



January 21, 2015

Planning and Sustainability Commission  
City of Portland  
1900 SW 4th Avenue, Suite 7100  
Portland, OR 97201

Subject: City of Portland Proposed Draft 2035 Comprehensive Plan

Dear Commissioners:

Following are comments and recommendations from the Northeast Coalition of Neighborhoods (NECN) on the Proposed Draft 2035 Comprehensive Plan. NECN serves to amplify the voices of community members from twelve inner North and Northeast Portland neighborhoods. The comments included in the testimony below were referred by our Land Use and Transportation Committee and were endorsed by the NECN Board of Directors on January 20, 2015.

In identifying Comprehensive Plan priorities and edits, the NECN Land Use and Transportation Committee considered several comments previously submitted to the Planning and Sustainability Commission. Please see the attached documents for additional reference.

### **1. Acknowledgement of the Legacy and Contributions of Neighborhoods**

We support the recommendations of the Public Involvement Advisory Council (PIAC) regarding Chapter 2, the goals and policies on community involvement, specifically:

- Adding language to the chapter introduction referencing the celebrated history of Portland's neighborhood system.
- Appointing an independent body, rather than the Planning and Sustainability Commission, to oversee the Community Involvement Program.
- Clarifying that neighborhood associations and coalitions are an integral and official part of the City's public involvement program, in addition to the other ways that the City seeks to involve the public that incorporates the work of under-represented and cultural communities. Employing a "both and" strategy, rather than an "either or" one will further strengthen this inclusionary effort.

### **2. Industrial development**

#### **A. In relationship to the protection of natural areas**

We support a change in the City's strategy to find new industrial lands to satisfy the requirements of Statewide Planning Goal 9, including the argument that the City to seek an exception to Goal 9. It is imperative that the rezoning and development of industrial lands does not result in the compromise of the health and well-being of our communities and furthermore does not overload the carrying capacity of the air, land, and water resources of our city. In this regard, the

Comprehensive Plan must consider:

- Informing the state that the City cannot remedy its deficit of new industrial land without sacrificing its neighborhoods and its environment, and thus it will seek a Goal 9 exception.
- Increasing its goal of cleanup and redevelopment of existing brownfields, especially those in existing Industrial Zones, to greater than 70% over the next 20 years to maximize otherwise underutilized and/or vacant parcels.
- Removing the City's West Hayden Island Urban Services Area designation and instead retain its current designation as Farm Forest. The proposed zone change would be a step towards the eventual development of this important natural area, a direction our communities do not support. Instead of compromising the health and livability of nearby communities and further stressing the carrying capacity of the surrounding ecosystems, the City should take steps to permanently protect this important natural area.
- Putting our current and future industrial lands to better use by protecting existing industrially zoned land by making it difficult for industrial lands to be up-zoned
- Creating mechanisms that ensure higher densification of jobs on current and future industrial zoned lands, especially where there are public investments.
- Removing proposals to rezone and develop existing golf courses on the Columbia Corridor, as the loss of green space and the natural resources they provide to this highly developed area is of great concern to our Coalition.

### **B. In relation to neighborhood safety and livability**

The Woodlawn Neighborhood Association, whose northern border is Columbia Boulevard, holds deep concerns about volatile substances (including oil, coal, and propane) travelling along railroad tracks just blocks from Woodlawn Elementary School and neighborhood residences. We echo Woodlawn's concerns about the additional negative impacts of heavy industry-related transportation, including:

- The need to increase safety of train traffic and reduce risks to neighbors.
- Increasing transparency about types of freight, levels of emissions, and what steps are being taken to protect the community, including disaster preparedness.
- Allowing the city and other interest groups to lobby for our interests.
- Oil/coal trains: the proposed Kenton Rail Line project would add another line, and the Draft Comprehensive Plan indicates that this line might be used for higher-speed volatile cargos.
- Hazardous cargos are currently carried on trains whose tracks are adjacent or close to multiple propane and ethanol storage tanks and major natural gas pipelines.

### **3. Housing, development and neighborhood compatibility**

We support the comments submitted by several NECN neighborhood associations addressing various aspects of development in or adjacent to residential areas.

#### **a. Concordia Neighborhood Association "Flats" Proposal**

We support Concordia Neighborhood Association's proposal to address demolitions and the loss of middle-income housing stock by suggesting that a new overlay zone that allows multi-family dwelling units be introduced in R5- and R2.5-zoned areas, served by high-quality transit service, which offsets the need for parking. In order to help our neighborhood retain affordability in the midst of rapid infill and development, an

overlay zone allowing for multi-family units would help achieve goals for increasing the supply of affordable housing and slowing gentrification, while reducing pressure on the Urban Growth Boundary. To maintain neighborhood character, such structures would be subject to all of the existing height, setback, lot coverage, and other requirements pertaining to the exterior form; however, the number of dwelling units on the interior would be raised to allow up to five dwelling units per structure in this overlay within R5 and R2.5 zones.

b. Eliot Neighborhood Association Land Use and Transportation Committee Comments

We support the Eliot neighborhood's recommendations related to protecting a residential part of the city that has been drastically impacted by urban renewal actions, specifically:

- Adopting, without delay, Eliot's plan to reduce the current medium density zoning (R2) to a low density zone (R2.5)
- Restricting Rx zoning to the Central City
- Directing infill away from historic districts, including conservation districts, and limiting additional density to existing centers and corridors through appropriate zoning.
- Incorporating the RH zone into the Mixed Use Zone process currently underway at the Planning Bureau to ensure that massing and bulk are compatible with adjacent low density residential parcels, with additional setback and/or step-down provisions for projects within 50 feet of historic buildings or districts (including conservation districts). It should be noted that RH zones have similar off-site impacts on residential sectors of our community with their inclusion of commercial operations. These operations, for instance, could be bars and restaurants with patios and outdoor late night activities until 2:30 a.m. or later which could be directly adjacent to a resident's bedroom.

c. Sabin Community Association

We support the Sabin Community Association's recommended changes to the policy language in chapters 3 and 4 of the Comprehensive Plan Draft, specifically:

- Promote the recognition, maintenance, and preservation of sound housing stock; discourage the demolition of sound housing stock.
- 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.
- Create and enforce scale and pattern policy, i.e., development that respects the scale, character and natural landscape features of neighborhoods.

d. Our Land Use and Transportation Committee elaborated on Sabin's concerns of equity as it relates to solar access, namely: we encourage the City Of Portland to return to a more scientifically valid and protective solar code. The attached language was carefully vetted in the late 1980's here in Portland to both encourage and to protect equitable access to solar resources for all residents and properties.

