

# Montavilla

neighborhood association

PO Box 16245  
Portland OR 97292

*March Lew Scholl*  
~~February~~ 7, 2012

Staci Monroe, Land Use Services  
staci.monroe@portlandoregon.gov  
City of Portland  
Bureau of Development Services  
1900 SW 4<sup>th</sup> Ave, Suite 5000  
Portland, OR 97201

Re: Case File Number LU 12-102240 DZM – Multnomah University proposed student housing

The comments contained in this letter have been reviewed, and approved by the Montavilla Neighborhood Association (MNA; AKA *Montavilla Community Association*) board of directors. They are derived from interactions that MNA Land Use Chair, Lew Scholl, had with local neighbors, and University staff and administrators during the comment period, and are also based on information contained in the subject design review (LU 12-102240 DZM ) as well as statements from the previous design review and "Decision of the Hearings Officer", LUR 00-00502 DZM (effective date December 7,2000), which established an Impact Mitigation Plan (IMP) for the long-term development of the Multnomah University campus (then referred to as "Multnomah Bible College").

The purpose of this letter is to support the concerns of the neighbors nearest to the proposed development. It focuses on how the proposed design is inconsistent with LUR 00-00502 DZM, and how the design process has failed to allow adequate time and information for input from the nearby residents. There are a wide variety of opinions and concerns about potential impact from the proposed development. MNA does not take a stand regarding any specific issue such as how to handle parking, traffic, the visual impact of the proposed buildings, or other issues that of great concern to the nearby neighbors except as these concerns relate to discrepancies between what is currently proposed and what the University committed to doing in LUR 00-00502 DZM (below referred to as "**the year 2000 document**"). The following is a detailed account of those discrepancies:

- A) In the **year-2000 document** under 33.848.070 Section J, it states:

*Neighborhood communication and coordination. The institutional campus must provide an ongoing process for communicating with neighbors. The process is to be implemented during all phases of growth provided for by the impact mitigation plan. This process must provide for the following:*

*The institution must host a meeting, at least annually, with representatives from recognized neighborhood and business associations within whose boundaries the institution is located. The purpose of the meeting is to discuss short term and long-range plans for campus building and development.*

No such meetings have been held in recent years if ever and the University made no attempt to contact the Montavilla Neighborhood Association about the current proposal

prior to submitting the building permit application. Local neighbors and the city's design review notice were the only source of information available to the MNA board until the meeting of 2/27/2012; only 10 days before the comment deadline. Before that date actions by the University, including a groundbreaking ceremony, gave neighbors the impression that their input was not wanted or needed and that the plans had already been approved.

B) Throughout the **year-2000 document** it is stated that buildings for student housing along Pacific Street shall be 2 (two) stories tall. An electronic search was conducted on the document for all occurrences of the word "story" or "stories". This search found no indication that long-term plans included structures greater than 2 stories in height along Pacific Street. This is contrasted to the current proposal for the structures to all be 3 stories tall. According to the **year-2000 document**, as pointed out in "C)" below, there is apparently no need for 3 stories to provide the needed number of units.

C) In the **year-2000 document** under the word "Proposal" and under "The applicant requests approval of the following" it states:

*The following projects have been identified for future development to accommodate long range plans of increased student enrollment from 800 to a maximum of 1,200 over the next 25 years. The following project list is not in a specific chronological order, but in general reflects the current phasing order desired by the applicant.*

The key bullet item under this statement is:

- *Replacement of 18 existing student occupied houses along the south side of NE Pacific Street with a total of 48 units of 2-story apartment-style townhouses anticipated to be developed in two phases;*

This statement of "48 units" at ultimate buildout is contrasted with the current proposal that would result in approximately 73 units at ultimate buildout. This number is derived from the proposed 21 units for phase 1 times approximately 3 ½ at full buildout ( $21 \times 3.5 = 73.5$ ). The 3.5 factor comes from plans and drawings presented by the University's designer at the meeting of 2/27/2012. It appears from information currently available that this increased housing capacity is not necessary. One University administrator stated during the meeting of 2/27/2012 that enrollment is now at about 900 and is actually declining. Calculating the annual growth rate over 12 years from 800, as stated in the **year-2000 document**, results in annual growth of just over 8 students per year.

Considering that the same document based the planning for 48 units on Pacific Street on a growth rate of 20 students per year, it is difficult to understand where the need for 73 units might come from. Since 48 is approximately 2/3 of 73, it should be possible for the university to achieve the 48 units at full buildout with building heights of no more than 2 stories.

D) The traffic study in the **year-2000 document** was based on the lesser number of units (48) as discussed above and did not take into account two significant new changes in traffic flow that impact the ease of entering and exiting the area by the only major access points. 1) That 87<sup>th</sup> Avenue is now a "bicycle boulevard" and 2) That it is now extremely difficult and dangerous to turn left onto 82<sup>nd</sup> Avenue from Pacific Street due to high traffic volumes and a relatively new pedestrian island blocking the center turn lane.

Also with regard to housing density and the related traffic issues, it would be worthwhile to verify that the University's new student housing units constructed in 2002 on the east side of NE 87<sup>th</sup> and south of the "married student housing" complex were constructed with no more than 48 units as also promised in the **year-2000 document**.

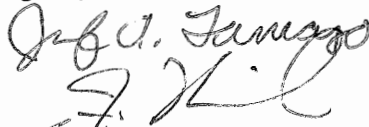
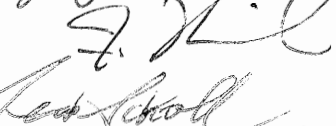

#### Summary of MNA Board Positions

The primary position of the MNA board is to support concerns of residents on Pacific Street and near to the proposed development. The concerns that nearly all nearby neighbors agree on are listed below:

- 1) Multnomah University provided inadequate time and opportunity for public review and design input from immediate neighbors and the Montavilla Neighborhood Association. The University made no contact with MNA about the proposed development in advance and did not comply with the **year-2000 document** plan to meet annually to discuss development and expansion plans.
- 2) The current proposal is inconsistent with the year 2000 Impact Mitigation Plan, LUR 00-00502 DZM; Particularly the increase from 2-story to 3-story buildings and the increase from 48 units to over 70 units. This suggests that either the year 2000 Impact Mitigation Plan should be revised or the current plans should be changed to be consistent with what is stated in the **year-2000 document**.
- 3) There appears to be a broad general consensus among nearby residents on Pacific Street that 3-story buildings are not aesthetically compatible with the neighborhood and that they do not *"provide an attractive transition from the campus to the surrounding neighborhood"*, as is required in the **year-2000 document** under approval criterion "L" (section 33.848.050).
- 4) Before the current development plan proceeds, the traffic study performed for the **year-2000 document** should be revisited based on item 2 above and also on other recent changes that impact the ease of entering and exiting major arterials from the area.

Therefore the Montavilla Neighborhood Association board recommends denial of this proposal until these issues and concerns can be adequately addressed.

Signed,

  
  
  
Montavilla Neighborhood Association  
Jennifer Tamayo, Co-chair  
Fritz Hirsch, Co-chair  
Lew Scholl, Land Use Chair