



# COALITION FOR A LIVABLE FUTURE

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**To: Damascus Concept Plan Advisory Committee**  
**From: Coalition for a Livable Future**  
**Date: October 21, 2005**  
**Re: Comments on the draft Damascus/Boring Concept Plan**

Thank you for the opportunity to share our comments with you regarding the draft Damascus/Boring Concept Plan. The Coalition for a Livable Future (CLF) is a coalition of more than 60 community-based organizations from throughout the Portland metropolitan area. We bring together organizations like the Audubon Society of Portland, Community Development Network, 1000 Friends of Oregon, Bicycle Transportation Alliance, and the Oregon Foodbank, to find the connections between the issues they work on, and support each other's efforts to promote sustainable and socially just development in our region. A number of our members are based in Clackamas County, such as the Clackamas Community Land Trust, Northwest Housing Alternatives, Johnson Creek Watershed Council, and Oregon Sustainable Agriculture Land Trust. For a full list of our member organizations, please visit [www.clfuture.org](http://www.clfuture.org).

The development of Damascus will have a significant impact on the region as a whole. It represents the largest expansion of the Urban Growth Boundary in our region's history. We are participating in the concept planning process in order to ensure that as Damascus grows it uses land efficiently, protects and restores natural areas, provides new jobs, supports the local food system, and includes ample housing and transportation choices in every neighborhood, creating a great place for people to live for generations to come.

We compliment the work done by the Damascus/Boring Concept Plan Advisory Committee, the staff, and the consultant team to achieve a community that respects the unique attributes of the Damascus area, strives to both look and function differently than most urban communities, and recognizes that a complete community offers housing and transportation choices for all. We have the following comments that we hope offer observations and methods by which to build on the work accomplished thus far.

Our comments are based on the "*Damascus/Boring Implementation Strategies*" dated October 4th, the latest maps on the Clackamas County website, as well as additional maps presented to us by Otak staff. If any of our conclusions appear to be based on an inaccurate interpretation of the documents available, please let us know. We hope that our recommendations will be taken into consideration as the concept plan is refined, and as the Cities of Damascus and Happy Valley, Clackamas County, other agencies, and the community as a whole begin the hard work of turning the plan into a reality.

In developing our comments, we used as a reference the report developed at the Damascus community design workshop sponsored by 1000 Friends of Oregon and Coalition for a Livable Future in 2002. This is sometimes referred to as the "CLF alternative" or "CLF charette" in our comments. To view the report, visit <http://www.designdamascus.org>.

## SUMMARY OF KEY POINTS

The Damascus Concept Plan should be an integrated whole, as any sustainable solution must be. It should balance construction cost with livability, habitat, transportation, affordability, marketability, etc. Not only should it do all of these things, but it should do them all well, reflecting a change in what we have done and how we have done it in the past.

**Density, Livability and Rural Character.** Damascus will be a thriving, self-reliant, walkable city when the plan calls for more density. A more compact urban form in the valley, while protecting the buttes, streams and other natural resources and features, will make Damascus healthier for people and the environment. Use the valley to create a dynamic town center and vibrant mixed-use neighborhoods with high enough density to support businesses and services that are accessible by walking, biking, or taking transit for daily activities. Use the buttes, the stream corridors and the transition areas to preserve Damascus' rural character. We are concerned that the density proposed for the valley floor is not sufficient to create walkable, transit-friendly neighborhoods.

**Farming.** Protect and encourage the growing of food, especially for the local community. Public acquisition and easements should be used for community gardens and historic farms, and these should be integrated into the parks, trails, and natural area plans of the jurisdictions. An industrial agricultural zone, with appropriate buffers and protections from incompatible uses, should be used to enable the nursery industry to thrive. Because of their ability to use, filter and retain stormwater runoff, ecologically responsible small farms and gardens should be planned for and encouraged in transition zones just outside of stream corridors and wetland areas.

**The Parkway.** We generally support the parkway concept, and in our detailed comments we have recommendations for reducing wildlife collisions and preventing development pressure on the south side of the parkway. However, we propose that the City of Damascus, rather than ODOT, can best construct and manage the facility to balance the needs of through traffic and access to the local community. In this scenario Highway 212 would remain the designated state highway, though functioning as a boulevard.

**Transportation Connectivity.** The East/West and North/South arterials and major collectors appear to set an adequate framework to develop a future complete local street network that can support multiple modes of travel. The buttes and green system elements may pose barriers to an interconnected street network, and therefore we recommend off-street pedestrian and bicycle paths to ensure a complete and usable transportation system for all modes. Thoughtful design of Hwy 212 will be necessary so that it does not become a barrier separating the southern part of Damascus from the rest of the community. This will be particularly important in the proposed town center where Hwy 212 dissects the northern and southern sections.

**Healthy Stream System.** The Concept Plan protects stream reaches very well where intact riparian areas exist, but the overall system is at risk because too little consideration has been given to restoration. Much wider corridors (300' – 600') need to be protected and restored throughout the area to ensure the health of streams, preserve crucial habitat areas, allow for terrestrial wildlife movement, bound and define neighborhoods, and provide space for trails.

**Stormwater.** Greener, lighter, smarter, and cheaper stormwater management to achieve a maximum of 10% effective imperviousness will be required to support healthy streams. The current projected 26 - 46% imperviousness will damage natural systems. Greenstreets, forest canopy retention and creation, and innovative design solutions should be used to achieve 10% effective imperviousness, at the site and watershed scales. Other localities are achieving this goal, and their example techniques should be used.

**Interconnected Wildlife Habitats.** We support the high level of habitat protection on the buttes and efforts to provide linkages between habitats. However, there is a need to establish a more robust network of connecting corridors to facilitate wildlife mobility throughout the landscape by using wider riparian corridors, multiple upland connections, and incorporating wildlife crossings into transportation project designs.

**Affordable Housing.** More housing is needed for people working lower wage jobs, seniors, families and people with disabilities. A full range of housing types, affordability, and tenancy preferences should be provided in both the small lot attached and detached categories. The housing types provided, and the percentage in each category, should be driven by the economic development plan for the Damascus area – in particular, the range of wages expected to be paid and the number or percentage of workers in Damascus at various wage levels. The current plan does not seem to connect these basic elements of the community – wages and housing.

**Location of Employment Areas.** Much of the area's employment can be located within neighborhoods themselves, either in neighborhood centers, or within or adjacent to homes. Employment that relies upon a large work force and generates many customers should be located in areas that are transit-friendly and accessible by walking and bicycling. Even if employment is large-scale retail or a large medical facility, it should be located in town centers and near public transit, not in isolated office parks or commercial strips.

**Public Involvement.** The public involvement process started out well with community representatives drafting and getting community approval for the Community Vision, Values and Goals. Original discussions implied this would be a collaborative effort with the community. However, actual efforts have been primarily at an informational level. When input is offered regarding this planning process, feedback needs to be given in response, so the public can know whether their ideas were considered, why their ideas were or were not incorporated into the plan, and how their involvement actually impacted the plan.