The current Portland City Code eliminated the attached language and Solar Access Amendments of the 1980's and does little to protect the rights of less affluent home-owners or renters to install new solar photovoltaic or

solar water heating systems.

The current City Code also does nothing to protect existing solar access for already installed solar systems from the rapid development pattern currently impacting many neighborhoods in our City. This currently accounts for a “takings” in Planning nomenclature by removing solar access to existing homes and potentially ensuring only the most affluent and tallest buildings, and their owners, are able to draw from the resource of the sun in the future.

*Please see the attached excerpt from the 1987 City Council efforts to incorporate progressive environmental language into the City code in the form of “Solar Access Amendments” to City Code. The attached document was approved unanimously by City Council.)*

#### **4. Public Health and Safety**

We support the general arguments outlined by the North Portland Land Use Group (NPLUG) regarding a Health Overlay Zone, which would apply specific land use, design, and monitoring requirements on new development to mitigate negative health and safety impacts. However, we have the following comments on NPLUG’s arguments.

- Rather than an overlay, we feel that the health and safety goals outlined in NPLUG’s letter should be applied to the Comprehensive Plan citywide.
- Health and safety concerns must be integrated into codes related to freight and disaster response.
- We feel that the City and Multnomah County should coordinate on the development and implementation of health policies, specifically focusing on hiring and training city staff with expertise in science and public health.

The NECN Board of Directors and our Land Use and Transportation Committee members thank you for your important work for the future of our city, and we appreciate your consideration of our comments.

Sincerely,



Alan Silver  
Chair, NECN Board of Directors



CITY OF  
**PORTLAND, OREGON**  
BUREAU OF PLANNING

8/20 2p TC  
160050

Earl Blumenauer, Commissioner  
Norman A. Abbott, AICP, Director  
Room 1002, 1120 S.W. Fifth Avenue  
Portland, Oregon 97204-1966  
(503) 796-7700

Annexation    Central City Plan    Housing    Code Administration    Land Use    Neighborhood Planning    Urban Design

July 27, 1987

**MEMORANDUM**

TO:            Edna Cervera, Office of the City Auditor  
FROM:        Doug Warren, Code Administration Section *DJW*  
SUBJECT:    Time Certain for Solar Access Amendments

Please schedule the hearing for proposed amendments to Titles 33 and 34, regarding Solar Access Regulations, for 2 p.m. time certain, Thursday, August 20, 1987.

D. Warren  
(ME Data Disk)

**ORDINANCE NO. 160050**

An Ordinance amending Title 33, Planning and Zoning, and Title 34, Subdivision and Partitioning Regulations, of the Municipal Code of the City of Portland, Oregon, to provide new and more effective language to implement the city's solar regulations and to provide a more efficient manner of invoking these regulations in previously approved, but undeveloped, subdivisions, and declaring an emergency.

The City of Portland ordains:

Section 1. The Council finds:

1. On February 18, 1986, the solar access requirements of the Municipal Code went into effect. Since that time, approximately 500 new residential building permits and 50 subdivision plats have been approved.
2. At the time of adoption of these solar regulations, the City Council required that the new provisions be studied during an evaluation period consisting of the first two years of implementation of the new regulations.
3. Such an evaluation study has been conducted by the Bureau of Planning and the Energy Office. These amendments are the first of several sets of amendments to improve the solar access code.
4. The study includes data tabulation and interviews with builders and homeowners for approximately 200 single-family residential construction permits. The study also includes data tabulation and analysis of all subdivisions, variances and adjustments processed since the effective date of the regulations.
5. Preliminary analysis of the evaluation data shows six areas of modification which would improve implementation of the existing ordinance language.
6. Those areas of modification include:
  - a. Streamlining the exception process by using quantifiable criteria to issue building permits.
  - b. Provisions to exempt slopes steeper than 25 percent from the setback requirements because construction of housing on these slopes presents many practical difficulties in meeting setback requirements.
  - c. Expanding the definition of "unbuildable area" so that only areas where dwellings will be built are protected by the solar regulations.
  - d. Incorporation of an actual shadow-pattern provision which would allow flexibility in the method of calculating solar requirements.



- e. Establishment of a solar envelope recordation process for largely undeveloped subdivisions which were approved prior to adoption of the solar regulations.
  - f. Amendments to clean up and make consistent the provisions for solar access between Title 33 and Title 34.
7. Statewide Planning Goal 13 states that "Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles." The solar access provisions of this ordinance are supportive of this goal.
  8. The 1981 state legislature adopted enabling statutes (ORS 227.190) allowing local governments to adopt ordinances to provide and protect solar access.
  9. The City of Portland adopted an Energy Policy (Ordinance 148251) whose principal goal is to

"Increase energy efficiency of existing structures and the transportation system of the city through policies and programs which encourage conservation of nonrenewable energy resources, while maintaining the attractiveness of the city as a place to live and do business."

Policy 4 of the city's Energy Policy, Renewable Resources and Alternative Energy Systems, states,

"The consumption of nonrenewable resources for residential and business use shall be reduced by encouraging the application of renewable and alternative energy sources."

Objective 2 of Policy 4 of the city's Energy Policy is,

"To reduce residential space heating needs by encouraging residential developments which increase opportunities for solar use."

The amendments support these policies, goals and objectives by providing adequate solar access protection, while providing for unusual circumstances and the most efficient administrative means of assessing the adequacy of solar access protection.

10. Goal 7, Energy, of the Portland Comprehensive Plan incorporates the city's Energy Policy. Therefore, the amendments are supportive of Goal 7 of the Comprehensive Plan.
11. The amendments have been reviewed and approved by the City Energy Commission and the Solar Evaluation Advisory Committee.
12. The amendments were reviewed and approved by the City of Portland Planning Commission on August 12, 1987.

