

Dear City of Portland Planning & Sustainability Commission:

I am submitting comments regarding proposed comp plan changes in Buckman in the following 3 areas:

14th & se Stark

The proposal is to change the zoning from R1 to CS on a currently non-conforming commercial property at 1403-1415 SE Stark. The current use for this lot is 1-story commercial creative space. The scale allowed by CS would disrupt the existing neighborhood severely. Immediately to the north of these lots are R2.5 single family residential backyards which would lose their access to sun and privacy. A more appropriate zoning would be CN1, or one of the new CM zones, still in the process of being defined. Stark Street east of 12th Avenue is a primarily residential street with a node of commercial development surrounding Washington High School. This commercial development consists of either 1-story commercial or 1-story commercial with 1-story residential above.

Changing this lot to CS would drastically change the character of this neighborhood commercial node. This quiet, mixed use neighborhood is already being heavily impacted by the lose of historic designation that happened with the (seemingly impulsive) Landmarks Commission change to all commercial zoning at Washington High School. If the object of Portland Planning & Sustainability is to create walkable neighborhoods, CS is not the appropriate zoning for this location. It does not foster the development of residential units above commercial spaces, which would serve those residential units. The intention of any proposed zoning change should be to encourage "...the provision of small scale retail and service uses for nearby residential areas....Development is intended to be pedestrian oriented and compatible with the scale of surrounding residential areas." [Title 33.130.030.A]

The current R1 and R2.5 zoning works and allows housing that is affordable and with existing historic homes. R1 development works and, as townhouses or larger apartments built in R1 allow for families with children, this supports the school and maintains children in Buckman.

1900 Block between Alder and Washington

The western half of this block is proposed to be zoned from R5 to R2.5 to make it "match" the rest of the block. This zoning is being proposed despite the fact that 3 of the 5 properties (612 & 624 SE 19th & 1915 SE Alder) currently have single family homes on 5000 SF lots, and would be out of conformance with the new underlying zoning. The conversion of these 3 true R5 properties to R2.5 is not consistent with the current use, and would destroy the current block character in what it would allow. There are other half-blocks in the neighborhood, which are built to R2.5 density and which

are keeping their R5 zoning. What would be appropriate is to correct the zoning for those properties and to not change zoning for properties which are currently conforming.

Blocks from 15th to 19th between Belmont & Morrison

These blocks are currently zoned a mix of R1, R2.5, CM and CS. The proposed zoning is all CS. As already discussed for 14th & Stark, CS zoning allows unlimited density of residential units with no requirement for providing commercial space on the ground floor. The end result will be monolithic buildings, built to zero setbacks, with a high density of small, high-rent units. They will be displacing family-friendly housing, affordable duplexes and quadruplex rentals, and some retail commercial and warehouses.

These blocks are currently between the Belmont-Morrison couplet and on the number 15 bus line. The end result of assigning CS zoning to this area will be to create 4 blocks of high density, high rent, small apartments unsuitable for families and with no guarantee that the necessary commercial spaces to support this high density of residential use will be developed. In addition, because CS zoning allows zero property line development, with up to 4 stories 45 feet high, resulting development will divide the Buckman neighborhood visually and functionally in half, making a perceptual barrier between north and south Buckman. This will only reinforce the splitting of the neighborhood which occurs because these streets are designated collector streets and form a couplet.

In conclusion, I'd like to point out that the neighborhood elementary school, Buckman Elementary already has issues with kids walking or riding their bikes safely to school. A more appropriate zoning change would be to support the existing single and multi-family housing by leaving their zoning intact, changing the zoning of current non-conforming uses (such as the telecom building at 17th) and then implementing zoning which will allow for a mix of residential and commercial for a truly walkable neighborhood that supports families and renters of all incomes. And additionally, this proposed change is not coming from the property owners, nor the neighborhood, but is being promoted by Planning Bureau managers. It also seems there is ample EX development areas all along 12th Avenue. Plenty of room to build there. Thanks you so much for your hard work and consideration.

Respectfully,

Sheila Baraga

423 se 15th Avenue (and 512-518 se 16th Avenue)

Sheila Baraga <sheilabaraga@gmail.com>