**Map Graphics.** To the general public, the color green implies parkland or undeveloped open space. However, on the maps we have reviewed, existing subdivisions within proposed conservation areas, as well as the low-density development transition areas, are shown in green. We encourage the use of graphic techniques and labeling on the maps to make it clear to the public that these areas have been or will be developed to some degree, and are not parks or undeveloped natural areas.

## DETAILED COMMENTS

Our comments are grouped into the following subsections:

- Public involvement in developing the plan (p. 4)
- Natural resources (p. 4)
- Transportation (p. 14)
- Urban form (p. 17)

### PUBLIC INVOLVEMENT IN DEVELOPING THIS PLAN

- The public involvement process started out well with community representatives drafting and getting community approval for the Community Vision, Values and Goals. Original discussions implied this would be a collaborative effort with the community. However, actual efforts have been primarily at an informational level. When input is offered regarding this planning process, feedback needs to be given in response, so the public can know whether their ideas were considered, why their ideas were or were not incorporated into the plan, and how their involvement actually impacted the plan.
- The October 8 Open House was extremely well attended, and we applaud the outreach efforts that led to this outcome. However, the presentation sessions were rushed and inadequate time was provided for questions and feedback. It appears that community members need more time to digest and understand the wealth of information associated with this Concept Plan, so they can make thoughtful and well-informed choices about the future of their community. Additional public involvement opportunities are needed.
- The implementation strategies are a critical component of the plan, and the timing of the process has not allowed the public to provide input on this important element.

### NATURAL RESOURCES

#### **Stream Corridors**

*Issue:* Stream corridors are an integral part of a healthy ecosystem, including both terrestrial and freshwater habitats. Terrestrial species use stream corridors for cover, water and food (i.e., habitat), and travel between larger patches of habitat. Many aquatic species, including listed salmon and steelhead, depend on streams in and downstream of the Damascus area. The way Damascus urbanizes will determine what species will continue to occur there in the future. To protect these key habitats, CLF's *"Damascus Community Design Workshop Report"* called for 300-600 foot wide corridors. However, while some of the stream corridors shown on the Concept map fall within that range, others are only 100' wide, and some are even less. This is not nearly robust enough. It was assumed that much wider corridors would be protected as publicly owned park land, with passive activities and pedestrian and bike paths allowed where impacts to fish and wildlife would be minimal, and where the beauty of the riparian area would add value and delight to neighborhoods astride them. Streams would both "bound and protect" special neighborhoods, at the same time they too were protected. In addition to their ecological values, stream corridor and their associated floodplains and wetlands are a critical element of the area's green infrastructure.

The green infrastructure provides the area with flood storage, water quality improvements, and multiple other environmental, social and economic services.

*Comments:*

- In the draft *Natural Resources Implementation Strategies*, under *Restoration, Enhancement and Tree Canopy*, it is recommended that "areas within 150 feet of streams [in other words, a stream corridor 300' wide] and the 100-year floodplain be targeted for protection in order to maintain intact habitats along the stream corridor and restore those that have been lost or degraded. This area is the most critical for providing riparian and floodplain functions. Wider areas should be protected whenever possible." While this protection is recommended in the natural resources implementation strategies, it is not reflected in the sizes of many of the stream corridors shown on the concept plan map
- Portions of Rock Creek, Richardson Creek, and North Fork of Deep Creek were recently designated as Critical Habitat under the ESA for Chinook and steelhead by the National Marine Fisheries Service. These stretches of stream and upstream areas that feed into them need to be protected with wide riparian areas to provide for silt filtration, shade, and large woody debris (LWD), which are needed to develop stream complexity (important in providing habitat areas for both juvenile salmon as well as adult holding areas and nesting sites).

*Recommendations:*

- Protect and restore 300'-600' wide stream corridors for fish, wildlife, and people.
- Headwater and tributary stream corridors should be a minimum of 300' wide. Mainstem stretches of primary streams and any major ravines should be a minimum of 600' wide. (Corridors may be narrower for intermittent streams and in higher density urban areas if stream health will not be compromised.)
- Avoid running utilities (including storm/sewer pipelines, water lines, electric and telephone lines) within any protected stream corridor areas. Where utilities must cross streams, they should do so in the shortest distance, in the most direct manner possible, and with the fewest number of crossings. Trenchless technology should be used to eliminate or reduce impact on riparian and wetland vegetation.

**Stream Transition Areas**

*Issue:* Healthy streams are the foundation of any functioning ecosystem. To a large degree, in current development, runoff from development and impervious surfaces is the major factor in the degradation of urban streams. In typical sprawl development, these stream corridors often wind up being placed behind fenced backyards in large-lot subdivisions, out of sight of the community. And, because of the impact of development and other disturbances, they often become poorly maintained, ill-used patches of impenetrable weeds and invasive species. Instead of this, networks of streams can be an important element in the urban design of neighborhoods and communities, with transition areas serving to buffer the impact of development on the streams themselves. Transition areas can serve as a place for parkland and open space, for tree-lined boulevards and stormwater detention facilities, for trails and pedestrian pathways, for neighborhood and community joint-use areas (such as community gardens). They could help make the stream corridors a gathering place and a focal point of neighborhoods, a feature of community pride, rather than being neglected pieces of land, leftover from the carving out of commercial tracts and subdivisions.

*Comments:*

- The draft *Natural Resources Implementation Strategies* lists a number of tools that can be used to protect sensitive habitat lands. Tool #4 is to use "*Land uses with overall low impact on water quality and habitat integrity (such as small organic farms, etc.) as buffers between higher density development and the habitat areas, with the intent of preserving and enhancing water quality, wildlife corridors, and habitat integrity.*" However, nearly all the transition areas shown on the Concept Plan map are located between the bluffs and other development – there are no transition areas shown at all between streams and higher density development except along streams with slopes greater than 15%. Stream transition areas would be ecologically valuable, especially along (and upstream from) salmon-bearing streams, and for overall water quality and stormwater management.
- The draft *Natural Resources Implementation Strategies*, under *Buttes*, says that "*Master Plans should be developed for each butte to identify the appropriate locations for the clustering of new houses and to maximize the protection of wildlife habitat.*" Metro's "*Livable New Communities Handbook*" on p. 35 also notes, under *Plan by Watershed*, that planning should be done by the community on a watershed and sub-watershed basis. The same could be done for each major stream corridor in Damascus, so that appropriate locations for transition area uses along streams can be determined within that stream basin by the people in the community. Uses such as small organic farms could be placed between development and the streams. These could function even in higher density areas, because organic farms do not generate the conflicts usually associated with other agricultural uses (spraying pesticides, herbicides, etc.) Even very small plots 50'-100' wide could be functional in higher density urban areas, and would serve to reduce pollutants and runoff running into the streams. (It should be noted that current zoning regulations do not allow small organic farms, if commercially run, within non-agriculturally zoned areas. This would need to change in order to implement our recommendation.)

