



Aug. 11, 2016 <Sent this date via e-mails noted below>

City of Portland (residential.infill@portlandoregon.gov)  
Attn: Morgan Tracy, BPS Project Manager (Morgan.Tracy@portlandoregon.gov,)  
1900 SW 4<sup>th</sup>, Suite 7100  
Portland, OR 97201

CC: BPS City Commissioner, Amanda Fritz (Amanda.Fritz@portlandoregon.gov)  
BPS Director, Susan Anderson (Susan.Anderson@PortlandOregon.gov)  
BPS Long Range, Joe Zehnder ([Joe.Zehnder@portlandoregon.gov](mailto:Joe.Zehnder@portlandoregon.gov))  
BPS District Liaison, Nan Stark (nan.stark@portlandoregon.gov)  
CNN Exec. Dir., Alison Stoll (alisons@cnncoalition.org)

Subject: RCPNA Board Recommendations on June 2016 Residential Infill Project

Dear Morgan Tracy:

The RCPNA Board met on Aug. 2<sup>nd</sup> and reviewed the June 21<sup>st</sup> Land Use and Transportation Committee Recommendations together with the results of the RCPNA Residential Infill Project survey conducted by Tamara DeRidder and a support team using SurveyMonkey. This neighborhood survey was distributed through Mail Chimp and the Next Door blog. In nine days this survey obtained 94 respondents.

Summary. The general consensus is that RCPNA opposes the density and types of infill contained in the City's Residential Infill Proposal in its present form and timeline. There are some areas of support. But, overall we concluded that there should be 'truth in zoning' as the city looks for a means to integrate infill options into the code.

The RCPNA Board concluded the following recommendation at this meeting based on the City of Portland Residential Infill Project published June, 2016:

**Proposal 1- Establish house size square foot limits proportional to lot size**

**Support** – But, we would like to see a slight increase the house size limit to 3,000 square foot minimum for 5,000 square foot lots.

*Note: RCPNA single dwelling zones contains a majority of R-5 zoned property this size. The 2,500 square foot maximum is too low and does not take into consideration the size of historic homes in our neighborhood.*

**Proposal 2 - Measure from the lowest point 5 feet from the house. 30' max in R5**

**Support** - No additional comment.

**Proposal 3- Increase min. front setback by 5 feet with exceptions for matching front setbacks on existing, immediately adjacent homes.**

**Support** - No additional comment.

#### **Proposal 4 – Housing Types**

**Oppose** - However, in our RCPNA survey there was a 28% support and unanimous support by the LU & TC for *internal conversions only* of existing homes from a single home to a duplex & corner triplex. The Board is adamant that the City maintain ‘truth in zoning’. A single dwelling zone should mean just that. To allow additional density should require a change of the zone.

#### **Proposal 5 - Allow Cottage clusters on lots larger than 10,000 square feet**

**Abstain** – The information provided by BPS was confusing and we concluded we did not have enough information.

#### **Proposal 6 - Establish a minimum unit requirements for R 2.5**

**Oppose** - This is due to requiring a minimum of 1 unit per 2,500 SF of lot area.

*Note: LU & TC stated, “If the wording were to change from 'require' to 'allow'. We would be more in favor of this proposal then at this time.”*

#### **Proposal 7- Allow new houses on historically narrow lots near Centers and Corridors within the R5 zone**

**Abstain**- There were conflicting votes so we chose to abstain. 27% of the survey respondents would support this proposal if it were applied city-wide.

#### **Proposal 8- Do not require parking and do not allow front-loaded garages for detached houses on narrow lots and historically narrow lots.**

**Opposed** - We concluded that off-street parking needs to be required for all residences.

*Note: The LU & TC went on to state: “The front loading garage should be considered as not required, but optional or as a bonus to a required off street parking place. The provisions of this proposal that we would support include: the retention of the current allowance for alley-loaded garages; and the allowance for front-loaded garages that are tucked under the main floor when combined with a driveway. In addition, we recommend allowing parking pads within the 18'-0" of the house to be counted as off-street parking.*

#### **Conclusion:**

A majority of RCPNA survey respondents (71%) and Board support the current housing types and density allowed by the code and oppose the city’s Residential Infill Proposals 4, 6, and 8. There was clear support for Proposals 1-3 while the Board abstained on Proposals 5 and 7 due to lack of clarity.

