

MEMORANDUM

Date June 14, 2013

To Bureau of Planning and Sustainability Comprehensive Plan Management Team

From Barry Manning, Staff Lead and Deb Meihoff, Facilitator of the Residential Development and Compatibility PEG

Re **Summary Report of the RDC PEG Discussions, Comprehensive Plan Working Draft Feedback and Ideas about Implementation**

This memorandum is intended to summarize the key elements from the discussion of the Residential Development and Compatibility Policy Expert Group (RDC PEG). The RDC PEG staff and facilitator have listened, prepared meeting summaries, and reviewed written comments from PEG members. This memo is a supplement, not replacement, of the full compendium of meeting summaries and comments.

The following is a high level recap of the key themes that emerged from the RDC PEG conversations, followed by more detailed discussion points and ideas for improving policy and implementation of the Comprehensive Plan. A memo that includes an appendix with specific RDC PEG member policy comments is also available.

Key Themes from the RDC PEG

While the group was not charged with reaching consensus or agreement on the policy approach, there are ideas and concerns PEG members generally hold in common. The key themes and recommendations that emerged from the RDC PEG deliberations and feedback sessions are listed below.

1. **Foster Context-Sensitive Development.** The design and character of residential development in single and multi-dwelling areas is an important citywide issue. The City should prioritize implementation efforts to address the context-sensitive design issue as articulated in the Comprehensive Plan.
 - Infill and change in single dwelling residential areas will continue, satisfying demand and providing housing choices, even though development in lower density residential areas is not a major component of the city's future growth strategy. This development needs to be respectful of context and historic development patterns.
 - A pattern area approach holds potential to broadly address context-sensitive design, however five pattern areas are not sufficient to address more detailed design issues in the many Portland residential neighborhoods that are so varied in design and style.

- There needs to be a balance between providing the detail needed to reflect the complex residential areas of the city and avoiding added complexity in the zoning code. Standards for development should be presented in a consistent and easy to follow pattern accommodating contextual customization while ensuring standards can be readily understood.
 - The City should address compatibility in terms of setbacks, scale/coverage, and height. Possible approaches to address massing include application of Floor Area Ratio (FAR) in residential areas or a modified Systems Development Charge (SDC) fee structure.
 - A context-based approach could lead to additional layers of standards and potential conflicts, or affect the cost of development. Need to be cautious that this approach is not counter to maintaining affordability and ensuring equity throughout the city.
 - Review the purpose and effectiveness of development codes in Design and Conservation Districts.
2. **Allow Flexibility in Housing Stock.** Portland should allow flexibility to encourage better use of existing housing stock, as well as new housing, to meet multiple goals, including providing equitable access to housing opportunities, responding to the needs of a changing demographic, increasing housing unit supply, continuing the care and use of existing structures, maintaining affordability, and encouraging compatibility.
- Consider adding a policy to address reuse or ‘refill’, which could include reorganization of large homes / other structures into more than one dwelling unit or other ways to get more efficient use from an existing and contextually appropriate structure.
 - Maintain affordability by preserving the supply of existing well-maintained housing stock and reconsidering codes that encourage replacement of housing stock with larger and more expensive housing.
3. **Address Development Transitions to Residential Areas.** Development in centers and corridors is the main opportunity for accommodating future population growth, but in order to maintain Portland’s livability this new development needs to provide a transition in scale and mass when adjacent to predominantly residential areas.
- The context should be the most critical piece to determining appropriate height and massing transitions: proximity or relationship to residential uses in a residential zone, solar direction and access, construction types.
 - Standards alone will not produce the desired outcomes - principles of good design should drive solutions.
4. **Address Use Relationships and Off Site Impacts.** As Portland grows, some land uses and the intensity of uses may create impacts and conflicts with residential uses. The City should employ approaches to minimize these conflicts through its Comprehensive Plan mapping process or development code regulations.
- When considering buffering and transitions, there is a need to balance public health, public safety, community expectations, and livability / ability to conduct business for both uses. There needs to be a balance in order to achieve 20-minute neighborhoods and preserve employment areas within Portland.
5. **Foster Well-Served Multi-Dwelling Residential Areas.** Higher density multi-dwelling residential uses are best located in areas where services exist or can be made available in a realistic