*Recommendations:*

- As a general guideline, locate 100' wide transition areas beyond the Conservation Area along both sides of stream corridors in the Damascus area, for uses appropriate to the area (see "Neighborhood Transition Design Areas" on pp. 41-42 in Metro's *Livable New Communities Handbook*, for specific examples of such uses. These are designed to include a mix of appropriate uses, placed within a 100' transition area bordering "Environmentally Sensitive/Restoration Areas," which are equivalent to Conservation Areas in the Damascus Concept Plan.). Allow for reduction of the transition areas (down to 50') in higher density urban areas.
- Develop Master Plans for each watershed in the Damascus area, so that appropriate locations for transition area uses along streams in that area can be decided upon by the people in the community. Protection of stream quality and the specific needs of the local community should be major factors in these decisions. Transition area widths can be reduced or enlarged, as decided by the community (but generally the square footage of land should remain roughly the same as if uniform width transition areas were kept.)
- Uses such as small ecologically-responsible farms could be placed between development and the streams. These could function even in higher density areas, because of the lack of conflicts usually associated with other agricultural uses (spraying pesticides, herbicides, etc.)

Even very small garden plots 50'-100' wide could be functional in higher density urban areas, and would serve to reduce pollutants and runoff running into the streams.

- Amend current zoning regulations to allow commercially run small organic or ecologically-responsible farms, limited in size to a set acreage maximum, with proper protection for the health and safety of the environment and adjacent residents, within these transition areas.

### **Stream Crossings**

*Issue:* Stream crossings can fragment habitat in and along stream corridors, reduce the ability of both aquatic and terrestrial species to move through an area, and can negatively impact riparian vegetation, floodplains, water quality, and in-stream habitat. In addition, they can pose hot spots for wildlife-vehicle conflicts that can be hazardous to both people and wildlife.

#### *Recommendations:*

- To balance the value of interconnectivity with the desirability of minimizing impact, stream crossings should be spaced at an optimum average distance of 1,800 feet (3/8ths mile) apart wherever possible.
- For residential collector-type roads, bridges should be used that span from at least the top-of-bank to top-of-bank, and be narrow enough to be inserted within the tree canopy without opening up the forest to too much sun (22' maximum width).
- For small, local streets that need to cross streams to maintain street connectivity, use small, narrow one-lane bridges, where vehicles take turns crossing, one car at a time. This would maintain the 'web' for vehicular traffic, but would reduce tremendously the impact on streams and be less expensive.

### **Stream Restoration**

*Issue:* Restoration of currently degraded stream corridors was a primary tenet of the *Damascus Community Design Workshop Report*. This has received little attention in the Concept Plan. Which streams exist, and which could be restored (based on historical data), is an important issue that should be evaluated. Although there are some good recommendations in the draft *Natural Resources Implementation Strategies*, restoration opportunities are not reflected on the map.

#### *Recommendations:*

- Those areas shown on the Concept Map as Conservation Areas are generally Riparian Class I and II habitats according to Metro's Goal 5 inventory. The inventory only considered *existing* conditions, and not areas where streams historically existed. These have the potential to restore a healthy stream network, if restoration were to occur. They also can be important, due to their position within the landscape, as potential open space. Restoration opportunities within 300-600' wide stream corridors should be set aside for protection and future improvement as a key part of the Concept Plan. Intermittent stream corridors should be restored, where possible, to a minimum width of 300'. Perennial streams and any major ravines should be restored, where possible, to a minimum width of 600' wide. (Corridors may be narrower, especially when existing land uses prevent restoration to these optimum widths.) There will be circumstances where a 300' wide corridor is not possible or practical, where very high density development will occur. In those instances streams should be daylighted and/or restored as an integral design element of the development or redevelopment, not put or left in underground pipes.

- Identify opportunities to daylight stream reaches. Since the baseline conservation areas only include stretches of existing streams, and not those that have been rerouted, removed or put underground in pipes, this is a vital issue, in order to provide for stream health and continuity (as well as locations for wildlife corridors). Both the existing stream reaches and those there historically need to be mapped.
- Based on historical maps and information, and the identification of opportunities as noted above, restore those stream reaches which have been degraded. Priority of restoration should be based on to what degree restoration would improve the overall environmental health and integrity of the stream.
- *Alternatively:* Follow the approach used in the Pleasant Valley District Plan, which established its Environmentally Sensitive Restoration Area Sub-Districts on the premise of restoration, especially to recover listed species. It led to 200-foot setbacks from the channel meander zone (on each side of the stream) for most of Pleasant Valley because they explicitly recognize the need to protect restoration opportunities.

### **Wetland Protection and Restoration**

*Issue:* Wetlands are key wildlife habitats and provide many important ecological functions. There are very few wetlands in the area, possibly due to extensive tiling and grading for agricultural purposes. Those wetlands that still exist, such as the forested wetland in the area known as “Hoffmeister Woods” and possibly another east of the 3 branch confluence of Sunshine creek (a potentially significant wetland has been identified here by a citizen, but it is not shown in the Goal 5 inventory), are at risk of development and the impacts of urbanization, including the adverse effects of stormwater management.

#### *Recommendations:*

- Conduct a local wetland inventory and verify the locations of unmapped wetlands that may exist; correct maps as needed to ensure that all existing wetlands are included.
- Include all wetlands, contiguous regionally significant upland habitats (i.e., those areas on the Goal 5 inventory), and corridors that will maintain connections between wetlands and adjacent streams in the conservation area, and plan for their full protection.
- Shift intensive development away from wetlands; do not develop within 200’ of wetlands.
- Do not direct stormwater into natural wetlands, or use them for stormwater treatment; to ensure that water quality and quantity is not altered (both pollution and changes to wetland hydrographs have been shown to degrade wetland biodiversity, functions and values).
- Identify wetland restoration opportunities by researching historical maps, soil surveys, and other records and information that can be used to determine the locations of wetlands that have been lost and could be restored.
- Avoid running any utilities (including storm/sewer pipelines, water lines, electric and telephone lines) through wetlands. Where utilities must cross wetlands, they should do so in the shortest distance and most direct manner possible.

### **Wildlife**

*Issue:* Wildlife habitats and connecting corridors are shown on the map and discussed in the documents, but additional information and research are needed to develop a conservation strategy that will protect functional habitat networks that will be able to sustain local wildlife populations.

