

November 4, 2014

Subject: Draft Comprehensive Plan Preliminary Comments

Dear Chairman Baugh, Eric Engstrom, and Planning Commission,

This letter continues discussion of Draft Comprehensive Plan requests made by the Eastmoreland Neighborhood Association Board in December of 2013 as well as providing testimony for the direction of the proposed Comprehensive Plan Update released in July, 2014.

Key Directions

Complete Neighborhoods is a concept we strongly support and in our case this includes support for adjacent neighborhood center plans and for retention of existing neighborhood supported commercial uses as proposed in changes 766 and 639.

One size Does Not Fit All. “Plan and design to fit local conditions” is a concept we strongly support. However reading the details in *GP3* makes clear that the authors have not been listening to cries from neighborhoods across the city and from the Residential PEG group that found “Five Portlands” aka *Pattern Areas* to be an inadequate approach to meet goals for preserving and enhancing neighborhood character while adapting to change.

Noticeably absent in the Key Directions is mention of engaged public participation in guiding the process. Certainly there are public processes influencing the Comprehensive Plan however no mention in *Key Directions*. Given the difficulty of locating and understanding the significance of the various documents associated with the Plan, the cutoff of public verbal testimony on Election Night in early November seems unrealistic and should be aligned with the March 2015 cutoff for written testimony especially since the “Urban Design Direction” which illustrates the intent of the plan was not issued until mid-September 2014.

Planning Goals and Policies

GP4 Design and Development. Goals are laudable. Goal 4A “Context –sensitive design and development” is an important goal that we support but when reduced to “Five pattern areas” it loses most credibility. Context is localized in space - not categorical. The GP4 section deserves a separate critique beyond the scope of this testimony.

GP2-1. Community Involvement notably fails to mention Neighborhood Associations as primary vehicles or even participants for public participation in the planning process. In *GP-4.2* and *4.3* the role of the Neighborhood Associations are similarly omitted.

Historically neighborhood associations are the designated contacts in land use review, requesting neighborhood planning and protecting Portland citizens from destructive impulses of urban freeway visionaries, the pressures of irresponsible development and careless abuse of environmental and cultural resources. While admittedly varying in capacity, these organizations along with business associations (that are mentioned) the Neighborhood Associations need to be

recognized as integral to ongoing success of formulation, implementation and enforcement of policies.

The role of the *Policy Expert Groups* in addressing the Draft Comprehensive Plan is omitted as well. Months of effort by staff and participants should be referenced and hot linked from this document- especially the final draft version of the “Residential Design and Compatibility” report before it was effectively whitewashed by staff editors (see example below).

GP10.5 Land Use Designations. The land use designations indicated for single family residential substantially misrepresent the intended densities. For example, the R5 designation is used to indicate an area in which it is intended that each dwelling has approximately 5,000 square feet of land. In fact lots of 3000 SF are allowed and, at corners, lots as small as 1600 SF. These designations should not be reinforced by approval in the Comprehensive Plan but should be on the docket for reconsideration.

Alternative development options. The policies are intended to make use of “underutilized land”, a worthy goal in concept, but in the details they neglect to consider the unintended impacts when misapplied to a local context. The “alternative development options” effectively double the allowable density by doubling the density on all corner sites, and by including accessory dwellings (that we support when accessory to a primary residence) potentially doubling the density on every site. In RICAP 7 there is a proposal to allow accessory dwellings to be carved off as flag lots.

Another “alternative” land use irregularity is the recognition of substandard platted lots – aka historic lots of record. These are lots or portions of lots that are accidents of history randomly located in the city that may or may not meet the density standards established by the code and were – except in rare instances – amalgamated into larger tax lots. Until 19xx these were not recognized at entitled parcels for building. When they were recognized they were portrayed as empty lots on which smaller more affordable houses could be built. As is well known that is not what happened. By splitting lots, developers were given a free hand to produce clusters of highly inefficient “skinny” housing with garages and driveways dominating the street at a scale that overshadowed neighboring houses and left little open land for landscape or garden. In general they were less affordable than the houses they replaced.

Without considering context, these “one size fits all” policies encourage wasteful redevelopment and infill – often destructive to the fabric of existing or intended neighborhoods and not consistent with other Goals and Policies. They have proved to be corrosive to public trust, often reduce affordability and result in displacement of groups specifically targeted for protection in the goals and policies, and threaten historic architectural and cultural fabric. By definition they greatly increase the carbon footprint from producing replacement materials, and add significantly to landfill from demolition and new construction.

It can be argued that these policies are intended to “make room” for new residents and contain the urban growth boundary. Our information is that these policies are producing little in the way of affordable new housing or accommodating more residents but meanwhile undermining confidence and trust in local government. The primary benefit accrues to private development

interests at the expense of existing neighborhood residents and artificially drives up the value and cost of land and housing.

Summary. The zoning designations need to relate to the context (one size does not fit all). Densities should reflect historic patterns but also a pattern of increased density in the context of planned, complete, neighborhoods. They need to be clear and concise, and they need to be able to be understood by the public as well as City staff responsible for review and enforcement.

[These issues were addressed in considerable depth by the “Residential Design and Compatibility” Policy Expert Group but their recommendations are omitted in the Proposed Draft Comprehensive Plan.]

Submitted by Rod Merrick, AIA
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