timeframe, and should be developed in a manner that provides amenities for users across the income spectrum. There are currently underserved higher density residential areas in Portland and some areas with planned density that do not have the amenities or services to support the desired future land use - both instances require additional investment to realize the vision and outcomes of the Comprehensive Plan.

- Do not let land use designations get out too far ahead of timeline for infrastructure and service provisions. Policy must support concurrent development of complete street networks.
- Focus future high-density housing development in well-served and amenity-rich areas.
- Recognize underserved residential areas and prioritize implementation of infrastructure, services, or amenities to complete these existing communities and meet the City's Comprehensive Plan and Climate Action Plan goals.
- Add policies to support and guide improvements to areas that have already developed with multi-dwelling housing and higher density, but are not envisioned to be a center or a civic corridor.

6. **Address Form and Design of New Multi-Dwelling Development.** The form and design of multi-dwelling development should be given a high level of attention, respond to context and be intentional to meet urban form, urban design, public health, energy conservation and other goals in balance with affordability and land consumption.

- Development standards for multi-dwelling residential uses should address existing or desired future context - including topography and other natural features, street classifications, infrastructure, etc., but must also balance housing affordability and land consumption.
- Focus density expectations on areas that are likely to build up given proximity to urban amenities and infrastructure, but be mindful of topography, natural features and hazard areas, and the layering of development requirements.
- A broader contextual framework for development should be developed for areas with large and/or irregular lot and block patterns.

7. **Improve Communication about Change and Development.** Improve community understanding about future development and change by creating a clear vision and engaging in ongoing communications about development potential throughout the city.

- Portlanders should have a clearer expectation of future development allowances - Comprehensive Plan and Zoning designations should better align with planned and allowed development types and intensities.
- Development codes should be clear and explicit about use and development allowances.
- Find a better balance between certainty for development and flexibility to meet context-sensitive design, new building techniques, and/or changing aesthetic preferences.
- Need to balance prescriptive standards and the desire to eliminate risk of bad design.

RDC PEG Discussion Topics

Through neighborhood-level conversations, Bureau of Planning and Sustainability staff collected ideas and comments from Portlanders about residential development in the city. Leading up the RDC PEG process, staff summarized these comments into eight policy topic areas. Through the process an additional ninth topic surfaced for discussion. The nine topic areas, listed below, formed the structure for RDC PEG discussions and review of the Working Draft.

Throughout the process RDC PEG members were asked to provide specific feedback on concerns or ideas to address current issues in residential areas, ideas for forming or improving policies, and to surface the potential for unintended consequences of proposed policies. These issues are noted throughout the following summaries.

Topic 1: Context-Sensitive Design for Residential Areas

Problem Statement: Certain forms of single and multi-dwelling infill development do not reflect the established character of residential areas, such as: construction of two or three story homes adjacent smaller homes with larger lot coverage, long side walls, and little rear yard space; demolition of modest-sized houses in established neighborhoods and replacement with homes built closer to the maximum capacity of development standards; expansions and new duplexes and attached houses which are out of scale with surrounding homes; and multi-dwelling developments in predominately single-dwelling neighborhoods zoned to transition to higher-density development.