### *Recommendations:*

- Develop criteria to evaluate conservation areas and wildlife needs, using on-the-ground fieldwork and evaluation. Adjust the conservation areas on the map as needed to provide for the needs of native species before any more detailed planning or land use determinations are carried out. Use this as the basis to make decisions about land acquisition, conservation easements, wildlife corridors, trails, road layout, platting, etc.
- Identify locations for critical wildlife corridor connections, and incorporate design strategies to reduce the adverse affects of development (e.g., wildlife road crossings).
- As noted above, many of the stream corridors as shown are too narrow; they should be widened to provide better wildlife habitat and mobility across the landscape.
- At this stage of planning, show at least the most critical potential corridors, including:
  - A strong connection between Scouter Mountain and Rock Creek Canyon.
  - A corridor connecting the Butler Buttes, Damascus Butte, and Richardson Creek.
  - A connection between Sunshine Butte, Tower and Zion Hills, and the North Fork of Deep Creek
  - A corridor running along the north edge of the study area, connecting N. Butler Butte, Sunshine Butte, and Tower Hill to the east.
  - Provide connecting corridors through the “pinchpoints” to alleviate lack of connectivity.
- For major wildlife corridors such as those identified by the NRTT, a minimum corridor width of 600 feet is recommended.
- Include a map showing the NRTT’s vision of wildlife corridors as part of the Concept Plan.

### **The Buttes**

*Issue:* The CLF design workshop included protected buttes that became the constant signature of the place, remaining visible from all parts of the study area. The plan proposed connecting the protected butte top forest zones to the Clackamas River via wide stream corridors. Some very low density development was envisioned on certain lower slopes. The Concept Plan is relying on low and very low density and clustering to achieve protection that is similar to that envisioned in the CLF alternative. We support the level of butte protection in the Concept Plan as long as specific targets are met.

### *Recommendation:*

- Low impact development standards should be developed to ensure 85% forest canopy (largely contiguous) and 10% or less effective impervious surface.
- Consider the use of rural-scale streets and street development standards for these areas, to reduce the impact on the slopes and the environment of the buttes and transition areas.

### **Stormwater**

*Issue:* Stormwater management is a critical issue, and one that was key in the CLF design workshop. Estimates projected for total impervious surface that would result from the hybrid approach are 26%, or up to 46.5% if just the urbanizing portion is considered. Our goal is to achieve a maximum of 10% *effective* imperviousness. If this is not accomplished, it is not likely that the principles (both CLF’s and those adopted in the Damascus Concept Plan) related to stream health will be met.

*Comments:*

- The high clay content of soils in the area are presumed to pose challenges for stormwater management due to slowed infiltration and groundwater movement, but the streams are the result of these soil types. Thus the soils in Damascus should not be viewed as a limitation to the use of "green" or low impact practices/design techniques that mimic pre-development infiltration rates. To preserve the streams, and the salmonid populations and other species they support, protection and restoration strategies must be designed around the unique soil types and topography of the area.
- Similar heavy soils (probably heavier) are found at the East Clayton project in the City of Surrey, Canada. The 10% effective impervious target is being met there on this project, which is well under construction. For more about East Clayton, visit <http://www.sustainable-communities.agsci.ubc.ca/projects/Headwaters.html>.
- The City of Portland Bureau of Environmental Services (BES) has many local examples where engineers and stormwater modeling indicated that soils would not allow for infiltration. BES can provide specific examples where allegedly "tight" soils have successfully been infiltrated during daily storm events that exceed 1.5 inches. (Contact: Tom Liptan, BES)
- How stormwater will be handled on a regional basis will be an important part of local community planning, since details about the stormwater network and facilities have not been determined in the Concept Plan. Ideas under consideration include both small and large stormwater facilities. It will be important for planners to conduct more detailed analyses so that information about the costs and benefits of the options, suggestions from the concept planning process, and the best available science can be used to design a stormwater management program that will avoid potential adverse impacts of stormwater on conservation and wildlife habitat areas.
- Occasionally, there may be a temporary condition where the capacity of surface soils to accept new rainfall is exceeded, such as in the winter after a series of heavy storms. It is during these conditions that a perched or seasonal high water table may occur. This will not compromise the infiltration function and should not be of concern if the locations of various land uses account for these conditions. The natural ecology of the region is such that this has always been the case. Further, these conditions may be indicative of wetland protection and restoration opportunities that could provide multiple public and natural resource benefits.

*Recommendations:*

- Emphasize greener, lighter, smarter, cheaper ways of dealing with stormwater.
- Incorporate dispersed, multi-point stormwater infiltration areas that treat stormwater as a critical resource that needs to be retained; get it into the soil profile whenever possible through green streets, landscaping, retention and expansion of urban forest canopy, and other means.
- All parcels and streets, of whatever type, can and should be designed to retain and infiltrate the first inch of rainfall from the average 24-hour event. Most backyard lawns are capable of this rate of infiltration if designed with this performance standard in mind, even in heavy soils.
- Building large centralized detention facilities runs the risk of making structural detention a substitute rather than a necessary but secondary complement to green or low impact practices/design techniques that detain, treat and infiltrate stormwater as part of the green

infrastructure system. Centralized detention facilities would be more uni-functional and lack the multi-functional advantages (esthetic, habitat, open space) that are key to efficient land-use and integrated design. Large regional facilities should only be used to address unmet stormwater management needs after all other innovative stormwater management solutions have been exhausted.

- The stormwater management system needs to address both winter peak flows and summer base flows, as well as water quality. A decentralized approach that puts more reliance on restoring historic wetlands, infiltrating rainfall where it lands, and using artificially created wetlands and other stormwater facilities that can attenuate flows should be central to any stormwater management plan.
- The target and associated measures of total and effective impervious surface in Damascus should be evaluated, determined and planned for on a watershed basis, since the 10% effective impervious surface target is a generalized guideline that has not taken into account the variability in land uses throughout watersheds in the Damascus area (i.e., a high level of butte protection and dense development in the lowlands).
- Site stormwater facilities where multiple uses can be provided (such as stormwater retention in ball fields).
- Institute tree protection ordinances that will apply throughout the area.
- We support the recommendations in the *Natural Resources Implementation Strategies* for stormwater management, with the additions and exceptions discussed above.

### **Water Supply**

Water development to serve the growing Damascus/Boring area needs to occur in a way that protects the cherished fisheries and recreational values of the Clackamas River watershed. Damascus is within the service area of the Sunrise Water Authority, which diverts the majority of its water from the lower Clackamas River (a portion comes from ground water wells in the Damascus area). Other large regional water suppliers also divert water from the lower Clackamas River. Sunrise Water Authority projects a 447% increase in average daily demand for water between 2004 and 2024, largely due to growth in the Damascus area. This massive increase in demand is to be met largely by additional water diversions from the Clackamas River. Boring currently draws its water from ground water wells but the ground water resources in the area are already at risk from overuse, highlighting the concern for future water development as this area grows.

The minimum stream flows needed for fish are already not being met at some times of the year in the lower Clackamas River. Without careful water development planning, this serious situation could get substantially worse in coming years as demand for water increases. The Clackamas River still supports high value fisheries but unfortunately many of the salmon runs in the watershed are at risk of extinction. Impacts of water development on Clackamas River fish runs, including coho, steelhead and chinook, need to be fully considered in the Damascus/Boring planning process. Water development plans for the Damascus/Boring area must include adequate protections for minimum flows needed by fish and to support the recreational value of the Clackamas River.