NOW, THEREFORE, the Council directs:

- a. Title 33, Planning and Zoning, is hereby amended by deleting Sections 33.98.310, Adjustments to the Solar Setback Regulations, through 33.98.350 and amending Chapter 33.525, Solar Access Design Requirements, as follows:

Section 33.525	<b>Section Titles</b>	*** No Change
Section 33.525.010	<b>Purpose</b>	*** No Change
Section 33.525.020	<b>Conflict Resolution</b>	*** No Change

Section 33.525.030 **Special Solar Access Definitions.** The following definitions are for use in conjunction with solar access design regulations:

A. through B. \*\*\* No Change

C. **Northern Lot Line.** ~~All lot lines at an angle of 45 degrees or less from~~ The line nearest to a line drawn due east-west and intersecting the northernmost point of the lot. The pole of flag lots is excepted. If the north side of a lot adjoins an unbuildable area (defined in P.Ø), the northern lot line shall be at the northerly edge of the unbuildable area.

D. **North-South Lot Dimension.** ~~The average distance between lines from the corners of the northern lot line south to a line drawn due east-west and intersecting the southernmost point of the lot. (Delete Diagram).~~ The length of a line beginning at the midpoint of the northern lot line and extending in a southerly direction perpendicular to the northern lot line until it reaches a property boundary.

E. through O. \*\*\* No Change

P. **Unbuildable Area.** An unbuildable area is one where habitable structures are not permitted or where habitable structures cannot reasonably be expected to be constructed. This expectation can be based on access limitations, on the presence of existing accessory buildings or other permanent uses which are not dwelling units, or on the topography of the land. Areas may include sites designated Open Space on the Comprehensive Plan, rights-of-way, private roads, and commonly owned open space or, parking areas, designated water features, the pole portion of flag lots, or grounds of adjacent institutional or commercial uses. Required yards are not considered unbuildable areas.

Section 33.525.040 **Lots with Recorded Solar Envelopes.**



- A.** For any approved subdivision which was platted prior to September 1, 1987, in which more than 50 percent of the originally platted lots have not been developed, solar envelopes may be recorded as provided in 34.60.040 of the Municipal Code.
- ~~A.~~ **B.** Height Limits. On lots with recorded solar envelopes, no new non-exempt structures or non-exempt vegetation shall violate the solar envelope height limits.
- ~~B.~~ **C.** South Building Lines. No dwelling shall be placed south of recorded solar building lines.

Section 33.525.050. **Lots Without Recorded Solar Envelopes.**

- A.** Affected Zones. The provisions of this section apply to the FF, R20, R10, R7, R5 ~~and~~, R2.5 and C4 zones.
- B.** Affected Structures. \*\*\* No Change
- C.** Structures and Lots Exempted. The provisions of this section do not apply to any of the following:
1. through 6. \*\*\* No Change
  7. All lots with ~~a north facing slope~~ slopes steeper than 25 percent; or
  8. Lots where the adjacent lot to the north is in a zone not protected by the solar design requirements. These zones are R2, R1, RH, RX, ~~and~~ all the commercial zones, except C4, and all the industrial zones; or
  9. Substandard lots which are 3,000 square feet or less in area; or
  10. The applicant cannot build a structure with a 24-foot shadow point at the midpoint of the north-south lot dimension, or a 30-foot shadow point in the R2.5 zone, due to factors on the lot such as easements, drainageways, soil conditions, zero lot line developments, or other similar circumstances; and the proposed structure meets the standards of Subsection 11.b below; or,
  11. The applicant can demonstrate that the height of the proposed structure is no greater in height than the average height of all residential structures within 150 feet of the lot and within a single-family zone; and if the shadow pattern of the proposed structure meets the appropriate standard below:
    - (a) If the lot has a solar factor of 71 or more in all applicable zones or 98 or more in an R2.5 zone, the shadow pattern does not shade the south wall of an existing dwelling. If the northern adjacent lot is vacant, the shadow pattern shall

not extend beyond a point five feet north of the property line and 12 feet above grade.

**(b) If the lot has a solar factor of 44 to 70 in all applicable zones, or 71 to 97 in an R2.5 zone, the shadow pattern does not shade the south roof of any dwelling. If the northern adjacent lot is vacant, the shadow pattern shall not extend beyond a point five feet north of the property line and 12 feet above grade.**

D. Solar Setback Requirements for Lots Without Solar Envelopes.

1. through 3. \*\*\* No Change

**4. Actual Shadow Standard. The shadow pattern of the proposed structure will not shade the buildable area of any lot(s) to the north because of factors affecting the northern lot(s) such as easements, drainageways, yard requirements, or other similar circumstances.**

E. Determination of a Solar Factor for a Lot. \*\*\* No Change

b. Title 34, Subdivision and Partitioning Regulations, is hereby amended to read as follows:

Chapter 34.04 Title and Purpose, \*\*\* No Change

Chapter 34.08, Violation and Continuation \*\*\* No Change

Chapter 34.12, Administration \*\*\* No Change

Chapter 34.16, Definitions

Sections 34.16.005 through 34.16.087(B) \*\*\* No Change

Section 34.16.087

C. Northern Lot Line. ~~All lot lines at an angle of 45 degrees or less from~~ **The lot line nearest to** a line drawn due east-west and intersecting the northernmost point of the lot. The pole of flag lots is excepted. If the north side of a lot adjoins an unbuildable area (defined in O.), the northern lot line shall be at the northerly edge of the unbuildable area.

D. North-South Lot Dimension. ~~The average distance between lines from the corners of the northern lot line south to a line drawn due east-west and intersecting the southernmost point of the lot. (Delete Diagram).~~ **The length of a line beginning at the midpoint of the northern lot line and extending in a southerly direction perpendicular to the northern lot line until it reaches a property boundary.**

E. through N. \*\*\* No Change



- O. **Unbuildable Area.** An unbuildable area is one where habitable structures are not permitted or where habitable structures cannot reasonably be expected to be constructed. This expectation can be based on access limitations, on the presence of existing accessory buildings or other permanent uses which are not dwelling units, or on the topography of the adjacent land. Areas may include sites designated Open Space on the Comprehensive Plan, rights-of-way, private roads, and commonly owned open space ~~or~~, parking areas, designated water features, the pole portion of flag lots, or grounds of adjacent institutional or commercial uses. Required yards are not considered unbuildable areas.

Sections 34.16.090 through 34.60.030

\*\*\* No Change

Section 34.60.040 Lot Standards for Solar Access. New single-family-zoned lots shall be supportive of solar-efficient development through the following requirements.