PEG Comment:

- **Expectations.** Expectations for future growth and change in a residential should be clearer and more explicit - need clear and consistent communication to existing and potential residents about the changing nature of development in an area.
- **Five Portlands - pattern areas.** Treating development in different parts of the City differently is generally a good idea. However, five areas are not enough to adequately address the issue in detail and likely will not fit the many Portland residential neighborhoods that are so varied in design and style. Additionally, it is unclear if the pattern areas are intended to also reflect the natural environment (not just architectural or built), which could include natural hazard areas, creeks, and green spaces. Concerned that the five areas will lead to additional layers of standards and conflicts. Be cautious that this approach is not counter to ensuring equity throughout the city.
- **Infill scale and massing.** Scale and massing of new infill development must be handled differently and better than it is today. A pattern-area approach does not appear to fully resolve the issue. Massing is integral to context-sensitivity.
- **Room for innovation.** Consider how the collection of policies may be driving new development to cookie-cutter form - do not be so restrictive that innovative design is stifled. Some want new development to mirror existing, but consider the potential unintended outcomes of uniform scale.
- **Unclear terminology.** It is unclear how and if the natural environment and 'green' development integrate with context-sensitive design, as outlined in the Working Draft. Additionally, 'urban

fabric’ was interpreted differently among PEG members - does it represent all areas of Portland including those more ‘suburban’ in character, or only the highly urbanized sections? The different understandings resulted in confusion about the meaning, intent and, therefore, effectiveness of the policy.

- **Missing policy on reuse:** The draft policies do not appear to consider or allow for reuse of existing housing stock. Consider adding a policy to address reuse or ‘refill’, which could include reorganization of large homes / other structures into more than one dwelling unit or other ways to get more efficient use from an existing and contextually-appropriate structure.

Considerations for Implementation

- Consider how the pattern areas will work within the context of overlay zones.
- Keep an eye out for how the ‘Five Portlands’ concept will translate into zoning - to the extreme, it could result in complex zoning ordinances that would be difficult to navigate.
- The City must address compatibility in terms of setbacks, scale/coverage, and height. Possible approaches to address massing are application of Floor Area Ratio (FAR) in residential areas or possibly a modified Systems Development Charge (SDC) fee structure.
- Need to consider the economic impacts of infill policy, zoning changes, and the infrastructure needed to serve new development. Most newly-built housing is not affordable for first-time buyers - land prices are based on development potential of a lot, which can distort the equation. Fixing up older structures with sweat equity is often more attainable for younger and moderate income buyers.
- Look at options to allow for a greater variety of multi-dwelling development forms to achieve growth and transition needs, than what is typically allowed today (examples: allowances to use existing structures more intensely / splitting up large homes into apartments like those found in Irvington, or new development of multiple units in structures that look like single-dwelling homes from the exterior).

Topic 2: Development in Design and Conservation Districts

Problem Statement: There is a design quality and compatibility “gap” with new development in Conservation and Design districts, as well as other areas where the Design Overlay Zone is applied. The policy direction and expectation is that these areas will be subject to higher standards. Often this is not reflected in the resulting development. Where projects are reviewed using Community Design Standards, community members often comment that the resulting design does not meet the intent of adopted plans or is otherwise lacking. Many development proposals in Conservation Districts using the standards do not result in projects that does not appear to meet historically-compatible design.

PEG Comment

- **Balance certainty and compatibility.** Need to balance prescriptive standards and the desire to eliminate risk of bad design. Too prescriptive and developers can’t get good designs built. Not prescriptive enough and the compatibility suffers.
- **Potential policy conflicts.** It is not clear how the urban design framework will interface with conservation or design districts. How will the overlap work? Which policy supersedes which?

- **Clarity for discretionary review.** Working Draft Administrative section should include language about enforcement of zoning code - level of specificity in approving projects, breadth of review, and guidance on discretionary reviews. Design review is not perceived as being reasonable or clear, with too much uncertainty for most developers to pursue the design review track.

Considerations for Implementation

- To the greatest extent possible, developers will avoid the uncertainty built into the design review track, so the Community Design Standards need to change to address design issues. Administrative section of the Comprehensive Plan should include language about enforcement of zoning code - level of specificity in approving projects, breadth of review, and guidance on discretionary reviews.
- Could the Design and Conservation District be replaced by standards that respond to the 'Five Portlands' pattern areas? Avoid layering on more standards.

