



CULLY ASSOCIATION OF NEIGHBORS

Central Northeast Neighbors
4415 NE 87th Avenue
Portland, Oregon 97220

November 14, 2017

City of Portland
Bureau of Planning and Sustainability
Residential Infill Project
residential.infill@portlandoregon.gov

RE: Residential Infill Project Discussion Draft

Dear Planning Staff,

The Cully Association of Neighbors (CAN) is pleased to offer comments on the Discussion Draft of the Residential Infill Project. Our thanks to Nan Stark, Julia Gisler and Tyler Bump for attending our Transportation and Land use Committee meeting on October 17. This helped us to better understand the proposal, and there is much in it that we like. Once implemented, the provisions in this draft will create new opportunities for smaller, more affordable housing in many single-family areas. Our meeting also raised some concerns about how the proposal would impact Cully. The purpose of this letter is to articulate those concerns so they can be addressed in the Preferred Draft. Specifically, we are concerned about:

- Large portions of Cully that were left out of the Housing Opportunity ('a' overlay) zone, and
- The lack of a true "Cottage Cluster Code" in the draft.

The Housing Opportunity Zone, as proposed, excludes all of East Cully, that portion of the neighborhood between Cully Boulevard and 82nd Avenue. The stated reason for this is to prevent the displacement of vulnerable families from this area. Tyler explained that renters of detached, single-family homes are most at risk for displacement. Involuntary displacement is an overwhelming concern for CAN. It is reflected in our Inclusive Cully Policy, adopted in April 2015. That policy states that among other things we will:

- Encourage development of permanently affordable housing in Cully.
- Encourage development of workforce housing in Cully.
- Encourage renters to become homeowners to build wealth and stabilize families.
- Encourage moderately-priced individual homeownership.
- Support elders who want to remain in Cully and age in place.
- Encourage alternative designs for infill such as accessory dwelling units, small house "cottage clusters," and other strategies to promote more affordable, market-rate, infill housing.
- Support greater density of development where appropriate in areas that have good access to transit and other services.

All of these approaches could be furthered by the opportunities available in the Housing Opportunity Zone. Nonprofit developers might be able to construct affordable 3- and 4-

plexes on the R5 and R7 zoned lots here. Smaller scale market-rate units would be more affordable to working people. Older adults in the area would be able to downsize without having to leave their neighborhood. Also, as Tyler points out, due to the R7 zoning here, the area could be attractive to developers who want to build "trophy houses" larger than what the new code would allow in R5 zones. The Housing Opportunity Overlay would attract a different kind of development, more in keeping with our policy goals.

We appreciate the City's concern that application of the overlay could increase development pressure. We don't share that concern when a mere 10% of the development on single-family corner lots consists of a currently allowed duplex. If the City's concern is valid, however, it will be a result of scarcity—not enough land within the 'a' overlay to meet the demand. There is an easy solution to that. Increase the amount of land zoned for Housing Opportunity. If most or all single-family zoned land were allowed the modest proposed increase of one unit per lot, no area would receive too much development pressure.

Our final concern about the exclusion of East Cully has to do with Cully Boulevard. We are very hopeful that Cully Boulevard will develop into the thriving commercial street envisioned by the Cully Boulevard Alliance and the comprehensive plan, which designates it a neighborhood center. The residential area east of Cully Boulevard should provide much needed vitality for the commercial district. This will be severely limited, however, by the R7 zoning. That zoning also creates a jarring transition to the multi-family and mixed-use zoning along Cully Boulevard. It will be much more graceful and beneficial to allow some "missing middle" housing in this area.

For many of the same reasons noted above, we were looking forward to the cottage cluster provisions of the new code. We are disappointed that we see only a couple of minor tweaks to existing codes. Allowing an ADU with each unit of a planned development is certainly a welcome change, but it only keeps Portland current with the requirements of Oregon law. Far from offering a density bonus that might persuade a developer to go through additional process, this code actually offers fewer units than could be built by right in the 'a' overlay zone. As proposed, it is unlikely to result in the flowering of small, affordable market rate housing that would be encouraged by a true cottage cluster code. Such a code, for example, might allow double or even triple the zoned density for cottages that were 1200 square feet or less.

Why does this matter to Cully? As you know, Cully has many large lots in single-family zones. Often these lots are quite deep with a relatively narrow street frontage. This makes them challenging to develop with more than a single house. Flag lots are not very desirable, but are currently the only available option for such lots. With a true cottage cluster code, these lots would lend themselves to developments that would provide Cully with more of the moderately priced housing we need.

Another result of our large lots is that Cully has become a center for urban agriculture. There are currently 18 commercial farms in Cully. CAN values this part of our

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neighborhood culture, and we fear that development pressure could bring about its demise. Many Cully farmers are working land that belongs to someone else, and could be subject to sale and development. Among the long-term strategies envisioned by Cully farmers, is to promote the development of a portion of a farm with something like a cottage cluster that could exist alongside a working farm. A fully developed cottage cluster code might enable such a solution.

Thank you for your consideration of our comments. We look forward to the next draft and the legislative process to follow. We see the Residential Infill Project as critical to the future of Cully and our dream of retaining the economic, racial and cultural diversity that we so value.

Sincerely,

Laura Young, Chair
For the CAN Board