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Chair Baugh, and PSC Commissioners:

In light of the number of neighborhood associations clamoring for reductions in the zoning capacity in Centers and along Corridors in their neighborhoods, I would point out that while certainly you need to understand the neighborhood association members' concerns, the city has greater goals to consider. The Comprehensive Plan will shape our city, to serve all current and future residents, not just the single-family homeowners that such associations often primarily represent. In addition, the city, county and state Climate Action Plans address how the actions the city takes will affect the planet's climate and resources.

It is important for the Commission to think about what type of plan will reduce auto travel, reduce carbon emissions, and encourage alternative transportation means, as well as best serve not only homeowners, but renters, those of limited means, and disadvantaged communities. Allowing more housing, and a variety of sizes of housing units to be built, in all parts of the city will further this goal. It will best serve these goals if the majority of these units are located in places with good access to transit, such as Town Centers and Neighborhood Centers, as well as Downtown.

To achieve this, the first step would be to preserve the by-right capacity of the existing zoning, and to even increase the capacity of those zones near services and transit, in order to put more Portlanders within the 20-minute neighborhoods the plan seeks to support. While compatibility with existing adjacent houses should be considered, it should not be at the cost of housing capacity in these critical locations.

Although the city may have enough theoretical capacity in existing zoning, much of it seems to be in areas where the market is not building housing. The capacity needs to be available in locations where developers see a need and will build the units. If enough units are built, the market price will drop, allowing more affordability for many residents. There is still a need for subsidized, and for incentivized, low income housing, and provision for these should also be part of the Comprehensive Plan.

I ask that you look at extending the Mixed-Use – Urban Center designation to all those properties slated for Mixed-Use designation on Division from east of 44th to just east of 50th, and on SE 50th from Hawthorne south to Powell. I have written to the Commission twice with details of my reasoning and will not repeat that here.

Increasing the use of transit, bicycling and walking are another key to making the whole plan work. The concept of Civic Corridors, that are “safe for all types of transportation”, the “most prominent streets” in the city, is a good step toward building a more modally integrated city. Policy 3.40 on page GP3-13, specifies these corridors will “accommodate all modes of transportation”, but then backtracks to say “within their right-of-way or on nearby parallel routes”. Such side street routes may work for commuting, but not for shopping or participating in the civic life the previous language imagines. While compromises may sometimes be necessary, they should not be given away in the policy language. The “parallel routes” language should be removed.

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