- (A) **Applicable zones.** In the FF, R20, R10, R7, R5, ~~and R2.5 C5~~ and C4 zones, solar envelopes are required for all subdivisions and major partitions. For any approved subdivision which was platted prior to September 1, 1987, in which more than 50 percent of the originally platted lots have not been developed, solar envelopes may be recorded. The solar envelopes will be reviewed and approved by the Planning Director for compliance with the standards of this section, using the minor land division process. Any major changes to the plat may require resubdivision through a major land division process.
- (B) **Required Solar Envelopes.** Unless exempted in (D) below, solar envelopes are required for all lots as follows:
- (1) For all applicable zones, no less than 90 percent of all lots shall be shaped and placed to have a solar envelope which is no higher than ~~6~~ 8 feet above grade at the northern lot line.
  - (2) However, the Hearings Officer, or the Planning Director in the case of a pre-existing subdivision as described in 34.60.040(A), shall approve lots with solar envelopes that are 14 feet above average grade at the northern lot line when, because of the solar envelope, there is no other lot pattern or arrangement which would allow for the development of a structure with a 24-foot shade point, at the midpoint of the north-south lot dimension, or a 30-foot shade point in an R2.5 zone, because of:

(a) through (C)(4)

\*\*\* No Change

**ORDINANCE No.**

7

(D) Exempted Lots. Solar envelopes are not required for lots where the applicant can demonstrate one of the following:

(1) The lot is on a ~~north~~ slope steeper than 25 percent; or

(2) through (3) \*\*\*No Change

(4) That the adjacent lot to the north is in an R2, R1, RH, RX zone or any commercial (except C4) or industrial zone; or

(5) \*\*\*No Change

Sections 34.70.010 through Chapter 34.110 \*\*\*No Change

Section 2. An effective date of September 1, 1987, is necessary to meet LCDC notification requirements and yet provide the earliest effective date for streamlining solar access requirements: therefore, the Council declares that an emergency exists and this Ordinance shall be in force and effect on September 1, 1987.

Passed by the Council, **AUG 20 1987**

Bureau of Planning  
July 31, 1987

**BARBARA CLARK**

Auditor of the City of Portland

By

*Edna Cowera*

Deputy

Calendar No.

ORDINANCE No. 160050

Title

An Ordinance amending Title 33, Planning and Zoning, and Title 34, Subdivision and Partitioning Regulations, of the City of Portland, Oregon, to provide new and more effective language to implement the City's solar regulations and to provide a more efficient manner of invoking these regulations in previously approved, but undeveloped, subdivisions, and declaring an emergency.

Add emergency clause

THE COMMISSIONERS VOTED AS FOLLOWS:		
	Yeas	Nays
BLUMENAUER	✓	
BOGLE	✓	
KOCH	✓	
LINDBERG	✓	
CLARK	✓	

FOUR-FIFTHS CALENDAR	
BLUMENAUER	
BOGLE	
KOCH	
LINDBERG	
CLARK	

THE COMMISSIONERS VOTED AS FOLLOWS		
	YEAS	NAYS
BLUMENAUER	✓	
BOGLE	✓	
KOCH	✓	
LINDBERG	✓	
CLARK	✓	

Filed AUG 14 1987

BARBARA CLARK

Auditor of the CITY OF PORTLAND

By Mammy Dunford Deputy

INTRODUCED BY
Commissioners Lindberg and Blumenauer

NOTED BY THE COMMISSIONER
Affairs <u>MP/let</u>
Finance and Administration
Safety
Utilities
Works <u>Earl Blumenauer</u>

BUREAU APPROVAL
Bureau: <u>Comm. Lindberg</u>
Prepared By: <u>Doug Warren</u>
Date:
Budget Impact Review: <input checked="" type="checkbox"/> Not required
<input type="checkbox"/> Completed
Bureau Head:

CALENDAR
Consent <input checked="" type="checkbox"/> Regular

NOTED BY
City Attorney
City Auditor
City Engineer





**\*\*\*NECN-LUTC members and participants: for discussion at our 12/2/14 meeting, please review comment #5, highlighted on page 4 of this document.\*\*\***

November 10, 2014

Planning and Sustainability Commission  
City of Portland  
1900 SW 4<sup>th</sup> Avenue, Suite 7100  
Portland, OR 97201

**Subject: City of Portland Proposed Draft 2035 Comprehensive Plan**

Dear Commissioners:

Following are comments and recommendations from the City of Portland's Public Involvement Advisory Council (PIAC) on the Proposed Draft 2035 Comprehensive Plan. PIAC is a City commission charged with advising elected officials on public involvement in government citywide, and with helping City bureaus improve their community outreach and engagement practices. Established by City Council in 2008, PIAC is comprised of both community members and bureau staff.

Members of PIAC have worked closely with Bureau of Planning and Sustainability (BPS) staff, through both PIAC and the Policy Expert Group (PEG) for the Comprehensive Plan community involvement chapter. We have greatly appreciated the opportunity for sustained input on earlier drafts of the Comp Plan, and for a productive, collaborative relationship with BPS staff over the past two years, particularly Marty Stockton through PIAC and the PEG and Deborah Stein through the PEG. PIAC's comments are intended to offer the collective expertise and experience of PIAC members to strengthen an already strong document, and we limit our remarks to Chapter 2, the goals and policies regarding community involvement.

Our overarching comment is that the community involvement chapter is **clear, comprehensive and exceptionally relevant** to an evolving Portland. It is responsive to the mandates of State planning law, and consistent with the vision of the Portland Plan. PIAC strongly **supports the intention to develop a manual** to guide the implementation of the Plan's policies, and we believe this approach has the potential to become a model for other jurisdictions.

Where PIAC recommends revisions to the proposed draft, it is generally to restore elements that were removed from the previous draft we reviewed in March.

## Recommendations

1. **Make a clear distinction between policies that require ongoing action by bureaus and their staff and policies that are project-specific.** This distinction was made and explained throughout earlier drafts on which PIAC members had input. It is an important distinction because it clarifies (a) who is responsible for carrying out the policy (the bureau as a whole or an individual staff member), (b) when the policy applies (as part of an ongoing program or when staff begin to work on a project), and (c) how to evaluate a policy (as part of an ongoing program or as it was implemented for specific projects). The previous draft of the Plan achieved this by categorizing policies 2.1-2.16 as “ongoing” and policies 2.17-2.33 as “project-specific.”
2. **Restore policy language on adequate funding for the community involvement program.** In order to carry out the policies of the Comp Plan, bureaus must devote sufficient financial and staff resources to the community involvement program itself, and must provide staff with training and support. Indeed, the commitment of adequate resources marks the difference between a policy that makes a meaningful difference in the City’s work and one that looks good on paper.

