



# Forest Park Neighborhood Association

C/O Neighbors West Northwest  
2257 NW Raleigh St.  
Portland, Oregon 97210

September 21, 2020

Land Conservation and Development Commission  
Attn: Esther Johnson, Commission Assistant  
Oregon Department of Land Conservation and Development  
635 Capitol Street NE, Ste. 150  
Salem, OR 97301

To: Land Conservation and Development Commission

Re: Item 7 Middle Housing Rulemaking for Large Cities and Metro, Draft HB 2001 Rules

Dear Chair McArthur and Commissioners,

I suspect that none of you woke up this morning wishing that more people had been living in Phoenix, Talent, or Detroit last week.

I am writing to ask you to explicitly exclude Wildfire Hazard Zones from HB 2001 Rules that will require cities to allow more density in areas zoned for single family homes. We should not put more people and homes at risk from wildfire. Please also consider allowing cities to remove other hazard areas and Goal 5 resource areas before applying new density rules.

We support the creation of more affordable “missing middle” homes. But we would like those homes to be both safe and affordable.

Forest Park Neighborhood is unique. Our boundaries include portions of the city of Portland around the edges of Forest Park, along the top and sides of the Tualatin Mountains. The neighborhood is largely forested, located largely on steeply sloped hillsides with mapped landslide hazards. We also have a dense network of headwater streams and thousands of acres of high value wildlife habitat. There are very few businesses or destinations.

Portland considers all of our neighborhood to be a Wildfire Hazard Zone (see attached map).

Because of our hills, steep slopes, streams, and Forest Park, the road network is very limited. That means that evacuation routes are limited.

Starting Monday, September 7, we were under both a Red Flag Warning for Wildfire Risk and a High Wind Warning for gusts up to 75 mph on the top of our hills for days. Because trees are still in leaf, there was greater risk of trees falling.

By 6PM that Monday, there were trees and powerlines down blocking one of the main roads through our neighborhood (NW Germantown Road). More trees and powerlines fell as the winds continued. Several of the main roads were by fallen trees, and some, including NW Skyline Blvd, remained blocked for days. Power was out for extended periods for many people (10.5 hours at my house, for several days at other homes).

During this period of high fire danger, at least 3 small fires broke out. Fortunately, they were extinguished before they got out of control, but no one in the neighborhood was officially notified of the fires while they were active. I live less than 2 miles from the location of a fire that grew to between 1 and 2 acres in Forest Park and which got up into the trees, but I received no warning.

If there had been an evacuation notice, available routes would have been limited because of the downed trees. If there is a fire, it may not be clear what direction is safe for evacuation on winding roads with limited visibility and with limited information.

While the power was out, people who rely on the internet or internet-based phone service lost it. Cell phone service in our area is limited – I feel lucky if I see 3 bars at my house, and in some areas cell service is unavailable. Cell phones only work when they are charged, so if power is out for days they may stop working. If you have a landline, falling trees can take out that phone service. So even if the authorities try to notify people, there may not be any phone service available.

Many homes in the area, including some in the city, are on wells. When the power goes out, you have no water to use to fight a fire or wet down your property.

We were lucky this time that no fire in our area grew out of control. Other parts of the state were not as fortunate. Wildfire risk will continue to grow as the climate changes.

It makes no sense to require cities to allow more homes in Wildfire Hazard zones.

The proposed rules could require the city to allow triplexes, quadplexes, and other high-density forms of housing in Wildfire Hazard areas. We ask you to explicitly exclude Wildfire Hazard Areas from application of the requirements for higher density housing.

The draft rules could, for example, require the city to allow triplexes on 75% of the single family lots in a Census Block Group (CBG). I have attached a map showing the CBGs in Forest Park Neighborhood, with red arrows pointing to the CBGs that include most of our neighborhood and a blue arrow pointing to a CBG that is just outside our neighborhood but that includes only 10 to 15 residential lots that are inside the city near the far north end of Forest Park. Unless Wildfire Hazard areas are excepted, the city could be required to allow Triplexes on 75% of lots in these areas.

Adding higher density housing in our neighborhood would also require vast investments in infrastructure by the city and home builders, increasing the price of any additional homes. Sewer service would need to be extended great distances across hills with unstable slopes or septic system drainfields, already difficult to place when building on steep and unstable slopes, will need to be larger to accommodate higher density housing. Stormwater management systems (also limited by steep slopes and landslide hazards) must be sized to new impervious surfaces.

