



Nov. 29, 2017 <sent this date to the email addresses below>

City of Portland

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Subject: RCPNA testimony on the Residential Infill Project (RIP) Discussion Draft Refinement Project, 6+ Month Extension Request and Recommendations

Dear BPS RIP Staff, Morgan Tracy and team,

Thank you for the opportunity to comment on the BPS's Residential Infill Project Discussion Draft. We understand that the comment period for this draft is to conclude on Nov.30, 2017, by 5:00 pm.

On Nov. 7<sup>th</sup>, 2017, the Rose City Park Neighborhood Association Board unanimously agreed to the Recommendation:

"The Public Comment Period for the RIP Discussion Draft deadline needs to be postponed for at least 6-months".

(Supported by 86% surveyed)

*The Board's reasoning for this comes from opponents and proponents, alike, including:*

- 1. A better understanding of the potential infrastructure and service impacts of the proposal, including schools, stormwater, sanitary sewer, water, power(electricity & gas), communications, and private utilities;*
- 2. To allow more neighborhoods the opportunity to review the massive RIP documents proposed and make knowledgeable recommendations; and*

3. *To allow the City to better explain the housing need for small apartments that would be at the sacrifice of existing home ownership housing.*

On November 16, 2017, the RCPNA Land Use and Transportation Committee added to this recommendation. A neighborhood survey was developed the last week in October that was based on LU & TC Oct. 19th RIP Tentative Recommendations. This survey was publicized on Nov. 2<sup>nd</sup> to the neighborhood residents and businesses using emails through MailChimp, Nextdoor blog, and our RCPNA.org and Facebook websites. This neighborhood survey was concluded on Nov. 15<sup>th</sup> and used as the basis for the Committee discussion. This survey received 135 responses and all respondents provided their names and addresses, confirmed as located within RCPNA boundaries.

The RCPNA LU & TC unanimously also Recommends the following:

1. Reject the RIP Discussion Draft proposing "a" Overlay for all Low Density Residential Properties , based on:
  - A. Impact on existing neighborhoods is too excessive. Will spur additional demolition of existing homes by developers in order to create higher density and increased cost rental housing/square foot;
  - B. 'Centers' shown for use in 'a' Overlay(p.45 of <https://www.portlandoregon.gov/bps/article/657688>) conflicts with 'Centers' in adopted 2035 Urban Design Framework map, Figure 3-1, p. 29 Chapter 3 Urban Form (<https://www.portlandoregon.gov/bps/article/579166>). Proposal wrongly identifies 60th St. Station Area as a 'Center' from which properties within a 1/4 mi. radius from its edge are included in the 'a' Overlay
  - C. Fails to comply with City Council's 12/09/16 RIP direction, "Council did not vote on the conceptual boundary criteria for the Housing Opportunity Overlay Zone. Rather commissioners asked staff to come back early next year with mapping options." BDS has failed to provide Housing Opportunity Overlay Zone/'a' Overlay mapping options.

(Supported by 84% surveyed)

2. Reject proposed Rezone of Historically Platted Skinny Lots from R5 to R2.5, based on:
  - A. Reverses the City Council direction on RIP final hearing, 12/09/16 where the record states: "Council did not approve staff's recommendation to rezone historically narrow lots currently R5 zones to R2.5....Instead, Commissioners voted for an amendment that would not allow individual R5-zoned historically narrow lots to be developed - even when they have been vacant for more than five years, as presently allowed."
  - B. Promotes demolition of existing homes in R5 zone where developers will remove existing structures in favor of constructing higher density housing on two

historically narrow lots. City Council Dec. 2016 RIP decision states, "To encourage internal conversions over demolition..."

- C. Promotes spot zoning inconsistent with maintaining historic neighborhood fabric of housing together with the following issues:
1. Does not transition from high to low density zoning;
  2. Does not match historic pattern of the lots;
  3. Does not provide access to high-frequency transit and services, such as grocery stores; and
  4. Raises the question of legality, what right does BPS have to rezone property without the consent of the owner(s)?

(Supported by 83% surveyed)

3. Reject limitation on allowed off-street parking and garage options for narrow lots. The Proposed Draft restricts parking to front loading and access from alleys.

(Supported by 72% surveyed)

4. RCPNA additionally recommends:

- A. 'a' Overlay/Housing Opportunity Overlay Zone applied to Low Density Residential properties a distance of no more than 300' from NE Sandy Blvd. (current high frequency transit <https://trimet.org/schedules/frequent-service.htm>), the 60<sup>th</sup> Ave. Max Station, and the Hollywood Town Center, as defined by the adopted 2035 Urban Design Framework map, Figure 3-1, p. 29 Chapter 3 Urban Form (<https://www.portlandoregon.gov/bps/article/579166>);
- B. Removal of all proposed R5 to R2.5 rezoning for historically platted narrow lots;
- C. Increased allowed off-street parking options for Low Density Residential zone including off-street parking pads and front-loading garages for skinny lots.

(Supported by 69% surveyed)

It is our hope that you will honor our request for a 6+ month Extension for public comment on the RIP Discussion Draft to allow a healthy public discourse on this proposal. We propose the RCPNA's additional recommendations will serve as a basis for our neighborhood dialogue with the City as we, together, move forward with this proposal. The vast majority of the 135 RCPNA residents and business owners surveyed support this RCPNA decision based on our SurveyMonkey results. In addition, over 15 participants at the Nov. 16<sup>th</sup> LU & TC meeting had not been aware of this neighborhood survey and voted in support of our final decision.

Thank you for your time and consideration. Please let me know if you have any questions or I can be of further assistance.

Respectfully,



Tamara DeRidder, AICP  
Chairwoman, RCPNA  
Chair, LU & TC  
1707 NE 52<sup>nd</sup> Ave.  
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Attached:

Exhibit A – Draft Minutes Nov. 16, 2017 RCPNA Land Use & Transportation Committee  
Exhibit B – Nov.16 LU & TC PowerPoint Presentation on RCPNA Survey Results

Please note: The RCPNA Charter designates the Land Use & Transportation Committee (LU & TC) the final authority for RCPNA regarding land use actions and policies when the deadline is time sensitive, meaning that it occurs prior to the next scheduled Board meeting. This Recommendation serves as the final recommendation on the RIP Discussion Draft based on the Nov. 30<sup>th</sup> deadline.