PIAC understands the recommendations from the City Attorney and OMF to remove funding questions from Comp Plan policy on the grounds that “The budget is not a land use decision” (Editing Change List note). However, the intent of this policy is not to compel elected officials to increase bureau budgets, but to direct bureaus to allocate a sufficient portion of their budgets (whatever those budgets might be) to implement the requirements of the Comp Plan.

3. **Appoint an independent body, rather than the Planning and Sustainability Commission (PSC), to oversee the Community Involvement Program.** Throughout the process of community input on earlier drafts of the chapter (including the Community Involvement PEG), the composition of the Community Involvement Committee (CIC) was left unspecified. In the proposed draft, a subcommittee of the PSC serves as the CIC. The reason for this decision is not discussed in the Editing Change List. We understand that there are resource constraints in establishing new committees. However, PIAC believes there are advantages to appointing a separate body apart from the PSC.

First, the CIC must have the capacity to evaluate community involvement programs for multiple bureaus, review community involvement plans for numerous individual projects, and create and maintain a community involvement manual to implement the Comp Plan goals and policies. It

seems unrealistic to expect the PSC, a body already charged with significant responsibilities and workload, to take on this additional role.

Second, we concur with the State's Citizen Involvement Advisory Committee (CIAC), the body that advises Oregon's Land Conservation and Development Commission (LCDC) on public involvement in land use planning, that the multiple responsibilities of the PSC can detract from, or even conflict with, the role of the Committee on Citizen Involvement (CCI):

"Having a CCI – a committee with citizen involvement as its *only* responsibility – ensures that citizens are not forgotten in the planning process.... An independent CCI is the best choice to ensure widespread public involvement. The hybrid planning commission/CCI is an acceptable but less desirable choice. Finally, the least desirable option is having the governing body or the planning commission act as the CCI. It's likely to work against citizen involvement and should be done only as a last resort" (CIAC, *Putting the People in Planning*, May 2008, pp. 8-9).

The City of Portland should strive to be a leader within Oregon, demonstrating best practices in the institutional design of its community involvement program.

- 4. Restore previous language applying the Comp Plan to "plans, policy, investment and development decisions" where it was replaced by "land use decisions" in the proposed draft.** PIAC is concerned about the nearly blanket change in "plans, policy, investment and development decisions" to "land use" because it seems to restrict the application of the Comprehensive Plan unnecessarily. The Comprehensive Plan applies to infrastructure projects, capital investment and development decisions, in addition to land use planning.

PIAC recommends that the previous language be restored throughout, or that the language be restored selectively to those policies that apply to "plans, policy, investment and development decisions" beyond land use alone. It is important to avoid the implication that the Comp Plan only applies narrowly to land use decisions and the work of the Bureau of Planning and Sustainability.

PIAC is tasked with recommending policies and practices to expand public involvement in city government. Even if the term is defined broadly, we are concerned that the use of "land use" alone could limit public involvement by creating the perception that the Comprehensive Plan does not apply to other kinds of government decisions. The issue of community perception, and its potential effect on community participation, is critical as you reexamine this language.

5. Add language to the chapter introduction referencing the celebrated history of Portland's neighborhood system. Our city's early commitment to community involvement in government is recognized internationally, and the neighborhood system has been central to that history. The January 2013 draft of Chapter 2 summarizes the evolution of the system and the continuing challenge to become even more inclusive. As we chart a course forward, PIAC believes it is appropriate to reference where we have been, and to reassure the community that the intent of the Comprehensive Plan is not to dismantle the neighborhood system.

Specifically, we recommend the following revisions to the proposed chapter introduction on page GP2-1 (new language in **bold**, most of which is taken from the previous draft of the Plan):

"The results are better — more durable, equitable and accountable — when a wide and diverse range of Portlanders are involved in the scoping, development and implementation of plans and investment projects. **No one person, agency, organization, or business can provide all the things Portland's diverse communities need.** Collaborative partnerships and inclusive community participation in land use decision making are essential to creating and sustaining a prosperous, healthy, equitable and resilient Portland.

**Portland has a long history of community involvement that gained strength and power in the 1970s and forms the foundation of today's neighborhood system.** As the city grows, diversifies, and works to advance equity, it is essential that all community members' needs and concerns are considered. Particular efforts must be made to improve services **and participation** for people of color, immigrants and refugee communities, people with disabilities, renters, low-income Portlanders, older adults, youth, and the lesbian, gay, bisexual, transgender and queer (LGBTQ) community. **A new paradigm of community involvement and engagement that supports intercultural organizing, recognizes that diversity is an advantage, and works to achieve equitable outcomes must be embraced and paired with Portland's neighborhood organizations to create a robust and inclusive community involvement system.**

It is the City's responsibility to promote deep and inclusive community involvement in land use decisions."



## 6. Additional Recommendations

- Remove “as appropriate” in policies 2.7, 2.25, 2.28 and 2.31.
- Direct bureaus to collect data regularly as an ongoing activity. This is implied by the policies on evaluating, sharing and using data (policies 2.7, 2.8, 2.19), but it is not stated explicitly. We recommend changing the first phrase in policy 2.8 to “Collect and evaluate data...” We also recommend changing the order of policies 2.7 and 2.8, and changing the title of policy 2.7 to “Community participation in data collection.”
- Revise policy 2.16 to emphasize two-way sharing of engagement methods. Add the phrase in **bold** to the proposed policy: “Coordinate and share methods, tools, and technologies that lead to successful engagement practices with both government and community partners, **and solicit engagement methods from the community.**”
- Define key terms from this chapter in the glossary: “accountability,” “engagement,” “accessible” and “community verified data.”

PIAC members thank you for your important work for the future of Portland, and we appreciate your consideration of our comments.

