

March 11, 2015

Planning and Sustainability Commission  
City of Portland  
1900 SW Fourth Avenue  
Portland, OR 97201-5380

Ladies and Gentlemen:

I am writing to submit some comments regarding the proposed revisions to the City of Portland Comprehensive Plan. I am a resident of the Woodstock neighborhood. I have been attending neighborhood meetings regarding land use issues for the past two years. I had an opportunity to become more involved and concerned about the proposed Comprehensive Plan changes through this involvement. I have concerns about proposed changes to the commercial zoning schema as well as comments about the previous Comprehensive Plan with respect to residential zoning, which is being largely unanalyzed and untouched in the current revision process.

First, with respect to changes proposed from the commercial zones to “multi-use” zones. It is being proposed that since residential uses are currently allowed in commercial zones, that the anticipated changes are primarily administrative in nature, to streamline and standardize regulations throughout the city. However, since the multi-use zones have not yet been clearly defined at this point, residents are rightfully concerned. Much as numerous areas of residential zones were designated with increased density in the last Comprehensive Plan, often without any vetting by residents of such areas, allowing city staff to designate multi-use zone restrictions without clear review by property owners and neighborhood residents essentially deprives city residents of a voice in some very important decisions affecting their everyday lives.

One thing that many Woodstock residents have expressed concern about is that we do not want Woodstock Boulevard to become another Division Street (referring to the over-development of the area between SE 26<sup>th</sup> and Cesar Chavez Blvd) and I share that concern. This area was zoned “commercial storefront” (CS), similar to most commercial properties on Woodstock Blvd. Current zoning regulations for this zone allow buildings as tall as 45 feet, but the floor area ratio of 3:1 would appear to limit that height. However, current zoning regulations exempt residential areas from the floor area ratio. This exemption appears to me to be what allowed such overdevelopment on Division Street to occur. I would like to see all uses included in the floor area ratio, as well as requirements for setbacks and step backs when approaching the 45 ft height limit. In addition, current CS zoning does not require adequate parking, especially when residential space is involved. The result on Division Street is multiple towering structures with inadequate parking, causing spillover parking on adjacent residential streets. In my own personal experience, I have tried to dine at a restaurant in the Division Street area and had to change my plans due to the inability to find a parking space within a reasonable distance. I do not want this to happen in Woodstock. I am aware that the philosophy of the City is to make driving automobiles so unpleasant that people will pick other modes of transit. I find this philosophy short sighted and absurd. Automobiles are here to stay and we need to plan for them. Unless Portland suddenly finds funding for true rapid transit – not light rail or streetcars – automobile use will not decrease. Thus, it is imperative

that the City plan for adequate streets and parking for cars. All residential development, regardless of zone, should require inclusion of at least one off-street parking space per residential unit. Whatever mixed-use zones properties currently zoned CS end up in should also be evaluated so adequate off-street parking is also mandated. It is not rational to think that customers for commercial properties will be able to access those businesses without using an automobile. Not all customers and purchases can be transported by bicycle, walking or public transportation.

There has been considerable discussion in our neighborhood, largely as a result of our recent “charrette” process, about the concept of “leakage”, where residents have to leave their neighborhood to procure goods and services. I think this attention is over-rated. It is simply not reasonable or economically viable to businesses to try to achieve neighborhoods in Portland with no or low “leakage”. While I value small businesses for the unique products or values they may provide, they cannot and should not be expected to provide everything for everyone. That is just not economically feasible and would, in my opinion, result in less variety at very expensive prices. The way for small businesses to compete with “big box” regional businesses is to provide products and services that are not valued by the larger retailers, not try to limit their existence through regulation.

I would also like to take this opportunity to comment on the decision to leave residential zoning designations largely unreviewed. I do understand the reason for this. However, since changes that were designated in the prior Comprehensive Plan were largely the result of administrative decisions with little to no review or input by the public, I think that any residential zoning changes proposed based on a zone designation from the prior Comprehensive Plan should require a full review with input from individual residents, the neighborhood association and the regional coalition. These changes should not be implemented “automatically”. My basis for these comments is the experience I had with a proposed zone change and lot partition at 3936 SE Reedway. This is a 10,000 sf lot with one residential dwelling one block off Cesar Chavez Blvd. The proximity of this lot to Chavez led to its zone being designated to be changed from R5 to R2.5 under the prior Comprehensive Plan. It was explained by the Bureau of Development Services that at the time of the last Comprehensive Plan, residential property within a certain distance of an arterial street was designated to be re-zoned to a higher density level. No attention was paid to the character of the immediate neighborhood. This type of indiscriminate zoning re-designation is simply inappropriate and to make such designations official through “inaction” would be the height of bureaucratic tyranny.