We believe that conducting water development in a way that is protective of the Clackamas River and its fish and recreation resources is a key part of “place making by watershed.”

## **Parks**

*Issue:* The CLF alternative called for “ample greenspaces accessible from every neighborhood,” and land acquisition for parks will be an important tool for protecting the system of conservation areas. However, the Concept Plan only shows “active use parks” on the map, and includes only active parks in land use estimates (446 acres). While it might be assumed that some subset of lands within the conservation areas are expected to be acquired as natural area parks and have been accounted for in land use acreage calculations for conservation areas, there is very little specific discussion about this in the draft Public Facilities Implementation Strategies and natural area parks are not shown on the map. Further, the guidance that *is* provided places too little emphasis on the importance of natural area park acquisitions as a conservation strategy to achieve the natural resource goals.

*Comments:* The big issue here is perhaps not specifically *how much* parkland and open space we need, but simply this - *what function do we want this land to perform?* If we look at it this way, it breaks down into three major areas:

### **1. Natural Systems**

We need open space for *Nature* - uplands and stream habitats for animals and plants to survive in, corridors for movement, streams where salmon are able to breed - an integrated series of ecosystems that are able to function and be self-sustaining. The land is there, in this case, simply to allow Nature to survive. We need to have land for enough habitat in each type of ecosystem, for protection of streams, and for adequate wildlife corridors.

### **2. Green Infrastructure**

We also need land for natural *systems*. Forests and wetlands slow down and store rainfall, provide areas for stormwater infiltration, and provide for flood water storage. Natural systems can provide these functions much better than hardscape concretized engineering facilities can and provide multiple environmental, social and economic benefits whereas engineered solutions typically are single purpose facilities.

### **3. Active Recreation Parks**

The area also needs parks and open space for people to enjoy and places for kids to play. Residents also need places to get outdoors and interact with other people in their community, places to experience the outdoors and get in touch with Nature.

For all these things, there *are* starting points for determining how much area is needed, *and* where it should be. Some examples:

- For upland species habitat, we have to look at such factors as access to water, and fragmentation of habitat - there may be a minimum size and distance from habitat edge needed for different species.
- For wildlife corridors, what's the minimum width different species will accept?
- For salmon habitat, how clean and cold and shaded does the water need to be? What kind of setbacks and buffers will be needed to achieve that?
- How much forest land is needed for watershed protection? How much storage capacity for stormwater?
- How far do we want to walk to get to a playground for our kids to play? To get to a community plaza? To get to a hiking trail or a natural area?

*Recommendations:*

- Emphasize and promote land acquisitions for parks that will be managed as natural areas in support of the natural resource goals and to provide equitable public access to nature.
- Set natural area acquisition targets that would significantly contribute toward achieving the natural resource goals.
- Maximize opportunities to site active parks and other open spaces in places that could help meet the natural resource goals (e.g., schools with natural areas on their campuses, etc.)  
Some of the parks shown on the map could be sited more strategically for providing low impact uses and transition zones around key habitat areas. In the implementation phase, set a minimum number of acres of parkland per 1000 people, based on needs derived from the multiple park-related goals in the Concept Plan.
- Also set minimum requirements for *specific types* of open space:
  - A. Playgrounds (for residential and mixed use areas) should be within walking distance (1/4 mile or less) of every residence, be a minimum size, and have certain features (such as playscape structures, seating, water fountains, etc.).
  - B. Small urban parks (for residential, mixed use, commercial, *and* industrial areas) should be within walking distance (1/4 mile or less) of every residence, and *every job* (allowing workers be able to get away to a park for lunch), and should be a minimum size, and have certain features (such as seating, water fountains, etc.).
  - C. Some form of natural area (like stream corridors) or semi-natural parks ("passive" recreation areas) should be located within 1/2 mile of every residence, and every job.
  - D. The location of ball fields and active recreation areas should be determined based on a needs analysis of the community, and have adequate parking (most people will probably drive there, instead of walking, so no minimum distance should be set). Since they take up a lot of space, they are perhaps not appropriate for higher density urban areas. Use of these areas as shared facilities with schools, and as stormwater detention, should be encouraged.

**Trails and passive recreation**

*Issue:* Creating a trail system that winds through portions of the conservation areas will provide people with access to nature and outdoor recreational opportunities that will enhance quality of life and keep people connected to the natural world. Some trails will inevitably be located in or near sensitive habitats, and careful planning will be needed to ensure that they are designed in an environmentally-friendly manner that does not diminish habitat values.

*Comment:* Only regional trails are shown in the Concept Plan (on the maps included with the draft "*Transportation Implementation Strategies*"); more detailed trail planning is expected to occur through the local planning process.

*Recommendations:*

- The local trail system should be compatible with the regional trail system and overall greenspaces planning.
- Trail planners should coordinate with those working on the preservation of conservation areas, including sensitive fish and wildlife habitats.

- Consider potential public uses as lands are identified for park acquisitions to ensure that enough park land will be available to accommodate those public uses (e.g., trails, parking, and other infrastructure) while avoiding or minimizing disturbances to habitats and species.
- Follow the principles and guidance provided in Metro's 2004 publication entitled, "Green Trails, Guidelines for environmentally friendly trails."

### **Map Graphics**

*Issue:* Improvements could be made to the map so it more clearly and accurately reflects what the Concept Plan would look like, and to be more consistent with recommendations described in the "Natural Resources Implementation Strategies."

*Comments:*

Generally in any map, the color green implies parkland or public open space to most people. The Concept Plan uses green for existing subdivisions within proposed conservation areas, as well as the low-density development transition areas. This could be confusing to many people. It visually implies that these areas will remain pristine and green, instead of being areas that include current or existing development (albeit at a fairly low density).

*Recommendations:*

- Use graphic techniques and labeling to clearly show that transition areas will have residential land uses such as cluster development and estate housing.
- All current development within proposed conservation areas should be shown clearly and labeled as existing development.
- Areas within 150-300' of streams that are not currently included in green as conservation areas should be added to the map as restoration areas.
- The scale on all maps should include a breakdown into 100' intervals (this is important for things like measuring the width of stream corridors).

## **TRANSPORTATION**

### **The Parkway**

We generally support the parkway concept, and we believe the purpose and need of the new capacity needs to be defined in terms of its impact on the development of Damascus. In that regard it serves three purposes:

- Providing access to commercial and industrial centers to promote job growth in the new city;
- Relieving traffic on Highway 212 by providing an attractive alternative for traffic that would otherwise go through the center of Damascus;
- Providing a green edge to the city of Damascus that helps to define it as a community.

The design of the new facility will require a careful balance between these three purposes. However, we believe ODOT's original vision for a limited access freeway for through traffic may conflict with the new purposes defined by the Damascus Concept Plan's vision for the parkway. While ODOT's primary function is addressed only by the second objective, the City of

Damascus has a need to accomplish all three. For that reason we propose that the City of Damascus, rather than ODOT, can best construct and manage the facility to balance the needs of through traffic and access to the local community. In this scenario Highway 212 would remain the designated state highway, though functioning as a boulevard.