Topic 3: Urban Scale Development Transitions

Problem Statement: Infill developments in higher intensity commercial, employment and residential zones are building out to, or close to, the maximum allowed building envelopes. When located adjacent to lower density single-dwelling zones and existing single-dwelling housing, urban infill can create compatibility and livability issues due to their larger mass and height, limited setbacks, and inconsistently applied transition requirements.

PEG Comment

- **Context elements.** The context should be the most critical piece to determining appropriate height and massing transitions - solar direction and access, construction types, proximity or relationship to residential uses in a residential zone. Standards alone will not produce the desired outcomes - principles of good design should drive solutions.
- **Height and setbacks.** If lowering height allowances or increasing setbacks, the City needs to be thoughtful about impacts to the buildable land capacity - what would it mean for growth? Need to consider height in terms of building/construction types - current height limits in the zoning code are not aligned with this.
- **Where to transition.** There are greater concerns with transitions mid-property or mid-block. Side yards are also a concern in addition to rear yard setbacks. Need to consider the context and different approaches to transitions: property line vs. across the street; north or south facing property and solar access impacts. Mapping will be critical to determine if the draft policy is adequate. Additional public discussion of transition policies is needed after draft maps are released.

- **Solar access.** The PEG discussed light and solar access and did not reach a consensus. Some think a solar access policy is much needed. Others are concerned about unintended consequences - how to balance tree canopy with solar access, how to address solar access for photovoltaic panels, etc. There are concerns about how such a light access policy would be implemented. May be best to address solar/light access issue through other transition elements in height, bulk, and scale.
- **Community parking in multi-dwelling residential areas.** PEG members did not agree on whether or not parking policy should be addressed/mentioned with regard to multi-dwelling residential areas. Some believe Chapter 5 should state clearly the need to retain current parking options and to mitigate on-street parking impacts from multi-dwelling development; long term commitments to community parking facilities and shared parking are potential options to address these issues. Other PEG members are concerned about setting such parking policy, given the potential inequities and impacts parking provisions on housing affordability.
- **Corridors as centers.** Portland's development pattern is predominantly one of linear commercial and mixed-use areas, not nodal 'centers'. The policies should address development along these mixed use strips, and more clearly articulate the role and purpose of 'centers'. Consider unintended consequences, issues of transition, if defining centers to include these linear strips.

Considerations for Implementation

- Consider 2-track system, similar to design districts - if there is potential for conflict or transition and the base standard for step or set back and height are not met, then the development should be sent through design review process to address issues of scale.
- New ideas for standards need to be tested through 3D modeling before they are adopted. Make sure it works.
- Form-based code elements can provide insight to workable solutions.
- Look at the potential impacts, positive and negative, of allowing shared parking on single-dwelling residential lots and/or community parking facilities.

Topic 4: Transitions and Buffering Between Residential and Non-Residential Uses

Problem Statement: In many situations throughout Portland, low-density single and multi-dwelling zones directly abut or are proximate to property zoned for commercial, employment and industrial land uses. Even when development in the commercial and employment zones is relatively low scale and potentially consistent with height allowances of adjacent residential zones, impacts of these uses (light, noise, odors, etc.) may be felt by the adjacent residential users.

PEG Comment

- **Expectations.** There should be an expectation that some land use conflicts will always exist in a city environment.

- **Balance.** When considering buffering and transitions, there is a need to balance public health, public safety, community expectations, and livability/ability to conduct business in both zones. There needs to be a balance, so that we can achieve 20-minute neighborhoods and preserve employment areas within Portland.
- **Adequate buffers.** Current code provisions to address potential impacts include erecting walls or landscaping at the property line. Walls provide a better noise buffer than landscaping, but not always attractive and can introduce public safety concerns.
- **Buffering transitions at property line.** Landscaping can be used to soften transitions and address privacy issues, but doesn't address other impacts such as noise or odors.
- **Urban form.** Focusing commercial development in 'centers' rather than linear corridors that encourage strip development and spread the impact may help address this issue.