Sincerely,

Public Involvement Advisory Council  
City of Portland

[Attachment: List of PIAC Members](#)

## **PIAC Members**

### Community Members

Claire Adamsick – NE neighborhood coordinator  
Mohamed Ali – Immigrant & refugee service provider  
Glenn Bridger – SW neighborhood activist  
Baher Butti – Refugee case manager  
Donita Fry – Native American Youth and Family Center  
Greg Greenway – Public engagement consultant  
Maryhelen Kincaid – North/NE neighborhood activist  
Julio Maldonado – SE neighborhood and EPAP  
Linda Nettekoven – SE neighborhood activist  
Jessica Wade – Educator  
Christine White – Port of Portland communications  
Mark Wubbold – Policy analyst, Portland State University

### City Staff Members

Kelly Ball – Office of Management & Finance  
William Beamer – Bureau of Planning & Sustainability  
Ross Caron – Bureau of Development Services  
Michael Crebs – Police Bureau  
Rhetta Drennan – Bureau of Environmental Services  
Tim Hall – Water Bureau  
Brian Hoop – Office of Neighborhood Involvement  
Denver Igarta – Bureau of Transportation  
Aaron Johnson – Fire & Rescue Bureau  
Paul Leistner – Office of Neighborhood Involvement  
Steve Pixley – Parks & Recreation Bureau  
Jeff Selby – Office of Equity and Human Rights  
Marty Stockton – Bureau of Planning & Sustainability

*Letter from the Concordia Neighborhood Association Board of Directors  
Tuesday, October 14, 2014*

To Whom It May Concern,

The recent wave of home demolitions in the City of Portland has left many residents scratching their heads and looking for solutions. One concern often expressed is that many of the demolitions are simply to replace a smaller, older, more affordable home with a new, larger, more expensive home. For adjacent neighbors, it is difficult to understand what benefit is being received by anybody but the developer: no additional housing units are being created, so pressure on the Urban Growth Boundary is not reduced. The price of the unit in question is actually sharply increased, so the shortage of affordable housing units is actually made worse. In short, it's hard to see how this trend actually helps the city or the region achieve any of our broader planning goals, aside from raising revenue.

Based on a series of recent discussions, and acknowledging that the wave of home demolitions will not be stopped, it is the position of the Concordia Neighborhood Association's Board that the following solution should be implemented as a part of the Comprehensive Plan update process to ensure that at least some of the demolitions will be followed by projects that do actually contribute towards meeting some of our broader community planning goals:

Within walking distance of Frequent Service transit routes (however the City chooses to define this -- 1/8, 1/4, 1/2 or 1-mile crow-fly or network buffer of frequent service transit routes or stops), there should be a new overlay zone created that allows for a residential property containing up to 5 separate residential housing units in a structure that otherwise conforms to the building envelope and setback provisions of its zoning designation (i.e. in an R5 zone, one main dwelling structure per each 5,000 sq ft lot, with required front, side and rear setbacks). The intended purpose of this overlay would be to allow for new residential structures to be constructed containing a number of "flats," i.e. 2-4 story residential structures that look like houses where each floor is a separate housing unit (or a variation where each floor has two units, one on the right and one on the left). This type of structure is the workhorse backbone residential product of places like San Francisco's Mission District, certain areas of Boston, London, and other successful world cities; indeed, Portland has examples of this type of structure in inner SE and the NW Alphabet District that were built in the late 19th and early 20th century.

The end result would be that, rather than a demolition to replace a \$250,000 home with a \$700,000 home, the replacement unit could potentially contain three flats averaging \$250,000 each. One affordable unit could thus be replaced by three affordable units, which would help to achieve goals for increasing the supply of affordable housing, and also reduce pressure on the Urban Growth Boundary. The overall cost would be somewhat higher, due to the need to provide additional kitchens, bathrooms, laundry and common facilities, in addition to the additional impact fees that the City would likely require. However, the price per unit would be significantly lower for the finished product.

We would propose that, because this overlay zone would only exist within areas served by high quality transit service, that automobile parking requirements should remain the same as if the structure were a single-family home; but that off-street parking should be

provided for bicycles at a rate of a minimum of one secure off-street bicycle parking space per bedroom.

It's possible that some neighborhoods would not want to see this type of unit constructed within their boundaries; as such, perhaps this overlay zone is something that could be rejected within its boundaries by a vote of the board of a neighborhood association. That would allow neighborhoods such as Concordia to allow this type of development in the appropriate areas near high quality transit, while neighborhoods like Laurelhurst and Eastmoreland could vote to reject it in favor of preserving their historic single-family character.

While we would love to find ways to slow down the wave of home demolitions, this proposal would allow us to live with the demolitions with the peace of mind that the replacement structures are at least helping us to achieve our broader community planning goals, bringing in more residents to help support neighborhood businesses, providing for more affordable housing, and reducing pressure on the Urban Growth Boundary.

We recommend that this proposal be studied and that language to implement it be developed and included as a part of this Comprehensive Plan Update process.

**Eliot Neighborhood Association**  
**Land Use and Transportation Committee**  
Mike Warwick, Chair

**Comments on the Draft Comprehensive Plan**

The Eliot neighborhood has a greater stake in the Draft than most others because of its proximity to the Central City, its historic and cultural significance and the unfortunate legacy of urban renewal actions that have significantly reduced to a fraction of its original size. The Albina Plan was the first effort to redress this legacy. By working diligently and closely with City staff, the current Draft takes additional steps, although that work is still incomplete. To continue that effort we offer the following recommendations.

- 1. First and foremost, the current Draft zoning proposal corrects many problems with the current Comprehensive and Zoning Plan (the Albina Plan). The Plan for Eliot should be adopted as is, without adjustment, and as promptly as possible to prevent further damage to Eliot from the current, inconsistent zoning.**

The Draft zoning best accomplishes the Plan’s goals to “preserve unique neighborhoods” while allowing for growth along “corridors” and focused on “centers.” This goal was achieved by reducing the current medium density zoning (R2) within the Eliot Historic Conservation District to a low density zone (R2.5). This lower zone was the dominate zone prior to the Albina Plan, so reverting to it is the *equitable* thing to do in light of the City’s legacy in the area. To compensate for potential housing loss, properties along “corridors” and proximate to the Williams/Fremont center, were zoned to accommodate more dense housing and “mixed use” development that is expected to provide employment for community residents without advanced degrees as well as additional housing.

