

## Argay Neighborhood Association Comments and Requested Revisions to the Current Draft of the City of Portland Comprehensive Plan

### Argay Overview and an Opportunity for New Housing for Families:

The Argay Neighborhood extends from the Columbia River on the north to I-84 on the south; NE 122<sup>nd</sup> Avenue on the west to NE 148<sup>th</sup> Avenue on the east. Approximately half of that area is made up almost exclusively of industrial properties. Higher density, moderate cost, multi-family development is nearly 45% of the housing stock. Much of the area zoned for commercial use remains undeveloped after 55 years of neighborhood building. The remaining vacant areas not zoned commercial are improperly zoned for multi-family development only. The revisions in the Comprehensive Plan include minor administrative changes to a few individual locations in the industrial area to the north of Sandy Blvd, so the following discussion, comments, and recommendations concern the residential portion of the neighborhood, that area south of Sandy Blvd. All further references to "Argay" are to that portion of the neighborhood.

Originally developed over 55 years ago as an alternative to the higher density, higher traffic, inner-city northeast and southeast neighborhoods, Argay offered a family oriented neighborhood: family sized homes on larger lots, protected from traffic by curving and dead-ended streets, and featuring short walking distances to a City park and good quality K-12 schools. From the beginning and continuing to today, that concept has proven popular with a wide range of people from all walks of life and all ethnic backgrounds. The neighborhood developed to include 2,500 households and over 6,000 residents. We demonstrate the City of Portland's goal to recognize all forms of diversity. The 2010 census figures show a wide range of ages, education levels, careers, and a population far more ethnically diverse than the City as whole.

Most City planning in the last two decades has been targeted at creating new housing for singles and couples and focuses on an urban lifestyle. If the City is truly going to embrace diversity and support families it has to offer living opportunities for all – including families. Lifestyles change as singles become couples and family formation begins. Good quality single family housing in safe family friendly neighborhoods becomes necessary – just the type of neighborhood Argay was intended to be and has become. As those families made up of well educated parents with family wage jobs seek a new family oriented lifestyle, they find few (and increasingly expensive) neighborhoods in Portland that can fill their needs. Argay can offer that much needed new housing, but we need zoning that will allow that type of housing to be built. That zoning does not exist at this time and the revisions in the Comprehensive Plan provide minor relief, but leave far more undeveloped land for non-single family development. This needs to be corrected. Once this opportunity is lost, it will be gone forever.

## Argay Neighbors' Concerns and an Opportunity to Improve Argay and Our City:

In meetings with our neighbors we have found two major concerns about current conditions in Argay and the potential for those problems to continue to grow and further negatively impact our neighborhood: our high percentage of higher density multi-family housing and a growing volume of pass-through traffic (that is, traffic originating and terminating outside our neighborhood – mostly commuters taking a short-cut). Opening residential streets to District Collectors will be addressed during the Transportation System Plan hearing. The use of existing undeveloped land areas for the creation of more single family, family oriented housing will be covered here.

Rental housing makes up a substantial percentage of our neighborhood housing inventory at 43.5%, and a new development in the planning stages will increase that to nearly 45%. While just on a par with the City-wide average of 46.2%, the citywide percentage includes downtown areas which approach 100% renter occupancy. With our surrounding four neighborhoods, we form an island of renter occupancies well above that of most other Portland residential neighborhoods. Contrast this to Beaumont, Alameda, and East Moreland with rental populations of between 3.1% and 9.7%. It is clear that we already carry more than our fair share of non-owner occupied housing. No more is needed.

Much of the current apartment inventory is made up of smaller units in higher density complexes that provide few amenities for families and children (open space, play areas, etc.). Our neighborhood does not allow convenient "walkable" daily shopping, personal support services, or a high level of mass transit; all goals of the City for the creation of higher density neighborhoods - those that are comprised of multi-family development. Even under R-3 zoning, the questionable practice of using "amenity bonus points" to increase density can shift R-3 zoning to an "as built" density approaching R-2. At 2,000 square feet of site area per unit, a complex rarely has enough space to provide facilities for families. Under the current zoning of our neighborhood that is the only type of development allowed and in fact another such complex is in the pre-building phase right now. The backbone of a neighborhood and a city, families with children, have been totally forgotten.

To return a reasonable balance to Argay, future housing development should be focused only on single family, owner occupied housing – the long term, low turn-over residency that builds and strengthens community ties. Most of the areas under consideration for re-zoning to Mixed Employment in the proposed Comprehensive Plan update should be re-zoned to support R-5 development and the existing R-3 zoning not already under consideration for such re-zoning should be re-assigned an R-5 classification.