Increasing the number of homes in our neighborhood would also undercut the state's goals for reducing carbon emissions. Because of our steep hills and long distances to destinations, few people can walk or

bike to meet their daily needs. There is no transit service in the neighborhood. Most people use motor vehicles to reach destinations and meet their daily needs. More people living in the area will result in more cars and more vehicle trips and more carbon emissions.

Our neighborhood includes Portland's 5,000 acre Forest Park and thousands of acres of high value habitat on rural land around the park that helps keep the park and its wildlife healthy. Our neighborhood association works hard to protect these resources. The forests on our hills absorb carbon, filter the city's air, hold soils on steep slopes, and absorb stormwater.

The draft rules are unlikely to create more affordable housing in this distant urban fringe because the infrastructure required will be very expensive for both the city and homebuilders.

Adding more homes in this area will also result in more carbon emissions, undermining state goals around climate change because the distances and steep hills make it impossible for most people to walk or bicycle to any destinations, and there is no transit service.

It would be far more sensible for the city and home builders to invest in building infrastructure and homes in areas that have or can more cost effectively add urban infrastructure, instead of pouring millions of dollars into infrastructure for a limited number of far-flung homes that will put people's lives and those homes at risk, add carbon emissions, and harm important Goal 5 resources.

We share the concern about avoiding creation or maintenance of enclaves of single-family homes. But do we want to encourage lower income people to live in Wildfire Hazard areas?

We encourage the Commission to consider a tool that Portland has found useful for ensuring that housing is affordable – limits on the size of single family homes.

Please do not require cities to allow more homes in Wildfire Hazard areas. Please do require cities to remove Goal 5 resource areas from consideration for higher density home development.

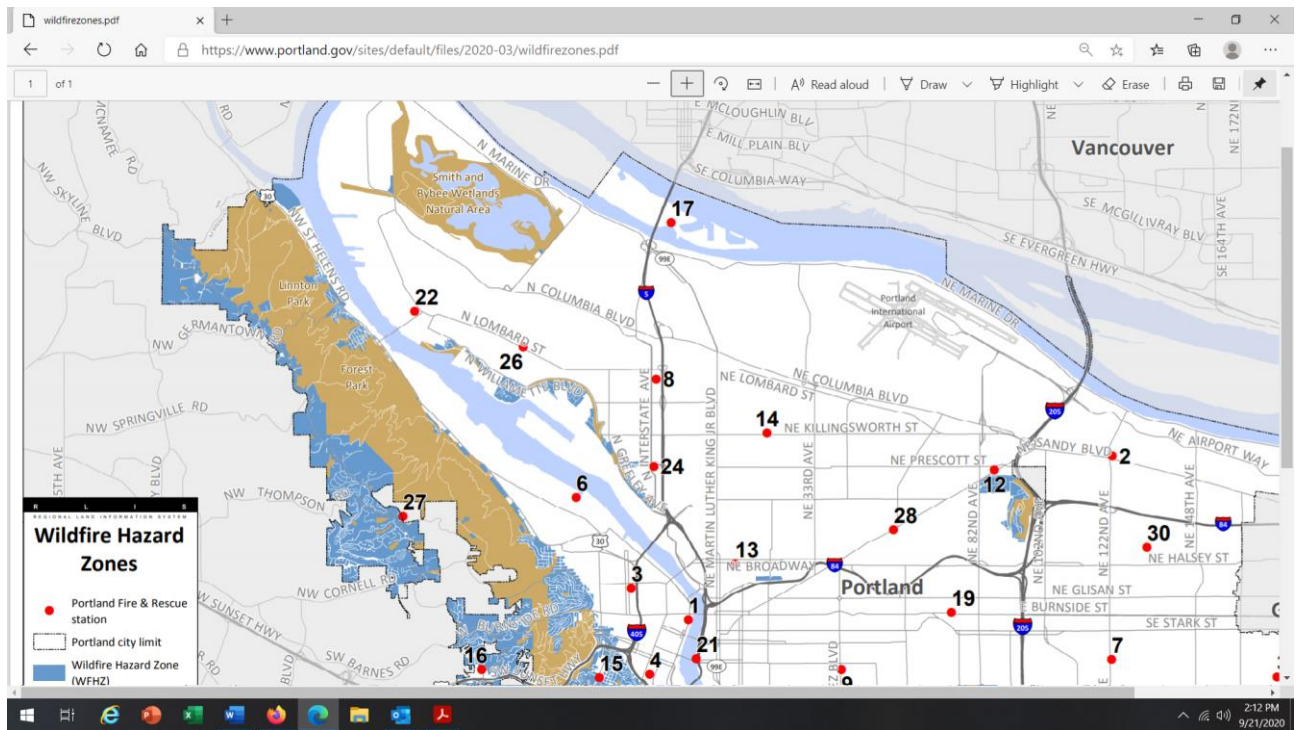
We thank you for your consideration.