Considerations for Implementation

- Consider restricting drive-through facilities and similar uses that allow for idling cars or trucks, adjacent to residential zones.
- Focus regulations on site layout options that move an impactful use or function away from abutting residential zones.
- Buffering standards - consider combination of opaque wall with landscaping along the residential-side of the wall.

Topic 5: Site Design Issues in Multi-Dwelling Zones

Problem Statement: Current city policy and regulations for multi-dwelling development were designed to respond well to inner Portland areas with small lots and established block pattern. However, there is not always adequate guidance for development and site planning on large or irregularly configured lots. Developments on these large and irregular lots are often deficient in adequate and usable outdoor space; building orientation that provides for resident comfort and safety; urban orientation to public streets; and scale, style, location, and type development compatible with the surrounding area and adjacent houses. Portland's current approach to multi-dwelling development does not provide the opportunity for staff or public review of multi-dwelling proposals in order to address these common deficiencies.

PEG Comment

- **Site planning.** A standards approach to development is still preferred, although some discretion may be needed on a case-by-case basis. Guidelines used in discretionary reviews should have clear performance objectives. Development standards such as setbacks, on-site landscaping and other features need to be re-examined.
- **Outdoor areas.** Adding development requirements for larger outdoor areas needs to be carefully considered and should not be used to substitute for public parks.
- **Connectivity through residential developments.** Provisions that require pedestrian or bicycle connections through large development sites is ideal, but must be designed and located in a way that balances the benefits to the community, addresses development site limitations, and minimizes safety concerns.

- **Healthful housing.** The healthful housing policy should also seek to address human health issues associated with noise and toxin exposure, as related to adjacencies to large transportation corridors or more intense land uses. Additionally, the PEG feels the ‘communal kitchens’ mentioned in the policy could provide solutions for co-housing and housing for elderly or frail community members. However, they suggest the communal kitchen would be a better fit with the resource-efficient and adaptive reuse policies in Chapter 5.
- **Housing affordability.** PEG supports the direction to address housing quality and livability standards. However, there are concerns with potential affordability impacts. Keep an eye on how many new expectations are being layered onto housing development and impacts on costs to construct.

Considerations for Implementation

- There is a need for a larger framework for development in places like East Portland, where site planning on a project-by-project basis will not fully address the issues.
- Consider a menu approach to desired on-site features including incentives for designs and materials promoting public health and benefits to residents.
- Consider incentives for lot consolidation and improved site planning
- Requiring connections during the development phase are more easily accommodated in a subdivision process than through permitting. Need to require street/pathway connectivity with multi-dwelling development, no matter the zoning district.
- Need to consider the collective layering of features expected for new housing and the impacts on affordability.

Topic 6: Building Form in Multi-Dwelling Zones

Problem Statement: Comprehensive Plan policy allows a variety of structure types in multi-dwelling zones (single-dwelling, duplex, row house, apartment, etc.) to foster variety, affordability, home ownership, income diversity, and to accommodate growth. There are other policies encouraging housing that supports sustainable development patterns by promoting efficient use of land, resource efficient design and construction, and easy access to public transit. Allowing a variety of residential types can conflict with these other policies. Current development standards do not distinguish between building types in the multi-dwelling zones; in some instances this has resulted in what appear to be small to medium subdivisions developed without the guidance of the land division regulations. The end result of such developments, while often affordable, are also often lacking amenities and may not respond to the context of adjoining development.

PEG Comment

- **Single-dwelling structures in multi-dwelling zones.** Limiting construction of detached single-dwelling-type structures in some areas can be an important urban form/design tool. Overall, form is less important than meeting the density / growth expectations. In lower-density multi-dwelling areas there is some concern about driving the market toward attached dwellings while homebuyers still typically favor detached units.
- **Affordability and equitable access.** Need to hold high development standards for multi-dwelling, but must also balance issue of affordability. Re-visit policies regarding outdoor area requirements

for multi-dwelling to ensure it is adequate, but that the provision isn't so large that other community and resident benefits are sacrificed. Focus density expectations on areas that are likely to build up given proximity to urban amenities and infrastructure.