The Draft increases areas in Eliot targeted for “mixed use” zoning. Although the new “mixed use” zone is currently undefined, Eliot is opposed to extending the schedule for plan review and adoption. Continued application of current zoning in Eliot is an existential threat to the neighborhood; one Eliot cannot afford simply to satisfy wealthier neighborhoods.

- 2. Strengthen protections for historic neighborhoods, not just buildings. This should include additional setback and/or step-down provisions and/or distances for projects within 50 feet of either historic buildings or districts (including conservation districts).**

The Plan pays lip service to historic preservation. When it is referenced it is generally specific to building preservation. There is more to history than a building here and there. The Eliot neighborhood deserves protection of its historic character and residential fabric for at least four reasons:

- A. Some researchers believe that what is now the Eliot neighborhood may have been the site of the Hall Kelly’s City, which was founded in 1834. That would make it the oldest city between San Francisco and Seattle, predating the founding of the City of Portland and of the City of Albina.



- B. Eliot was platted and developed prior to the automobile age. It was crisscrossed with street car lines. It is the last and largest remnant of Portland's original streetcar neighborhoods. That unique character and neighborhood fabric deserves protection by itself. But there are also two cultural reasons.
- C. Eliot was home to Portland's largest German community at the end of the 19<sup>th</sup> and early 20<sup>th</sup> Century. It was called "Germantown" for that reason. This community was primarily composed of "Volga" Germans; Germans who emigrated from Russia. They left behind a rich legacy of homes (mine is one) and churches when the original residents died or disbursed.
- D. The more recent and better known cultural legacy was as the commercial center for Portland's black community. Part of that legacy is also as a multicultural community, as Eliot's proximity to the railyards and industry made it home to both black and white working class families.

This legacy is an important part of Portland's history and identity and deserving of protection. It relates to the rebirth of Portland's streetcar development and its protection will prevent the elimination of cultural touchstones for Portland's German and black communities.

### **3. Restrict Rx zoning to the Central City.**

The Rx zone is characterized in Title 33 as a "Central City zone." Eliot is alone among Albina Plan neighborhoods to have Rx zoning. It should not have any Rx zones. The proposed plan reduces this to the more appropriate Rh or R1 depending on the current density.

### **4. Revise the Rh zone.**

The current Rh zone allows for heights that are incompatible with adjacent low density residential parcels and it has no provision for setbacks adjacent to historic properties or districts (which Ex does). This is an issue primarily because height and FAR bonuses are granted if the parcel is within 1,000 feet of transit facilities. We recommend some or all of the following:

- A. Incorporate the Rh zone into the Mixed Use zone.
- B. If elimination of the zone as above isn't possible, apply the same setback and step-down requirements to the Rh zone as will be imposed in the new Mixed Use zones.
- C. Reduce the distance from transit streets for height and FAR bonuses. The current 1,000 foot limit encompasses all of Eliot and almost all of Irvington, both historic districts where 75 to 100 foot tall buildings are inappropriate.

### **5. Direct infill away from historic districts (including conservation districts).**

The current draft directs infill to "inner" neighborhoods. Eliot is one of those. The existing homes that are currently affordable to teachers and city workers are being demolished by infill developers and replaced with townhomes. This is destroying the historic character of these neighborhoods. Ironically, the policy is justified as a response to "gentrification," a term which is misapplied in this case, partly due to poor statistical analysis. Home sale prices in Eliot are consistent with the median sales price city wide. The rapid increase in price is due to the purchase of homes from absentee landlords and their subsequent rehabilitation and their transition from slumlords to proud home owners. At present, existing homes in Eliot are about

as “affordable” as elsewhere in the inner city. However, part of the “statistical” increase in average home price is a consequence of infill. The townhomes that replaced existing, affordable homes are selling for two to three times the price of the home they replaced. Those prices aren’t “affordable” and they drag the average home price up. In simple terms, the City’s infill policy is causing “gentrification,” as well as destroying the “unique neighborhoods” the Plan pledges to preserve. Additional density in historic inner neighborhoods should be limited to centers and corridors through appropriate zoning rather than encouraged within established historic district boundaries.

Thank you Chairman Baugh, and Members of the Planning and Sustainability Commission,

My name is Micah Meskel, I am a Northeast Portland resident and a board member of the Northeast Coalition of Neighborhoods. NECN is a nonprofit organization comprised of twelve inner North and Northeast neighborhoods in the City of Portland that represents thousands of Portland residents.

Today, I am speaking on behalf of myself, to some general themes of the draft comprehensive plan that NECN's land use committee and full board may consider addressing in detailed written comments in the coming weeks.

In general, the City needs to take a more sustainable and balanced approach in its strategy for addressing industrial land demand in its comprehensive plan. Industrial zoned lands provide jobs and help drive portions of our local economy and community, but the quest to secure additional industrial land should not trump the health of our communities and environment. The livability of our neighborhoods is a huge asset and should not be compromised. In the draft comprehensive plan there are several industrial land sanctuaries (most notably are proposed changes #297 Broadmoor Golf Course, #298 Riverside Golf Course, and #321 West Hayden Island) which are proposed in North and Northeast Portland. These specific proposals would pave over significant swathes of existing open space and natural areas and develop portions of them as industrial sanctuaries. Upon rezoning and the development that follows, the surrounding neighborhoods will likely see an increase in pollution and loss of significant environmental benefits that these open spaces provide, with no real promise of economic benefits to the effected communities.

Instead of looking to pave over our last few remaining large intact open spaces, like golf courses and natural areas near our neighborhoods, the City and Bureau should look for other ways to secure industrial lands and jobs for our city and communities. The city should take a more sustainable strategy forward;

- A strategy that includes a greater emphasis on cleaning up existing brownfields, one that strives to redevelop greater than 60% of existing brownfields.
- A strategy that looks at promoting the intensification of jobs on current and future industrial lands which will provide more jobs per acre
- A strategy that restricts the ability of industrial landowners to up-zone industrial land for other uses

If these strategies don't bring the City to reaching its industrial lands goals then it needs to consider taking a serious look at seeking a Goal 9 exception from the State of Oregon. Goal 9 is the driving force behind many of these proposals that will adversely affect our North and Northeast Portland neighborhoods. The City needs to determine if a landlocked Portland can really continue to find large parcels of developable lands without completely compromising the health of its communities and environment now and into the future.

I would like to thank the City and Planning and Sustainability Commission for hearing testimony this evening and NECN will be submitting detailed written comments in the coming weeks.

