

Re: Comments on RR-SC Neighborhood Plan

February 24, 2020

Dear Eugene Planning Commissioners,

As long-time residents of the River & Garden district, we welcome the opportunity to share our views on the draft RR-SC Neighborhood Plan. There are many worthy features of the plan and process. Briefly, these examples include:

- The extent of community outreach, education, and opportunities for public engagement.
- The vision statements and goals capture important neighborhood values.
- Specific actions, such as 11.1 (Effective Public Process) ensure a process that protects RR-SC neighborhoods from maximized profit developments such as ECCO Apartments and the proposed Lombard Apartments. Additional actions, such as 14.3 (Willamette River Compatibility) seek to rectify the subjective nature of the Willamette River Greenway criteria (State Goal 15). Clear and objective standards will offer the precious Greenway true protection in perpetuity.

We also would like to take this opportunity to express our concern and/or confusion regarding the following issues:

1. The existing Agricultural zoning is being eliminated/sublimated into new zoning that seeks to intensify/densify use. Can an urban agricultural zoning be added to the proposed zoning districts? Or would an agricultural overlay suffice? Code standards that are clear, objective, and well-defined are essential for protecting areas with Class 1 soils, riparian zones, and that provide vital stormwater functions/flood protection.

2. A revision has been added to the draft plan to exclude R-1 zoned properties that face the Willamette River from the Corridor-Residential zone. Can current landowners, who historically have utilized their property as R-1 with urban agriculture, elect to downzone from R-2 to R-1 if their property is in the Willamette River Greenway? Can these unique properties be designated with small-scale conservation easements?

3. What are the specific maximum dwelling units per acre allowed in the new proposed zones that is currently noted as “determined through

development standards”? In contrast, minimum densities are clearly stated. By a reasonable person’s calculations, it appears that the new zoning will double density. If so, how is this compatible with other goals such as soil preservation, river access, stormwater standards, etc.?

4. How do we incorporate Traffic Impact Analyses into the zoning and code changes? Currently, a TIA is not required for many new developments, but can we proactively require a TIA for clusters of development? Safety is a major neighborhood concern that has only increased with the widening of River Road and additional developments along the Corridor.

5. Where are the clear & objective standards needed to protect the Willamette River Greenway? The current criteria in State Goal 15 do absolutely nothing to protect this precious resource in court from developers! What is the new proposed “redefined boundary”? Proposals to shrink the current boundary are unacceptable.

6. Livability, identity as the River & Garden District, context-sensitive design, stability, and compatibility are key values echoed throughout the Neighborhood Plan. How can neighbors have concerns addressed rather than be dismissed as NIMBY?

7. In addition to highly valuing river & soil protections, we value affordable housing in our neighborhood and are deeply concerned about potential displacement issues as market-rate housing is rapidly infilling the neighborhood. How does the proposed plan and subsequent zoning/code changes address these concerns?

8. Where and when can we find proposed amendments to the Metro Plan that accommodate the new zoning and code changes?

Thank you for your time and consideration. We look forward to learning more as our questions are addressed.

Sincerely,

Julie Hulme & Rob Handy, on behalf of the Greenway Guardians