Sincerely,



Carol Chesarek  
President, Forest Park Neighborhood Association

## City of Portland Wildfire Hazard Map, focused around Forest Park Neighborhood



Accessed from <https://www.portland.gov/sites/default/files/2020-03/wildfirezones.pdf>  
September, 2020

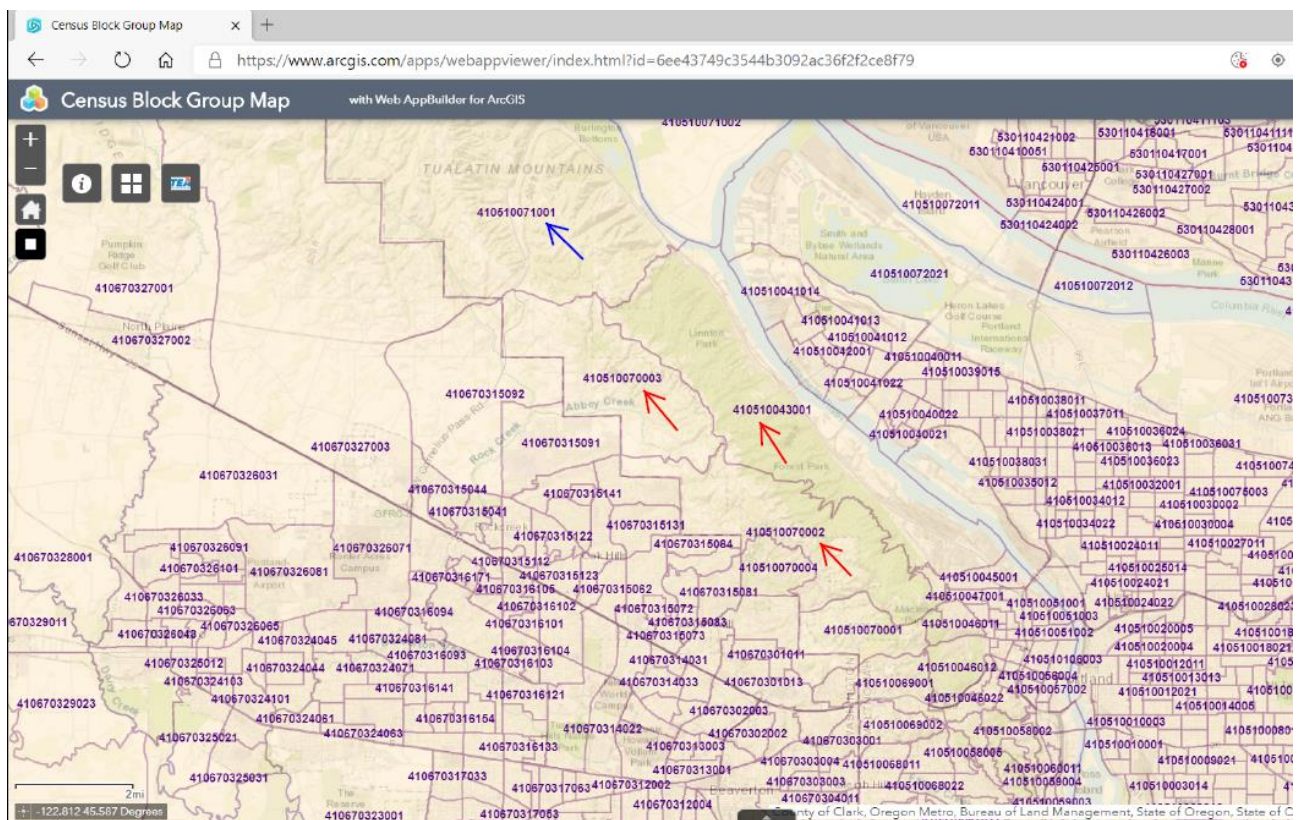
## Census Block Group Map including Forest Park Neighborhood

Census Block Groups entirely or partially in Forest Park Neighborhood (red arrows):

410510070003  
410510043001  
410510070002

Census Block Group, north of FPNA, with only 10 to 15 lots inside the City of Portland and UGB:

410510071001 (blue arrow)



This map was created using the web site

<https://www.arcgis.com/apps/webappviewer/index.html?id=6ee43749c3544b3092ac36f2f2ce8f79> ,  
accessed on September 21, 2020.

The red and blue arrows were added.