Thank You

To: North Portland Land Use Group (NPLUG)  
From: Cole Grisham, Friends of Cathedral Park  
Date: 02 October 2014  
Subject: Health Overlay Zone

## **Introduction**

North Portland is a vibrant, diverse community of single and multi-family homes, commercial centers, and industrial preserves situated at the confluence of the Columbia and Willamette rivers. Our eleven neighborhoods face increasing growth and density in the coming years. The City of Portland Comprehensive Plan identifies inner neighborhood areas such as North Portland as ideal for increased density. The plan recognizes, however, that increased density carries with it the challenge of maintaining a healthy, connected city where residents have access to clean air, accessible green space, and vibrant employment centers.

In order to meet the coming growth in our community without compromising the health and well being of our residents, North Portland's neighborhood representatives recommend a health overlay zone. This zone applies specific land use, design, and monitoring requirements on new development in North Portland to mitigate negative health and safety impacts. The health overlay zone supports a vision along with goals and strategies outlined below that together preserve and enhance our way of life while accommodating new development in our community.

Our community draws inspiration for our recommendations from two key sources. Portland's comprehensive plan update, Policy 4.28.d, encourages design and land use patterns that mitigate negative air quality and noise impacts in Portland neighborhoods, especially near high vehicle traffic areas, and other sources of air pollution. Similarly, Portland's Climate Action Plan (CAP) goals 1-4 aim to reduce the environmental impacts of new development through more sustainable land use and design principles.

## **Vision**

*A North Portland community that preserves and enhances the health and well being of its residents while accommodating growth and density needs.*

## **Goals**

To achieve our vision, North Portland's neighborhoods propose the following three goals:

- *Better Air and Water Quality:* Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on energy demand, air conditioning use, air pollution and greenhouse gas emissions, heat-related illness and mortality, and water quality.
- *Reduced Noise Pollution:* Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on unwanted or distressing sound.
- *Increased Safety:* Land use, design, and monitoring requirements that reduce or minimize the negative impact of future development on criminal activity and emergency preparedness.

## **Strategies**

Goals provide benchmarks by which to measure progress towards our vision. Each goal, however, is supported by specific, actionable strategies that residents, community leaders, and City of Portland staff can use to better our community. We provide an illustrative list of strategies below based on NPLUG discussions, but we expect individual neighborhood association meetings to generate and refine strategies to best fit our community vision.

### *Better Air and Water Quality*

- Install air-monitoring stations in North Portland neighborhoods
- Improve storm water management design standards for new developments
- Require low-emissions freight vehicles
- Preserve and build connections between existing green spaces
- Require air filtration in all new housing developments
- Plant trees that will help filter the air of carbon dioxide, harmful particulates, and other atmospheric contaminants in all new housing developments

### *Reduced Noise Pollution*

- Improve noise abatement design standards for new developments
- Install noise abatement walls or similar constructs between residential areas and freight corridors

### *Increased Safety*

- Educate residents on emergency preparedness procedures
- Improve coordination between neighborhood organizations and Portland Police Bureau North Precinct services
- Improve coordination between neighborhood organizations and Portland Fire and Rescue
- Improve coordination with other neighborhood, city, county, and state emergency and safety preparedness groups

## **Conclusion**

These goals and strategies support our community vision of a North Portland that accommodates future growth and density without compromising our health, safety, or well being. By incorporating these elements into the City of Portland comprehensive plan update, we may ensure our community is ready and capable of meeting future growth needs while guaranteeing existing and future residents enjoy a healthy, safe, and vibrant North Portland.



October 13, 2014

VIA EMAIL AND US MAIL

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

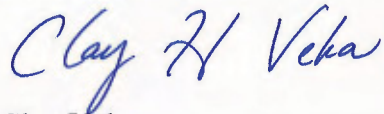
- *SCA Recommendation:* Delete “relocation” from the list of activities to be encouraged.

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.

Planning & Sustainability Commission  
October 13, 2014  
Page 5

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

Sincerely,



Clay Veka  
President, Sabin Community Association  
Sabin Community Association  
c/o NE Coalition of Neighborhoods  
4815 NE 7th Avenue  
Portland, OR 97211

cc: Mayor Charlie Hales, [mayorcharliehales@portlandoregon.gov](mailto:mayorcharliehales@portlandoregon.gov)  
Commissioner Amanda Fritz, [Amanda@portlandoregon.gov](mailto:Amanda@portlandoregon.gov)  
Commissioner Nick Fish, [nick@portlandoregon.gov](mailto:nick@portlandoregon.gov)  
Commissioner Steve Novick, [novick@portlandoregon.gov](mailto:novick@portlandoregon.gov)  
Commissioner Dan Saltzman, [dan@portlandoregon.gov](mailto:dan@portlandoregon.gov)  
BPS Director Susan Anderson, [Susan.Anderson@PortlandOregon.gov](mailto:Susan.Anderson@PortlandOregon.gov)

**Woodlawn LUTC Comp Plan Feedback**  
**Submitted by Anjala Ehelebe - 12/1/2014**

**Environmental:** We are against turning green spaces in the Riverside and Broadmoor golf courses into industrial areas; these concerns link with the N Portland air quality comments and Mikel's testimony. Also against turning W Hayden Island into a port facility. Plans for creating industrial areas along Lombard and Columbia go against the need to develop affordable housing, and also could increase the pollution in North and NE Portland. They would definitely increase the number of heavy trucks through the neighborhood.

**Safety:** Deep concerns about the volatile items being shipped on trains through our neighborhoods and the potential for explosions or environmental catastrophe. We now have propane tanks added to the areas near the railroad. Shipping oil, gas, ammonia, coal, or flammable liquids carries risk. The plan proposes adding another track. (Kenton Rail Line project). This additional track could increase shipping of volatiles and at higher speeds. We have grade schools and residences extremely close to the tracks. Our neighborhood center is well within the blast radius (which goes from the tracks to almost Holman Street, in the Woodlawn neighborhood).

**Transportation:** A proposed plan for a bridge over the train tracks near 11th or 13th would need closer examination. This bridge could be a good thing, allowing emergency vehicles to cross from south to north without having to detour to MLK when a train is on the tracks.

**Institutional Campus Zones:** We have concerns about this zoning as to how it could increase the ability of a school to expand into residential areas and its effects on parking.