We recognize that there is a perceived shortage of industrial sites within the city limits of the City of Portland overall, but we do not agree that those sites should be developed as small islands within residential neighborhoods such as Argay. Excluding the K-Mart location, the

Mixed Employment areas proposed for our neighborhood are incompatible islands, adjacent to well established residential housing, and do not adequately protect the existing housing from the negative impacts of those incompatible uses. Additionally the areas designated are too small to add significantly to what is a perceived lack of industrial land. Approximately one half of our neighborhood is already zoned for and developed as industrial land. That half of our neighborhood lies to the north of NE Sandy Blvd. That land is adequately buffered from the residential portion of our neighborhood by a 45mph state highway (Sandy Blvd.) and rail road tracts.

### Our Recommendations to Return Argay to its Original Purpose:

#### The K-Mart Site, 122<sup>nd</sup> and Sandy Blvd:

Well separated from the single family portion of the Argay neighborhood and currently improved with a commercial property, we see the proposed zoning for this site as logical and sensible. If redeveloped in the future, the new development is unlikely to negatively impact the neighborhood.

#### NE 122<sup>nd</sup> Between NE Fremont and NE Shaver Street:

We support the Comprehensive Plan revision that scales back the commercially zoned land near the corner of NE Shaver and NE 122<sup>nd</sup> (Change #287) and the commercially zoned area immediately to the north of the existing housing near NE Beech Street (Change #289). However, we recommend that these two areas along with the area identified as Change #288, be designated for residential use under an R-5 classification. A survey of our neighborhood commercial properties indicates that several have persistent vacancy issues and relatively low rents, and it has been over 20 years since a new commercial or office building has been built on a vacant site. Many of the existing buildings need to be re-developed to meet modern standards and expectations. Substantial undeveloped commercial zoned land remains available for future commercial and office development under the current zoning. The need for more commercial sites does not seem well supported.

We strongly reject the proposed rezoning of the area which lies to the east of the proposed commercial zoned property to Mixed Employment (Change #287). Commercial use along a commercial corridor like NE 122<sup>nd</sup> Avenue makes good planning sense. Placing additional non-residential uses between the existing residential community and the schools that serve that community does not. Creating additional opportunities for non-residential development further divides the neighborhood and fractures the sense of community that the City of Portland says it seeks to develop and enhance. Mixed Employment development of this area damages the livability of our neighborhood. This area is situated between Parkrose Junior High and Parkrose Senior High across NE 122<sup>nd</sup> to the west and the now under development

Beech Park, and Shaver Elementary (just beyond Beech Park) to the east. The proximity to a new major City park and to all three schools make this area uniquely suited to new single family homes on family sized lots.

Arguing against the uses allowed under the Mixed Use/Employment designation from a functional standpoint is that the area does not offer any light industrial or flex space support services such as nearby similar land uses, high visibility and ease of access, good mass transit access, or even that a proven demand for such space exists. "Build it and they will come" is not a supportable, logical, or proven planning principle. Our over 55 years of neighborhood history proves that. We strongly reject this incompatible use of this prime single family land that should go to support Portland's families and children.

The remaining portion of this now undeveloped area is currently zoned R-3, a hold-over from the failed planning theories of the 1970s. Under the Comprehensive Plan revision, it remains zoned R-3. That zoning should be adjusted to an R-5 classification. Multi-family, small lot single family, and row house development does not allow for family-sized houses with family-sized yards. R-5 zoning of this area reflects the established zoning for most of Portland's family neighborhoods. As stated earlier, we are over-burdened with apartment housing that fails to meet the needs of families. Row housing and small lot high density single family housing has its place, but it is generally seen as a less desirable alternative to more conventional, lower density development and tends to serve singles and couples, not families. There needs to be a place in Portland for moderate density new homes that serve families and that offers close proximity to parks and schools. This portion of our neighborhood is uniquely well suited to serve that need and R-5 zoning of this area is a reasonable compromise between the inadequate R-3 concept and the traditional, existing low density R-7 neighborhoods adjacent to this area. Close to all schools and a major new City park, this land should be used to further strengthen the family-friendly character of the Argay neighborhood, not wasted on incompatible non-residential uses.

Southeast Portion of the Argay Neighborhood, South of NE Milton and West of NE 148<sup>th</sup> Avenue:

We very much appreciate the recognition by the City planning staff that this area zoned R-3 long before annexation in 1984 has failed to attract the supporting neighborhood commercial and service businesses and the level of mass transit service anticipated and needed for the garden apartment style development originally contemplated under that zoning. The suggested down-zone to R-5 single family (Change #688) will help to supply much needed sites for new single family homes, but does not create nearly as much new single family opportunity as a look at the map would suggest. Over half of that area is already developed in a church, a temple, a residential retirement facility, two condominium communities, and one site currently under proposed development with a 56 unit (2,200 square feet/unit using amenity

bonus points) apartment complex. We see the R-5 zoning proposed as a reasonable compromise between the lower density R-7 development of the long existing neighborhoods to the east, south, and west; and the density needs of the City. We endorse this as the best use of this land and suggest that it is the best use of the other areas in Argay which are currently zoned R-3, including the area to the north of NE Milton directly adjacent this section.