I would also like to comment on a particular residential zoning designation. The area bordering SE Cesar Chavez from halfway between SE 38<sup>th</sup> Ave and Chavez eastward to SE 40<sup>th</sup> Ave and from SE Reedway St south to halfway between SE Ramona and SE Knight Streets is currently zoned R5 with a Comprehensive Plan designation of R2.5. I believe the Comprehensive Plan designation for this area should be removed. From reviewing the MapApp, it appears that all the property in this corridor north of Reedway to SE Steele is no longer designated R2.5. I see no rational reason for the small area between Reedway and Ramona/Knight to be left with an R2.5 designation with the risk to current property owners that nearby properties could be partitioned into significantly smaller lots than currently exist. This is a very desirable area in the Woodstock neighborhood and is well worth preserving in its current state, especially since areas of both the nearby Eastmoreland and Reed neighborhoods are



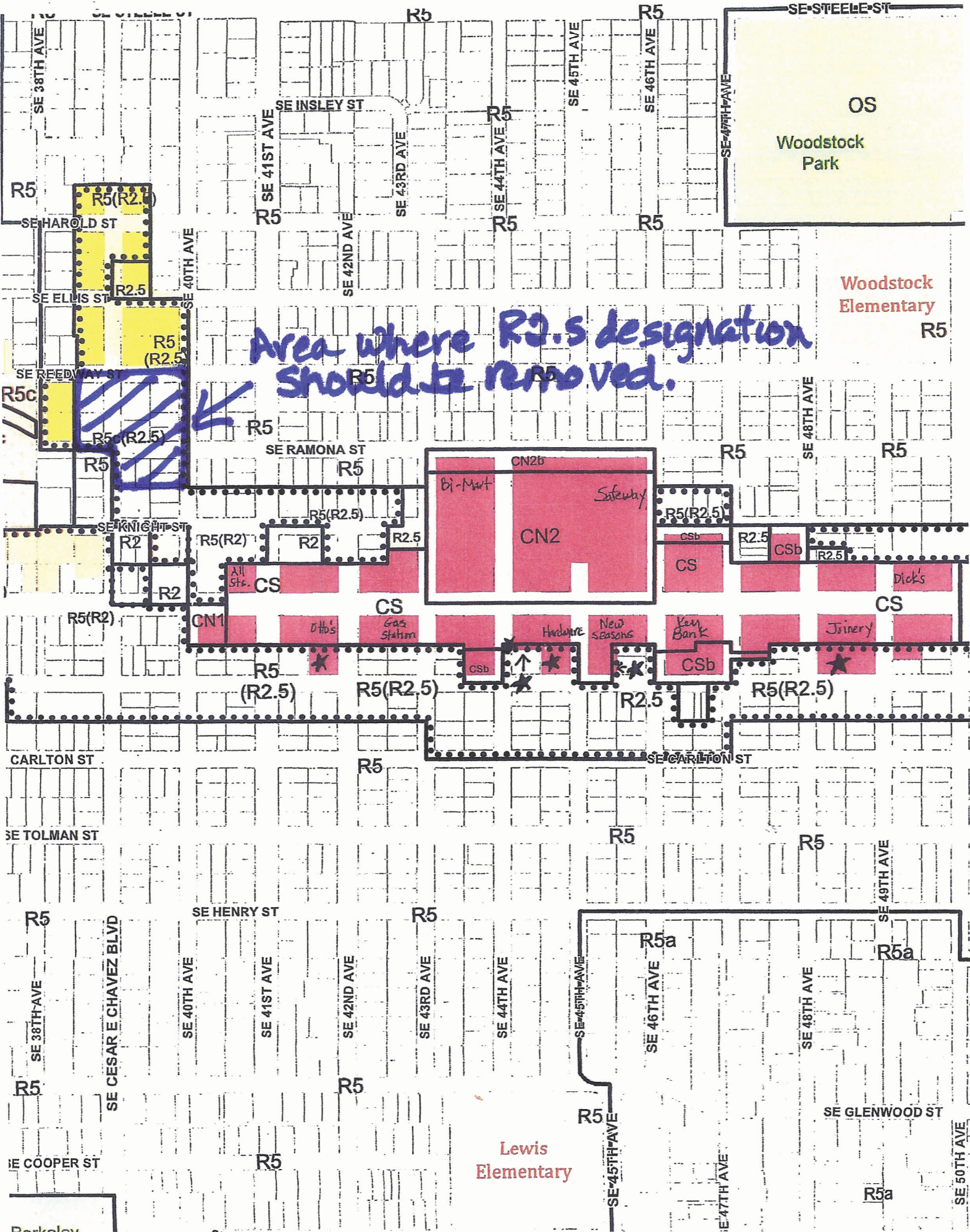
proposed to be “down-zoned” from R5 to R7. A map of this area with specific blocks I am referring to designated is included with this letter (area identified by blue hash marks).

Finally, I am extremely concerned about the increasing incidence of demolition of viable housing by developers who then cram as many new, large, expensive houses on the lot as zoning will allow. Requirements for private outdoor space are obviously being ignored or are so small as to be laughable. These new houses often rob their neighbors of solar access and privacy and destroy the character of a neighborhood. Incentives to discourage demolition and encourage rehabilitation of existing housing stock should be put in place by the City if it is serious about maintaining neighborhood character.

I appreciate the opportunity to provide this input.

Sincerely,

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Area where R2.5 designation should be removed.

OS  
Woodstock Park

Woodstock Elementary  
R5

Bi-Mart  
Safeway  
CN2

CSb  
CS

R5(R2.5)  
R2.5  
CSb  
R2.5

Dick's  
CS

CS  
Dob's  
Gas Station  
Hardware  
New Seasons  
Key Bank  
Jrinery

R5(R2.5)  
R5(R2.5)  
R2.5  
R5(R2.5)

CARLTON ST

SE CARLTON ST

SE TOLMAN ST

SE HENRY ST

SE CESAR E CHAVEZ BLVD

SE 40TH AVE

SE 41ST AVE

SE 42ND AVE

SE 43RD AVE

SE 44TH AVE

SE 45TH AVE

R5a  
SE 46TH AVE

SE 48TH AVE

SE 49TH AVE

SE GLENWOOD ST

SE COOPER ST

Lewis Elementary

R5a

SE 50TH AVE