- **Multi-dwelling development in pattern areas.** In West Portland there is a concern that the desire to maximize development in multi-dwelling areas may directly conflict with the need to reduce hazards, manage stormwater of impermeable surfaces.
- **Civic corridors.** The policy as written is unclear; amend to better describe the purpose, intent, and desired applications. Some corridors may be too noisy, busy, and frenetic to be considered 'civil' or 'civic'. What are the human health impacts to living adjacent these major transportation corridors? Potential transitions and impacts to surrounding residential areas should be considered.
- **Missing policies.** Current working draft policies do not adequately address the issue of single-dwelling houses in multi-dwelling areas, minimum lot sizes, connectivity requirements. There needs to be policy supporting a shift in implementation: require building form standards by development type, not by zoning district - a multi-dwelling development should have the same requirements whether in a low-density or medium-density area. PEG recommends policy that supports requirement of street/pathway connectivity with multi-dwelling development, no matter the zoning district.

Considerations for Implementation

- Development standards should be clear and promote the types of neighborhoods and housing desired.
- Consider adjustments to treat building forms the same no matter the zone (i.e. all single-dwelling development has the same set of standards, whether in a low-density or moderate-density zone).

Topic 7: Density Allowances in Single-Dwelling Zones

Problem Statement: In many parts of Portland, areas that are planned and zoned for single-dwelling residential development - R10 through R5 zones - are experiencing development at densities greater than anticipated by the Comprehensive Plan Map and Zoning Map because of allowances in the Zoning Code. This has created concern for some community members who see development at higher density incompatible with existing and expected neighborhood patterns. The fact that allowable densities are not easily "legible" by looking at zoning maps also creates confusion and uncertainty about permitted development types.

PEG Comment

- **Transparency.** There needs to be greater clarity/transparency about development potential on historic lots so neighbors understand the development potential. Raising zoning densities to match underlying lots can dramatically change character of an area and neighborhoods. Comprehensive plan should be intentional about development types and zoning allowances need to more directly reflect the vision of the Comprehensive Plan.
- **Policies affecting demolition.** Revise or avoid policies that encourage demolition of good-quality housing structures. Consider potential outcomes for the increased density potential. Consider policy that allows flexibility for existing structures (example: convert existing houses on larger corner lots to duplexes).

- **Comprehensive Plan Map Designation description updates.** Consider using form-based standards language, rather than number of units per acre, to describe what is allowed in each designation. Use bulk, massing, height, etc. to describe the allowances. PEG recommends changing titles to be inclusive of all residential types by density / intensity - example: 'low-density residential' rather than 'low-density multi-dwelling'. This could begin to address some of the transparency concerns.
- **Missing policy.** Policies do not adequately address the issues related to historic lots of record - the development potential needs to be clarified with possible rezoning in some areas to align with the potential, if appropriate. PEG recommends considering policy that distinguishes between historic lots of record and minimum size for buildable lots. Not all 'skinny lot' developments in low-density areas are a problem - may be appropriate in some situations.

Considerations for Implementation

- Be cautious in defining 'serviceable' and 'good design' when referring to obsolescence of structures.
- Consider alternative approaches to address historic lot lines -allow existing single-dwelling structures on corner lots to convert to duplexes, use denser single-dwelling designations (such as R2.5 zoning) for transitioning whole-block areas with substandard historic lots, develop context-sensitive standards for scattered or midblock lots.
- Need to consider the economic impacts of zoning changes. Most newly-built housing is not affordable for first-time buyers. Fixing up older structures with sweat equity, is often more attainable for younger and moderate income buyers.
- Change Comprehensive Plan Map Designation titles to be inclusive of all residential types by density / intensity - example: 'low-density residential' rather than 'low-density multi-dwelling'.

