps in the urban fabric through infill development on vacant and underutilized sites, and re-use of historic buildings on adopted inventories. Integrate new development into these districts’ historic development patterns.”

SCA Concern: “Infill” in the Sabin area is not generally alleviating blight or filling vacant lots anymore. Instead, it has become most common in Sabin for a developer to demolish a single-family home and replace it with another single-family home or, if the lot is partitioned, with two single-family homes. The SCA would like to see language in the Plan that encourages housing stock preservation and discourages unnecessary demolitions. Infill and new construction should be encouraged only on sites that are vacant or truly underutilized.

- *SCA Recommendation:* Define the terms “infill” and “underutilized.” A lot with a single-family home on it should not be deemed to be underutilized, unless the lot is located in a town or neighborhood center or along a civic or neighborhood corridor.
- *SCA Recommendation:* Promote the recognition, maintenance, and preservation of sound housing stock.
- *SCA Recommendation:* Discourage demolition of sound housing stock, to the extent reasonably possible.

“Policy 3.81: Inner Neighborhood residential areas. Continue the pattern of small, connected blocks and regular lot patterns in Inner Neighborhood residential areas.”

SCA Concern: The phrase “regular lot patterns” is vague and does not address the variety of regular lot patterns in each neighborhood.

- *SCA Recommendation:* Define “regular lot patterns,” to clarify whether lot partitioning is considered consistent with surrounding lots in residential areas.

“Policy 4.7: Access to light and air. Provide for public access to light and air by managing and shaping height, and mass of buildings, while accommodating urban scale development; and

“Policy 4.8: Privacy and solar access. Encourage building and site designs that limit reductions in privacy and solar access for residents and neighbors, while accommodating urban scale development.”

SCA Concern: City policy should not be one-size fits all. Appropriate expectations for light, air, privacy, and solar access will vary depending on location. Denser development should be encouraged in town and neighborhood centers and along civic and

neighborhood corridors, while more protection for light, air, and privacy should be given in single-family neighborhoods that are the historic norm in our communities.

- *SCA Recommendation:* Define the vague term “urban scale development.”
- *SCA Recommendation:* Provide greater protection for light, air, privacy, solar access in single-family and Central City pattern areas, while accommodating urban scale development in town and neighborhood centers and along civic and neighborhood corridors.

“Policy 4.13: Scale and patterns. Encourage design and development that complements the general scale, character, and natural landscape features of neighborhoods. Consider building forms, scale, street frontage relationships, setbacks, opens space patterns, and landscaping. Allow a range of architectural styles and expression, and respect existing entitlements.”

SCA Concern: This policy captures the type of regulations that the SCA would like the City to encourage. New development should take into consideration neighborhood patterns and scale. However, as written, this policy will have very little impact without implementation in enforceable regulations. Moreover, the phrase “respect existing entitlements” is open-ended enough to negate the entire policy, if it were to be construed as a policy of continuing to allow any development that is permissible as a matter of right under current City Code.

- *SCA Recommendation:* Mandate that the City implement the scale and pattern policy in enforceable regulations in City Code.
- *SCA Recommendation:* Narrowly define the phrase “respect existing entitlements” or delete it from the policy.

“Policy 4.37: Continuity with established patterns. Encourage development that fills in vacant and underutilized gaps within the established urban fabric, while preserving and complementing historic resources.”

SCA Concern: The language in this policy is vague, leaving room for varied interpretation depending on how the City understands the concepts of infill and underutilized properties.

- *SCA Recommendation:* Define the terms “fill in” and “underutilized.” A lot with a single-family home on it should not be deemed to be underutilized, unless the lot is located in a town or neighborhood center or along a civic or neighborhood corridor.

“Policy 4.40: Historic Resources Inventory. Survey and inventory historic resources as part of future planning projects, with a focus on areas of anticipated growth and change.”

SCA Concern: The City of Portland’s Historic Resources Inventory (HRI) is now 30 years old, leaving a large gap in the City’s protection of potentially historic structures and significant cultural areas. This gap leaves many properties vulnerable to demolition without proper consideration. According to the National Register of Historic Places, structures of at least 50 years of age are old enough to be considered eligible for listing.

- *SCA Recommendation:* Conduct a citywide survey to update the HRI, not just project-based assessment.
- *SCA Recommendation:* Prioritize creating at least a preliminary inventory in areas of where demolitions are anticipated to be concentrated, including the inner east-side neighborhoods.
- *SCA Recommendation:* Recognizing that the City does not always have the benefit of a recently updated HRI, adopt policies that discourage demolition of houses more than 50 years old more strongly than they discourage demolition of younger houses.

“Policy 4.48: Prioritize reuse. Encourage maintenance, rehabilitation, and/or relocation of viable buildings over demolition and new construction.”

SCA Concern: Relocation of buildings is not a realistic option in most instances, and the City should focus its attention on more pressing issues.

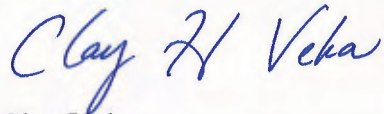
- *SCA Recommendation:* Delete “relocation” from the list of activities to be encouraged.

The SCA encourages the City to incorporate our recommendations into the Comprehensive Plan and to follow through with actionable and enforceable policies for future growth and development.

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Please feel free to contact me at (503) 961-3702 or at clayveka@gmail.com should you have any questions about this comment. Thank you for considering our input.

Sincerely,



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