About one-third of our survey respondents liked some of the city’s proposal but wanted the ‘Infill Map Overlay’ to apply only to the centers and corridors identified in the 1980 Comprehensive Plan Map, which limits centers to Town and Regional Centers<sup>1</sup>. This comment includes the concern that the 2045 Plan Map has been used as the basis of the city proposal but it

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<sup>1</sup> Nov. 2011 Comprehensive Plan Policy 4.3 Sustainable Housing B. Establish development patterns that combine residential with other compatible uses in mixed-use areas such as the Central City, Gateway Regional Center, Station Communities, Town Centers, Main Streets, and Corridors.

has not yet been state-approved. One-quarter of our respondents supported applying the city proposal throughout the city<sup>2</sup>, not just near centers and corridors, while another quarter believe that the impact area should be reduced altogether. There is clearly a divergent opinion of how and where such a proposal should apply if it were supported.

Process. The majority of the RCPNA survey respondents (62%) support a much broader discussion with our neighborhoods on this issue throughout the fall of 2016. A slight majority of respondents (54%) support stopping this proposal in its tracks and taking the time needed for public education and integration of public comments. The majority of respondents would like to understand the impact of city's Residential Infill Proposal on:

1. Public facilities such as parks and sanitary sewer;
2. Neighborhood livability, home ownership, and safety<sup>3</sup>; and
3. How the addition of this number of new dwelling units will impact on-street parking and air quality<sup>4</sup>.

Summary. The general consensus is that RCPNA opposes the density and types of infill contained in the City's Residential Infill Proposal in its present form and timeline. There are some areas of support. But, overall we concluded that there should be 'truth in zoning' as the city looks for a means to integrate infill options into the code.

In addition, the city has failed to provide an analysis of the neighborhood impacts as a result of this increased infill as it relates to public facilities, livability, ownership<sup>5</sup>, safety<sup>6</sup>, and vehicle parking. The City's Residential Infill Proposal supports infill options that could serve to undermine single dwelling housing stability<sup>7</sup> while supporting commercial building types<sup>8</sup> (of 3 or more units per lot) that further conflict with the intent of the single dwelling zones<sup>9</sup>.

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<sup>2</sup> Nov. 2011 Comprehensive Plan Policy 4.7 Balanced Housing, Objective: E. Actively encourage the dispersal of housing with on-site social services throughout the city.

<sup>3</sup> Nov. 2011 Comprehensive Plan Policy 4.4 Housing Safety Ensure a safe and healthy built environment and assist in the preservation of sound existing housing and the improvement of neighborhoods.

<sup>4</sup> Nov. 2011 Comprehensive Plan Policy 4.6 Housing Quality A. Promote housing that provides air quality, access to sunlight, and is well protected from noise and weather.

<sup>5</sup> Nov. 2011 Comprehensive Plan Policy 4.7 Balanced Housing, Objective: I. Expand homeownership opportunities for existing residents in neighborhoods with homeownership rates lower than the regional average.

<sup>6</sup> Nov. 2011 Comprehensive Plan Policy: 4.4 Housing Safety. Ensure a safe and healthy built environment and assist in the preservation of sound existing housing and the improvement of neighborhoods.

<sup>7</sup> Nov. 2011 Comprehensive Plan Policy 3 Preserve and reinforce the stability and diversity of the City's neighborhoods while allowing for increased density in order to attract and retain long-term residents and businesses and insure the City's residential quality and economic vitality.

<sup>8</sup> Commercial Code. "A new structure covered under the Commercial Code. This would apply to new commercial structures and multi-family residential projects with 3 or more units." See: <https://www.portlandoregon.gov/bds/article/92699>

<sup>9</sup> 2014 Oregon Residential Specialty Code Definitions, page 2-4: DWELLING. Any building that contains one or two dwelling units used, intended, or designed to be built, used, rented, leased, let or hired out to be occupied, or that are occupied for living purposes.

Please let me know if you have any questions.

Respectfully,

A handwritten signature in black ink, appearing to read "Tamara DeRidder". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tamara DeRidder, AICP  
Chair, RCPNA  
1707 NE 52<sup>nd</sup> Ave.  
Portland, OR 97213

Attachment: RCPNA Residential Infill Survey