



DIVISION MIDWAY ALLIANCE FOR COMMUNITY IMPROVEMENT

March 13, 2015

Planning and Sustainability Commission
1900 SW Fourth Avenue #7000
Portland, OR 97201

RE: Mixed Use Zoning as it relates to the Comprehensive Plan

Respected Commission Members,

The Division Midway Alliance for Community Improvement (DMA) is deeply disturbed by how the currently proposed mixed use zoning incentives will adversely affect future East Portland development. DMA is one of six Portland Neighborhood Prosperity Initiatives; the organization is dedicated to revitalizing the commercial corridor and improving the livability for residents along Division Street between 117th & 148th Avenues. DMA is also an active participant in the East Portland Action Plan (EPAP) and actively advocates to *Market East Portland as a Place to do Business*, which is an EPAP strategic priority.

The Midway district's largest concentration of businesses is located within 10 blocks of 122nd & Division Street, which is designated as a Towncenter in the proposed Comprehensive Plan. A Towncenter designation indicates a level of vibrancy that is far above the Midway District's current status, and if this status is to be achieved, it is imperative that special incentive bonuses be written into East Portland mixed use zones including requiring small, affordable commercial activation on the street level.

DMA staff serves on the mixed use zones committee and has advocated, repeatedly, with other committee and community members, to determine a way to require small, affordable commercial development on the street level. This requirement would prevent future 'tooth-gaps' caused by residential only developments existing within the mixed use zones in commercial districts. Tooth-gaps prevent walkability, detract from commercial district continuity, and are extremely prevalent in East Portland's current business districts. Allowing for small, affordable commercial development promotes local business and can be an effective anti-displacement tool by providing entrepreneurial-minded residents the opportunity to invest in their communities by building their own businesses.

Committee members have been made to understand that requiring small, affordable commercial development on the street level would not only be too difficult to write into building codes, it would inhibit development, and BPS staff have proposed incentive bonuses to address this.

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However, these bonuses provide NO incentives for East Portland development. DMA understands that other municipalities require commercial development on the street level, and DMA believes the Commission can find a way to require it, as well.

DMA advocates that the Commission determine an East Portland Development Package designed to provide a fast track to development for community supported developments in Mixed Use Zone areas in East Portland. These packages would offer deferred SDC and permit fees, development models, community organization partnerships and assistance for developments with a set percentage of small, affordable commercial street level spaces (750-1250 square feet) designed for small and micro enterprise businesses receiving community partner assistance. Developers would agree to maintain rents at a set percentage below market rent rates for the area, which DMA understands is allowable but not practiced tool available in Portland. Enforcement would need to be built into the program at all levels, including the opportunity for neighborhood business association review.

DMA understands such a proposal would require a City-wide effort and that time is limited to affect the mixed use zones as it pertains to the comprehensive plan, but it implores upon Commission members to make the time to create an East Portland specific development incentive package for mixed use zones. In the words of John Wooden, "If you don't have time to do it right, when will you have time to do it over?"

Best Regards,

Board of Directors,
The Division Midway Alliance
for Community Improvement

cc: Division Midway Alliance Board of Directors
David Edwards, President, Midway district property owner
Jean DeMaster, Treasurer, Executive Director, Human Solutions
Lorelei Young, Secretary, Keepsake Family Tree Video, co-owner
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