In addition, we have the following recommendations regarding the relationship between the parkway, wildlife, and the “big park” to the south.

- Use the ravines of the major streams (Rock Creek, Richardson Creek, Noyer Creek and North Fork of Deep Creek) to allow wildlife passage **under** the parkway. The parkway should be designed so that bridges pass over these ravines with adequate areas for wildlife corridors.
- Where feasible, use the landscaped buffers on either side of the parkway to provide east/west cross-connections between the major north/south wildlife corridors. Use wildlife fencing and other means to ensure that wildlife does not encroach onto the parkway, and individuals are directed safely through the area.
- Land to the south of the parkway should be acquired as part of right of way acquisition. This land should be designated as park land to prevent future development pressure.
- The parkway poses a potential bicycle and pedestrian barrier to Clackamas River Bluff area to the south. Design of the local transportation network, including over and underpasses, will be crucial to creating access to this natural feature of the region.

### **Interconnectedness**

Metro’s existing space and connectivity requirements in the Regional Transportation Plan will help ensure a future street system that provides safe bike and pedestrian routes in Damascus. In the Concept Plan, an arterial and major collector system begins to set the framework for that future local street system and greater level of detail. To the extent that we can determine, the hybrid system of arterials and collectors can support an interconnected local street network. East/West and North/South spines travel through neighborhoods and employment districts to neighborhood and city centers and natural areas, particularly on the east side of the planning area in Sunshine Valley.

The buttes and green system elements may pose barriers to an interconnected street network. More detail and design is needed on an off street-trail system to better determine if buttes and natural areas can be integrated into a connected bike and pedestrian network.

### **Bike & Pedestrian Access to Natural Areas (Trails)**

The trail system did not receive much attention until late in the process. There was confusion about which technical team had responsibility for addressing this, and little coordination among transportation, public facilities, and natural resources teams. Ultimately a map was created that identified major trail connections, and implementation strategies do suggest creating a trail master plan to identify local trail connections.

It is difficult to determine if the street network will provide adequate bike/pedestrian access to natural areas throughout the community and region. The proposed street system is trying to limit impact on natural resource areas, and a multi-use, off street trail system will be necessary to connect Damascus residents to abundant natural resource areas.

The plan needs to provide stronger tools for ensuring local parks and green spaces are integrated within the dense urban community. Currently this is not adequately addressed in the implementation strategies.

### **Access to Community Destinations/Linking Land Use and Transportation to Support Walking and Biking**

We are pleased that the Design Types (such as Neighborhood and Town Centers, Mixed Employment and Corridor Overlay) plan for coordination of land uses and transportation systems. They define mixed-use retail and neighborhood environments that provide bicycle and pedestrian access to a variety of community destinations.

In addition, neighborhood centers and mixed employment areas are connected by arterials and major collectors. Street design standards proposed for main streets include bike and pedestrian facilities and amenities.

We are concerned that while the proposed City Center is well-connected to neighborhoods from the north for multiple travel modes, Hwy 212 is potentially a major barrier to bike and pedestrian access to the southern half of the proposed City Center. It will be important that the design of 212 allow for safe and convenient bike and pedestrian crossings.

We recommend stronger language in the implementation strategies about making sure schools are accessible by walking and biking. Particularly with such a large area to develop, there is the risk that schools will be located in the middle of nowhere, outside of neighborhood centers on large parcels of land. Challenges to locating schools within neighborhoods (most important for elementary and middle schools) must be addressed early on, perhaps by requiring or recommending that school and transportation agencies conduct school traffic safety audits to identify and create safe routes to schools.

### **Transit**

Consider the extension of light rail or a non-urban streetcar line (such as the old interurban lines or the 'Red Line' in Los Angeles) south from Gresham, in addition to other connections.

Please see our comments below under “density and livability”. We are concerned that the housing densities in the Damascus Concept Plan do not adequately support transit and create walkable communities.

### **Heavy Rail Connection**

Consider whether a heavy rail connection in Damascus could help attract industry to the area.

## **Street Design and Speeds**

The goal of preserving the rural character of the area can best be achieved by designing local collectors for vehicle speeds of 15 MPH or less. At these low speeds autos and pedestrians can share a common right of way. They also allow for narrower streets, less than two full lanes in many cases, and much narrower right-of-ways than are needed to provide safety barriers at higher speeds. Narrower streets also reduce stormwater runoff and provide for a more natural and rural character.

## **URBAN FORM**

### **Housing**

The Coalition strongly supports Housing Principles C1 and C2, which state that the Concept Plan will plan for:

- “C1. A full range of integrated housing types, affordability, and tenancy preferences in every neighborhood that will fulfill state and regional housing requirements and allow people of all ages and incomes to live in every neighborhood.
- C2. A range of housing types that allows community members to continue to live locally throughout all of life’s stages (i.e. entry level worker, student, young professional, retired, elderly).”

We recommend adding a Principle C3, to affirm the commitment to sustainable house construction and use, including: encouragement of small homes, energy efficiency, resource efficiency, environmental responsibility, on-site storm water management, recycling water systems and minimizing impervious surface.

To better achieve these Principles, we have the following recommendations:

- There are not enough affordable housing types to meet the needs of those in the 80% - to 110% range of Area Median Income (AMI). A memo discussing this in greater length and critiquing the Affordable Housing Analysis is attached. Our primary conclusion is that more housing should be provided in the smaller lot attached and detached categories.
- The housing types provided for, and the percentage in each category, should be driven by the economic development plan for the Damascus area – in particular, the range of wages expected to be paid and the number or percentage of workers in Damascus at various wage levels. The current plan does not seem to connect these basic elements of the community – wages and housing.
- There seems to be an assumption that providing “estate homes” in the early phases of the urbanization of Damascus will drive economic development in the area; i.e., that executives who find homes in Damascus will bring their companies, and hence workers, with them. We question that assumption, particularly since much of the discussion about likely area employers has focused on incubator companies, creative knowledge industries, and businesses focused on the unique outdoor features of Mt. Hood and the Clackamas River.

Those are not the types of businesses whose founders start out in “estate homes.” Entrepreneurs growing new local businesses are more often of modest means.

- The housing types appear to assume an average family size of 2.5 persons or smaller. Where is there the accommodation of larger families or shared housing? Also, the high-density multi-family type is described as typically containing smaller household sizes. We question whether this is accurate, particularly for middle and lower income families, for whom multi-family rental options are more affordable.