Topic 8: Location of Multi-Dwelling Districts

Problem Statement: Current Comprehensive Plan policies direct higher density development, including multi-dwelling residential, to areas that are generally well-served by transit and retail services. However, in some cases, multi-dwelling map designations have been applied in areas that are somewhat distant from frequent transit service, deficient in complete transportation infrastructure, and/or lacking community services within nearby walking distances. There is a potential disconnect in some areas where dense housing is allowed or encouraged and the ability to serve these places with high-quality services and urban amenities. In addition, for some areas, higher density development has resulted in school enrollment increasing faster than can be accommodated within existing facilities.

PEG Comment

- **Concurrency.** Policy should address growth and concurrency timeframes established through the Comprehensive Plan - expectations, density, infrastructure and support services. Do not let land use designations get out too far ahead of a reasonable timeline for infrastructure and service provisions. Policy must support concurrent development of complete street networks.
- **Transparency and equity.** There should be a transparent process and equity plan clearly communicating when and where public investments and incentives will be applied.
- **Missing policy.** The Comprehensive Plan is geared toward looking at future growth and change, but does not adequately guide how to serve the areas already built at moderate densities but not envisioned to be a 'center'. The PEG would like to see additional policy that supports and guides improvements to areas that have already developed with moderate density, but are not identified as a center or a civic corridor. Many people are living in these areas who need increased access to services, amenities, and transit to meet the City's comprehensive plan goals.

Considerations for Implementation

- Zoning allowances and other implementation measures need to better express and implement the vision of the Comprehensive Plan. Zoning should align with existing conditions - not always the same as the long term vision.
- Consider special zoning options for places that have moderate to high residential density and are not envisioned as a center in the design framework - ways to allow for modest amounts of commercial services through conditional use or similar, infrastructure improvements to better access in these areas, etc.
- Topography and availability of walking routes in an area should be considered in determining need and location of areas to provide services and amenities.

Topic 9: Businesses and Other Activity in Residential Areas

Problem Statement: Residential areas are primarily intended to allow household living use. However, certain types of business activities and other uses such as schools and religious institutions may be allowed when they are compatible with household living and maintain a residential character. Questions for discussion are generally: What types of activities are appropriate and/or inappropriate in these areas? What are the impacts, features, or characteristics of such activities that should be regulated in order to maintain compatibility in residential areas? What types of notification or reviews are appropriate?

PEG Comment

- **Home occupations in single-dwelling areas.** Home occupations are generally not an issue in low-density residential areas. Existing zoning code has ways to address potential conflicts of use, health and safety of neighbors. Consider revising regulations to limit the regulatory burden for benign activities.

- **Home occupations in multi-dwelling areas.** Conflicts are more likely to arise in higher-density, multi-dwelling homes. Consider policy that differentiates home occupation standards / allowances by building type.
- **Noise and signs.** Policy should not rely entirely on noise controls, since citywide noise enforcement is understaffed. Electronic and illuminated signs should be disallowed. Small signs are generally viewed as appropriate.
- **Short term lodging.** Short-term lodging provisions should be tied to the state definitions - greater than three rooms is a Bed and Breakfast, fewer than that is not. PEG members have not experienced significant impacts from 'Air Bed and Breakfast' (AirBnB) type of short term lodging in residential areas.
- **Schools after hours.** Allowing co-location of community uses at school sites is fine, so long as it is not a requirement of a school.
- **Group home expansions.** City should consider limiting the size/expansion potential of group homes in lower density residential areas and explore controls to offset negative impacts.

Considerations for Implementation

- Consider flexibility and reduced regulatory burden for home business uses with minimal impact on residential areas.
- Explore whether or not different approaches may be needed for co-locating uses at existing schools, which likely pre-date neighboring residential uses, and new schools being established in existing residential areas.