Area immediately south of NE Sandy Blvd. West of NE 147<sup>th</sup> Avenue to the Existing 50 year Old Developed Area of Argay:

We recommend down-zoning this area from its current R-3 designation to R-5 single family, the same down-zoning that has already been suggested by the City staff in the Comprehensive Plan revision for the area immediately adjacent to the south. This helps to fill the shortage of single family zoned building sites recognized by the City and is a reasonable compromise between the lower density R-7 development of the existing Argay residential area and the City's need for more compact development

Arguing against the proposed Mixed Employment designation now slated for this area in the draft Comprehensive Plan (Change #290), is the extremely poor vehicle access to this area. Existing and likely future street improvements simply do not support this type of development. Sandy Blvd. is a two lane 45 mph state highway with traffic frequently backed up through as many as three light changes. NE 148<sup>th</sup> is a District Collector, narrow, slightly curving, two lanes and lacking shoulders, curbs, and sidewalks along the portion north of the I-84 overpass. NE 147<sup>th</sup> Avenue is actually an even lower quality roadway which terminates to the north at Sandy Blvd. (exactly at the point of the frequent traffic back-ups) and curves to meet NE 148<sup>th</sup> at its south exit. New traffic generators built on the proposed Mixed Employment land would add further to the current traffic issues. From a functional standpoint, Mixed Employment use is impractical.

Also arguing against the proposed Mixed Employment use slated for this area is that it strongly and negatively impacts an existing residential neighborhood that directly abuts this land to the west. As proposed, no form of adequate buffering is required within the zoning classification. The idea of placing three story office buildings, service and assembly facilities, and potential generators of both dirt and noise pollution just feet from the back fences of the homes of families is totally against the basic beliefs and expectations of Portland residents and is contrary to the image that the City of Portland wants to project: "people and their quality of life they enjoy comes first". Not if this area becomes Mixed Employment development. The families that live in the homes abutting this proposed zoning must be taken into consideration. They did not purchase their homes and spend their time and money improving those homes with the anticipation that they would have anything other than compatible residential neighbors. The small area of limited utility, poorly served industrial land that may be gained by development of this isolated island under Mixed Employment zoning is at the expense of these

families. It damages the livability of our neighborhood and is not in keeping with the image and goals of the City of Portland.

Area Immediately South of NE Sandy Blvd. Between NE 147<sup>th</sup> and NE 148<sup>th</sup>:

We have not taken a position on this portion of the Plan revision. This area is an “overlap area” shared with the Wilkes neighborhood and since the rezoning covers not only that shared area but the area to the east of NE 148<sup>th</sup> which is exclusively within the Wilkes neighborhood it makes sense that the Wilkes neighborhood should help guide its future development.

Conclusion:

The City of Portland has among its six stated goals: “Ensure a safe and peaceful community, Improve the quality of life in neighborhoods, Protect and enhance the natural and built environment.” Within the Comprehensive Plan document we find the recognition that: “One size does not fit all, Plan and design to fit location conditions. Each area of Portland has distinctive and valued characteristics — natural features, community histories, patterns of development and types of buildings. Instead of following a one-size-fits-all approach, harness growth and change to enhance positive and valued community characteristics.”

We believe that the existing zoning within our neighborhood and the proposed land use changes included in the current revision of the Comprehensive Plan must be judged using those goals. If that criteria is applied, the hold-over zoning now in place and the planned revisions in their current form not only fail to meet those goals but they will do significant damage to our neighborhood. We now have an opportunity to change all of that for the better.

Our suggested revisions more closely meet those goals and aspirations voiced by the City of Portland. We know that our suggested alternatives will enhance the quality and livability of our neighborhood. Those revisions return the Argay Neighborhood to its original role as a family neighborhood and take full advantage of the characteristics of the neighborhood: low traffic streets, close proximity to K-12 schools, nearby great city parks, and lots large enough to have back yards kids can play in. Portland needs more neighborhoods that foster family formation and development. This opportunity for Argay to return to its original purpose will come only once, right now, and should not be wasted.

The Argay Neighborhood Association and the residents of the Argay Neighborhood that we represent thank you for this opportunity to testify and demonstrate our concern for the future of our neighborhood.

Argay Neighborhood Association Board of Directors

Submitted: October 28, 2014 on behalf of the residents of the Argay Neighborhood