### **Employment**

- Employment that both relies upon a large work force and generates many customers should be located in areas that are transit-friendly and accessible by walking and bicycling, to reduce reliance on the automobile and provide transportation options to a community that will reflect the larger population – one that because of age, choice, or oil prices will not have the option of a car. Therefore, these uses – whether they are large format retail or a large medical facility, or a similar use, should generally be located in town centers near public transit.
- We note here that the comment above about the disconnect between the economic development contemplated for Damascus and the estate housing notion applies here as well.
- The Concept Plan, in its land designations and implementation measures, should recognize the agricultural industry in and around Damascus. It is a major and growing traded-sector industry and employer, and should be protected as such, just as with any other significant industry.
- The range of office building types includes “suburban office complex.” This suggests the standard one-story building(s), with extensive parking lots and impervious surfaces. This is not appropriate if Damascus is truly to be a different model for development. We recommend that this be deleted or modified.
- The location factors for “Large Format Retail,” designate this building type along major arterials or other corridors, which suggests a remote location with surface parking contrary to the suggestion that this type, if considered at all, should be woven into the town centers near public transit.

### **Neighborhoods**

- We applaud the language in the *"Community and Urban Design Implementation Strategies"* that refers to the use of design techniques that foster pedestrian and transit oriented development.
- For all neighborhoods and developed areas (except for the low density transition areas next to the bluffs), there should be a neighborhood center and transit stop within walking distance (¼ mile or less) of all dwelling units and work locations. (The current maps show these in some neighborhood areas, but not in others).

### **Town Center**

- We share the concern of many that a Town Center with Highway 212 running through it could either be an example of great urban design and creativity in the use of a boulevard, or could result in two disconnected and dysfunctional halves of a center. To that end, we encourage that the emphasis in the treatment of Highway 212 and the Town Center be on pedestrian-scale visibility and accessibility from the neighborhoods in and around the Center, and the emphasis should not be on the traffic driving through the area. The Center should be a destination for all modes of travel.

### **Schools**

- Schools define and create neighborhoods, and should be centrally located to those they serve, not out on the edge where the least expensive land may be located. Therefore, creative tools should be used to purchase school sites as soon as possible.
- Eliminate ineffective “jobs creating” corporate subsidies such as property tax abatements and tax increment financing. Responsible companies and lawmakers will not balk at concurrent, adequate, and fair financing of schools, which means no one escapes this important contribution to society & our economy. Currently siting consultants pit municipality against municipality to maximize these subsidies for their clients, *even though they would site here anyway*. Ultimately, the most attractive locations for business will be those which are most attractive to their workers and customers: excellent schools, clean air & water, healthy food, sensible transit, and a long-term focus on sustainability.

### **Community Self-Reliance**

While this is not a category used in the Concept Plan, we use it to encompass some overlapping ideas:

- We support aggressive efforts to protect and encourage the growing of food. Public acquisition and easements should be used for community gardens and historic farms, and these should be integrated into the parks, trails, and natural area plans of the jurisdictions. An industrial agricultural zone, with appropriate buffers and protections from incompatible uses, should be used to enable the nursery industry to thrive. Because of their ability to use, filter and retain stormwater runoff, ecologically responsible small farms and gardens should be planned for and encouraged in transition zones just outside of stream corridors and wetland areas.
- The clean water and wastewater management systems should be designed to close the loop to the greatest extent possible. The system starts with clean water conservation from the tap and includes re-using grey water in non-potable applications such as laundry and landscaping.
- Recruitment of businesses that produce, manage and distribute sustainable energy supplies, such as wind, solar and biofuels will provide the city with clean industry, good paying jobs and greater local energy self reliance.
- Creating living systems to recycle wastewater, such as engineered wetlands, will enhance the protection of existing wetlands, produce opportunities to restore native habitat and ensure that the city is in control of its water recycling system.

### **Density and Livability**

For CLF's charette project, our target population for the area was about 120,000 persons. This has been significantly reduced to roughly half in the Concept Plan, which uses more land for fewer homes. The charette design had densities in all developed areas that were at the minimum necessary to make transit work (10 dwelling units per gross acre or greater). The other value of this density is that it would reduce future pressure for more UGB expansions. For the Damascus Charette, we ended up with over 6,000 acres given over to residential use, at densities of 10 du per acre (NW Portland is 10 to 15 du per acre by comparison) on average. That generated 60,000 units, or homes for about 120,000 people. Research shows that if average densities drop below 10 du per acre, residents don't take transit (too far from home, too infrequent, everything is set up for cars anyway). Densities below 10 du/acre are also associated with neighborhoods in which walking is infrequent, and commercial services cannot be within walking distance. Auto trip generation in neighborhoods with densities below 10 du per acre can be up to twice as high as trips generated by neighborhoods with greater than 10 du per acre. The Concept Plan, if implemented, will result in average densities in developed areas of about 4 - 6 du gross per acre (the Damascus Concept Plan's calculation of 9.8 units appears to be per *net* acre, which translates to about 4-6 units per *gross* acre). This could lead to unwalkable sprawl and there are many examples of what this will look like in Beaverton, Happy Valley or many other areas developed in a lower-density, sprawling style. There is also an impact on affordability, as this type of housing, at these densities, costs more than the housing types found in more dense neighborhoods.

*Note: It is not necessary to trade-off protection of the buttes with density. The Charette Design achieved significant butte protection as well as densities that support transit, walkable neighborhoods, and mixed-use development.*

The Coalition for a Livable Future is a partnership of more than 60 organizations working together to create communities in the Portland-Vancouver metropolitan region where people and nature flourish.

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## **Appendix: Feedback on the Affordable Housing Analysis**

### **Damascus/Boring Concept Plan**

CLF Recommendations

Urban Form subgroup

9/28/2005

**Goal C: Affordable Housing:** Provide housing choices for people of all income levels and life stages.

#### **Principles:**

C1: full range of integrated housing types, affordability, and tenancy preferences in every neighborhood that will fulfill state and regional housing requirements and allow people of all ages and incomes to live in every neighborhood.

C2: A range of housing types that allows community members to continue to live locally throughout all of life's stages (ie. Entry level worker, student, young professional, retired, elderly)/

According to the draft concept, it is provided in:

Residential A: Town Center: HD multifamily and MD multifamily and attached single family

Residential B: Neighborhood Center: MD multifamily and attached single family.

### **Feedback on the affordable housing analysis by Scott Weddle of Metro on May 7, 2005**

1. Affordable for whom? The affordable housing analysis assumes a homogenous family of four in calculating affordability. It does not analyze affordability for entry level worker, student, young professional, retired, or elderly. It is not planning on the provision of housing that will allow people of all ages and incomes to live in every neighborhood.
2. Highly limited in homeownership opportunities: The homeownership assumptions made by Metro make homeownership affordable to a family of four earning \$62,000 per year. This effectively eliminates anyone earning less than \$30 per hour. Everyone else would all be renters in medium density or high density multifamily developments.
3. Homeownership not affordable for folks below 100% AMI: The homeownership assumptions include making a 10% downpayment, which is highly unlikely. If a buyer can not get a loan to value ratio of 80%, and thereby save on private mortgage insurance, they will not put that much cash into the deal. And, it is highly unlikely that the buyer would not have that much savings in place. They are more likely to put 1% down. At 1% down the \$225,000 home is affordable to a family of four who earns \$68,444 or 100.8% AMI. This would not fulfill the HUD requirements mentioned in the report of being affordable to someone earning less than 100% AMI.
4. Rentals not affordable to anyone below 70% AMI: The rental assumptions exclude affordable housing for anyone who earns less than \$47,530, or \$22.85 per hour. Anyone who earns less than that will be rent burdened, ie spend more than 30% of their income on housing. Hardworking people should be able to afford housing and still have enough money for groceries and other basic necessities.

