CENTRAL NORTHEAST NEIGHBORS, INC.

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Dear Mayor Hales and City Council,

August 11, 2016

The Bureau of Planning and Sustainability through the Residential Infill Project (RIP) recently released a set of proposals that would adjust single-dwelling zoning rules to meet the needs of current and future generations. These proposals center around three specific areas: the size of new houses, the types of new housing and development on historically narrow lots. We applaud the Bureau of Planning and Sustainability for their proactive approach in this area and we welcome its endeavor to ensure accessible and affordable housing for current and future Portlanders.

The Central Northeast Neighbors Coalition (CNN), comprised of the Madison South, Sumner, Rose City, Roseway, Beaumont-Wilshire, Cully, Hollywood and Sunderland neighborhood associations, believes that housing, or the lack thereof, is the paramount issue facing our neighborhoods and the City of Portland as a whole.

The CNN Board met to discuss the proposals put forth by the Residential Infill Project and to vote whether or not to lend our support.

The following reflects the decisions made by the CNN Board:

Proposal 1-Limit the size of houses while maintaining flexibility in form.

This proposal would establish house size square foot limits proportional to the size of the lot while excluding basements, non-habitable attics and detached structures from the size limits. This proposal would also retain the current housing code's building coverage limits.

Some concern was expressed regarding the size limit under this proposal, specifically that it was too low. One CNN Board member felt that it did not take into consideration historic homes that were larger in size and suggested a 3000 square foot limit would be more appropriate. However, it was noted that this limitation is less restrictive on square footage than it appears since the area of basements, non-habitable attics, and detached structures would not be counted against these limits.

In general, the Board felt this proposal was reasonable and voted to support.

Proposal 2-Lower the house roofline.

This proposal would lower the acceptable roofline of newly constructed houses by mandating that a house be measured from the lowest point five feet from a house rather than the highest point. This proposal would retain the current measurement to midpoints of pitched roofs and to the tops of flat roofs. Additionally, this proposes a reduction of the height of flat roofs by 5 feet to lessen undesirable shading impacts and limit dormer projections that are over height limits to 50 percent of roof length.

The Board believes that the height limitations provide an important means to reduce the scale of new homes so that they better conform to neighborhood character.

The Board felt this proposal was reasonable and voted to support.

Proposal 3-Make front setbacks consistent with setbacks on existing, immediately adjacent homes.

This proposal would increase the minimum front setback by 5 feet, with exceptions for matching front setbacks on existing, immediately adjacent homes. It would also retain current side and rear setbacks minimums and allow eaves to project 2 feet and bay windows to project 18 inches into setbacks.

The biggest concern voiced by a CNN Board member was that this proposal as stated does not sufficiently address setbacks, but rather simply increases the minimum required front setback from 10 feet to 15 feet, with an allowance to reduce (but not increase) the required setback to match immediately adjacent homes. This does not take into account houses with a setback greater than 15 feet. They suggested the proposal should require that front setbacks be the average setback of the two adjacent homes, regardless of distance thereby preserving the character of existing neighborhoods.

The Board as a whole, however, felt this proposal was reasonable and voted to support.

Proposal 4-Allow more units within the same form as a house near Centers and Corridors.

This proposal would allow two ADUs per house, one internal and one detached, and one ADU with a duplex. It would also allow duplexes on all lots and triplexes on corner lots. Finally, this proposal would allow an additional bonus unit for providing an affordable unit, an accessible unit or internally converting an existing house.

No other proposed change to the single-dwelling zoning rules generated as much discussion. The one thing that the entire Board agreed on is that no member was in favor of this proposal as written. Some members felt the proposal went too far with the ¼ mile distance from Centers and Corridors while others supported removing the ¼ mile distance all together. It was pointed out that given the designated Centers and Corridors, this proposal would cover 85% of the City of Portland.

The majority of Board members felt that this proposal was so broad that it was tantamount to a change in zoning. Therefore, we, as a Board, do not support this proposal.

Proposal 5-Allow cottage clusters on lots larger than 10,000 square feet.

This proposed change to the current zoning regulations would call for the development of specific "cottage cluster" rules to augment Planned Development reviews. It would also reduce the current review procedure from Type III to Type IIx. Lastly is would allow additional bonus units for providing affordable units, accessible units or for retaining the existing house on the site.

Cottage Clusters have been developed in other cities and there is one located in the Cully neighborhood. The main opposition to this proposal was that there was a lack of specifics including the number of units

allowed, minimum setbacks, housing heights and off-street parking requirements. Some members supported the concept of cottage clusters but would like to see limitations on where they can be placed.

Most Board members felt that allowing these clusters on any lot larger than 10,000 square feet was too big of a step to take and they could potentially encourage demolition of existing houses. Therefore, We, as a Board, do not support this proposal.

Proposal 6-Establish a minimum unit requirement for R2.5 zone lots.

This proposal would require one unit per 2500 square feet of site area and would allow ADUs to count toward the minimum requirement.

In general, the Board felt this proposal was reasonable and voted to support. One member who did not vote to support opposed this proposal due to verbiage, specifically the word 'require'. They would have been in favor had the word, 'allow' been used.

<u>Proposal 7-Allow new houses on historically narrow lots near Centers and Corridors within the R5</u> <u>zone.</u>

This proposal would allow new houses on historically narrow lots near Centers and Corridors and prohibit new houses on historically narrow lots outside of areas near Centers and Corridors. It would require units to be attached on lots where an existing house was removed but allow tandem houses when retaining an existing house.

One Board member voiced strong opposition to this proposal believing that by allowing lot divisions within these portions of the city more demolitions of existing, viable homes will occur.

However, given that the lot is the biggest development cost and smaller lots are more affordable and create more opportunities for home ownership, the majority opinion was that this proposal did not go far enough. The Board voted to support this proposal while striking the qualifying words "near Centers and Corridors".

<u>Proposal 8-Do not require parking and do not allow front-loaded garages for detached houses on</u> <u>narrow lots and historically narrow lots.</u>

This proposal would retain the current allowances for alley-loaded garages or shared driveways to rear parking. For attached houses on narrow lots, front-loaded garages would be allowed when tucked under the first floor and the driveways are combined. Lastly, this proposal would retain current parking requirements for all houses on standard lots.

One Board member felt off-street parking needs to be required for all residences, while other Board members felt that requiring off-street parking would impact the aesthetics of the neighborhood. It was pointed out that this proposal only applies to historically narrow lots and not residential lots in general.

While there was some opposition, the Board felt this proposal was reasonable and voted to support.

This could not have been accomplished without the yeoman efforts by the CNN Board, the CNN Land Use Advisory Committee, Executive Director Alison Stoll, Community Program Manager Sandra

Lefrancois and the Bureau of Planning and Sustainability Liaison Nan Stark. My deepest gratitude for their time and efforts.

Sincerely,

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Douglas Fasching CNN Chair

P.s. Please note that included are letters from Rose City Park Neighborhood Association dated August 3rd, 2016 and Beaumont-Wilshire Neighborhood Association dated June 23rd, 2016. Also included is a copy of the CNN LUTOP minutes from July 26th, 2016.