5. Workforce Housing: If the employment sector is focusing on medical staff they will be hard pressed to find housing for their workers. According to CDN, a full time medical lab technician earns \$22.86 per hour. According to Salary.com the median income for a Licensed Practical Nurse in Oregon is \$19.23 per hour. A janitor earns \$9.58 per hour. A bookkeeper earns \$12 per hour. The affordable rental assumptions are only affordable to someone earning \$22.85 per hour.
6. Housing for the nursery workers: With over 50 nurseries in the surrounding area, this industry is a significant economic driver in the Damascus/Boring area and in Clackamas County. Nursery workers are year round workers who need decent housing. According to Caritas, a highly paid nursery worker earns approximately \$20,000 per year, or the equivalent of \$9.62 per hour.
7. Importing workers: All those retail shops in the neighborhood and town center will be importing their workers, because according to CDN, a full time retail sales person earns \$11.42 per hour.
8. Limited range of housing types: The analysis assumes affordability will only be provided by HD, MD and attached housing, not by offering a full range of housing types. The only "median" family that could afford a detached home would be a family of six earning \$78,750.
9. Senior housing choices: An elderly family of two would need to have an annual income of 87% area median income, or \$47,200, to rent the typical apartment. If they are a single elderly person, they need to earn 99% of the AMI.
10. Single and starter families: A single person would need to earn 144% of the area median income, or \$68,400 to buy an attached single family home. Even a family of 3 would need to earn 112% of AMI to buy an attached single family home.
11. Inequitable housing choices: There is an automatic inequity in housing choices, as the only "median" family that could afford a detached home would be a family of six earning \$78,750. Everyone earning less than that would be in attached homes, medium density multifamily developments or high density multifamily developments.

### **Feedback on Project Management Team Memo of 9/7/05**

The Project Management Team memo of September 7, 2005 concludes that the discussion draft concept plan will provide 11,000 units of housing that is affordable to people earning between 70-90% ami.

1. This ignores family size, it assumes everyone has the income of a four person family at 70% of the area median income, or \$47,200. A single person at 70% AMI earns only \$33,200. To reach the same income as the four person family, the single would need to earn 100% ami.
2. Slight changes to the assumptions about homeownership move that type of housing out of range for anyone earning less than 100% AMI.
3. Unit size for town center units in the design type document assumes a family of 2.
4. The supply analysis assumes all the MD and HD multifamily units will be occupied by people with income at 70% and all the attached single family home will be occupied by people with income at 90% AMI. The reality is that the market make-up of this housing plan will put people who earn more than 100% AMI in the "affordable" units because

they can not afford higher costs housing. This leads to a bottleneck in housing supply for folks at 70-90%.

5. Anyone earning less than 70% AMI, or less than \$22.85 per hour, will be rent burdened.
6. The housing plan ignores seniors, singles, young professionals, and members of the community with special needs.
7. There is a complete dis-connect from the employment plan. Will all jobs in Damascus/Boring pay atleast \$22.85 per hour?

### **Feedback on Damascus-Boring Master Plan Design Type document**

1. Attracting businesses with executive housing stock: The assumption that nearby executive housing opportunities will attract business owners to the area and create incentives to locate businesses in Damascus needs to be substantiated. If the executive is incubating a business idea, he or she is not yet in the market for executive housing. If the executive has a well-established business their analysis for moving their business to Damascus will be more focused on the availability of inputs for their business (appropriately skilled workers, the availability of workforce housing, raw materials, power, water, transportation, business incentives) than they will be concerned about where their executive home is located.
2. Sequencing town center development: The analysis concludes that the denser housing will come after land prices have appreciated to a point where the market can support the higher cost of town center locations. It is the denser housing that is to be the affordable housing, so sequencing the denser development to occur after land prices have appreciated will seriously jeopardize any developers' ability to produce affordable housing.

### **Goal I Feasibility analysis:**

According to the Project Management Team memo dated 9/7/05, "Developers and cities viewed a high percentage of multi-family units as limiting their flexibility to adapt to changing markets and to the strong market for larger lot and "executive housing". They expressed concern about housing mix being dominated by attached and small lot housing".

I1: How does large lot development fit in with **goal J urban design**?

I2: Why would a city rather have 62 half acre estates worth \$1.5 mil each, with market value of \$93 million when they could have 373 small lots homes worth \$280k each with a market value of \$104.5 million?

### **Impact of lack of affordable housing on the community of Damascus**

1. Lack of workforce housing supply will:
  - a. Increase traffic as workers commute from distance communities, thus negatively impacting the transportation goals.
  - b. Decrease local spending as workers do not shop in the city, but at home, thus negatively impacting the economic development goals.
  - c. Increase worker financial stress and family stress due to cost of commuting. Housing gives people an opportunity to build better lives. TO succeed you need a place to call home.
  - d. Decrease worker productivity and morale due to long commutes. Children deserve an opportunity to succeed in school and life, which is tied to having stable housing.
  - e. Reduce the number of incentives available to attract employers to the area
2. Lack of affordable senior housing will:
  - a. Force the elders of the community to move out
  - b. Create a mono-culture of well to do, middle aged professionals

### **Additions to Goal C Housing Principles**

1. Provision of workforce housing stock should be perceived like public infrastructure, there must be concurrence of housing development to match the employment base. Housing zoning and incentivizing supply of affordable housing needs to be driven by the business recruitment and employment assumptions that are driving the economic plan for the region.
2. Codes needs to enforce sustainable house construction including: small homes, energy efficient, resource efficient, environmental responsibility, on-site storm water management, minimize impervious surface.
3. Density is key. Damascus will be a thriving, self-reliant, walk-able city when the plan calls for more density. Increasing density will make Damascus healthier for people and the environment. It will provide more workforce housing and housing for people in all stages of life. Do density where it makes sense, in the valleys. Preserve the buttes to provide the pastoral/rural feel. Use the valley to create the dynamic town center that will support the type of transportation and economic plans that will make Damascus a great place to live and work.

**Looking to other examples:** This housing concept is heading right down the path that the City of Wilsonville is on with the Villebois development. Too late in the game the city realizes the developers are not going to solve their jobs/housing imbalance, in fact, they are contributing to it by developing the last significant land in Wilsonville, and developing it for people of significant means. If Damascus/Boring is not pro-active about providing housing for the whole range of community members, they will not get the supply they need. Developers will not do it on their own.